

This letter was received from 217 individuals.

Tina Berger

From: Robert Beal
Sent: Friday, July 20, 2018 3:03 PM
To: Comments
Subject: FW: Uphold menhaden fishing cap that is critical to coastal economies

-----Original Message-----

From: s_choroman@everyactioncustom.com [mailto:s_choroman@everyactioncustom.com]
Sent: Friday, July 20, 2018 3:03 PM
To: Robert Beal <Rbeal@asmfc.org>
Subject: Uphold menhaden fishing cap that is critical to coastal economies

Dear Executive Director Robert Beal,

The recreational fishing community is deeply concerned with the failure of Virginia's legislature to pass legislation consistent with the Chesapeake Bay reduction fishing cap established by the Atlantic States Marine Fisheries Commission (ASMFC) in Amendment 3 to the Atlantic Menhaden Fishery Management Plan. Given the potential economic risks associated with overfishing this cap, I write to encourage you to find Virginia out of compliance with Amendment 3.

Menhaden are a critically important food source for striped bass, bluefish, summer flounder, and other sportfish that keep Americans coming back to Atlantic waters and spending money in coastal communities. In Virginia alone, more than 830,000 anglers contribute at least \$2.1 billion annually to the local economy, supporting 18,600 jobs.

In November 2017, the ASMFC approved Amendment 3, which allows an eight-percent increase in the menhaden quota and places a reasonable cap on the level of menhaden harvested in the Chesapeake Bay. This limit, set at 51,000 metric tons, is greater than the average catch of the reduction industry in the Bay over the past five years and more than 30,000 metric tons higher than the 2017 Bay catch.

Given how important the Bay is to recreational and commercial fishermen in Virginia, Maryland, and all along the Atlantic coast, depleted menhaden populations in the Bay pose a real economic risk. Menhaden recruitment in the Bay has been low for more than 20 years, and many fishermen worry that striped bass, for which the Chesapeake is a critical nursery, are malnourished and diseased due to exploitation of Bay menhaden. The new Chesapeake Bay cap poses a minimal overall impact on the reduction fishery, but it is vitally important to the recreational and commercial fisheries that depend on menhaden being available in the Bay for bait harvest and support of predatory species like striped bass.

I respectfully request that the Commission find Virginia out of compliance with Amendment 3 at their August 7, 2018 meeting and, further, that the Commerce Department support this non-compliance determination.

Sincerely,
Mr. Steven Choromanski
10450 Buckeye St Littleton, CO 80125-9100 s_choroman@yahoo.com

From: foragematters@aol.com
To: [Max Appelman](#)
Cc: [David Blazer](#); mark.belton@maryland.gov; [Megan Ware](#); [Megan Ware](#); [Allison Colden](#); [Jason E. Mcnamee](#); [Nicole Lengyel](#)
Subject: menhaden assessment questions
Date: Tuesday, July 17, 2018 1:29:21 PM

Max.....menhaden coordinator ASMFC

I have read much of the material you sent me including the menhaden 2017 stock assessment and the 2017 Review for State compliance. I can't find answers to my question " just where are the menhaden schools the assessments indicates are out there" ?

These are the same basic unanswered questions that I had when I started this. Will you direct me to a member of the staff and/or one of the Commissioners that can answer or attempt to find answers to these questions.

Right now there are many undeniable signs that our Chesapeake Bay wild life are in bad shape .. The rock fish, for example ,depend on menhaden , both juveniles and adults . Rockfish are the species that most of the 400,000 Maryland salt water anglers depend on to enjoy their sport . As I understand it, and as I have experienced it personally, the last two Spring and Fall trophy rock seasons have been a failure . Our DNR just announced the blue crab population is down nearly 50% in two years. Maybe this could be explained by the number of rockfish being caught in our area that have empty stomachs or just a small crab in them. There are many many other signs of the decline in our Bay fish species . From what I see and hear the majority of our saltwater anglers have quit fishing and if not, take a trip knowing they will only catch a catfish , skate or undersized rock.

