



BACKCOUNTRY HUNTERS AND ANGLERS

NEW ENGLAND CHAPTER
NEW JERSEY CHAPTER
CAPITAL CHAPTER

NEW YORK CHAPTER
NORTH CAROLINA CHAPTER
PENNSYLVANIA CHAPTER

April 27, 2023

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
Martin Gary, Chair, ASMFC Striped Bass Board

Re: BHA Comments - ASMFC Striped Bass Board May 2023 Meeting

Backcountry Hunters & Anglers 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.

The Leadership Boards of the New England, New York, New Jersey, North Carolina, Capital and Pennsylvania Chapters of Backcountry Hunters & Anglers (collectively, "BHA") submit these comments to make BHA's priorities and desired actions known as they relate to items on the agenda for consideration by the Striped Bass Management Board during the ASMFC's Spring 2023 meeting:

- BHA urges the Striped Bass Management Board to initiate a management action (addendum) in response to the technical committee's projections
- BHA urges the Board to include "Option A" in final action on Addendum I

We will detail our priorities further below:

Management Response (Addendum II)

Under Amendment 6 to the Interstate FMP for Atlantic Striped Bass the timeline required to recover the Striped Bass fishery to *target* in response to a SSB management trigger was 10 years. During the development of Amendment 7 there was discussion, both amongst the Board and in public testimony, related to modifying both the recovery timeline and the biomass reference points that affect the definition of recovery (i.e. SSB target). Ultimately, the Board decided to uphold both the recovery timeline and existing reference points, knowing at that time that a management trigger had been tripped and that the stock needed to be recovered to *target* SSB by

2029. Of relevance, Amendment 7 also included provisions related to prompt management action to rebuild the stock, stating specifically in Section 4.4.2 that:

“If the 2022 stock assessment results indicate the Amendment 7 measures have less than a 50% probability of rebuilding the stock by 2029 (as calculated using the low recruitment assumption) and if the stock assessment indicates at least a 5% reduction in removals is needed to achieve F rebuild, the Board may adjust measures to achieve F rebuild via Board action (change management measures by voting to pass a motion at a Board meeting).”

Ultimately, the 2022 stock assessment (which only included data up through the 2021 fishing season) did not indicate that management changes were needed at that time, so no action was taken pursuant to section 4.4.2. The Board did, however, request that the Technical Committee provide a report during the May 2023 meeting outlining the impact of the 2022 fishing season data so that action could be taken in advance of the 2024 season if needed.

The projections prepared by the technical committee in response to the Board’s request are included in the April 17, 2023 memorandum, and clearly demonstrate the need for responsive management action. While the 2022 Stock Assessment Update (which included data through the 2021 fishing season) projected an acceptable 78% chance of recovering SSB to *target* by 2029, the addition of 2022 fishing mortality data reduces the odds of recovery by 2029 to an unacceptable 15%. While the odds of ending overfishing (SSB exceeds *threshold*) by 2029 remain quite good, that is not the requirement for recovering the Striped Bass stock.

When the Board enacted Amendment 7 in 2022 it made a commitment to the public that everything possible would be done to recover the Striped Bass stock by 2029. The Board also acknowledged that responsive management actions might be needed, and that rapid response was the best course of action. The data now clearly indicates that current management measures are *not* sufficient to fulfill the Board’s obligation of recovering SSB to target by 2029, **and we urge the Board to initiate responsive management action immediately**, so that necessary changes might be implemented for the 2024 fishing season.

Addendum I

In correspondence related to the public input process for Addendum I to Amendment 7 BHA urged the Board to **support Option A**, which would effectively prohibit the interstate transfer of ocean commercial quota by maintaining the status-quo policy. In urging support for Option A we provided the rationale that facilitating additional fishing mortality would detract from current and future recovery efforts and general conservation of the species, and this would not align with BHA’s mission and priorities.

Since the Board decided to seek additional data rather than taking final action on Addendum I during its January 2023 meeting the rationale supporting Option A has only been reinforced. While the current management regime projects a disappointing 15% chance of recovering the Striped Bass stock by 2029, the addition of quota transfers further reduces that projection to 11%.

As we noted in our public comments on Addendum I, even those options that restrict transfers based on stock status would facilitate additional fishing mortality during periods when SSB exceeds threshold (i.e. is not overfished), but has not yet been reached target (i.e. is not yet recovered), essentially hampering recovery efforts at the time that they are on the verge of being successful.

Given that the data supporting the need to initiate responsive management actions so the fishery is recovered by 2029 is now clear, it would be counterintuitive for the Board to take action that would facilitate additional fishing mortality, which all options on the table aside from the status quo clearly do. As a result, we re-iterate our priority from earlier this year, and urge the Board to **include Option A** in the final action on Addendum I.

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:

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