

October 24, 2017

Megan Ware, Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission (ASMFC)
1050 North Highland Street, Suite 200 A-N
Arlington, Virginia 22201

Re: Menhaden Amendment 3

Dear Ms. Ware, Director Beal, Chairman Ballou, and members of the Menhaden Management Board,

As more than 180 organizations, businesses, and individuals representing hundreds of thousands of members, business patrons and communities in every Atlantic state, we support the immediate adoption of ecological reference points in Amendment 3 to the Interstate Fishery Management Plan for Atlantic Menhaden. Specifically, we support Section 2.6 “Option E: BERP Workgroup Continues to Develop Menhaden-Specific ERPs with Interim Use of 75% Target, 40% Threshold.”

Atlantic menhaden play a vital role in the marine food web as forage fish that feed a multitude of species including gamefish like striped bass, bluefish, king mackerel, and tarpon; marine mammals such as whales, dolphins, and seals; as well as birds including osprey, bald eagles, common loons, and brown pelicans. As key prey for these and other species, Atlantic menhaden are a critical backbone for our coastal communities, and the many businesses and wildlife-viewing opportunities that they support on and off the water.

Managing Atlantic menhaden through Option E prioritizes their role as forage fish, allowing the resource to continue to grow and increase in value to recreational fishing, commercial fishing, and wildlife and tourism businesses. In fact, with over 28 million resident and nonresident wildlife watchers generating over \$17 billion for the Atlantic states, ecological management of menhaden can help to drive healthy marine ecosystems as well as robust economies.¹

Amendment 3 should follow the best science available today. Option E represents the best available science and is most consistent with the Menhaden Management Board’s long-standing commitment to ecological management. Option E sets a target of 75% unfished biomass and a threshold of 40% unfished biomass, providing flexibility to the Board to manage to the target over time, while also managing the resource conservatively, combining the best features of Options C and D. Furthermore, Option E sets the Board up for long-term success, allowing for management of this resource towards a target, while limiting the potential of overfishing from an ecosystem perspective.

Amendment 3 also presents an opportunity to protect The Chesapeake Bay through a catch cap on the active reduction fishery in those waters. We recommend ASMFC adopt “Option B: Cap Set At 51,000 mt” and “Sub-Option B: No Rollover of Unused Cap Permitted” to adjust the cap to better reflect recent landings, following a precedent set by ASMFC in its adoption of catch limits and subsequent adjustments, while protecting an important nursery for menhaden.

This is a historic opportunity to invest in the future of our Atlantic fisheries and Amendment 3 would set a precedent for the management of other species nationally. **Please adopt ecological reference points now by passing Section 2.6, Option E, which is based on the best available science, provides for the needs of predators, and is a commonsense way to manage this valuable public resource to the benefit of every Atlantic state from Maine to Florida.**

Sincerely,

¹ U.S. Department of the Interior, U.S. Fish and Wildlife Service, and U.S. Department of Commerce, U.S. Census Bureau. 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation.





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