



Jared Golden
Congress of the United States
2nd District of Maine

April 25, 2025

Atlantic States Marine Fisheries Commission
Caitlin Starks
Senior Fishery Management Plan Coordinator
1050 N Highland St, Suite 200 A-N
Arlington, VA 22201

Dear Ms. Stark and Commissioners,

I am writing to convey my strong support for the option in Addendum XXXII that would repeal the gauge and vent measures for Lobster Management Area 1 in Addendum XXVII, as proposed by the Atlantic States Marine Fisheries Commission (ASMFC) Lobster Board.

As I have conveyed to you in a previous letter, management decisions regarding lobster and other fisheries must always incorporate the knowledge and expertise of our seafood harvesters, who have unparalleled familiarity with the resource. I believe the option to repeal in Addendum XXXII acknowledges what you and I have heard from harvesters, processors, and dealers for some time – the data used to determine the trigger index is overly cautious with severe limitations, raising concerns that it does not fully reflect the current status of the stock.

With a new lobster stock assessment scheduled for completion in 2025, any future regulatory decisions should be informed by both the data gathered during this process, engagement with the Lobster Conservation Management Teams, and by incorporating the feedback from the robust conversations that have occurred at the Lobster Zone Council meetings over the past few weeks and are set to continue in the coming months. These discussions have clarified that harvesters are dedicated to dialogue about conservation, the health of their fishery, its viability, and ensuring access to the fishery for future generations.

A repeal of the gauge increase would also offer the Lobster Board an opportunity to consider the economic impacts on the American lobster fishery before proposing future conservation measures. Maine's lobster industry serves as an economic engine for the state, generating over \$1 billion annually and supporting 4,500 lobstermen's livelihoods, along with thousands of Mainers employed by lobster dealers, seafood processors, vessel manufacturers, trap manufacturers, restaurants, and other coastal businesses. Lobster consistently ranks as the highest-value species harvested in the United States — a direct result of strict adherence to conservation measures that sustain the resource.

American fishermen are operating under a constant imbalance due to stricter regulations enforced by U.S. regulators. It makes little sense in the name of conservation if an American harvester releases an oversized or minimum-sized lobster only for it to be picked up by a Canadian harvester who can legally harvest those oversized or smaller lobsters. This is particularly concerning in the “Gray Zone,” where U.S. and Canadian harvesters often operate “shoulder-to-shoulder” in the contested area.

That is why I encourage the ASMFC to adopt the option in Addendum XXXII that repeals the gauge and vent measures for Lobster Management Area 1 in Addendum XXVII. Doing so will ensure ample and meaningful engagement with U.S. harvesters regarding regulations that affect them, and proactively collaborate with our Canadian counterparts to ensure that all lobstermen adhere to the same rules to ensure the long-term sustainability of the fishery for future generations.

I appreciate your attention to this important matter.

Sincerely,

A handwritten signature in blue ink that reads "Jared F. Golden". The signature is written in a cursive, flowing style.

Jared F. Golden
Member of Congress



Atlantic States Marine Fisheries Commission

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MEMORANDUM

TO: American Lobster Management Board
FROM: Caitlin Starks, Senior FMP Coordinator
DATE: May 1, 2025
SUBJECT: Public Comment on Lobster Draft Addendum XXXII - REVISED

Please note that a previous version of this document contained an error and has been revised.

The following pages represent a draft summary of all public comments received by ASMFC on Draft Addendum XXXII to Amendment 3 to the American Lobster Fishery Management Plan as of 11:59 PM (EST) on April 25, 2025 (closing deadline). Comment totals for the Draft Addendum are provided in the tables below, followed by a summary of the webinar public hearing, and written comments sent by organizations and individuals. A total of 157 written comments were received. These included 5 letters from organizations and 152 comments from individuals. One public hearing was held via webinar on April 10, 2025. Eighty-two members of the public attended the webinar, and 35 individuals provided comment during the public hearing.

The following tables are provided to give the Board an overview of the support for each of the management options contained in Draft Addendum XXXII. It should also be noted that some individuals provided comments at the public hearing and also submitted written comments, and these are counted separately in the tables below. Additional comments that did not indicate support for a particular option are included in the breakdown of total comments received. Prevailing themes from the public comments on Draft Addendum XXXII, including rationales for support or opposition and general considerations, are summarized below the tables.