The two objective "surveys "of menhaden in the Maryland Bay are the juvenile seine surveys and the pound net harvest. The Chesapeake was once the major nursery for juvenile menhaden on the Atlantic coast, juvenile menhaden that supplied the protein and energy that our young rockfish need to survive and flourish..that juvenile index has been pitifully low for years .I was told the pound net harvest last year showed a sharp drop. Those are facts.

As you know Rhode Island relies on weekly aerial surveys of their menhaden schools to manage menhaden, to count for abundance. From one of the spotter plane log sheet there were 240 schools seen in that small bay one day in June of 2014, the total exceeded 5,000,000 lbs that day . Right now there are very few menhaden in Narragansett Bay and the purse seiner has gone elsewhere . I see in the ASMFC State Compliance Report from 2017 page 10 that the Reduction Fisheries landings in the Virginia Bay were 20,000mt in 2017 which is less that 25% of the Cap plus "rollover" What are the obvious inferences that are being drawn by the ASMFC from that statistic ? How can that situation be reconciled with any thought the menhaden are stable or increasing so far as Maryland and Virginia are concerned ? Isn't it obvious there are drastic changes going on that are not being accounted for ? Isn't it equally obvious the Commission is allowing more and more fish to be taken from a shrinking population coming to Maryland and Virginia ?

We have been flying the Virginia Bay since June . We are hopeful of starting on the Maryland Bay in the near future and building this effort into a weekly survey plan that will yield useful data for the ASMFC in the future , however it is the present I hope is of very real concern to the assessors and the Commission. Perhaps we need to do some thinking out side the box.

As far as the Chesapeake Bay is concerned the Questions remain the same:

- (1) After the reduction fishing begins each year what real evidence is there that Maryland receives its " fair, equitable share " of menhaden as required by Section Six paragraph (7) of the ASMFC Charter?
- (2) What is the best estimate to date of the amount of menhaden that Maryland's fish and total Bay

wild life need to sustain themselves / grow to abundance in ; a year and in the months of the menhaden season ? Same question for Virginia.

(3) What is the best estimate from all sources available to you of the total amount by weight or number of schools of menhaden that make it from Virginia into Maryland on a monthly basis during the menhaden fishing season?

(4) Using the information you have available what is the usual estimated volume of menhaden or % of menhaden that circulate from the Maryland Bay during the fishing season that are caught in Virginia and thus never return to Maryland.

(5) Considering the more recent menhaden biomass assessment of over 1,000,000 mt is that an estimate for the Atlantic Coast off shore stock or the total stock of menhaden in the Atlantic and in the bays and rivers etc ? If for everything then what is the best estimate of the Atlantic stock ?

(6) Joseph Smith in his article on the Reedville fishery in Marine Fisheries Review (p.7) found that the usual catch size of schools in the Atlantic was from 15-30 t , at least in 2009 . Using that as a basis to start with , I would like to sit down with one of the staff to discuss if it is possible to translate the Atlantic assessment mentioned in (5) into the expected number of menhaden schools that should be in the Atlantic so the public and the Commissioners can determine if

the assessment is in the ball park. I believe 100s of thousands of Marylanders and Virginians want and deserve answers to the Questions we have asked . These questions , I believe, are the same basic ones the Menhaden Board promised to answer more that ten years ago !

I am told by people that know that at this time of the year the Atlantic menhaden schools tend to be found from one mile to three -five miles from land . That they tend to be nearest to land in the morning and work off during the day. If these fish are there in anywhere near the amount the assessment says they are they would not be very hard to find. If you or one of the other Commissioners is willing to take some steps toward verification we would be interested is helping in any way we can.

Could you please make this email part of the material the stock assessment subcommittee will see as I would like to see if they will consider the thoughts about verification Thank you

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