

Virginia Saltwater Sportfishing Association

Suggest Talking Points on Amendment 3 for Atlantic Menhaden

There is a series of public hearings on menhaden being held by the Atlantic States Marine Fisheries Commission (ASMFC). We need as many anglers and conservation minded individuals to show up at one of the Virginia public hearings and sound off. We believe ASMFC will do like last year and take input issue by issue so our recommended talking points are organized in that manner. We have done our best to figure out what will be in the best interest of the recreational angling community so we suggest using our talking points at the public hearings. Feel free to download and read the entire Amendment and formulate your own comments if desired.

http://asmfc.org/uploads/file/598dd1b9AtlanticMenhadenDraftAmendment3_PublicComment.pdf

Suggest you print these talking points and attend the meeting closest to your location. We have until October 20th, 2017 to get in our written comments so we will send that out later.

The Public hearings are as follows:
Potomac River Fisheries Commission
September 19, 2017; 6PM
Carpenter Building
222 Taylor Street Colonial Beach, VA

Virginia Marine Resources Commission
September 20, 2017; 6 PM
Northumberland High School
201 Academic Lane Heathsville, VA

Virginia Marine Resources Commission
September 21, 2017; 6PM
2600 Washington Avenue,
4th Floor Newport News, VA

We will keep you abreast of this amendment on this VSSA page. Suggest you bookmark this to keep abreast. Thanks for your continued support.

<http://joinvssa.org/action-plan/menhaden/>

Amendment 3 to the Interstate Fisheries Management Plan for Atlantic Menhaden is very complex. ASMFC is offering a number of options for managing this fishery that the average fisherman may find overly difficult to comprehend. There are a total of eight (8) issues being addressed. VSSA believes the three most important issues are:

1. **Ecological Reference Points** (Issue 2.6.4) VSSA supports Option E implementing an ecosystem management approach utilizing Ecological Reference Points (ERP's) now, rather than wait.
2. **Quota Allocation** (Issue 4.3.2) VSSA supports giving each of the states at least 2% of the Quota. Virginia's current allocation of 85% is too much for one state.
3. **Bay Cap** (Issue 4.3.7) VSSA supports reducing the Chesapeake Bay cap.

Following is more detail on each of the issues presented in Amendment 3 and VSSA's position

2.6.4 ISSUE: Ecological Reference Points

This is one of the most important issues addressed in this amendment. The ASMFC is presenting five options for managing menhaden. Option A uses the current single-species management, i.e. the status quo, and Option B is waiting until a technical committee finishes menhaden-specific ecological reference points. Options C, D, and E would manage menhaden under scientifically appropriate rules for managing forage fish until the technical committee is finished, which could be several years down the line. Now is the time to establish reference points through Option E.

- **VSSA supports, Option E as the best solution. Ecological Reference Points for management need to be implemented now.**

The current approach that ASMFC uses for setting catch limits is wrong for menhaden, because it ignores their importance to the ocean food web and for other fisheries. The time has come to move away from "single species" management and adopt an ecosystem approach. The best available science supports Option E: managing to a target of 75 percent of the total menhaden biomass before largescale fishing. It is crucial for a key forage species like menhaden to be managed to maintain the population at the target level so menhaden can fulfill their role in the ocean food web, thus ensuring the population will never approach the overfished threshold of 40 percent. Science tells us that this amount would vastly reduce the impact of fishing on menhaden predators, 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.

4.3.1 ISSUE: Total Allowable Catch (TAC)

ASMFC has presented the methodology for computing the TAC. VSSA simply believes the entire catch should be counted regardless of the method used. Current regulations

contain a bycatch loophole that allows several million pounds to be caught and not counted towards quota.

- **VSSA believes the entire catch should be counted regardless of the method.**

See also issue 4.3.6 Incidental bycatch. Moreover VSSA supports the inclusion of the indecision clause contained in 4.3.1.1 that says “If the Board is unable to approve a TAC for the subsequent fishing year by December 31st of the current year, the TAC for the subsequent year will be set at the current year’s TAC”

4.3.2 ISSUE: Quota Allocation

The current quota allocation for menhaden gives more than 85% of the fishery to Virginia, leaving the remainder of the states to split the rest. This is inherently unfair and must be fixed. ASMFC presents several options for distributing the quota.

- **VSSA supports Option C, Jurisdictional Allocation with a Fixed Minimum, and Sub-option 3 allocating a fixed minimum of 2%, are the best options on the table. We believe an even larger reallocation is more appropriate.**

As menhaden populations recover, fish are showing up again in places like Maine, Rhode Island and New York where they used to be abundant. The current allocation is unfair, and Amendment 3 is a chance to establish a more equitable distribution. Paired with ecological management, a quota reallocation could mean both more fish in the water while giving bait fishermen more fish to catch. That is a win-win for recreational and commercial fishermen – outside of Virginia. It is also a potential benefit to the ecosystem as it will spread catch out along the coast. Also, states that choose not to use their entire quota can choose to allocate their surplus to the predators that rely on menhaden as forage.

Regarding the Allocation timeframe, the Historic landings of menhaden have varied over the years due to changes in fishing effort, changes in the geographic range of the fish population, and spotty reporting. VSSA believes an ideal allocation scenario would consider the catch over more than a century of time.

4.3.3 ISSUE: Quota Transfers

The ASMFC is trying to determine what to do if a state reaches or approaches its quota and there is unused quota in other states.

- **VSSA does not support Quota transfers.** VSSA believes quota transfers would potentially allow and/or encourage trading among the states.

4.3.4 ISSUE: Quota Rollovers

Should states be allowed to rollover unused quota to the next year?

- **VSSA does not support Quota rollovers.** Rollovers may lead to unintended consequences with regard to localized depletion or quota allocation on a year to year basis.

4.3.5 ISSUE: Incidental Catch & Small Scale Fisheries

The current management approach exempts bycatch from counting towards the quota, thus allowing millions of pounds of catch to go uncounted.

- **VSSA supports Option F—counting all the catch regardless of the method.**

The bycatch provisions are a result of trying to accommodate fishing methods under the current allocation scenario. By more fairly distributing quota, all fishing methods can be counted under the catch limit.

4.3.6 ISSUE: Episodic Events Set Aside

This set aside is designed to accommodate unusually large amounts of menhaden in a state when the quota has already been reached.

- **VSSA supports Option C. VSSA believes now is the time to end the episodic events set aside.**

Episodic events are becoming more likely to occur as the stock recovers. A better allocation across states will reduce the need for this set aside.

4.3.7 ISSUE: Chesapeake Bay Reduction Fishery Cap

The Chesapeake Bay is an important nursery for menhaden that eventually migrate across the coast. The cap on this area is to prevent overfishing of young menhaden.

- **Option B – VSSA supports reducing the cap for the Chesapeake Bay to 51,000 Metric Tons, and sub option B no rollover of unused cap.**

Over the past several years, the catch in the bay has fallen drastically. This option provides an opportunity to further protect the nursery. Setting the cap equal to recent Bay landings follows the precedent set by the Commission in its adoption and subsequent adjustments. Moreover, quota rollovers in the Chesapeake Bay should not be allowed.