



June 3, 2021

Julia Beaty
Fishery Management Specialist
Mid-Atlantic Fishery Management Council (MAFMC)
800 North State Street, Suite 201
Dover, DE 19901

Re: Recreational Reform Initiative Framework/Addendum and Amendment

Dear Ms. Beaty:

The American Saltwater Guides Association (ASGA) is a coalition of recreational fishing guides, small businesses, and conservation-minded anglers who find greater value in long-term stock abundance rather than simply maximizing harvest. We are committed to the concept of “better business through conservation.” This reflects our belief that a precautionary approach to fisheries management based on the best available science provides higher-quality fishing opportunities that bolster the recreational fishing economy.

In advance of the June MAFMC meeting, we would like to offer some thoughts on the Recreational Reform Initiative intended to address a range of management issues in recreational fisheries. This joint initiative between the MAFMC and the Atlantic States Marine Fisheries Commission (ASMFC) is a dual Framework/Addendum and Amendment process for four species including black sea bass, summer flounder, scup, and bluefish. The topics, management issues, and goal/vision raise some significant concerns for conservation-minded recreational fishermen and for-hire captains who target MAFMC-managed species. While we appreciate the challenges associated with both recreational accounting and constraining catch within Recreational Harvest Limits (RHLs), we urge the MAMFC and ASMFC to ensure that any measures considered do not violate the mandates of the Magnuson-Stevens Act (MSA) nor jeopardize the long-term outlook for these important species.

First and foremost, the goal/vision articulated by the initiative—stability in regulations; flexibility in management; and accessibility to harvest that matches stock status—is not aligned with the views of our members. For us, “stability” means knowing that a stock’s status is stable so we that can confidently book trips targeting them in the future. Likewise, “accessibility” means abundant fish populations that provide opportunity—for catch-and-release or harvest—for the entire fishing community. “Flexibility” in recreational management, meanwhile, is already built into the Council structure (if it doesn’t violate the Magnuson-Stevens Act) but can in some cases jeopardize stock health (as we have seen with Conservation Equivalency in the ASMFC-managed striped bass fishery).

Specifically, we have significant concerns regarding the Framework/Addendum, which will include the following topics:

- Better incorporating Marine Recreational Information Program (MRIP) uncertainty into the management process;
- guidelines for maintaining status quo recreational management measures (i.e., bag, size, and season limits) from one year to the next;
- a process for setting multi-year recreational management measures;
- changes to the timing of the recommendation for federal waters recreational management measures; and
- a proposal put forward by six recreational organizations called a harvest control rule.

MRIP uncertainty, while a reality that managers must contend with, necessitates more risk-averse management, rather than the development of means to achieve this initiative's goals at the potential expense of stock health. Managers must be able to change size, season, and creel limits as new information becomes available and gives us better metrics on stock status. Forcing multi-year management measures or the proposed Harvest Control Rule through the Framework/Addendum raises serious questions around accountability; unless these measures are associated with uncertainty buffers to account for the greater risk of overharvest that they engender, we foresee significant conflicts with the mandates of MSA and the ability to effectively prevent overharvest.

The limitations associated with MRIP have undoubtedly led to challenges for managers tasked with managing the MAFMC's recreational fisheries, and we understand that this Recreational Reform Initiative is needed. However, the recreational sector in the Mid-Atlantic is massive and not well represented by the steering committee, the goal/vision, or the topics for the Framework/Addendum. The Recreational Reform Fisheries Management Action Team (FMAT)/Plan Development Team (PDT) is currently pursuing ideas set forth by only a small group of stakeholders. This is not surprising considering the lack of a Public Information Document during the scoping process. In fact, this initiative has been progressing since 2019 and outreach to the recreational community has been almost completely absent. Five meetings have taken place during a global pandemic. The vast majority of the recreational fishing public has no idea that this process is underway and its potential implications. Fisheries management should be for the good of all, not special interests that represent a fraction of the entire community. We strongly suggest that the public is afforded formal opportunity for engagement on the Recreational Reform Initiative in its entirety before considering each of its constituent parts.

As other regional councils also wrestle with the challenges of managing the recreational sector, the MAFMC has a critical opportunity to set a precedent in how it can improve recreational management in an inclusive fashion that ensures long-term stock health. We hope that our comments are helpful in informing that process and look forward to being a part of the discussion moving forward.

Thank you for your consideration,

Sincerely,



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