

From: [rr](#)
To: [Tina Berger](#)
Cc: [STEVEN G. BOWMAN](#); [PHILIP ZALESAK](#)
Subject: [External] material for meeting
Date: Friday, May 1, 2020 10:57:20 AM
Attachments: [Scan_0235.pdf](#)
[2020-04-21_214309 NOAA chart.pdf](#)

Tina Good morning.....I hope you are well. Can you check to make sure the 3 pages of the scans got to you and let me know.

I would like to make a comment or two to the Policy Board, the Commission Delegates and the members of the menhaden board, Menhaden Project, as we call ourselves, continues to gather data and other information on menhaden with a goal of restoring menhaden to Chesapeake bay to fulfill their ecological purpose.

When I listened in on Youtube to Steve Bowman's comments to the Virginia Marine Resources Commission members this past Tuesday I learned that the Virginia law that speaks to fisheries resource allocation (28.2-203) has a goal of " benefit to the Commonwealth, with particular reference to fishing for food production and to recreational fishing" Allocations shall be fair, promote conservation and "in a manner that no person acquires an excessive share". This, of course, in similar to Amendment 3, that in essence says you are to allocate the benefit of menhaden to where it does the most ecological, social and economic good.

We hope you will look at the three page attachment which addresses the question of benefits from allocation. The majority of the statistics on numbers of charter captains and finfish watermen etc. are the VMRC and MDNR data. Most of the economic impact numbers are from ASA/Southwick and the National Marine Manufacturers trade association (NMMA). Certainly this information needs refinement and I think most of the commissioners should be able to fill in the numbers of how what happens in Chesapeake bay affects their state. Conversely the benefits that would flow to all the people on the Atlantic coast if this resource was shared not wasted. The current allocation to Omega is destroying the ecology of Chesapeake, it is negatively affecting many hundreds of thousands people and businesses. The Omega company has no vested right to be preferred over the people of Virginia and

Maryland but, unfortunately, that is exactly what has happened. When a member of an organization is hurting the right thing to do is to focus the group's attention on the immediate problem and solve it. The path to do so was clearly laid out in Bob Beal's letter to Secretary Ross page three.

Thank you for taking the time. We will follow this up looking at protection for the early schools on menhaden needed to resupply the entire Chesapeake bay from the winter exodus. There are five purse seine bait boats and eight industrial size Omega boats targeting these relatively few fish. We believe this is gross overcapacity.

Thanks to all of you for your action in N.H. and staysafe.... Tom Lilly 443 235 4465

AMENDMENT 3 COMPARISON . We consider the number of people, jobs and businesses that are affected by whether menhaden are allocated to Omega Protein or to "user groups" three and four. These are the people , the jobs and businesses, that benefit by leaving menhaden in the water to feed and grow abundant and healthy fish

OMEGA	MARYLAND	VIRGINIA	BENEFIT RATIOS
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(1.) BUSINESSES AFFECTED (2019 data)

One foreign Owned company	645 Charter Businesses 683 finfish watermen	269 Charter Businesses 270 Finfish watermen	1 versus 1,867 businesses
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There were 88,009 Virginia charter trips in 2000 , the trips dropped from 65,943 in 2015 to 33,197 in 2019. . there were 412,000 number of anglers in 2009 to 294,000 in 2019.

There were 18,199 Maryland charter trips in 2,000, 16,771 in 2010 and 9,571 in 2019., according to the figures the Number of anglers stayed constant around 112,000.

The number of finfish watermen in Maryland was 1,112 in 2000. In 2010 it was 953 and in 2018 was 783.

CONCLUSION Reducing the allocation to Omega would benefit 1,867 traditional Maryland and Virginia small businesses. If fishing improved by 20% it would allow many of these people to stay in business and increase the chances younger people would continue to work on the water. That alone is a very meaningful goal to achieve. Charter captains could provide more successful fishing for up to 400,000 to 500,000 customers in just our two states.

(2.) COMMERCIAL CREWS AFFECTED

8 purse seiners with 15 crew, 120 crew	1,328 working boats with 2,656 crewmen	523 working boats with 1,046 crewmen	120 versus 3,702 (crew)
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CONCLUSION

Fewer watermen and fewer fish means much less fresh Maryland and Virginia caught Fresh fish for our local markets and restaurants . There is a lot of dollars added as fresh fish moves from the waterman at the dock to the wholesaler to the distributor and then to the retail level of markets and restaurants. The 935 finfish watermen sell to over 90 independent fish wholesalers in the two states . All of this economic activity occurs only when menhaden are left in the water to grow abundant healthy fish for our watermen to catch. None of this happens when the menhaden are taken and exported.

