



Maryland Saltwater Sportfishing Association

"Maryland's Sportfishing Advocates"

Est. 1981

October 5, 2016

Secretary Mark Belton
Maryland Department of Natural Resources
Tawes State Office Building
580 Taylor Ave.
Annapolis, MD 21401

RE: Scoping Regulations – Gear – Commercial and Recreational Finfish Trotlines

Dear Secretary Belton,

On October 4, 2016 the Maryland Saltwater Sportfishing Association (MSSA) held its monthly Board of Directors meeting. At the direction of the Board, we would like to share with you and your fisheries staff some concerns and questions regarding the scoping of a finfish trotline fishery in the rivers within Maryland's portion of the Chesapeake Bay.

While the finfish trotline, also called a long-line, is currently being used in the ocean and in some parts of the Chesapeake Bay, we believe there are a lot of unanswered questions and concerns with respect to this gear type and Maryland's critical role in the health of the Atlantic striped bass stock.

As you well know the Maryland portion of the Chesapeake Bay produces 70-90% of the migratory striped bass from its river systems. Having such a large portion of the Atlantic Coast stock migrating and spawning in the Maryland Chesapeake Bay makes this even more complicated and difficult to introduce a new commercial fishery into its rivers. We would like to note that the MSSA opposes opening any striped bass fishing in the rivers during the spawning season.

Below you will find several questions and general concerns the MSSA has with this potential commercial fishery. We want to thank you in advance and hope we can work together to determine the best path forward.

- 1.) Has the Department, along with the Atlantic States Fisheries Commission (ASMFC) assessed the impact this gear type and the potential regulations would have on the striped bass spawning stock? What is the estimated by-catch and mortality rate of striped bass using finfish trotline?
- 2.) Does the Department have any concerns allowing this type of gear in the striped bass spawning rivers during the spawning season?



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- 3.) Has the Department determined the cost associated with introducing a new commercial fishery to its management (i.e. policing, man hours, etc)?
- 4.) Would introducing a new commercial fishery negatively impact other commercial and recreational fisheries occurring during the same time?
- 5.) Regarding the timing of the finfish trotline, what is the specific species being targeted and why is the suggested months of March-June the best time to conduct this type of commercial fishing?
- 6.) Does the Department have a position on allowing an unlimited number of trotlines and number hooks?
- 7.) Will the by-catch of striped bass be accounted in the commercial quota?
- 8.) Has the Department identified any other protected or endangered species that might be impacted by this new commercial fishery? If so, what species and what kind of impact?

In closing, the MSSA's questions noted herein, et al, will most likely be addressed by DNR compliance with §4-221 of the Natural Resources Article which states: "The Department shall consider relevant biological, ecological, and socioeconomic factors before adopting regulations under this subsection". Please advise about the status of this mandated undertaking and with whom DNR plans to share the results.

We would like to thank you and your staff in advance for addressing these very important concerns. Please feel free to contact us anytime to ensure we are all on the same page.

Respectfully,

Frank Holden
President

Respectfully,

Dave Smith
Executive Director

Cc:

Dave Blazer, Director of Fisheries – MD DNR