

December 3, 2019

The Honorable Wilbur Ross
Secretary
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

Dear Secretary Ross,

As members of the recreational fishing and boating industry, we ask that you affirm the October 31, 2019, decision by the Atlantic States Marine Fisheries Commission (ASMFC), which found the Commonwealth of Virginia out of compliance with Amendment 3 of the Interstate Fishery Management Plan (FMP) for Atlantic Menhaden for failing to fully and effectively implement and enforce the Chesapeake Bay Reduction Fishery Cap (Bay Cap). Furthermore, we ask that you take such action as deemed necessary and consistent with the Atlantic Coastal Fisheries Cooperative Management Act to compel the Commonwealth of Virginia to come into compliance with the FMP.

As ASMFC describes in their letter to you dated November 15, 2019, the Bay Cap is a management solution that conserves menhaden as critical forage for the Chesapeake Bay ecosystem, while reducing conflicts between an industrial fishing fleet and the sportfishing and boating communities. The Bay Cap is particularly important as of late because menhaden's top predator, Atlantic striped bass, is currently in poor condition and the Chesapeake Bay is the primary spawning and nursery area for the species. Additionally, recent science suggests that the industrial harvest of menhaden contributes to the decline in striped bass biomass¹. Therefore, the intent of the Bay Cap is to ensure adequate forage for striped bass and other important predator species (e.g., bluefish, summer flounder, black sea bass, weakfish) that have significant recreational fisheries within the Bay and along the Atlantic coast.

These valuable recreational fisheries are major contributors to America's economy and support many fishing-dependent businesses across our industry. A Department of Commerce report, "Fisheries Economics of the United States 2016", details the economic contributions of these menhaden-dependent fisheries to the various regions along the Atlantic coast². Saltwater recreational fishing along the Atlantic is enjoyed by 6 million anglers annually, contributing \$11.3 billion to the economy and supporting 120,236 jobs. The jobs created by these fisheries are the lifeblood of our Atlantic coastal communities as more than 90% of the sportfishing and boating industry is made up of small businesses.

Furthermore, the sportfishing and boating industry consistently plays an integral role in stewardship of our fisheries by directly funding conservation and habitat restoration efforts through licensing fees and excise taxes set up through the Sport Fish Restoration and Boating Trust Fund. In 2019 alone, \$365.4 million was apportioned to the states to fund fishery conservation programs with the money generated from excise taxes on fishing equipment and motorboat fuel. Our industry is proud to be a partner in this cooperative approach to fisheries management because we know that fisheries conservation and fishing access afforded by these funds directly supports outdoor recreation and the American

¹ <https://www.tandfonline.com/doi/full/10.1080/19425120.2017.1360420>

² <https://www.fisheries.noaa.gov/webdam/download/97729452>

economy. As stewards of our shared public resources, we respect the laws that govern our fisheries which ensure the sustainability of the resource and our industry. We simply cannot tolerate the recent actions of Omega Protein which willfully exceeded the Bay Cap and forced the Commonwealth of Virginia out of compliance with ASMFC.

Interstate fishery management only succeeds when each state fully and effectively implements and enforces the requirements of ASMFC and its FMPs. Your affirmation of the finding of non-compliance will hold Omega Protein accountable for their actions; demonstrate clear leadership to the millions of Atlantic coast anglers and the thousands of businesses they support; and ensure the ASMFC process continues to bring cooperative management solutions to our shared fishery resources.

Respectfully yours,

Glenn Hughes

President
American Sportfishing Association
Alexandria, VA

Jeff Angers

President
Center for Sportfishing Policy
Baton Rouge, LA

Jeff Crane

President
Congressional Sportsmen's Foundation
Washington, DC

Matt Gruhn

President
Marine Retailers Association of the Americas
Minneapolis, MN

Jim Donofrio

President
Recreational Fishing Alliance
New Gretna, NJ

Chris Edmonston

President
BoatU.S.
Springfield, VA

Patrick Murray

President
Coastal Conservation Association
Houston, TX

Jason Schratwieser

Acting President & Conservation Director
International Game Fish Association
Dania Beach, FL

