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Saving a National Treasure

April 29, 2015

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Robert H. Boyles, Jr.
Chairman, Atlantic Menhaden Management Board
Atlantic States Marine Fisheries Commission
1050 N. Highland Street, Suite 200 A
North Arlington, VA 22201

RE: Possible Actions by the Menhaden Management Board at its May 5 Meeting

Dear Mr. Boyles,

On behalf of the Chesapeake Bay Foundation (CBF), I wish to provide the following recommendations to the Atlantic States Marine Fisheries Commission's (ASMFC) Atlantic Menhaden Management Board (Board) prior to its May 5, 2015 meeting. CBF supports the Board's decision to adopt the new benchmark stock assessment for management at its February meeting but we believe the job is not complete until Ecological Reference Points (ERPs) are adopted. The Technical Committee should be commended for its robust efforts in completing the assessment and peer review. Although CBF is encouraged by the results of the assessment, there is still important work to be done by the Board to ensure menhaden fulfill their critical role as a forage fish. As noted by the Board, the new stock assessment is a "single-species assessment" and therefore does not account for the important ecological role menhaden play as forage for a wide variety of fish, birds, and marine mammals.

Although menhaden are managed at the coastwide level, it is important to note that the reproductive success of the menhaden population in the Chesapeake Bay region, where the fishery is concentrated, has been poor for the past 20 years. The lack of juvenile menhaden that are so important to the Bay's ecosystem has been linked to negative consequences for commercially important species such as striped bass. In addition, the abundance of menhaden noted in the assessment is lower than when the fishery was declared overfished by the ASMFC in the 1960s. **For these reasons, CBF recommends no increase in harvest quotas be considered until interim ERPs are adopted or ASMFC employs other means to ensure that an increase will not undermine menhaden's ecological role.**

In order to improve the abundance of menhaden and ensure menhaden can maintain their ecological role as a forage fish, CBF requests that the Board work with the menhaden Technical Committee to hasten its development of ERPs which should allow for an ecosystem-based approach to menhaden fishery management.

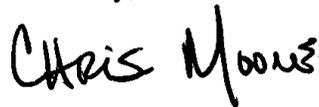
Robert H. Boyles, Jr.
Chairman, Atlantic States Marine Fisheries Commission
April 29, 2015
Page Two

Since adoption of Amendment II, fisheries managers have been provided not only with better biological data on this species, but also better harvest data on many sectors of the fishery. The harvest data has highlighted the need to review the current allocation scenario to ensure that it is representative of the best available information on historical landings of menhaden. CBF, therefore, urges the Board to initiate an addendum or amendment process, seek public input on the current allocation scenario, and consider possible revisions that would better reflect historical landings and be more equitable for the menhaden bait industry.

Finally, CBF urges the Board not to increase the Chesapeake Bay reduction fishery harvest cap that limits the landings of menhaden within the Bay. CBF believes this conservation measure serves as an important tool in helping to ensure harvest does not significantly increase from Virginia's portion of the Bay and cause localized depletion of the forage base.

Thank you for your time and consideration of these recommendations. We look forward to continuing our work with ASFMC to build a healthy menhaden population and fishery.

Sincerely,

A handwritten signature in black ink that reads "Chris Moore". The signature is written in a cursive, slightly slanted style.

Chris Moore
Virginia Senior Scientist

cc: Ann Jennings, Virginia Executive Director, CBF
Mike Waine, AMSFC Senior Fishery Management Plan Coordinator