



November 25, 2019

The Honorable Wilbur Ross  
Secretary of Commerce  
1401 Constitution Ave., NW  
Washington, DC 20230

Dear Secretary Ross,

Founded by anglers in 1973, *Wild Oceans* is the nation's oldest conservation group dedicated to marine fishery resources. We urge you to stand with the east coast angling community by concurring with the Atlantic States Marine Fisheries Commission's (ASMFC) decision to find the Commonwealth of Virginia out of compliance with the Interstate Fishery Management Plan (IFMP) for Atlantic Menhaden and by acting swiftly to impose a moratorium on reduction fishing.

The reduction fishery in the Chesapeake Bay, which is prosecuted by a single foreign-owned company, Omega Protein, operating out of Reedville, Virginia, has intentionally failed to comply with a critical component of the IFMP, which places a limit on the amount of menhaden that can be taken from bay waters. In fact, Omega Protein has brazenly declared its intent to set its own limit on a publically-owned resource,<sup>1</sup> and has already exceeded the 2019 limit by 30% (over 33 million pounds).<sup>2</sup>

The Chesapeake Bay is the largest and most important nursery for Atlantic menhaden and many of the predators that feed on it.<sup>3</sup> Our organization has been deeply engaged in the management of Atlantic menhaden since the late 1990s, when the fishing public, concerned about the health of Chesapeake Bay striped bass, urged fishery managers to look into the stripers' food supply. Years of research and hard work on the part of fishery managers and stakeholders culminated in management measures designed to safeguard the menhaden prey base, the most important of which was to establish a coastwide quota that limits reduction fishery removals of menhaden from the bay. The recreational fishing community is rightly outraged that a foreign company would so easily dismiss our nation's Atlantic coastal fisheries management program and hold it in such low regard.

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<sup>1</sup> Omega Protein. (Oct. 2, 2019). Letter to the Atlantic States Marine Fisheries Commission.

<sup>2</sup> Atlantic States Marine Fisheries Commission. (Nov. 15, 2019). Letter to Secretary of Commerce Wilbur Ross.

<sup>3</sup> Hildebrand, S. F. and W. C. Schroeder. 1928. Fishes of Chesapeake Bay. U.S. Bureau of Fisheries Bulletin 43:1-388.

From Maine to Florida, six million citizens are licensed recreational fishermen. Recreational fishing expenditures total over \$11 billion annually, fueling the economies of our coastal communities.<sup>4</sup> Striped bass, bluefish and weakfish, three major predators of Atlantic menhaden, are key species pursued by Atlantic anglers.<sup>5</sup> Given the importance of menhaden to the health and prosperity of our Atlantic fisheries, it is of utmost importance that the ASMFC management plan for menhaden be upheld and enforced.

The Atlantic Coastal Fisheries Cooperative Management Act bestows a great responsibility on the Secretary of Commerce to back our Atlantic States Marine Fisheries Commission by imposing a moratorium within the waters of a state that has failed to implement and enforce measures necessary for the conservation of the fishery.<sup>6</sup> The ASMFC has laid out a clear case for why the Chesapeake Bay harvest cap is essential for not only the long term sustainability of menhaden and menhaden fisheries, but for a number of other Commission-managed fisheries.

*Wild Oceans* thanks you for your attention to this important matter and looks forward to a swift decision and action to bring Virginia into compliance.

Sincerely,



Pam Lyons Gromen  
Executive Director

cc: Earl Comstock, Deputy Chief of Staff and Director of Policy, DOC  
Stuart Levenbach, Chief of Staff, NOAA  
Alan Risenhoover, Director of the Office of Sustainable Fisheries, NOAA Fisheries  
Derek Orner, Fishery Management Specialist, NOAA Fisheries  
Robert Beal, Executive Director, ASMFC

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<sup>4</sup> National Marine Fisheries Service. 2018. Fisheries Economics of the United States, 2016. U.S. Dept. of Commerce, NOAA Tech. Memo. NMFS-F/SPO-187a, 243 p.

<sup>5</sup> Ibid.

<sup>6</sup> 16 U.S.C. §5106