



## The Great Egg Harbor Watershed Association & River Council

**Fred Akers - Administrator**  
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The Honorable Wilbur Ross  
Secretary of Commerce  
1401 Constitution Ave., NW  
Washington, DC 20230  
(Sent via email)

November 29, 2019

RE: Virginia's non-compliance of menhaden rules.

The Great Egg Harbor Watershed Association and River Council urges you to uphold the unanimous finding by the Atlantic States Marine Fisheries Commission (ASMFC) that the Commonwealth of Virginia be found out of compliance with Section 4.3.7 (the Chesapeake Bay Reduction Fishery Cap, or Bay cap) of Amendment 3 to the Interstate Fishery Management Plan for Atlantic menhaden, and impose a moratorium on Virginia's reduction fishery, effective immediately, and until the state comes into compliance.

As the Administrator for both the River Council and Watershed Association, I am also on the MAFMC's Ecosystem and Ocean Planning Advisory Panel to help with the national efforts to transition to an Ecosystem Approach to Fisheries Management.

The tidal tributaries of the Great Egg Harbor River are part of the National Wild and Scenic River System and a National Park, and the presence and abundance of menhaden in our system to support striped bass and threatened and endangered bird species is especially important to us.

We have been following and supportive of the ASMFC's work on menhaden conservation, and the violation of the Chesapeake Bay Reduction Fishery Cap this year is a real slap in the face to the ASMFC and ecosystem management efforts.

Therefore, we urge the Department of Commerce to take appropriate action consistent with the ASMFC's noncompliance finding, the Cooperative Act, and our Nation's interest in the stewardship of resources and economic wellbeing, and impose a moratorium that is necessary for the conservation of menhaden, its predators, and the long-term productivity of Atlantic fisheries and the interstate fishery management system.

Sincerely,

Fred Akers

cc: Earl Comstock, Deputy Chief of Staff and Director of Policy, DOC  
Stuart Levenbach, Chief of Staff, NOAA  
Sam Rauch, Deputy Assistant Administrator for Regulatory Programs, NOAA Fisheries  
Alan Risenhoover, Director of the Office of Sustainable Fisheries, NOAA Fisheries  
Derek Orner, Fishery Management Specialist, NOAA Fisheries  
Robert Beal, Executive Director, ASMFC  
Chris Moore, Executive Director, MAFMC

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