COASTAL CONSERVATION ASSOCIATION VIRGINIA

Ensuring the health and conservation of our marine resources and anglers' access to them

September 30, 2026
Mr. James Boyle
FMP Coordinator Atlantic States Marine Fisheries Commission
1050 N. Highland Street, Suite 200A-N
Arlington, Virginia 22201

Dear Mr. Boyle:

On behalf of the members of Coastal Conservation Association Virginia, please accept the following preferred options for Draft Addendum II to Amendment 3 to the Interstate Fishery Management Plan for Atlantic Menhaden - Modifying the Chesapeake Bay Reduction Fishery Cap.

We support a proactive, precautionary, and adaptive management approach for Atlantic menhaden that responds to the concerning changes in available abundance of menhaden occurring in Chesapeake Bay and the effect this has on the broader ecosystem and sportfishing economy.

We recommend that the Atlantic Menhaden Management Board (Board) adopt the following options currently under consideration:

- The Chesapeake Bay Cap should be set at a different amount than is currently specified. We recommend **Option C - Link the Chesapeake Bay Cap to the coastwide total allowable catch (TAC).**

- The Chesapeake Bay proportion of the TAC should be **Option C1E - Set the Bay Cap at 13.6% of the coastwide quota, initially equivalent to a 50% reduction from the current cap.**

- The upper and lower limits of the Bay cap would be best served by **Option C2A - Establish 51,000 metric tons as the upper limit, with no lower limit.**

- The Bay Cap should be divided into **3 quota periods** to moderate reduction fishery landings in the beginning and middle of the reduction fishery. This would be best accomplished by **Option B2 - Allocate 25% of the Bay Cap to the first quota period, 25% to the second, and 50% to the third**.

- Overages and underages within a quota period would be best addressed by **Option B - Require quota-period overage paybacks while allowing unused quota to roll into the final period of the same fishing year.** Any underage in Quota Periods 1 or 2 should be rolled into Period 3 of the same fishing year. **Any underage in Period 3 should not roll over into a future fishing year**, an approach that is consistent with precautionary management.

- The ASMFC Board should set a timeframe for periodically revisiting the Bay Cap measures. We support **Option B - Require ASMFC to revisit the Chesapeake Bay Cap every three years.** However, this requirement should be modified to include **"or sooner as may become necessary by changed conditions."**

These options provide a reasonable balance among competing interests under current resource conditions. Their adoption would reduce ecological and economic risk while allowing management to adapt as new Chesapeake Bay-specific science becomes available.

While studies to assess menhaden abundance in Virgina's Chesapeake Bay waters are an important next step to guide management, we encourage the Board to act now to strengthen precautionary measures to mitigate the risk

of long-term harm to the menhaden predator-prey relationships in the Chesapeake Bay ecosystem. This includes a return to managing the coastwide TAC at levels that will achieve a 50% or greater probability of achieving ecosystem-based fishing mortality target.

Board members must also recognize the ongoing economic effects associated with this species including not only those that pertain to the coast wide menhaden fishery, but also to the sportfishing and commercial fishing sectors that rely on predators which rely on menhaden as forage or menhaden as bait.

Overall, the extraction of menhaden in Virginia Bay waters by intense, concentrated commercial reduction fishery harvesting without a sufficient scientific basis to support such harvests exacerbates the risk of long-term harm to the food web and forage base-predator relationships in the Chesapeake Bay. Therefore, we respectfully request that the Board select the options we prefer as they strike a reasonable balance under the present circumstances among the competing interests in the Chesapeake Bay menhaden fishery. Adoption of these options would help mitigate the risk of adverse environmental and further economic effects.

Regards,

Robert Allen

Robert Allen
Chairman
Coastal Conservation Association Virginia