Sustainable Fisheries Goal Implementation Team
Chesapeake Bay Program
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http://www.chesapeakebay.net/groups/group/sustainable_fisheries

August 2, 2016

Mr. Richard B. Robins, Chairman
Mid-Atlantic Fishery Management Council

RE: Unmanaged Forage Omnibus Amendment

Dear Chairman Robins and Members of the Council:

Thank you for the opportunity to comment as the Council discusses the Unmanaged Forage Amendment and related efforts with the Ecosystem Approach to Fishery Management Guidance Document. My name is Peyton Robertson, and I am the Chair of the Chesapeake Bay Program's Sustainable Fisheries Goal Implementation Team—a group of fishery managers, scientists, and stakeholders working to advance ecosystem-based fisheries management in the Chesapeake Bay, using science to inform decisions across state boundaries. Our team does not have specific regional management authority, but our Executive Committee of fishery managers from Maryland, Virginia, the Potomac River Fisheries Commission, the District of Columbia, and a representative from the Atlantic States Marine Fisheries Commission work together to achieve consensus on Baywide policies.

The Sustainable Fisheries Goal Team applauds the Council's recognition and consideration of the important role forage species play in maintaining ecosystem balance and supporting higher trophic level predatory species. Our team and the Chesapeake Bay Program also recognize the importance of forage species, and through the 2014 Chesapeake Bay Watershed Agreement, we committed to a forage outcome as follows:

> Continually improve the [Chesapeake Bay Program] Partnership's capacity to understand the role of forage fish populations in the Chesapeake Bay. By 2016, develop a strategy for assessing the forage fish base available as food for predatory species in the Chesapeake Bay.

Since that 2014 commitment, our team members and Bay partners have been engaged in several research and data synthesis efforts to build this understanding of the Chesapeake Bay forage base. We conducted a workshop to identify key forage species based on diet data from fishery-independent surveys for predator species and based on the expertise of workshop participants. Twenty-five forage species were identified as key and important forage species in the Chesapeake Bay, including a few that also appear on the Council's list of forage species that

are being considered for inclusion in the unmanaged forage amendment: bay anchovy (considered most important in the Bay based on diet analysis), Atlantic silversides, amphipods and isopods (invertebrate species). This list of species was discussed extensively among our partners, and now provides our team with more specific focus moving forward.

Based on recommendations from the workshop, we funded a project to develop a suite of forage indicators to begin quantifying population trends and predator-prey relationships for key forage groups. That initial project was recently completed, and now the next phase of data synthesis will focus on evaluating the environmental drivers of forage variability.

We would like to continue to make connections between the Council's efforts on forage species in offshore waters and our work on forage in the Chesapeake Bay in order to align priorities where possible. Our team would welcome the opportunity to share more details about our work at a future Council meeting or Ecosystem and Ocean Planning Committee meeting.

It is encouraging to see the progress, commitment and leadership of this Council to proactively address forage and other ecosystem considerations in your management process. The Chesapeake Bay Program's Sustainable Fisheries Goal Team supports action by the Council today on the unmanaged forage amendment to protect the important role of forage species in the ecosystem.

Sincerely,

Peyton Robertson
Chair, Sustainable Fisheries Goal Implementation Team
Director, NOAA Chesapeake Bay Office

Sustainable Fisheries Goal Implementation Team: http://www.chesapeakebay.net/groups/group/sustainable_fisheries
Chesapeake Bay Forage Workshop: http://www.chesapeake.org/stac/workshop.php?activity_id=234