



September 22, 2014

Mike Waine
Atlantic States Marine Fisheries Commission
1050 N. Highland St. Suite 200 A-N
Arlington VA 22201

Subject: Draft Addendum IV – Support for Option B2 & B3

Mike Waine & ASMFC members,

New York Sportfishing Federation was founded in 1981 specifically to develop and promote programs designed to protect and conserve the marine environment and fisheries, and also to protect and promote the interests of the marine recreational fisherman. Today, our Board of Directors is made up of 13 members – club delegates, individual ‘unaffiliated’ anglers, tackle representatives, and for-hire captains who come from all areas of the New York Marine district, north shore, south shore, east end and west.

Having surveyed our membership in 2013 and following extensive discussion amongst members, the New York Sportfishing Federation Board voted on July 8th to “*support a reduction in the harvest of striped bass starting in 2015, including a reduction in the recreational restrictions of the daily angler bag limit from two fish to one fish, and an increase in the minimum size limit from the 28-inch coastwide standard.*”

Respectfully, the New York Sportfishing Federation offers the following official comments to the Atlantic States Marine Fisheries Commission (ASMFC) with regard to *Striped Bass Draft Addendum IV*.

As that relates to the suite of options presented by ASMFC, our organization supports the following options with detailed citation following;

Section 2.5.1, Coastwide Population Reference Point, we support Option B - use the 2013 Benchmark Stock assessment F Reference Points.

Section 2.5.2, Chesapeake Bay Stock Assessment Reference Point options, we support Option B – Use Coastwide population F reference points as stated in Section 2.5.1

Section 2.6, Timeline to Reduce F to the Target, we support Option A – Status Quo: One year Time Frame

Section 3.0, Proposed Management Program, we support Options B2 and B3, a one fish bag limit and 30-inch size limit, or one fish bag limit and 32-inch size limit with a Fallback position of Option B1 should either Option B2 or B3 fail to be approved.

Section 3.1, Commercial Quota Transfers, we support Option A – Status Quo: No Commercial Transfers

Section 3.2, Commercial Size Limits, we support Option A – Status Quo with amendment 6

Section 5.0, Recommendation for Federal Waters, we continue to support the closure for targeting Striped Bass within the EEZ and would not support any recommendation to change the EEZ closure at any time.

Recognizing that 2010/2011 year classes are the most robust of recent record, the New York Sportfishing Federation supports both B2 and B3 as options which offer a better than 31% reduction in recreational harvest while allowing more opportunity for those 4- and 5-year one or even two (or more) chances to spawn before reaching harvestable lengths.

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NEW YORK SPORTFISHING FEDERATION, 73-11 AUSTIN STREET, SUITE 144, FOREST HILLS, NY 11375

2014- President Jim Hutchinson; Vice-President Chuck Hollins; Secretary Jeffrey Leavitt; Treasurer Tom Wallace;
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Specifically, the New York Sportfishing Federation has taken the following three points into consideration when arriving at our recommendation.

1. Reducing the individual bag limit by one fish offers a better than 31% reduction in harvest (according to ASMFC), but would also effectively cut the number of broodstock fish harvested during the spring migration when pre- and post-spawn fish are congregated in key areas.
2. New York Sportfishing Federation remains concerned about the current recruitment classes; with the 2010 and 2011 recruitment years being the most robust of recent record, it's important to better protect age 4 to 5 females until better than 90% can spawn (age 5 to 8) at least once before harvest.
3. ASFMC has previously stated that reducing fishing mortality on fish aged 8-12 (32- to 40-inch fish) by half would result in "*much greater egg production in the stock and an age distribution in which older fish are much more dominant*"; as such, any slot option (*proposed in options B4, B6, B7, B8, or B9*) which focuses undue harvest pressure on more 'fertile' age/size fish in the stock could be counterproductive to conservation efforts.

Striped bass is an iconic species; in the state of New York, it's designated the State Marine Fish and it's very important to the recreational community. New York Sportfishing Federation believe both sectors, recreational as well as commercial, need to take an equal harvest reduction and a full harvest reduction starting in 2015, and not 'staggered' over the course of several years – we don't have the luxury of 'loitering' here with this important fishery.

In terms of the regulatory options and the timing for implementation, we believe the majority of fishermen support taking the full reduction necessary starting in 2015 to ensure we don't overfish and to protect and preserve that 2010/2011 year class coming up, options B2 and B3 meet that goal in our opinion (with a fallback option of B1).

