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"Potomac River Compact of 1958"

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June 16, 2016

Mr. Peyton Robertson, Chair
Sustainable Fisheries Goal Implementation Team
NOAA Chesapeake Bay Office
410 Severn Avenue #207
Annapolis, Maryland 21403

Dear Mr. Robertson,

On behalf of the Potomac River Fisheries Commission, I am writing you to provide some thoughts from our Commission based upon recent discussions related to the management of Blue Crabs in Chesapeake Bay. Our Commission, Blue Crab Advisory Committee (BCAC) and our crabbing industry on the Potomac River have discussed the most recent information related to the management and biology of Chesapeake Bay Blue Crabs, and have two thoughts to relay to you.

First, we are aware the most recent iteration of the Chesapeake Bay Agreement contains a provision to explore a jurisdictional based allocation system by 2018. It is the preference of the PRFC to not pursue jurisdiction based allocation at this time. This is based principally on three factors:

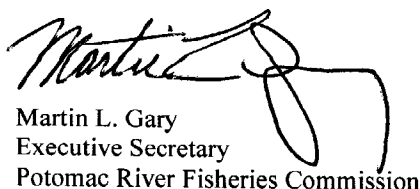
1. Our industry, BCAC and Commission are comfortable with the current Blue Crab management framework
2. We are concerned about how the use of historical reference time frames could influence a PRFC jurisdictional quota
3. We are concerned that harvester reporting behavior could be altered/influenced by even the conceptual discussion of a jurisdictional based quota allocation management framework

Our second thought for your consideration relates to the possibility of implementing a jurisdictionally equivalent minimum size for male hard crabs bay wide at 5.25 inches carapace width. Currently, PRFC has a 5.25 inch carapace width all season (April 1 through December 10). Maryland has a 5 inch minimum carapace length through July 14th and then 5.25 inches through their season end. Virginia is currently at a 5 inch minimum carapace length throughout their season. The rationale for this suggestion is based upon market considerations, specifically shifts in consumer preference for a larger (#1) crab, the corresponding value to the harvesters, consistency for regulatory enforcement, accountability in harvest reporting, and the potential ecological benefits of leaving more male crabs in the water for a longer period of time.

By attachment, I am referencing a letter to the NOAA's CBP SFGIT from PRFC Commissioner William Rice that provides an industry and Commissioner perspective of the thoughts I have outlined above.

I hope you can relay the themes we have expressed to our other partners in the SFGIT, and to the greater partnership within the Chesapeake Bay Agreement.

Very Respectfully,


Martin L. Gary
Executive Secretary
Potomac River Fisheries Commission