Frank Hugelmeyer

President
National Marine Manufacturers Association
Washington, DC

Whit Fosburgh

President and CEO
Theodore Roosevelt Conservation Partnership
Washington, DC

Massachusetts

Carl Abissi

National Sales Manager'
Dexter Outdoors-Dexter Russell, Inc.
Southbridge, MA

Randall Lyons

Executive Director
Massachusetts Marine Trades Association
Foxboro, MA

Chris Megan

Publisher
On the Water LLC
East Falmouth, MA

Dan Cui

VP Sales
SiOnyx, LLC
Beverly, MA

Beau Thebault

Managing Member
Why Knot Fishing, LLC
Winthrop MA

Rhode Island

Stephen Medeiros

Executive Director
Rhode Island Saltwater Anglers
Association
Coventry, RI

Connecticut

Capt. Rick Constantine

VP of Marketing and General Manager
Acme United Corporation
Fairfield, CT

Anthony Graffeo

CEO and Founder
FlipRocks, Extreme Footwear
Sandy Hook, CT

Dan Orefice

President
Game On, LLC
Enfield, CT

Alan Gnann

President
REC Components
Stafford Springs, CT

New York

Steve Carhart

CEO
Coyote Eyewear
Pittsford, NY

Jeffrey Goldberg

President
Fish307 LLC
Lake George, NY

Neil J. Miritello

President
FJ Neil Company, Inc.
Lindenhurst, NY

John H. Butts

President
Rome Specialty Company, Inc.
Rome, NY

John Hoge

Co-Owner
Sea Eagle Boats
Port Jefferson, NY

Michael Caruso

Publisher
The Fisherman Magazine
Shirley, NY

New Jersey

Nick Cicero

Sales Manager
Folsom Corp.
Mahwah, NJ

Mark Taylor

President
Jersey Coast Anglers Association
Toms River NJ

Marilou Geverola

Co-Owner
NOREAST'R
Morganville, NJ

David Arbeitman

Owner
The Reel Seat, Inc
Brielle, NJ

Pennsylvania

Michael Shields

VP Sales & Marketing
AFW Fishing Brands
Coatesville, PA

Brad Myers

Owner
CarLyd Enterprises/ Bait Up
Ephrata, PA

Michael S. Flanagan

President and C.E.O.
Felmlee Lures
Lewistown, PA

Marlene Cipriani

Operations Manager
Hopkins Fishing Gear, Inc.
Northumberland, PA

Hunter Grogan

Founder & CEO
Zee Bait Co. LLC
Birchrunville, PA

Delaware

Damon Olsen

President
Nomad Design Tackle Inc
Lewes, DE

Maryland

Larry Goldberg

Managing Member
FWBC, LLC t/a Freedom Boat Club MD/DC
Annapolis, MD

Tobin Mergenthaler

President
Imperium Outfitters In
Edgewater, MD

Virginia

Jim Dunbar

President
Fiber Consulting Services, LLC
Mechanicsville, VA

Capt. David Gibb

Owner, Director of Operations & Training
Freedom Boat Club of Virginia
Portsmouth, VA

John Crews

President
Missile Baits
Salem, VA

Brian Ryals

Partner
Ocean Creek Apparel
Virginia Beach, VA

Capt. Andy Sutter

President
SOVA Boat Club
Chesapeake, VA

North Carolina

Donald W. Betts

President
Betts Tackle Ltd.
Fuquay Varina, NC

Gary Zurn

SVP Industry Relations
Big Rock Sports
Graham, NC

Jim Hardin

Government Relations Manager
Grady-White Boats
Greenville, NC

Rob Jones

President
Propel IP, Inc.
Raleigh, NC

Robert A. Eakes

President
Red Drum Tackle Shop, Inc.
Buxton, NC

South Carolina

Jeff Williamson

Co-owner
Best Catch Bait Company
Chapin, SC

Evan Lyendecker

Brand & Content Director
Confluence Outdoor
Greenville, SC

Mark Davis

Owner
DL Ventures LLC
Lexington, SC

Steve Martin

Owner
Fish Razr
Charleston, SC

Scott Clyburn

President
Heybo Outdoors
Chester, SC

Michael Sims

President
Hook + Gaff Watch Company
West Columbia, SC

David Pfeiffer

President
Shimano North America Fishing
Ladson, SC

Cary J. Hinze

President/CEO
What The Fin LLC
Greenville, SC

Daniel Nussbaum

President
Z-Man Fishing Products, Inc.
Ladson, SC

Georgia**Darrell Keith**

President
Hydro Glow, Inc.
Eatonton, GA

Skip Dahlstrom

Managing Partner
Rogers Sports Marketing
Norcross, GA

Ben Speciale

President
Yamaha Marine Group
Kennesaw, GA

Florida**Joseph Meehan**

President
American Tackle Co
Oviedo, FL

Brett Fitzgerald

Executive Director
Angler Action Foundation
Lake Worth, FL

Jim McDuffie

President and CEO
Bonefish & Tarpon Trust
Miami, FL

Scott Salyers

Fishing Group Publisher
Bonnier Corp.
Miami, FL

Peter Foley

President
Boone Bait Company
Winter Park, FL

James Zaloga

Owner
Captains Cove Outfitters
Inglis, FL

Aledia Hunt Tush

President
CB's Saltwater Outfitters
Sarasota, FL

Dave Bulthuis

VP Government Affairs
Costa Sunglasses
Daytona Beach, FL

Lili Crook

COO
Crook and Crook Fishing & Marine
Supplies Miami, FL

Phil Lillo

Owner
Don Coffey Company
Windermere, FL

Michael Dixon

VP/GM
Engel Coolers
Jupiter, FL

Doug Hughes

CEO
FishAnywhere, LLC
Winter Garden, FL

Linda Sheldon

Vice President
Flying Fisherman
Islamorada, FL

Louis Chemi

Vice President
Freedom Franchise Systems, LLC
Venice, FL

Adrian Martinez

Owner/President
Handler Fishing Supply
Merritt Island, FL

Chris Peterson

President
Hell's Bay Boatworks
Titusville, FL

Sid Dobrin

Co-Owner
Inventive Fishing, LLC
Alachua, FL

Don Patnaude

President
Jones & Company
Stuart, FL

Eric Bachnik

President
L and S Bait Co./ MirrOlure
Largo FL

Clark Lea

VP
Marine Metal Products
Clearwater, FL

Jeff Miller

President
Millers Boating Center, Inc.
Ocala, FL

Ray Rosher

President
R and R Tackle
Miami, FL

Derek Williams

President & Owner
Sea Fear, LLC
Clearwater, FL

Jennifer Stegura

Co-Founder/VP Marketing
Skinny Water Culture
Clearwater, FL

Ted Alfien

CEO
Skuze Shoes, LLC
Pompano Beach, FL

Casey Damron

Founder
Sodium USA
Crystal River, FL

Rob Southwick

President
Southwick Associates
Fernandina Beach, FL

Hunter McIntosh

President
The Boat Company
Jacksonville Beach, FL

Troy Faletra

Founder/CEO
Throw Raft LLC
Ft. Lauderdale, FL

Bill Bachman

President
Tuppen's Marine & Tackle
Lake Worth, FL