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**RECREATIONAL ANGLERS  
WORKING TO CONSERVE, PROMOTE, AND ENHANCE MARYLAND'S  
MARINE RESOURCES**

December 19, 2016

The Honorable Lawrence J. Hogan, Jr.  
Maryland State House  
100 State Circle  
Annapolis, MD 21401-1925

Re: Oysters & Dredging Man O' War Shoal

Dear Governor Hogan:

As you know, certain representatives of the commercial public oyster fishery have been advocating for the industrial dredging of Man O' War Shoal, a natural oyster bar in Baltimore County, to recover oyster shell to place elsewhere in the Bay. We are writing to correct the record they've presented, to highlight the fact that the majority of commercial oyster industry groups oppose dredging Man O' War Shoal, and to ensure that you're aware of "the rest of the story."

CCA Maryland is a non-profit conservation group representing approximately 2,000 of Maryland's recreational anglers. We are deeply engaged in advocacy and education efforts aimed at conserving and enhancing Maryland's saltwater fisheries. Our volunteer members work regularly and cooperatively with DNR and its dedicated and professional staff in addressing the many difficult management challenges it faces. CCA Maryland believes that we have an obligation to base our fisheries policies on the best available science and then when in doubt, conservation-minded principles should rule the day.

Dredging Man O' War Shoal to acquire shell would represent only a short term solution for the industry. Once exhausted it would still be left without a further supply of shell. You should know this scenario has already played out in Maryland and certain parties seem to have learned nothing from that experience. From 1960 until 2006, DNR dredged more than 185 million bushels of buried oyster shells from bars in the upper bay and moved them by barge elsewhere to support the industry. When the major shell deposits were exhausted and public opposition grew to new permits and the damage, this "repletion program" ended. After 46 years of great environmental damage from this dredging at great taxpayer expense, the result didn't lead to the long-promised "restoration" of the native oyster bars (as is being promised now by supporters of dredging), but the loss of the upper bays natural oyster bars

and the substrate they provided for natural oyster reproduction, fish, and crabs. Can we learn nothing from this experience?

A large body of evidence has developed in recent years documenting that oyster will set quite well on many alternative materials such as stone, concrete, marl and clam shells. These materials are being used for oyster restoration in sanctuaries but the public oyster industry opposes their use.

This is a highly controversial issue that has been vigorously debated for many years. Did you know that Man O' War Shoal is one of the more popular recreational fishing locations for families in Baltimore County and that oystermen still harvest living oysters off the Bar? Did you know that a joint federal-state public hearing on the dredging permit application in eastern Baltimore County this past February, 16 of 17 oral commenters opposed the permit (including Robert T. Brown, representing the Maryland Watermen's Association.) With written comments, 46 were opposed to dredging the shoal and none were submitted in favor.

The bottom line is that no matter how well intentioned, without a clear and achievable purpose for such activity, a funding plan and binding financial commitment to see that plan through, and a strong demonstration that the greater goal of restoring oyster populations Bay-wide would be served by such severe action, CCA Maryland has not and cannot support or condone any dredging of fossil shell from Man O' War Shoal.

Dredging Man O' War Shoal would effectively destroy a natural oyster reef structure in the upper bay that is used by many citizens and commercial oystermen. Dredging the Shoal would provide short-term support for a few select commercial and business interests while creating unrepairable harm. There are better and more sustainable ways to solve the problems facing our industry and the communities they support, such as considering how we might keep oyster shell harvested in Maryland in our state for reuse in our own fishery.

Thank you for noting our concerns about this issue.

Sincerely,



Frank Bonanno  
Chairman



David Sikorski  
Chair, Government Relations Committee

cc: Secretary Mark J. Belton, Department of Natural Resources  
DNR Oyster Advisory Commission Co-Chairs  
Sam Malhotra, Chief of Staff  
Jeannie Haddaway-Riccio, Deputy Chief of Staff