



BACKCOUNTRY HUNTERS & ANGLERS

NEW ENGLAND CHAPTER

NEW YORK CHAPTER

NEW JERSEY CHAPTER

NORTH CAROLINA CHAPTER

MID-ATLANTIC CHAPTER

PENNSYLVANIA CHAPTER

October 3, 2025

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 III 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, Mid-Atlantic and Pennsylvania Chapters of Backcountry Hunters & Anglers (collectively, "BHA") to provide our comments on Draft Addendum III to Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass ("Addendum III").

Backcountry Hunters & Anglers is focused on advancing proven approaches to protect and conserve 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. Since the adoption of Amendment 7 BHA's Chapters from Maine to North Carolina have provided our input, preferences and concerns to ASMFC's Striped Bass Board (the Board), and we continue to support management actions that **maximize the odds of recovering striped bass female SSB to target by 2029**. Beyond 2029, BHA remains concerned that even if female SSB exceeds target for a short while that sustained spawning failures will create significant obstacles to long-term abundance, as we have mentioned multiple times in correspondence to the Board (Comments to Annual meeting, October 2024 & Comments to Striped Bass Board, December 2024). Accordingly, our comments on specific issues and priorities under consideration for inclusion in Addendum III are as follows:

3.1 Method to Measure Total Length of a Striped Bass

Priority for Inclusion: Option B – Mandatory Elements for Total Length Definition

Since Atlantic striped bass were declared overfished in 2019 managers have relied on a slot size limit to control recreational fishing mortality. In both the Ocean and Bay recreational fisheries the slot was further reduced in 2022. Addendum III includes a memorandum prepared by the Massachusetts Division of Marine Fisheries (Appendix B) analyzing the implications of varying length measurement definitions, which provides data suggesting that the lack of a uniform definition could potentially result in a 1.67" increase in allowable take. Relative to the current 3" ocean recreational slot limit (the approximate size range of the fish analyzed by Mass DMF) this represents a 56% increase.

When ASMFC's Striped Bass Board enacts management measures, their effects should be reasonably precise. While the need for a uniform length definition may have been proportionally less critical before the slot limit was reduced to its current level, it is clearly needed at this point.

3.2 Commercial Tagging: Point of Tagging

Priority for Inclusion: Option B – Commercial Tagging at the Point of Harvest

According to Addendum III only three states currently implement commercial tagging at the point of sale, although North Carolina doesn't currently have a commercial striped bass fishery. The remainder of the states that harvest striped bass commercially require anglers, rather than buyers/dealers, to tag harvested fish.

BHA feels that the commercial anglers who remove striped bass from the fishery should be accountable for tagging them or returning unused tags, rather than the buyers/dealers who later take possession, which could be accomplished by both Option B and Option C. Option B provides better accountability because law enforcement officers checking anglers on the water would be able to easily determine whether commercial anglers are following the regulations or not.

3.3 Maryland Chesapeake Bay Recreational Season Baseline

Priority for Inclusion: Option C – New Chesapeake Bay Recreational Season Baseline plus 10% Uncertainty Buffer

Given the prominent role that the Chesapeake Bay has historically played in striped bass production, and its failure to yield successful spawns, the fishing measures allowed in the Bay are of coastwide concern. While BHA agrees that shifting Maryland's recreational season to reduce fishing effort during the warmest time year, as proposed in Option B and Option C, is likely to reduce release mortality we are concerned that shifting seasons inherently invites uncertainty, and doubt that the 2024 and new baseline would result in similar recreational fishing mortality.

BHA was disappointed that the Board removed the option to consider Maryland's new baseline season with a 25% uncertainty buffer prior to circulating Addendum III for public comment, as we feel that an uncertainty buffer exceeding 10% would have been appropriate to mitigate the

uncertainty that arises from allowing new opportunities to pursue large fish that come into the Bay to spawn in April and early May. While we support Option C as the best option available in Addendum III, we urge the Board to consider using its discretion to increase the uncertainty buffer beyond 10%.

3.4 Reduction in Fishery Removals to Support Stock Rebuilding

Priority for Inclusion: Option B – Even Sector Reductions: Commercial & Recreational -12%

Preferences for implementation of reductions: Oppose for-hire exemption options, oppose no-targeting seasonal closures

Addendum III states that under status quo management the fishery is projected to have a 30% probability of recovery by 2029, and the odds increase to 50% probability if a 12% reduction is implemented beginning in the 2026 fishing season. Beyond 2029, we are concerned that even if female SSB exceeds target by 2029 that years of significant challenges will face the fishery subsequently due to sustained spawning failures. Imposing a 12% reduction beginning in 2026 is not only necessary to uphold the Board's obligation to recover the fishery within 10 years of its overfished declaration, but it also improves the probability that successful spawns will occur in the coming years by protecting breeding-aged fish.

Throughout BHA's involvement in striped bass advocacy our position has been that all segments that enjoy the striped bass fishery during times of abundance should participate proportionally in its recovery. As a result, we urge the Board to impose 12% reductions on both the recreational and commercial segments of the fishery. Following similar rationale, **BHA opposes sub-options O2 and CB2**, which would create different measures for for-hire operators compared to private recreational anglers. **BHA supports the inclusion of sub-option O1 and CB3**, which would achieve the recreational sector's 12% reduction by establishing season closures, although we acknowledge that sub-option CB1 would achieve a similar effect by reducing the slot size for the bay recreational fishery rather than imposing seasonal closures.

Related to how recreational reductions are implemented, **BHA opposes no-target season closures** for the simple reason that they are unenforceable, and thus unlikely to achieve their projected effect. Like our position that all segments of the fishery should contribute to its recovery, we also feel that all geographies should contribute proportionally. Based on the catch-time data (Figures 6,7,9,10) included in Addendum III, BHA prefers a framework that divides the ocean fishery into two regions, rather than imposing a single closure set on the entire coast. BHA further prefers the framework that groups ME-MA and RI-NC as regions, which would impose a similar closure across the entire area around Montauk & Block Island Sound and would be more likely to accomplish its intended effect. Finally, within each region we urge the Board to select season closure dates that are likely to affect each jurisdiction within the region similarly (i.e. closures that are timed during waves where all state within the region experiences similar catch/effort rates).

In conclusion, while we remain concerned about the fishery's age-structure and the challenges that it will face beyond 2029, the Leadership Boards of the New England, New York, New Jersey, North Carolina, Mid-Atlantic and Pennsylvania Chapters of Backcountry Hunters & Anglers urge the Striped Bass Management Board include the options we have prioritized, which will maximize the odds of recovering striped bass female SSB to target by 2029. 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:

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