Table 1. Breakdown of Total Comments Received by Category

Comments Received by Category	
Organization Letters	5
Individual Comments	152
Comments Provided at Public Hearing	35

Table 2. Support for Draft Addendum XXXII Options indicated in written comments submitted to ASMFC and provided at the public hearing

Option	A. Status Quo: Maintain Addendum XXVII Measures	B. Repeal Gauge and Vent Size Measures of Addendum XXVII
Public Hearing	1	26
Organization Letters	0	5
Written Comments	2	137

Support for Option A. Status Quo. Maintain Addendum XXVII Measures

- Lobster is a public resource and should be managed based on science. Those who ignore science or deny its accuracy are only protecting their self-interest.
- The claim that the gauge increase will put the harvesters out of business is not valid. After a year they will catch even more weight.

Support for Option B. Repeal Gauge and Vent Size Measures of Addendum XXVII

- Maine (LCMA 1) already has strict conservation rules including a low maximum size of 5" and mandatory v-notching and a zero-tolerance possession definition.
- Fishermen in LCMA 1 are not seeing a decline in juvenile lobsters, and many are reporting seeing an increase in lobsters below the legal minimum size of 3 ¼". Some noted that lobsters are moving further offshore and that is why survey indices are declining. Therefore, they think the gauge measures of Addendum XXVII are unnecessary.
- An increase in the minimum legal size from 3 ¼" to 3 3/8" would cause significant economic harm for harvester income (particularly to small and mid-sized owner-operators), processing, and the entire supply chain and lobster fishing community in Maine.
- Without the Canadian fishery implementing the same minimum size, an increase in the LCMA 1 minimum gauge would put the US industry at an extreme disadvantage to Canada. This issue is of special concern for harvesters in the "Gray Zone" where Canadian and US harvesters would operate under different minimum sizes. Canadian fishermen would be able to keep lobster smaller than the LCMA 1 minimum size, making the conservation effort of the gauge increase ineffective.
- The fishing industry expressed that it did not have the opportunity to engage in the development of measures while Addendum XXVII was under development, and that it should be given the opportunity to collaborate on developing alternative conservation measures through the LCMT process.
- Many commenters feel the data used for the Addendum XXVII trigger index were flawed, or not enough data was used, and that the Board should wait to review the results of the 2025 benchmark stock assessment before implementing any new management measures.
- Some comments indicated they are uncertain about whether the gauge increases in Addendum XXVII will achieve the intended goals. It was noted by several individuals that decreasing the maximum gauge size in other areas (e.g., LCMA 3, OCC) and applying a zero-tolerance v-notching policy to protect large reproductive females would be better for the conservation of the stock.
- Several comments suggested that reducing the trap limit in LCMA 1 would be preferred to increasing the minimum gauge size, and others suggested modifications to traps.
- Multiple comments suggested that predation by increasing populations of groundfish and other species is the driver of changes in juvenile abundance.
- Effort in LCMA 1 is decreasing due to aging of the fleet, increasing costs to harvesters, and economic uncertainty.

Other Comments

- There were 10 comments specific to the measures of Addendum XXVII pertaining to the Outer Cape Cod LCMA. These comments stated they do not support the implementation of the changes to the OCC management measures under Addendum XXVII, including the v-notch definition and the maximum gauge size. The comments expressed frustration that the OCC are

the only group that will be required to restrict their measured under Addendum XXVII, despite being the smallest fleet and contributing only a small percentage of harvest. They noted that the OCC is already very restricted, with measures including smaller trap allocations, a larger minimum size, trap reductions through a trap transfer tax, and a shorter fishing season. Cherry picking the measures to repeal from Addendum XXVII and only leaving measures that affect OCC is discriminatory and will not have a real conservation benefit.

- Some comments requested the Board look at the impacts of other ocean uses like offshore wind, energy cables, dredging, and trawling on the lobster fishery and ecosystem.
- Fishermen spend their lives on the water, they are the experts about what is happening with the lobster resource, and they have the most experience fishing for lobster. It is in the harvesters' best interest to maintain a sustainable population, and their input on management measures should be considered and valued.

