



BACKCOUNTRY HUNTERS & ANGLERS

NEW ENGLAND CHAPTER

NEW YORK CHAPTER

NEW JERSEY CHAPTER

NORTH CAROLINA CHAPTER

CAPITAL CHAPTER

PENNSYLVANIA CHAPTER

December 22, 2023

Via Email: 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: BHA Comments on Draft Addendum II to Amendment 7 to the Atlantic Striped Bass FMP

Dear ASMFC Staff and Members of the Management Board:

In this correspondence we are writing on behalf of the Leadership Boards of the New England, New York, New Jersey, North Carolina, Capital and Pennsylvania Chapters of Backcountry Hunters & Anglers (collectively, "BHA") to provide our comments on Draft Addendum II to Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass ("Addendum II").

Backcountry Hunters & Anglers is focused on advancing proven approaches to protect our public lands, waters and wildlife, and on ensuring our outdoor heritage of hunting and fishing in a natural setting. As BHA's footprint has expanded, our Chapters have applied this mission across North America.

Along the Atlantic coast fishing for striped bass is as much a part of our outdoor heritage as any pursuit in the region. While our Chapters from Maine to North Carolina have been encouraged by some of the recent actions that ASMFC's Striped Bass Board (the Board) has taken to recover striped bass, which were declared overfished in 2019, we remain concerned with the current state of the fishery. According to Addendum II, *"the most recent rebuilding projections indicate a low probability of meeting [the 2029 rebuilding deadline] if the fishing mortality rate associated with the level of catch in 2022 continues"*. Addendum II further clarifies that *"a 14.5% reduction from 2022 total removals will be needed to achieve F target in 2024"*. **BHA's priorities for inclusion have been selected to maximize the odds of recovering striped bass female SSB to target by 2029**, which is a commitment that the Board made when Amendment 7 was adopted in 2022. Accordingly, our comments on specific issues and priorities for inclusion in Addendum II are as follows:

3.1.1 Ocean Recreational Fishery Options

Priority for Inclusion: Option B – 1 fish at 28” to 31” with 2022 seasons (all modes)

Of the options presented only options B and C are projected to approach the necessary reduction in fishing mortality, and as a result we oppose the inclusion of options A, D and E.

Mode splits (ex. different size limits for ‘private’ anglers and ‘for-hire’ vessels) are proposed in several sections of Addendum II, including options C and E of 3.1.1. BHA urges the Board to remain focused on recovery as a primary objective that is applied evenly across all segments of the fishery, rather than providing enhanced harvest opportunities to any sub-segment. As a result, we oppose mode splits everywhere that they are proposed in Addendum II.

Option B is the only choice that meets our criteria to support for inclusion in Addendum II.

3.1.2 Chesapeake Bay Recreational Fishery Options

Priority for Inclusion: Option B1 – 1 fish at 19” to 23” with 2022 seasons (all modes)

Only options B1, B2 and C1 are projected to achieve the necessary reduction in fishing mortality, and as a result we oppose the inclusion of all other options. Additionally, we oppose the inclusion of option C1 because it proposes a mode split between ‘private’ and ‘for-hire’ sectors (see our note on mode splits in 3.1.1).

While both options B1 and B2 are projected to achieve at least the necessary 14.5% reduction in fishing mortality, we believe that the current state of the Chesapeake Bay fishery warrants exceptional protection. The tributaries of the Chesapeake Bay, which are collectively regarded as the most productive of the major spawning areas that support the coastal striped bass population, have experienced sustained sub-average juvenile recruitment. Until the Chesapeake population experiences successful juvenile recruitment that is likely to *“maintain an age structure that provides adequate spawning potential to sustain long-term abundance”* (Amendment 7 – 2.4 Objectives) BHA urges the Board to extend special care towards the fish we’ll be relying upon once favorable conditions do finally occur in the Chesapeake Bay tributaries by including Option B1.

3.1.3 For-Hire Management Clarification (If For-Hire Mode-Specific Limits are selected)

As noted in our comments on 3.1.1, BHA does not support mode splits anywhere they are proposed in Addendum II. If the Board does choose to include mode splits we urge the inclusion of Option B, which would ensure that the benefit of enhanced harvest opportunities is only extended to patrons of for-hire vessels, rather than captains and crew.

3.1.4 Recreational Filleting Allowance Requirements

Priority for Inclusion: Option B – establish minimum requirements for filleting

According to Appendix I in Addendum II many states already have standards that would fulfill the requirements of Option B, so it does not seem as though its inclusion would constitute an excessive burden upon anglers. BHA support the inclusion of Option B, which would increase coastwide compliance with the FMP standards and aid in the recovery of the fishery.

3.2.1 Commercial Quota Reduction Options

Priority for Inclusion: Option B – up to a 14.5% reduction from 2022 commercial quotas

We feel that all segments of the fishery should participate in its recovery, and as a result BHA supports Option B, which would authorize the Board to reduce commercial quotas by up to 14.5%. Recognizing that Option B allows the Board discretion in *how much* commercial quotas are reduced, **we also urge the Board to implement the full 14.5% reduction** allowed under the option, which would be consistent with the necessary reductions we have advocated for in other segments of the fishery.

3.3 Response to Stock Assessment Update

Priority for Inclusion: Option B – Board Response via Board Action

BHA supported a similar option in Amendment 7, granting the Striped Bass Board the authority to act quickly in response to changing conditions that warranted amending the FMP standards. BHA supports Option B, which would allow the Board to implement corrective measures as quickly as possible if they are clearly needed, rather than allowing insufficient measures to persist and subsequently requiring more severe action closer to the recovery deadline to achieve a similar result.

In conclusion, the Leadership Boards of the New England, New York, New Jersey, North Carolina, Capital and Pennsylvania Chapters of Backcountry Hunters & Anglers urge the Striped Bass Management Board **maximize the odds of recovering striped bass female SSB to target by 2029** by including the options we have prioritized in Addendum II. These are the necessary steps to preserve our traditions of fishing for Striped Bass for current and future generations.

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)
newengland@backcountryhunters.org

New Jersey Chapter Board
newjersey@backcountryhunters.org

Capital Chapter Board
(Maryland, Virginia)
capital@backcountryhunters.org

New York Chapter Board
newyork@backcountryhunters.org

North Carolina Chapter Board
northcarolina@backcountryhunters.org

Pennsylvania Chapter Board
pennsylvania@backcountryhunters.org