



# BACKCOUNTRY HUNTERS AND ANGLERS

## NEW ENGLAND CHAPTER

### NEW YORK CHAPTER

January 12, 2023

Via Email: [comments@asmfc.org](mailto:comments@asmfc.org)

Atlantic Striped Bass Management Board  
Atlantic States Marine Fisheries Commission  
1050 N. Highland Street, Suite 200 A-N  
Arlington, VA 22201  
Attn: Emilie Franke  
Fishery Management Plan Coordinator

Re: New England BHA Comments on Draft Addendum 1 to Striped Bass Amendment 7

Backcountry Hunters & Anglers (BHA) seeks to ensure North America's outdoor heritage of hunting and fishing in a natural setting. As a component of this mission, BHA supports management policies that ensure abundant populations inhabit our public lands and waters and are accessible to the hunters and anglers who choose to pursue them.

During the development of Amendment 7 to the Atlantic Striped Bass Interstate Fishery Management Plan the New England and New York Chapter Leadership Boards of BHA advocated with two principles in mind – to recover the Striped Bass fishery as soon as reasonably possible, and to implement policies that ensure target levels are maintained long-term after recovery. Because little time has elapsed since the adoption of Amendment 7 and the state of the fishery has changed minimally, although our understanding of today's fishery has been enhanced by the acceptance of the November 2022 Stock Assessment, we still consider these principles our top priorities.

While we understand, to a degree, the desire by some managers to utilize the totality of the ocean region's commercial quota and/or increase their proportional share we are concerned both with the timing of the proposal before us now, as well as the long-term likelihood of proposed changes to protect the fishery. As a result, **we urge the Striped Bass Board to select Option A – status quo** and will detail our concerns further below.

#### **Near-Term Transfer Options (B & D)**

According to the November 2022 Stock Assessment the Striped Bass fishery remains overfished, with the current female SSB approximately 24% below the threshold and 39% below the target set in Amendment 7. By including conservation-minded options in Amendment 7 in May 2022 the Striped Bass Board seemed committed to recovering the fishery's abundance to target SSB by 2029 – and this was urged overwhelmingly and celebrated by the interested public.

The 2022 Stock Assessment Update Report also outlines probabilities for recovery under different fishing mortality (F) scenarios (Table 10). While the odds of achieving target SSB by 2029 should current F be maintained seem positive there is no guarantee that fishing mortality levels will remain constant. One

trend is clear in Table 10, and that is that if F were to increase than the odds of successfully achieving target SSB by 2029 – a commitment the Striped Bass Board made – decrease.

Because of their inclusion as potential options in Addendum 1 it is clear that some members of the Striped Bass Board seek to claim unused commercial quota in the near term, and we are concerned that should Option B or Option D be selected a mechanism would exist to circumnavigate future public input and facilitate such utilization either by Board action or without Board approval at all. Successful efforts to secure quota transfers would undoubtedly result in increased fishing mortality, and in the near term such efforts would subsequently extend the recovery timeline and reduce the chances of achieving target SSB by 2029.

#### **Stock Status Restriction on Transfer Options (C & E)**

As slightly more restrictive approaches, Options C & E propose limiting the transfer of commercial quota based on stock status. Specifically, they state that “transfers would not be permitted when the stock is overfished”, or in other words when the stock’s abundance is below the SSB threshold. During times when the Board is required to rebuild the stock due to either of the SSB triggers being tripped, which is currently the case, Amendment 7 requires the stock be rebuilt to target SSB, not the relatively lower threshold SSB that designates the stock overfished.

As a result, when an overfished stock is being recovered a period necessarily exists when the stock is no longer overfished but has not yet achieved target SSB. During this period we feel that the Board’s focus should remain on the final stages of recovery rather than facilitating increased fishing mortality, so we do not feel that the additional restrictions posed in Options C & E adequately protect the fishery or facilitate recovery when doing so should be the top priority.

In conclusion, our concerns with Options B, C, D, and E make status quo the only option that we support. We respectfully urge the Striped Bass Board to prioritize recovering the fishery as soon as reasonably possible, and implement policies that ensure target levels are maintained long-term after recovery, by selecting Option A.

Thank you for the opportunity to provide input, and for your consideration of our comments.

Sincerely,

Michael Woods



Chair, New England Chapter Board  
Backcountry Hunters and Anglers

And the undersigned Chapter Leadership Boards:

New England Chapter Board  
(Connecticut, Maine, Massachusetts,  
New Hampshire, Rhode Island, Vermont)  
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New York Chapter Board  
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