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

May 11, 2018

Via email only to: fisheriespubliccomment.dnr@maryland.gov

RE: Comments for Proposed Changes to Regulations for Yellow Perch Commercial Fishery

1. The expansion of the commercial fishery to include the Choptank and Nanticoke Rivers:

CCA Maryland Position: OPPOSE

The opening of the commercial fishery in the Choptank and Nanticoke Rivers should not occur unless and until DNR Fisheries Service provides more specific information as to how this fishery would be managed in these two tributaries. The sustainable management of the yellow perch is of the utmost importance to CCA Maryland. Environmental conditions directly affect the successful recruitment of yellow perch. Many Maryland river systems have majorly depressed yellow perch populations at this time and strong caution should be used when opening rivers or expanding the current harvest of yellow perch.

Recreational yellow perch fisheries provide important and necessary revenue for local tackle shops at a time of year when income from hunting has ended. The yellow perch run is often the first business these shops see in the late winter and important to their success. Any changes in the current fishery should take into account the potential negative economic impacts to the recreational sector.

Many recreational anglers spend their spring pursuing yellow perch, but anecdotal evidence from recreational anglers and local tackle shops suggests a considerable decline in yellow perch being caught in these rivers in recent years.

CCA Maryland respectfully requests further information regarding the following questions:

- What measures will prevent the bycatch fishery from becoming a directed fishery and what process was used to determine the proper level of bycatch allowance for these currently closed rivers?
- Has DNR conducted a river specific stock assessment to determine the status of the stock? How has the stock condition changed since the closing of previous commercial fisheries in these rivers?



- If a stock assessment justifies opening these rivers, any TAC assigned would have to be allocated 50/50 between the commercial and recreational fisheries. Has this been taken into consideration when selecting a proposed bycatch limit of 2500lbs?
 - If approved, what efforts will be made to monitor bycatch landings and what funding will support necessary monitoring and/or the purchase of tags for the fish?
2. Remove the provision in the current regulations that requires a department staff person to be present during the sale of yellow perch in the live market:

CCA Maryland Position: OPPOSE

DNR staff should remain as an independent witness to verify the quantity of live yellow perch sold. DNR Staff have indicated that they have never missed a request to witness live sale, and unless further proof is provided of major hardship to the industry, this oversight should continue.

3. Open the month of December for commercial harvest:

CCA Maryland Position: OPPOSE

Budgetary and personnel shortfalls at NRP already limit the on-water enforcement of our natural resources laws. Any extension of the commercial yellow perch season would further dilute the already small number of field officers available. Given the enforcement burdens during both hunting and oyster seasons, no further fisheries should be opened unless proper monitoring and enforcement coverage can be demonstrated.

To discuss our position on these matters further please contact David Sikorski, Executive Director at davidsikorski@ccamd.org or 443-621-9186