Our Board has been discussing striped bass management and the topic of potential reductions for the better part of three years; and while ASMFC data indicates the stock is not overfished nor is it experiencing overfishing, the science shows that if we fail to act as a community to take an immediate action to conserve this iconic fishery, there's an 85% chance that the striped bass stock will be designated as overfished within the next two years. For that reason, doing nothing cannot be an option.

As ASMFC considers options to sustain the striped bass fishery through this downtrend, the New York Sportfishing Federation also asks respectfully that Commissioners consider the following items:

ILLEGAL, UNREPORTED AND UNREGULATED (IUU) FISHING

Pirate fishermen have a strong economic incentive: many species of fish, particularly those prone to over-exploitation (like striped bass) and in limited supply are of high value. On April 3, 2014, the U.S. Senate approved a pair of international treaties to combat IUU fishing, predominantly in the face of issues occurring in the North Pacific Ocean; ASMFC, in consult with NOAA Fisheries the Department of Commerce, can work to address IUU in the striped bass fishery without waiting for an Act of Congress.

NO COMMERCIAL QUOTA TRANSFERS

Section 3.1 of the *Striped Bass Draft Addendum IV* presents an option for commercial quota transfer between states. New York Sportfishing Federation is opposed to this change; of particular concern is the pressure this could apply to localized striped bass populations. When fish, particularly big fish, are congregating in certain coastal locations at particular times - late summer and early fall of Block Island, RI for example – taking unused quota from one state to maximize a 'time and area' harvest above and beyond allowable commercial harvest for another can have serious negative impact on the local stock.. Such activity could also have deleterious impacts on the recreational fishing community when those fish fail to make their way along the coast because of localized overharvest elsewhere.

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TIME & AREA CLOSURES

One topic of concern which was brought up at the September 16, 2014 ASMFC hearing on Long Island was with regard to the Hudson River breeding stock of fish. New York Sportfishing Federation would welcome a limited 'time and area' closure for the prime breeding grounds on the Hudson River during a two- to three-week period identified as the critical spawning time. As with portions of the Chesapeake (Susquehanna Flats) and Delaware (Salem River to Trenton) where a spawning area closure and 'catch and release' fishery (mandatory circle hooks) exists presently, we would ask ASMFC and the state authorities to consider such a change to conserve breeding fish in the Hudson River complex.

2.6 TIMELINE TO REDUCE F TO THE TARGET

To reiterate the position of the New York Sportfishing Federation in relation to the timeframe for reducing mortality, we do not support a modification of Management Trigger 3 under Section 4.1 in Amendment 6. While we appreciate the desire to "provide management flexibility" by spreading out required harvest reductions over time, New York Sportfishing Federation believes the deadline to address the conservation of striped bass is upon us now (if not already passed the date for action). We therefore support the one-year time frame and Management Trigger 3 which requires reducing harvest to a level at or below the target within one year.

While it's certainly good news that the striped bass stock is not overfished and overfishing is not occurring, the fact that the spawning stock biomass is approaching its overfished threshold and stock projections show it's likely to fall below the threshold in coming years is of great concern to New York Sportfishing Federation and our membership.

In response to these concerns, *Draft Addendum IV* proposes a wide range of options to broadly address several management objectives including conservation of the strong 2011 year class and conservation of large spawning fish to enhance the long term sustainability of the striped bass resource and the fisheries that it supports. We hope that ample consideration will be given to the position stated by the New York Sportfishing Federation, as we believe that giving serious attention to meeting the needs of the striped bass fishery in full as of 2015 will ensure a more healthy and robust fishery within the next three to four years.

Sincerely,



Jim Hutchinson, Jr.
President (718-896-3132)

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Article III – Our Purpose

- ⁱ To develop and promote programs designed to protect and conserve the marine environment and fisheries in the area of the eastern seaboard of the United States of America, including, but not limited to the southern part of New York State and its environs;
- To protect and promote the interests of the marine recreational fisher;
- To disseminate, to marine recreational fishers and the general public, information concerning proposed laws, rules and regulations and those already passed, which relate to the marine environment, fisheries, and marine recreational and commercial fishing;
- To distribute, to marine recreational fishers and the general public, research and other information concerning the marine environment, fisheries, and marine recreational and commercial fishing; and
- To support any other purpose that is consonant with the protection of the marine environment and the interests of the marine recreational fisher.

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