American Lobster Draft Addendum XXXI Public Hearing

Webinar Hearing

April 10, 2024

82 Public Participants

18 Commissioners and State Staff

Commissioners & Proxies: Allison Hepler (ME), Carl Wilson (ME), Megan Ware (ME), Cheri Patterson (NH), Doug Grout (NH), Renee Zobel (NH), Dan McKiernan (MA), Joe Cimino (NJ), Jeff Kaelin (NJ), Allison Murphy (NOAA)

ASMFC Staff: Caitlin Starks, Toni Kerns

Hearing Overview

- Of attendees who specified a preference for a proposed management option, 1 was in favor of Option A (maintain Addendum XXVII measures) and 26 were in favor of Option B (repeal all gauge and vent measures of Addendum XXVII).
- Support for Option B was based on concerns about economic impacts of the gauge changes, disagreement with the abundance index data, and the lack of an opportunity for industry to discuss alternative measures to gauge increases.
- Various attendees commented that no action to change the gauge should be taken until after the stock assessment is completed this fall and we have more up to date information on the stock.
- Four attendees who fish in the Outer Cape Cod (OCC) management area were opposed to both options in the draft addendum because both would implement the v-notch definition of 1/8" with or without setal hairs for OCC established by Addendum XXVII. These individuals would like to see an option for no action (i.e., do not implement any of the Addendum XXVII measures). They noted that OCC has more restrictions than the other LCMAs and only 44 permit holders and therefore changing this measure will have no real conservation benefit.

Summary of Comments

Jim Hanscom, ME

- Maine shouldn't have to do anything because it is the most restricted fishery. Other areas should be coming up to Maine's standards.
- The v-notch possession rule should be zero tolerance.

Will Clayton

- Supports Option A, status quo.

Beth Casoni, Massachusetts Lobstermen's Association

- MLA supports not all of Option B, but supports repealing the LCMA 1, 3 and OCC gauge and vent size changes. All gauges up and down should be repealed.
- The 40+ OCC lobstermen will be unfairly harmed.

Dustin Delano, New England Fishermen's Stewardship Association (NEFSA)

- NEFSA supports thousands of harvesters in New England and supports Option B.

- Opposes the Addendum XXVII increase to gauge size in LCMA 1 due to economic impacts of the gauge increase. This is two times size of any other increase. The vent size is too large. It will create more issues in the gray zone and inequality between areas.
- There will be an impact on the chick market for American dealers and it threatens the New England processors.
- There is a new stock assessment this year and the Board should wait until after that to consider changes.
- Disagrees with the three-year time period used as a baseline in Addendum XXVII, and alternative measures to a gauge increase were not discussed. The industry is already meeting about other possible measures.

Brendan Adams, MA, President, Outer Cape Lobstermen's Association (OCLA)

- The Outer Cape fishermen want to keep the v-notch definition as is.
- There should be another option to throw out all of Add XXVII.
- The OCC fishermen did not get included in the process for coming up with measures. They are a small number and not everyone has 800 traps.
- Last week at state meeting, someone said this hearing is just a formality and ASMFC is going to do what they want anyway. We are just going to have to fight for our v-notch definition.

Jason Mills, ME, Zone A

- Supports Option B

Patrice McCarron, Maine Lobstermen's Association

- Supports Option B.
- MLA opposes the Addendum XXVII gauge increase.
- There have already been meetings with the zone councils and they are seeing that the data are looking better and we will have new information on the stock in October.

Jeff Souza MA, OCC

- There should be an Option C to not change anything (leave everything as it was before Addendum XXVII). It should be all or none. OCC took a different approach to conservation measures and got to keep the v-notch. The only ones that get impacted by Option B is Outer Cape.
- Changing things for OCC is not going to have much of a conservation benefit with there being only 44 licenses. If there are changes they should be changing the things that are going to have a bigger impact.

Jim Hanscom, ME, Zone B, Maine Lobstermen's Union (MLU)

- Supports Option B and agrees with Dustin Delano.

