



April 5, 2022

Ms. Emilie Franke, FMP Coordinator  
1050 N. Highland St., Suite A-N  
Arlington, Virginia 22201

RE: Public Comments – Draft Amendment 7, Interagency Fishery Management Plan for Atlantic Striped Bass

Dear Ms. Franke,

Fly Fishers International (FFI) is pleased to provide these “Public Comments” on behalf of our members and the fly fishing community regarding Draft Amendment 7 of the Interagency Fishery Management Plan for Atlantic Striped Bass (IMP). The Atlantic striped bass is a very important game species to our members and the fly fishing community, especially those who live and enjoy fly fishing in the upper Atlantic states. It is for that reason that FFI shares the concerns of the Atlantic States Marine Fisheries Commission (Commission) and our Conservation Partner Organizations regarding the significant decline in quality of this fishery over the past decade, overfishing that is occurring and the need for regulatory and educational measures to reduce post-release mortality. We also are concerned about the need to reduce commercial harvest of menhaden that are essential food for striped bass and other marine fish species.

Fly Fishers International is a global organization that is dedicated to support, enhance and preserve the recreational opportunities and enjoyment of fly fishing for “All Fish and All Waters”. We do this through teaching all aspects of fly fishing and most importantly through our advocacy, demonstration, and voice for conservation of our natural resources.

We commend the Commission for development and implementation of the IMP and most importantly implementing adaptive revisions reflected in Draft Amendment 7 and previous amendments. These revisions are important to assure the IMP improves as new data emerge and we appreciate this opportunity to provide the following comments regarding Draft Amendment 7.

### **Management Triggers and Response Time**

Management Triggers are a very important aspect of the IMP that facilitates evaluation of relative population trends and indicated management actions. This is especially relevant in management of a species experiencing declines and overharvest. Response times are critical.

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It is our understanding that Amendment 7 proposes deferring response times and FFI opposes this provision. Management responses should be immediate to assure timely and adaptive management action when Management Triggers confirm trends that are contrary to sound population health and measures to rebuild stocks are indicated.

### **Recreational Post-Release Mortality**

Fly Fishers International supports “catch and release” of game fish and advocates “safe handling” methods to enhance survival of released fish. We are especially concerned that post-release mortality accounts for the highest percentage of striped bass deaths. We strongly recommend that the Commission implement regulatory actions to require use of barbless, circle hooks for bait and fly fishing and using nonlethal devices to handle and keep fish in water for release. Such regulations have been implemented successfully by the Florida Fish and Wildlife Conservation Commission (FWC) to reduce post-release mortality associated with recreational fishing of three species of marine fish in coastal waters of South Florida. We also recommend the Commission, and its member states, develop materials and programs to advocate and inform recreational fishers of “safe handling” methods they may use to personally enhance survival of fish they release.

### **Spawning Area Closures**

Spawning area closures are another management action that may be used to protect spawning fish to improve recruitment and rebuilding of population stocks. The FWC implemented such a measure in 2021 to close the Western Dry Rocks Spawning Area during a 4-month period to protect permit during spawning. Fly Fishers International recommends the Commission identify such areas and implement regulations to close spawning areas during critical periods to improve recruitment and rebuilding of striped bass stocks.

### **Conservation Equivalency**

Member states of the Commission have the option of submitting alternative striped bass management plans that theoretically achieve the same goals of the IMP but this only adds inconsistency in an already very complex interstate management effort and is not working. Management Triggers are being exceeded, the species is suffering from overharvest and FFI does not support this provision of Conservation Equivalency.

### **Menhaden**

Menhaden is a critical food of striped bass and many other predatory species of marine fish. It also is our understanding that the Commission is implementing measures to reduce the



commercial harvest of menhaden. Fly Fishers International strongly supports implementation of regulations to more equitably balance commercial harvest of menhaden with the forage needs of striped bass and other marine species.

Fly Fishers International thanks the Commission for providing the opportunity to provide Public Comments regarding Draft Amendment 7 of the Interagency Fishery Management Plan for Atlantic Striped Bass. This is an important conservation issue to our members and the fly fishing community, and we respectfully appreciate your consideration of our recommendations.

Sincerely,

Patrick Berry  
President and CEO

David Peterson, Chairman  
FFI Board of Directors

Tom H. Logan, Chairman  
FFI Board Conservation Committee  
Senior Advisor – Conservation