



October 14, 2021

Patrick Keliher, Chair  
Atlantic States Marine Fisheries Commission  
1050 North Highland Street  
Suite 200  
Arlington, VA 22201

Mike Luisi, Chair  
Mid-Atlantic Fishery Management Council  
800 North State Street, Suite 201  
Dover, DE 19901

Dear ASMFC Policy Board and MAFMC Council Members,

In a memo dated October 1, 2021, the joint Plan Development Team (PDT) and Fishery Management Action Team (FMAT) raise several important topics for consideration related to the recreational harvest control rule addendum/framework.

Given our involvement and support of the harvest control rule approach, and the broader recreational management reform initiative, we wanted to provide comments to the Policy Board and Council relative to the topics raised in the PDT/FMAT memo.

### **Use of Example Measures in the Addendum/Framework**

The PDT/FMAT determined it would not be appropriate to provide example recreational management measures associated with the draft alternatives included in the harvest control rule omnibus addendum/framework. Although providing example measures will be challenging, we reiterate the importance of these examples in the draft addendum to illustrate the differences in setting the recreational measures across the alternatives. As provided through previous rounds of public comment, the metric that recreational anglers understand are the measures themselves (i.e., size limit, bag limit, season length) and therefore, to get the most meaningful input from the addendum's public comment process we strongly recommend that example measures complement the harvest control rule alternatives described in the draft addendum/framework.

Providing example measures will not mislead the public, but instead put the draft alternatives into terms that anglers understand enabling a more inclusive public input process. The PDT/FMAT do not need to create examples across all species and can clearly indicate that the example measures are for informational purposes and are displayed to help the public understand the complexities associated with each harvest control rule alternative.

### **Stakeholder Workshops**

The PDT/FMAT also recommend against conducting stakeholder workshops to gather input on preferred recreational management measures and instead wish to rely on a planned NEFSC survey of anglers in 2022. We maintain that stakeholder involvement in the development of preferred management measures is vitally important to the success of the harvest control rule approach. A randomly designed

survey of anglers may achieve a more statistically defensible outcome, but it will lack the type of industry buy in that would occur during an interactive stakeholder workshop. To date, little information has been shared publicly about the NEFSC survey and how the survey would ultimately inform the harvest control rule approach. Therefore, if the Policy Board and Council believe the survey is the preferred forum, we recommend the NEFSC/GARFO and ASMFC/MAFMC conduct outreach to create broad awareness that the NEFSC survey will be conducted in 2022 and include details about the survey and why completing it is important to the recreational management reform initiative.

Additionally, at some point in 2022, we recommend conducting follow up workshops (open to all stakeholders) to review management measures coming from both the statistical modeling work and survey results. As one of the six recreational organizations supporting the harvest control rule approach, we collectively welcome the opportunity to engage our broad and diverse membership to assist in the successful development of the harvest control rule approach. However, opportunities to do that are currently limited with the PDT/FMAT recommendation to forego the public stakeholder workshops.

Thank you for considering our input on these important topics. We thank the Policy Board and Council for their continued support of the recreational management reform initiative and the PDT/FMAT for their work on the harvest control rule addendum/framework.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Waine", written in a cursive style.

Michael Waine  
Atlantic Fisheries Policy Director  
American Sportfishing Association