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## RECREATIONAL ANGLERS WORKING TO CONSERVE, PROTECT, AND ENHANCE MARYLAND'S MARINE RESOURCES

## Via email only

August 1, 2016

Mr.David Blazer Director of Fisheries Maryland Department of Natural Resources 580 Taylor Ave. Annapolis, MD 21401

RE: Setting Atlantic Menhaden Harvest Specifications for 2017

## Director Blazer:

This Wednesday, the Atlantic Menhaden Management Board will set specifications for the 2017 fishery and provide further guidance to its Plan Development Team on Draft Amendment 3. These two issues are of the utmost importance to the Coastal Conservation Association Maryland. We urge you to support the Board's commitment to managing menhaden for predators, allow conservation to continue working, and to avoid the impacts of regulatory whiplash. Be cautious and measured in your setting of the specifications and stay on the schedule previously established for the approval and implementation of Amendment 3.

Any increase in quota in 2017 without an understanding of the impacts to the ecosystem is contrary to the Commission's now long-standing commitment to manage menhaden based on its role as forage through Amendment 3. Furthermore, an increase will go primarily to Virginia and New Jersey, will not address shortages in the other states and in the bait market, and will not sufficiently help those states that are exceeding their allocations. States already have the ability to share quota to address their bait needs, and should exercise this option.

Any attempt to alter the current allocation formula through an addendum for 2017 presupposes that such a formula could be easily agreed to. Its development and consideration would further delay implementation of Amendment 3, which already considers new allocation schemes, but only after the much anticipated socio-economic study is completed. Amendment 3 is the right vehicle to address allocation, together with developing ecological reference points, not through an addendum now.

During this week's discussions, we ask that you consider that all of the Technical Committee's projections are based on a single-species model and assessment and the impacts of any increase in catch on predators like striped bass and weakfish in the system are unknown. Since no one has identified what a TAC would look like under ecological reference points, significant regulatory whiplash could result. There simply is no new science to justify a catch increase and there are good reasons to be cautious. You have no new data since the 2015 benchmark assessment and the troubling signs of low abundance and recruitment remain. In fact, the Technical Committee continues to inform that recruitment and fecundity are not expected to increase in 2017. With a new assessment is coming in 2017 that should inform Amendment 3, the board should set 2017 fishing levels consistent with 2016 and focus on the broader improvements in menhaden management through the Amendment 3 process.

We urge you to stay the course with Amendment 3 and let menhaden fully recover to their historic range, and fulfill their vital role as a key forage species in the region.

Sinceret

David Sikorski

Government Relations Committee- Chair

CC:

Mark Belton, Secretary MD DNR Lynn Fegley, MD DNR Rachel Dean, ASMFC Gov. Appointee Bill Goldsborough, ASMFC Legislative Appointee.(Proxy)