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April 6, 2023

Terrence Gray, Director
Rhode Island Department of Environmental Management
235 Promenade Street
Providence, RI 02908

Re: Proposed Changes to Commercial Menhaden Regulations

Dear Director Gray,

Save The Bay is deeply concerned by a recent recommendation made by the Rhode Island Marine Fisheries Council regarding state Menhaden regulations. During its April 3, 2023 meeting, the council voted to recommend a modification to Marine Fisheries regulations that would allow commercial fishing vessels to harvest 50,000 lbs of Menhaden per week in the Menhaden Management Area, regardless of whether the Management Area is open based on biomass estimates. **We urge you to deny this regulatory change and maintain the status quo based on the lack of a scientific basis for the decision, as well as its unknown but potentially harmful impact on this important species.**

As you know, current Menhaden regulations are the result of extensive research and collaboration between regulators, scientists, commercial and recreational fishing interests, and other stakeholders. In addition to their commercial value, Menhaden provide important ecological functions, serving as the foundation of the local food chain and filtering nutrients in the Bay. The Menhaden Management Area and biomass floor acknowledge the special standing of the Menhaden and ensure that a baseline level of Menhaden can safely exist in Narragansett Bay. The proposed regulation virtually eliminates these protections, allowing for an unlimited number of vessels to harvest 50,000 lbs weekly with no regard for the ecological benefits Menhaden provide.

Save The Bay acknowledges the large increase in Rhode Island's Menhaden quota and the opportunities this provides for the Rhode Island fishing community. However, this is not cause to create arbitrary regulations. RI DEM leadership, staff, and the state's regional fisheries delegation have advocated strongly for ecosystem-based fisheries management, highlighting the key role of Menhaden. Given the importance of Menhaden to multiple industries, as well as Bay health, any modifications to the state's well-regarded Menhaden management program must be taken only after careful consideration of all relevant factors, including ecological functions. As proposed, this regulation would be a major step backwards for Rhode Island.

Thank you for considering our comments.

Sincerely,

A handwritten signature in blue ink, appearing to be "MJ" with a long horizontal stroke extending to the right.

Michael Jarbeau
Narragansett Baykeeper