



CCA Maryland

Public Information Document Guidance for Amendment 3 to the Atlantic Menhaden FMP

The Atlantic States Marine Fisheries Commission (ASMFC) has released the [Public Information Document \(PID\) for Draft Amendment 3](#) for public comment. ASMFC is requesting comments on potential changes to the Interstate Fishery Management Plan (FMP) for Atlantic Menhaden to be considered in Amendment 3. CCA Maryland encourages all anglers to comment on any of specific issues either at the public hearing and/or by letter to ASMFC.

The Maryland meeting is:

Maryland Department of Natural Resources

December 7, 2016; 6 PM

Calvary United Methodist Church
Fellowship Hall 301 Rowe Boulevard
Annapolis, Maryland
Contact: [Lynn Fegley](#) at [410.260.8285](#)

Comments at a meeting should be limited to 3 minutes.

Written comments may be submitted by **5:00 PM January 4, 2017 to:**

Megan Ware
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201
Fax: (703) 842-0741
comments@asmfc.org (subject line: Menhaden PID)

Allocation is an important part of menhaden management and [NOAA Guidance](#) states that:

"Conservation and management measures shall not discriminate between residents of different states. If it becomes necessary to allocate or assign fishing privileges among various United States fishermen, such allocation shall be (a) fair and equitable to all such fishermen; (b) reasonably calculated to promote conservation; and (c) carried out in such manner that no particular individual, corporation, or other entity acquires an excessive share of such privilege."

All of the issues included in the PID are important to menhaden management. The following is a guide to issues 1, 6, and 8.

Issue 1.: Reference Points

Ecological management is right for menhaden, and Issue 1, Option D is the best solution now.

The current approach that ASMFC uses for setting catch limits is wrong for menhaden, because it is based on a single species approach and ignores their importance the ecosystem as a forage species. The best available science supports Option D: managing to a target of 75 percent of the total menhaden biomass before large scale fishing, so menhaden can fulfill their role in the ocean food web, and ensure the population never drops below 40 percent. Science tells us that this amount would vastly reduce the impact of menhaden fishing on predators that eat menhaden, and help menhaden continue to expand back into the northern and southern extents of their former range; while still providing ongoing substantial yields to fisheries.

Important predators need menhaden. Nearly all near shore predators eat menhaden at some point of the year or their life cycle. Option D recognizes the importance of menhaden to the overall system, and allocates an acceptable level to be left in the water to play out their natural role.

Conservation benefits everyone. Option D will enable the menhaden population to continue to grow, while increasing menhaden's value to recreational fishing, commercial seafood, and tourism businesses that all depend on this important fish, and its predators.

ISSUE 6: Incidental Catch & Small Scale Fishery Allowance

Count all the catch. The reallocation options in Amendment 3 should provide ample quota to all of the small scale bait fisheries that are utilizing incidental catch allowances under current management. The menhaden fishery is the largest on the

east coast, and even the smallest percentages add up to a large amount of catch; which must be counted against the quota.

ISSUE 8: Chesapeake Bay Reduction Fishery Cap

Protect the Chesapeake Bay nursery.

The Bay remains the primary nursery for the coast-wide menhaden population, and the area where the majority of catch is concentrated. The cap should remain in Amendment 3, but should be cut in half to be 96 million pounds, closer to current bay harvest levels, to protect against localized depletion and provide for the many predators that depend on menhaden in the Bay.