



*Larry Hogan, Governor
Boyd Rutherford, Lt. Governor
Mark Belton, Secretary
Joanne Throwe, Deputy Secretary*

July 15, 2016

Peyton Robertson
NOAA Chesapeake Bay Office
410 Severn Avenue Suite 107-A
Annapolis, MD 21403

Dear Mr Robertson,

The Maryland Tidal Fish Advisory Commission (TFAC) appreciates the dedication of those who have worked to advance the Chesapeake Bay Watershed Agreement (CBWA). We thank all who have listened to our fishery concerns and who have included us as active participants in the Agreement's development. TFAC believes that this CBWA document is one of the most all-encompassing efforts that Maryland Fisheries has seen to finally bring the Bay back to its former glory and bountiful state.

We appreciate the opportunity to provide input on the blue crab work plan's "key action" of "assessing the feasibility of using and calculating a Bay-wide Total Allowable Catch (TAC) of blue crabs." We do not support assessing the development of a TAC for blue crabs for the following reasons:

1. A large majority of our watermen do not support the exploration of a TAC. Our current management strategy has been successful at keeping female harvest at safe levels for eight years. A TAC is not needed to continue this progress. In fact, without provable data-based necessity, a TAC could strain relationships, cooperation, and trust that continues to be built between Fisheries and the Blue Crab Industry.
2. Assessing the feasibility of developing a Bay-wide TAC will consume valuable time and effort from scientists and fishery management. In return, it will provide little additional benefit to the management of our resource. This time and effort could be better spent pursuing other options that would offer positive impacts for our industry.
3. There is a lack of needed data to support the practicality of creating a TAC. The three jurisdictions are making advancements in their efforts for more timely and accurate catch data. E-reporting and other advanced reporting methods are being promoted, but the three jurisdictions are at different

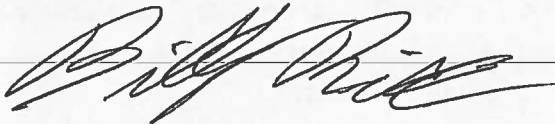
phases of development. Without accurate and comparable data between jurisdictions, a TAC is essentially guesswork that would provide no benefit to our industry.

4. For many years, CBSAC and many other credible sources have routinely stated that, "The Chesapeake Bay blue crab stock is not overfished and overfishing is not occurring." This endorses and confirms the fact that a TAC is not needed to protect the resource, nor is it "time critical" for Blue Crab sustainability.

For years the jurisdictions have calculated and regulated their crab allocations with 100% success of staying well under the given Bay-wide allocation. TFAC is therefore requesting the research into the evaluation of a Total Allowable Catch be abandoned.

A TAC would have a clear lack of data, a lack of support, and a lack of measureable value. It would offer losses of money, of time, of energy, and of fishery advancement opportunities. It has high opportunity costs offering very low returns and even lower participant morale.

Sincerely,



William 'Billy' Rice
Chair, Tidal Fisheries Advisory Commission

pvg, gs cc: Nicholas DiPasquale