

TOWN OF WELLFLEET

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To: Emilie Franke - Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
105 N. Highland Street, Suite 220 A-N
Arlington, VA 22201

March 30, 2021

Cc: ASMFC Representatives and staff
Maria Broadbent, Wellfleet Town Administrator
Wellfleet Selectboard, Shellfish Advisory Board

From: The Wellfleet Natural Resources Advisory Board

Re: Public comments on Striped Bass PID for Amendment 7
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Dear Ms. Franke and ASMFC representatives:

The Wellfleet Natural Resources Advisory Board (NRAB) believes ecosystem-based fisheries management (EBFM) which weighs how managing one stock effects the whole marine ecosystem has become a necessary tool in saltwater fisheries management. We applaud you for acknowledging this and implementing EBFM as ASMFC policy. For this reason, you will be hearing about Atlantic menhaden throughout this letter, how menhaden relate to Striped bass in the grand scheme of things, and why EBFM is key to planning the best way forward for both species.

NRAB has had both Striped bass and menhaden on their radar for years. I have personally observed the plight of Striped Bass since the 1970's as an avid recreational angler and have paid close attention to the various successes and failures realized under ASMFC management.

Below we offer comments on four issues in the PID. Top of the list and of most concern would be the Striped Bass Management Board's (Board's) interest in proposed changes to the striped bass biological reference points (BRP). A more liberal spawning stock biomass threshold or target would clearly be detrimental to the long-term sustainability of striped bass, especially since the stock is currently overfished. Furthermore, as the coastwide menhaden quota is now tied to the new ecosystem reference points, which include striped bass, changes to the reference points could create cascading negative ecosystem effects.

Issue 2 - BRP: Stay With the Best Available Science Until the Next Benchmark Assessment

The current striped bass BRP represents the best available science. Lowering the BRP bar at this time would be an unwarranted and arbitrary decision not supported by science, as highlighted in the PID:

"The SSB in 1995 was selected as the threshold because that was the year the Commission declared the stock recovered from its depleted status in the 1980s, and many desirable stock characteristics were achieved, such as an expanded age structure. The additional 25% buffer for the target was an ad hoc decision to account for uncertainty in the SSB estimates, and also produced a target value comparable to those observed prior to the stock's collapse in the 1970's."

The PID states that model-based alternatives to the current reference points are not available:

"Potential alternatives to the current reference points are restricted by data and modeling limitations. Unfortunately, the statistical-catch-at-age (SCAA) model currently used in striped bass stock assessment is unable to produce reasonable estimates for model-based reference points, such as MSY or SPR (spawning potential ratio)."

Issue 5 - Regional Management

This should be removed from the Amendment until a scientific model has been developed to account for regional differences in the fishery and fish stocks - especially while the stock is overfished.

Issue 6 - Conservation Equivalency

Conservation Equivalency should not be part of Striped Bass management. Allowing deviation from the coastwide standard only creates regulatory inconsistencies which makes compliance both confusing for anglers, and enforcement problematic.

Issue 10 - Ecosystem Based Management

In 2020, the ASFMC implemented an ecosystem-based fishery management system for Atlantic menhaden. The "ecological reference points" which define this new approach are inextricably tied to striped bass reference points, and the health of many other ASMFC managed stocks such as bluefish, weakfish, dogfish, and Atlantic herring.

The Striped Bass Management Board should absolutely consider menhaden while weighing decisions in Amendment 7. It would be a logical and reasonable thing to do because of striped bass dependence on abundant menhaden throughout the entirety of their range. Lowering the striped bass biomass target will potentially lead to an increased quota for menhaden, and thus reduced forage for striped bass.

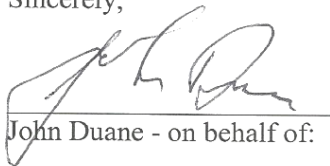
In 2017, when the Menhaden Management Board considered establishing an ecological management system for Atlantic menhaden based on a "rule of thumb" management protocol, commissioners expressed concern that "menhaden-specific ecological reference points" were not yet ready for management use. Accordingly, the Board chose to wait for the Ecological Reference Points Working Group and the Technical Committee to make management recommendations.

This history is important because the Striped Bass Management Board is now considering changes to the Striped Bass Management Plan based on *ad hoc* concerns about the ability to meet the spawning stock biomass (SSB) target; however, this decision is not based on science. In fact, the PID succinctly points out that the fishing mortality rate has never been low enough to meet the SSB target.

It is also important to highlight that the Atlantic menhaden ERPs do not account for the overfished status of Atlantic herring, a predominant forage species in our area. As Atlantic herring are another locally important prey species for striped bass, their overfished status should be a significant concern for striped bass management. A depleted population of Atlantic herring will further stress the striped bass stock, particularly when in tandem with increased fishing pressures on both menhaden and striped bass.

For these reasons, we believe that the Striped Bass Management Board should remove biological reference points from consideration in Amendment 7. If the next benchmark stock assessment provides a viable model-based alternative to the current empirical reference points, then and only at that time would it be appropriate to consider any changes to striped bass reference points. In the meantime, rebuilding the striped bass population, perhaps through effort reductions should be a top priority of the board, and you should embrace the inter-relationships between striped bass and the new ecosystem-based menhaden management system.

Sincerely,



John Duane - on behalf of:

The Wellfleet Natural Resources Advisory Board
John Riehl Chair, John Duane, Tom Flynn
Herb Gstalder, Laura Hewitt, Tom Slack