



March 18, 2020

Honorable Jeannie Haddaway-Riccio
Secretary
Maryland Department of Natural Resources
580 Taylor Avenue
Tawes State Office Building
Annapolis, MD 21401

RE: Support for Option 1 for the Striped Bass Summer and Fall Seasons

Dear Secretary Haddaway-Riccio:

The undersigned organizations representing Maryland's angling and boating community would like to offer the following comments on the management options regarding the 2020 striped bass summer and fall seasons, as well as our thoughts on the Maryland Department of Natural Resources (DNR) process for arriving at the options currently being considered.

According to a survey in 2016, Maryland's 744,236 recreational striped bass anglers (anglers fishing from their own boats and those fishing on charter/for-hire boats) supported 10,193 jobs and contributed \$802 million to state GDP, which represents 97% of the total economic value of the commercial and recreational striped bass fishery, combined. Furthermore, according to the U.S. Fish and Wildlife Service's report for 2019, the DNR received \$12,613,037 from fishing license sales as well as the Sport Fish Restoration and Boating Trust Fund, which is fueled by excise taxes paid on recreational fishing equipment and motorboat fuel taxes. Within the state, these funds are used for natural resource management, education programs and conservation efforts benefiting species like striped bass.

Clearly, Maryland's recreational anglers are important to both the state's economy and the conservation of striped bass. For that reason, among many others, it is unfortunate that the recreational angling and boating communities' perspectives were not solicited nor considered in any meaningful way over the last year leading up to this point in the management process.

We realize that in order to ensure the health and abundance of striped bass in the future, immediate and difficult management decisions must be made now. However, Maryland's current preferred

conservation equivalency options unfairly place the vast majority of the burden on the private recreational fishery and may not contain measures necessary to bring on-the-water results to end overfishing and begin rebuilding the striped bass population.

Option #1 – Preferred Management Option

Given the current management options the DNR has presented for public comment, only Option #1, the coast-wide, Atlantic States Marine Fisheries Commission (ASMFC) preferred management option of one fish at 18 inches for the recreational sector, is acceptable. While Option #3 does allow some additional input on season closure timeframes, both Option #2 and Option #3 seek to reallocate fish away from the private angler to the charter/for-hire fleet by allowing charter boat anglers to retain two fish per person while private anglers are limited to one fish. This reallocation is a de facto move towards a very controversial and unnecessary condition in the recreational fishery known as sector separation. To implement either Option #2 or Option #3 containing the sector separation and reallocation provision without going through a separate and necessary scoping process with ample public review is simply irresponsible for a state natural resource management agency. Through an administrative decision on what options to present to the public, the DNR is effectively divvying up a public trust resource without meaningful and deliberate input from the very public who owns the resource. Frankly stated, the DNR is picking winners and losers, and pitting portions of the recreational sector against each other.

The accompanying hail in/hail out requirement necessary for the two-fish per person bag limit for anglers on charter boats in order to obtain “better data” is a veiled attempt at justifying the lack of public input in the development of these management recommendations that were not presented to the public initially. We understand and fully support the need for better data. The DNR’s reliance on the Marine Recreational Information Program (MRIP) almost exclusively to provide harvest and discard estimates is a recognized problem. We fully support efforts to supplement Maryland’s MRIP data with a more accurate and timely state-based program. However, a supplemental program should not be limited to just the charter/for-hire component, which represents only 9% of the recreational catch in numbers of fish.

Process Deficiencies

While Option #3 does provide a welcome opportunity for input on season closure timeframes, it comes much too late in the process and is contingent upon accepting an allocation shift to the charter/for-hire angler, which again is not acceptable to the recreational angling community.

The full public scoping process for management options should have occurred prior to the development of the four conservation equivalency proposals the DNR presented to the ASMFC Striped Bass Technical Committee late last year. Such a process should have included attempts at finding consensus amongst the recreational fishing community, and a thorough public discussion on known impacts that water quality, air and water temperatures, and fishing gear have on discard mortality, and the efforts that DNR will be making to more accurately quantify, and limit such impacts for both commercial and recreational fishing moving forward.

In closing, we recognize and strongly support the need for tough decisions to reduce harvest and discard mortality in the striped bass fishery. As recreational anglers and boaters, the long-term health of the striped bass population is our top priority. Only Option #1 provides an equitable distribution of the harvest reduction across the recreational sector and the best opportunity to end overfishing and begin rebuilding the striped bass population. Furthermore, we stand ready and willing to work with the DNR in a public, transparent process to develop additional management measures in 2021, as well as the development of a supplemental state-based harvest information program moving forward.

For these reasons, we urge you to select Option #1 for the 2020 summer and fall striped bass season.

Sincerely,

Glenn Hughes, President
American Sportfishing Association

Jeff Crane, President
Congressional Sportsmen's Foundation

Chris Edmonston, VP Government Affairs
BoatU.S.

Matt Gruhn, President
Marine Retailers Association of the Americas

Jeff Angers, President
Center for Sportfishing Policy

Susan Zellers, Executive Director
Marine Trades Association of Maryland

David Sikorski, Executive Director
Coastal Conservation Association Maryland

Frank Hugelmeyer, President
National Marine Manufacturers Association