(3.) FISHERMEN AFFECTED

Omega has 120 Fishermen	228,000 anglers includes 30,000 Seniors add at least 30,000 children	428,000 fishermen	120 versus 656,000 fishermen
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CONCLUSION Maryland has seen a decline in salt water anglers of over 50,000 and Virginia over 20,000. Many of these people have given up the thing they enjoyed most. The numbers are not there but this means thousands of kids aren't fishing, People in our area are not fishing close to what it was just a few years ago. Based on average spending this is a loss of over 100 Million dollars annually to the two states.

(4.) RETAIL SPENDING BY ANGLERS...SALES TAX COLLECTION ...WAGES.....JOBS

OMEGA	MARYLAND	VIRGINIA	TOTAL/RATIO
\$ 6 million spending	\$225 million spending	\$360 million	\$6 million vs \$885 million
\$ 20 thousand tax	\$13.5 million tax	\$18 million tax	\$.30 vs \$21.5 million tax
\$ 20 million wages	\$108 million wages	\$139 million	\$20 vs \$274 million
300 jobs	1,972 jobs	2,864 jobs	300 vs. 4,836 jobs

CONCLUSION The ASMFC striped bass Amendment 6 section 2.2.5 states the impact of recreational striped bass fishing as \$7.7 billion and supporting 104,867 jobs. When menhaden serve their natural purpose of growing more abundant healthy fish their value is spread up and down the Atlantic Coast to the economic benefit of hundreds of thousands of our fellow citizens not just to one foreign fish meal company

(5.) ECONOMIC IMPACT OF RETAIL SPENDING ON FISHING BOATS.....JOBS SUPPORTED.....
TAX REVENUE (NMMA report – Michigan State University)

OMEGA	MARYLAND	VIRGINIA	TOTALS/RATIOS
8 boats	142,952 power boats 100,000 boats fishing	264,379 power boats 184,000 boats fishing	8 vs. 284,000 boats
Retail spending... \$4-6 million	\$1.0 billion total , average \$5,600 @ is \$560 million	\$1.2 billion total, average \$5,600 @ is \$1.03 billion	\$ 6 million vs. \$1.59 billion

Businesses directly involved (boat building, motor work, supplies, services and dealers);
 Unknown – 50% total Md. Businesses is 50% total Va. Businesses is
 Estimate 30 521 378 30 vs. 899
 Existing Jobs for recreational boating vs Omega existing jobs for 8 boats in use same categories
 Unknown-
 Estimate 100 6,641 6,628 100 vs 13,239
 (reference National Marine Manufacturing Assoc....scans 0196,0197)

(6) INVESTMENT IN FISHING BOATS

OMEGA	MARYLANDERS	VIRGINIANS	TOTALS/RATIOS
8 boats @ \$600,000 is \$4.8 million	60,000 boats @ \$20,000@ is \$1.2 billion	66,000 boats@ \$20,000 is \$1.32 billion	8 vs 126,000 boats \$4.8 million vs. \$2.52 billion

COMMENT The Omega boats are owned by one foreign company to our knowledge. The 100,000 plus boats used for fishing by Maryland and Virginia families often are often the favorite way that families spend quality time together enjoying Chesapeake Bay , its rivers and creeks. Collectively these Maryland and Virginia friends and families spend 4,304,000 days saltwater fishing according to the ASA . For the entire Atlantic states this total would be over 99 million days. If fishing on the Chesapeake rebounded even twenty percent from its low rate now we could see a million or more days of enjoyable fishing by families, friends and kids in Maryland and Virginia resulting in hundreds of millions of dollars of economic impact.

MARINAS AFFECTED BY THE QUALITY OF COMMERCIAL AND SPORT FISHING

Omega operates from one Marina.	There are over 500 marinas In Maryland (marinas.com)	There are over 300 marinas in Virginia	1 versus 800
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CONCLUSION There is a direct connection between the frequency of use of our marinas, boat ramps and parks both on the bay and ocean. We believe numbers of people fishing and fishboat use has declined by over 50% in a few short years.



Forecast for the 2019
Gulf and Atlantic Menhaden Purse-Seine Fisheries
and
Review of the 2018 Fishing Season
March 2019
Sustainable Fisheries Branch, NMFS Beaufort, NC

produced a post-season forecast of 441,300 mt with 80% confidence levels of 321,000 and 561,000 mt. Actual landings of 525,635 mt were 24% higher than our forecast and 19% greater than our post-season estimate.

