



October 1, 2025

Tracey Bauer  
Fishery Management Plan Coordinator  
Atlantic States Marine Fisheries Commission  
1050 North Highland Street, Suite 200A-N  
Arlington, Virginia 22201

Dear Ms. Bauer,

On behalf of the American Sportfishing Association (ASA) and the Congressional Sportsmen's Foundation (CSF), we appreciate the opportunity to provide comments on Draft Addendum II to Amendment 2 to the Interstate Fishery Management Plan for Red Drum. Our organizations represent the recreational fishing industry and the broader sportsmen's community, both of which generate billions of dollars in economic activity and conservation funding along the Atlantic Coast. Healthy, accessible red drum fisheries are essential to sustaining both conservation outcomes and angler participation.

Draft Addendum II presents important opportunities to modernize red drum management by incorporating updated science and ensuring that management remains adaptive and credible. We strongly support the Commission's efforts to refine the management framework and offer the following comments on specific sections.

### **3.1 Alternative State Management Regimes**

We support Option B, which would establish a new process to allow states to propose changes to their red drum management measures that are more appropriate for individual states and more responsive to changes in red drum population dynamics. Providing states with the ability to develop management strategies with input from the public while meeting conservation goals promotes trust in the ASMFC fishery management process and compliance among anglers.

### **3.2 Allow Alternative Methods to Estimate Fishing Mortality for Use in Management**

We support Option B because it creates a structured, science-based pathway for states to propose alternative methods of estimating fishing mortality outside of benchmark assessments. The process outlined in Draft Addendum II includes rigorous review by the Technical Committee (TC) and, where appropriate, the Assessment Science Committee (ASC). This dual-level review

mirrors the rigor of a formal peer review, ensuring that any alternative methods are credible, transparent, and technically sound.

This approach is especially valuable given the limited resources available for full benchmark stock assessments. By enabling states to advance scientifically reviewed analyses between benchmarks, Option B provides timely flexibility while maintaining high scientific standards.

Option B therefore achieves two critical objectives: it safeguards scientific credibility while also improving timeliness and flexibility in red drum management. This balanced approach better serves both conservation and the recreational fishing community by allowing adaptive decision-making without sacrificing rigor.

### **3.3 Management Program**

We support Option B, which would set management measures that achieve a minimum threshold of 30% SPR and reduce fishing mortality to less than  $F_{30\%}$ , thus ending overfishing as estimated by the 2024 red drum stock assessment. The need to manage to an  $F_{40\%}$  is questionable and would be unnecessarily punitive to the Southern Region states. Like with most fisheries, the stock assessment indicated that there is no stock-recruit relationship with red drum. Recruitment is influenced far more by environmental variables than the size of the spawning stock biomass. Even with the estimated escapement rate at a level below 30% SPR ( $F_{30\%}$ ), recent indices of recruitment and juvenile and sub-adult abundance are on a positive trajectory. Red drum are a vital recreational species, and any real problems with population abundance will be addressed through angler advocacy and their cooperative partnership with state management authorities. Managing to a minimum escapement rate of  $F_{30\%}$  is appropriate for this fishery.

### **3.4 Northern Region Management Options**

We do not support prescriptive measures that impose bag and slot limits on the Chesapeake Bay and North Carolina without flexibility.

If Option B in Section 3.1 is adopted, these jurisdictions should have the same latitude to develop state-specific management strategies as other states. That said, we recognize the benefits of coordination among Chesapeake Bay jurisdictions to reduce angler confusion and improve enforcement, and we encourage those authorities to pursue consistent regulations voluntarily. As a starting point for discussion, we recommend a bay-wide 3 fish bag limit and 18"-26" slot limit.

The priority in the northern region should be consistency and clarity where meaningful, but without unnecessary or punitive restrictions that provide little conservation benefit.

### **3.5 De Minimis Provisions**

We support Option B, which updates de minimis provisions to align with the Commission's 2022 policy. States contributing less than 1% of regional harvest should not be burdened with

marginal regulatory changes that provide little conservation benefit. This approach focuses resources where they matter most, prevents loopholes, and provides regulatory stability.

In summary, we strongly support Draft Addendum II as an opportunity to modernize red drum management by providing adaptive, credible, and equitable tools that protect the resource while sustaining the recreational fishing economy. We appreciate the Commission's work on this important issue and look forward to continued engagement as the process advances.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael Waite".

Michael Waite  
Atlantic Fisheries Policy Director  
American Sportfishing Association

A handwritten signature in dark ink, appearing to read "Chris Horton".

Chris Horton  
Senior Director, Fisheries Policy  
Congressional Sportsmen's Foundation