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March 15, 2023

The Honorable Gina M. Raimondo  
Secretary  
U.S. Department of Commerce  
Herbert Clark Hoover Building  
1401 Constitution Avenue NW  
Washington DC 20230

Secretary Raimondo:

I am writing to request the evaluation of what we believe to be an ongoing commercial fishery disaster in the Maryland waters of the Chesapeake Bay as outlined in the provisions of Section 312(a) and 315 of the Magnuson-Stevens Fishery Conservation and Management Act (MSA), as amended, and Sections 308(b) and 308(d) of the Interjurisdictional Fisheries Act (IFA). It is my hope that a full evaluation will clearly qualify Maryland for federal fishery disaster assistance.

In recent years, we have become increasingly concerned about the explosion in the abundance of invasive fish species in the Chesapeake Bay including blue catfish, flathead catfish, and snakehead. There is mounting evidence around the deleterious impacts of these species on the native ecosystem and the communities dependent on the commercial fisheries we manage. Blue catfish are a particular concern. They were first introduced in Virginia in the 1970s to create a recreational fishery, but have since spread to tributaries throughout the watershed. In areas where blue catfish have been established in the Bay, they comprise up to 75 percent of the total fish weight in that tributary. The NOAA Chesapeake Bay Office identified invasive catfish as a challenge facing the Chesapeake ecosystem several years ago. They are voracious eaters. They consume other fish, crustaceans, and even other catfish. They out-compete the native species for both habitats and food and threaten key commercial fisheries including blue crab, striped bass, white perch, yellow perch, and American eel.

We are beginning to see disturbing trends in both our commercial fishery landings and our survey data. Although direct links have not been drawn between the presence of invasive species and the observed trends in commercial harvest and ex-vessel value, we believe that it is critical to act now to mitigate the effects of the invasive species and to provide assistance to the commercial fishing industry that is already being heavily impacted by what is becoming a substantial shift in species composition within Maryland's portion of Chesapeake Bay.

Since 2012, landings of seven of Maryland's marquee commercial fishery species which share habitat with invasive fishes at some point in their life cycle have declined between 27% and 91% (Table 1). The dockside value of these species has likewise declined between 12% and 85%. In



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all cases, the declines are consistent over the time series. Over the same time period, the commercial harvest of blue catfish and snakehead increased by 287% and 1,183% respectively (Table 1).

Table 1. Harvest and dockside value for key commercial fisheries in the Maryland portion of Chesapeake Bay between 2012 and 2022. All native species have declined consistently since 2012 in both poundage and value. Harvest of invasives has consistently increased. Blue catfish are a lower-value product than our native fisheries.

Species	2022 harvest (pounds)*	average dockside value (2012-2022)	% change Harvest since 2012	% change dockside value since 2012	average price per pound (2012-2022)
Hard Crab (blue)	22,060,449	\$ 46,051,018	-45%	-12%	\$ 1.60
Soft Crab (blue)	700,544	\$ 9,051,308	-59%	-27%	\$ 7.49
White Perch	174,751	\$ 1,089,539	-91%	-83%	\$ 0.89
Yellow Perch	31,555	\$ 75,146	-27%	-29%	\$ 1.86
Striped Bass	1,174,808	\$ 5,371,422	-40%	-22%	\$ 3.40
American Eel	163,225	\$ 1,148,173	-71%	-85%	\$ 2.85
Channel Catfish	988,432	\$ 1,129,176	-61%	-47%	\$ 0.65
Blue Catfish	726,095	\$ 275,912	287%	447%	\$ 0.66
Snakehead	5,964	\$ 13,176	1183%	642%	\$ 3.29