ATLANTIC MENHADEN FISHERY

Atlantic Menhaden Landings, Fishing Conditions, and Vessel Participation in 2018

Final catch information indicated that 2018 landings of Atlantic Menhaden for reduction amounted to 141,314 mt (465 million standard fish; Fig. 4). This is 12% less than purse-seine landings for the 2012 season (160,627 mt), the last season before implementation of the coastwide total allowable catch (TAC). It is also 20% less than average landings for the years 2008-12 (160,524 mt). As has been the case since 2005, only one menhaden factory, the Omega Protein plant at Reedville, VA, operated on the Atlantic coast in 2018.

In December 2012, the Atlantic States Marine Fisheries Commission (ASMFC) approved Amendment 2 to the Fishery Management Plan for Atlantic Menhaden which established a TAC for the reduction and bait fisheries combined of 170,800 mt beginning in 2013. This TAC was subsequently raised to 187,880 mt in 2015, 200,000 mt for 2017, and 216,000 mt for the 2018 and 2019 seasons. The menhaden reduction fishery was allocated about 151,382 mt of the TAC for 2018 and 2019.

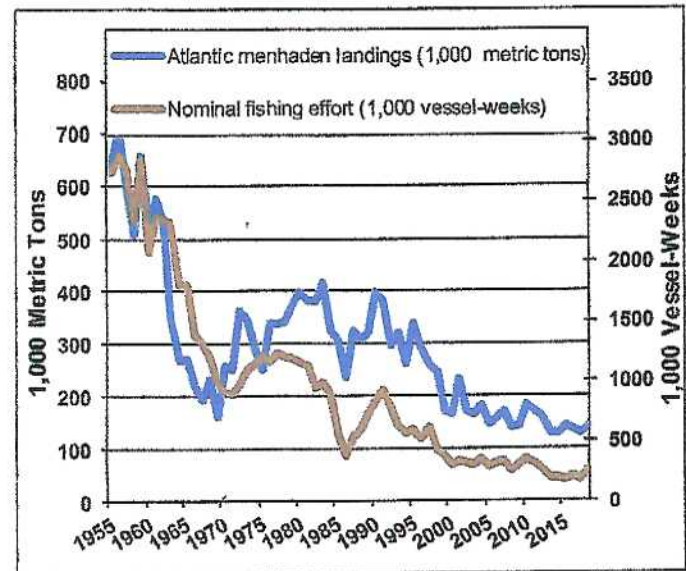


Figure 3. Atlantic Menhaden landings in 1,000s of metric tons (mt) and nominal fishing effort in vessel-weeks (VW), 1955–2018.

Forecast for the 2019 Gulf Menhaden Fishing Season

As in 2018, we expect that three menhaden factories (Moss Point, MS, and Empire and Abbeville, LA) will process Gulf Menhaden for the season. Our best estimate of vessel participation is for 33 vessels: 27 regular steamers, as many as five run boats, and one bait boat occasionally landing for reduction. Based on average nominal fishing effort for recent years by the vessels expected to be active in 2019, we estimate that nominal fishing effort in 2019 may be about 291,600 vessel-ton-weeks; with this level of nominal fishing effort, we forecast 2019 Gulf Menhaden landings of 454,000 mt, with 80% confidence levels of 334,000 and 574,000 mt.

(lines added)

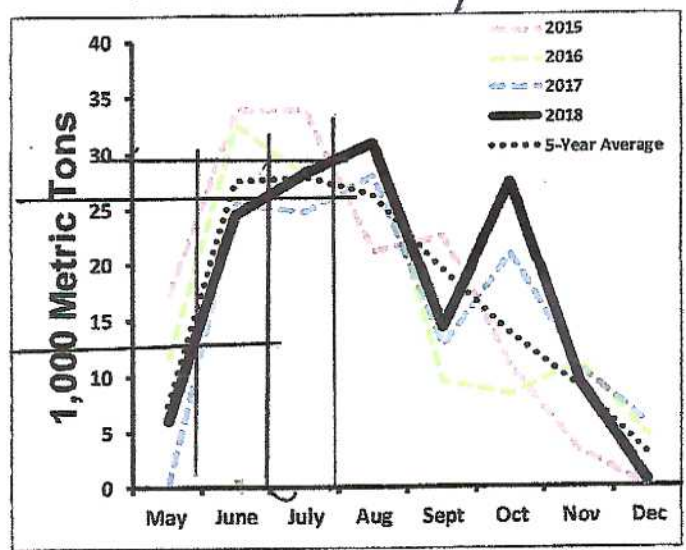


Figure 4. Atlantic Menhaden landings by month, 2014–2018.