

## Talking Points for ASMFC Atlantic Menhaden Public Hearings:

### Draft Addendum Options (overview)

- I support maintaining the 0.5% fixed minimum quota for each state, with allocation based off landings data from the 2018, 2019, and 2021 timeframe.
- I support increasing the episodic events set-aside program to 5%.
- I support permitted gear types of the IC/SSF provision including only non-directed gears, a 3,000 lb/day limit for small-scale gear types, and counting all IC/SSF landings against the coastwide TAC.

### Additional Concerns

- I believe that the fishery should be distributed throughout the menhaden's geographic range, not with 78% of the entire coastwide catch concentrated around Virginia, especially in sensitive estuaries like the Chesapeake Bay.
- The fishery should not be dominated by industrial fisheries, but rather enable the growth of smaller-scale and local commercial and recreational fisheries, especially in the Northeast.
- I am concerned that because the latest stock assessment update does not include updated data on species which were used to create the ERP targets and thresholds, the setting of the TAC for 2023 may disregard vital ecosystem effects.
  - The 2021-2022 TAC of 194,400 mt was set with the intention of keeping the fishery below the F target and above the SSB target set using ERP criteria, however, those criteria only use species data until 2017.
  - Therefore, the latest stock update does not consider the effects of the decline of the Atlantic herring stock, for example, which is a primary alternative prey species to menhaden, and remains overfished at just 21% of its target biomass.
  - Within the ecosystem, the depletion of the Atlantic herring resource has likely had wide-ranging effects on both prey and predators since 2017, and these impacts will continue as the resource slowly rebuilds.

### Draft Addendum Options (specific)

- 3.1.1: Allocation options for addressing the minimum allocation: **Option A**
  - The status quo option which allocates a 0.5% fixed minimum quota to each state is the only equitable utilization of a minimum quota system for each state participating in the interstate fishery management plan.
  - The alternative option penalizes states with low landings and does not account for the benefits that leaving fish in that states' coastal waters could have on their other fisheries (ie: forage for predators, etc.).
  - States who wish to dedicate their quota to striped bass productivity, for example, should be able to do so, as these fisheries are closely linked coastwide.
  - The alternative option assumes that states with low current landings will not increase their landings in the future, which goes directly against the objective of this section: to adjust allocations to align with the availability of the resource, and to reduce quota transfers.
- 3.1.2: Timeframes to base allocating the remaining TAC: **Option 2**

- The current TAC allocation timeframe uses 2009-2011 landings data, which does not reflect the current stock distribution.
- Using landings data from 2018, 2019, and 2021 most accurately reflects the current state of the fishery and the availability of the menhaden resource and best meets the addendum objectives.
- 3.2.1: Increase the Set-Aside: **Option 2 (Sub-Option 1)**
  - Increasing the flexibility that the Northeastern states have through increasing the EESA program to 5%, will give them more autonomy within their states' fisheries and minimize in-season disruptions.
- 3.3.1: Timing of IC/SSF Provision: **No preferred option**
  - The options within this section would impact states differently based off other final option choices.
  - It is not clear how this will affect the equitability of each state's fishery if they divide their allocation by sector, fishery, or gear type.
- 3.3.2: Permitted Gear Types of the of IC/SSF Provision: **Option 3**
  - Choosing this option will keep only non-directed gears within the IC/SSF provision, addressing the volume if IC/SSF landings, and making the provision more straightforward regarding gear types.
  - Gear types such as floating fish traps should not be considered together with purse seines, even if the purse seine is smaller than 150 fathoms.
  - This option will create the most equitable definition of the provision's creation in the first place and return it to its original Amendment 2 intentions.
- 3.3.3: Trip Limit for Directed Small-Scale Fisheries of IC/SSF Provision: **Option 3**
  - If Option 3 to Section 3.3.2 is chosen, then this section is no longer necessary.
  - However, if another option in Section 3.3.2 is chosen, creating a 3,000 lb/day trip limit for small-scale gear types will achieve the objective of this section: to sufficiently constrain landings to achieve overall management goals.
- 3.3.4: Catch Accounting of IC/SSF Provision: **Option 2**
  - In 2021, IC/SSF landings were 13.2 million lbs or 3.1% of the coastwide TAC.
  - IC/SSF landings should be evaluated against the TAC because while they only account for a small portion of the total, they are still landings within the fishery, and should be considered as such, just as directed landings are.