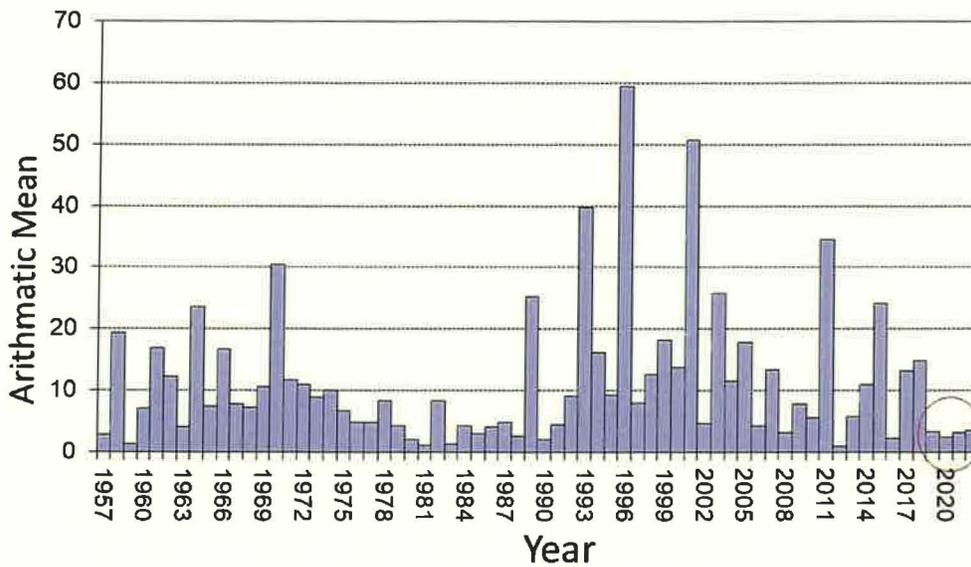
In some cases, commercial harvest has declined because of and in spite of management action. The commercial striped bass quota has been reduced over the past decade, but the stock remains overfished (overfishing is no longer occurring). Striped bass recruitment in the Chesapeake Bay, which produces the lion’s share of the coastal stock, has been alarmingly low in recent years (Figure 1). The overfished status of the stock will be difficult to surmount if recruitment remains limited since these young fish from the Chesapeake Bay will eventually contribute to the overall spawning stock biomass. There is growing concern that competition with and predation by blue catfish could lower striped bass recruitment success, and impede our ability to rebuild the stock. Survey data show substantial increases in blue catfish populations in juvenile striped bass habitat. For example, blue catfish captured in the annual Upper Chesapeake Bay spring striped bass spawning stock survey have increased from one fish in 2014 to a high of 404 fish in 2022. The application of an exponential trendline model to these data illustrates that we could see over 1,000 blue catfish in the 2025 survey on the Upper Bay. Likewise, blue catfish have increased substantially in samples from our Upper Bay winter trawl survey. They first appeared in 2011 and became extremely numerous in 2020 (Figure 2).



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Figure 1. The Maryland Bay-wide juvenile index for striped bass 1957-2022. Recruitment in recent years has been alarmingly low despite a spawning stock biomass that is much higher during the last low recruitment period in the early-mid 1980s and despite management action to end overfishing.

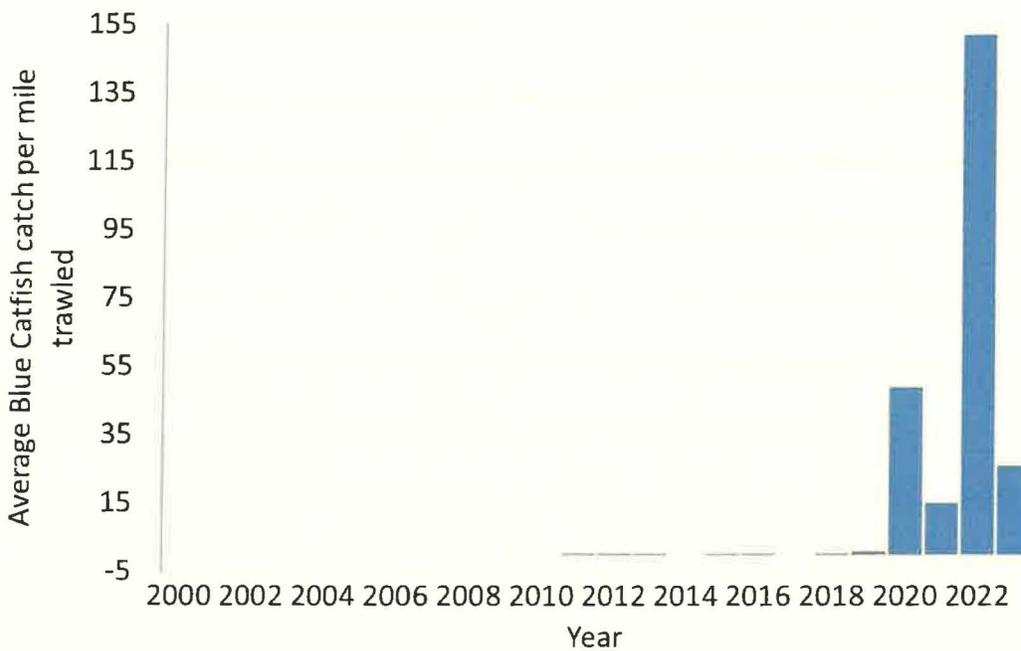




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Figure 2. Index of abundance of blue catfish measured annually in the winter trawl survey of the Upper Chesapeake Bay in Maryland. Further evidence of burgeoning blue catfish populations in juvenile striped bass habitat.



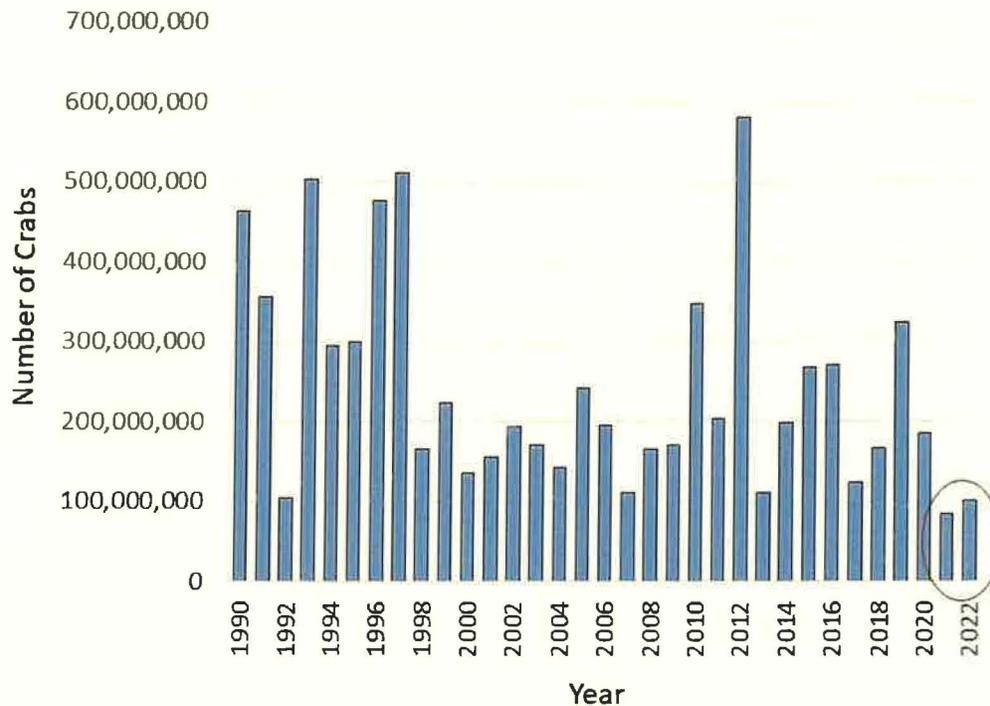
This scenario plays out for fishery after fishery. The blue crab fishery has been operating below the target exploitation fraction, and the spawning stock biomass has been above the overfished threshold, yet recruitment numbers remain depressed (Figure 3).



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Figure 3. Estimated number of age zero blue crabs in the Chesapeake Bay (Maryland and Virginia) from the annual Bay-wide winter dredge survey. Scientists are perplexed by the disconnect between healthy spawning biomass and ongoing poor recruitment.



I would be happy to provide further information based on available data to assist your evaluation. As this situation continues to evolve, it is becoming more clear that economic relief for our fishing communities is needed as they work to transition from fishing on native species to targeting invasive animals. Potential programs that could be implemented with disaster assistance include 1) incentivizing watermen to test novel gears for the harvest of invasives, 2) supporting processors and increasing capacity by subsidizing or funding the purchase of modern high-capacity processing equipment, 3) providing marketing support, 4) providing training to watermen and processors on harvesting, processing, and marketing invasives, 5) supporting novel product destinations (e.g., school lunches and organic fertilizer), 6) providing price support for watermen to incentivize the harvest of invasives, and the list goes on. I believe that disaster assistance could put Maryland into a position where commercial fishing communities are both supported in the present and positioned for a future of invasive species harvest.



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The science quantifying the impacts of invasive species on the Bay ecosystem and to our commercial fisheries is relatively new, and it is also challenging. Not all relationships are perfectly clear and myriad factors drive changes in abundance, species composition, and fishery dynamics. However, the evidence continues to mount that invasive species are a major and growing threat to the health of Maryland's environment and economy. The opportunity before us is to take action now BEFORE they become a truly unmanageable disaster. My staff and I stand ready to work with you on taking the next best steps to stop this crisis now.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Wes Moore'.

Wes Moore  
Governor

cc: The Maryland Congressional Delegation

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