John Moore, MA, LCMA 3

- Supports Option B.
- Questions the legitimacy of the trigger from Addendum XXVII, and also the effectiveness of the measure for LCMA 3. Limited information on how often large females produce eggs. Also question the socioeconomic impact estimates because it is based on observer and landings data; the larger lobsters are caught in January-March and we have never seen an observer in those months.

- The addendum needs to be reviewed in its entirety. If Option B is approved, they should come up with other measures.
- It is important for fishermen to get some extra trap tags so they can keep fishing their full allocation if they lose one.

Kenneth Dunn, Northeastern Fishermen's Coalition

- The science being used is highly inaccurate. We need a couple years of real science fishing in deep water.
- For Maine, this is supposed to affect all of the lobster areas. Maine is the smallest area of all of the bottom area. As small as it is, Maine has done enough. The no-tolerance v-notch policy should be for all areas.
- Supports Option B.

Nick Page, ME, Zone E

- Supports Option B.

Richard Howland, A1, Zone B.

- Appreciate ASMFC for being a states' rights group and looking out for the sustainability of the resource.
- At the February meeting the Board said we need industry buy in. We don't have it. We have not figured out anything with Canada. We want to see stock assessment. The LCMTs were not convened. We are very conservation-minded but it is not the time for this.
- Supports Option B.

Sherman Hutchins, ME, Zone C

- Supports Option B. Agrees with Dustin and Patrice.
- When it comes to conservation it needs to be noted that anyone harvesting a lobster with a v-notch, that is a lobster that Maine fishermen threw back for conservation and someone else is taking it.

Douglas McLennan

- Support Option B and agrees with Dustin and Patrice.
- We have not even mentioned the 2028 new whale regulations. For us to do this gauge increase now, that is completely opposed by industry, doesn't make sense. We don't know where we are going to be in 2028.

Virginia Olsen, ME, MLU organizer

- Supports Option B. Agrees with Dustin and Patrice. The LCMTs did not get opportunities to meet and discuss options and that is why there is not buy in from the industry. Appreciates Sherman's comment on the v-notch, and we have the same issue with the gray zone.

Samuel Pickard, MA, OCC and A3

- The big issue with this Addendum is conservation. The OCC zone in the early 2000s increased the minimum gauge to 3-3/8" and it brought reproduction up by over 40%. We also have a 10% trap transfer tax. There are only 44 active state permits, and they have an average of 393 tags. OCC has a short season, especially with the whale closures. Already lost two months of the season.

- The stock assessment for Addendum XXVII was missing from COVID. We need to use data from fishermen. The fishermen are seeing something different than what the state says.
- We don't fish on small lobster like LCMA 1 does. Data in Addendum XXVII for OCC wasn't even from OCC, it was extrapolated from LCMA 1 and 3. We need our own data for our zone.
- Not a fan of Option A or B because OCC is still being penalized and discriminated against once again.

Kate Oneal, ME

- Agrees with Dustin and Virginia. Supports Option B.
- The science needs to be reassessed.

Michael Dawson, ME, Zone D

- Agree with MLA and NEFSA and supports Option B. Zone D opposes the gauge increase unanimously.

Bobby Nudd, NH

- Supports Option B.

Jason Lemos, NH, New Hampshire Commercial Fishermen's Association

- Supports Option B.

Samuel Blatchley, Counsel to OCLA

- OCLA has submitted comments opposing the standard v-notch for all OCC permit holders. It undermines the legally binding settlement in place for two decades. In 2000, after a lawsuit the OCLA and ASMFC reached a settlement informed by science analysis. It allowed the OCC to establish a conservation equivalency measure in lieu of v-notching. MA biologist noted biological concerns with v-notching: increased risk of disease, egg loss due to handling, and that lobster that are thrown back after being v-notched would have been protected by having eggs anyway. The increase in the minimum gauge size resulted in an increase in egg production. The v-notch isn't going to save lobster resource.
- Draft Addendum XXXII threatens the OCC framework but spares Maine. Option B should be amended to add that OCC should be exempt from the v-notch definition.

George Prince

- Supports Option B. Supports the MLA, NEFSA, and MLU comments.

Wayne Delano, ME

- Agrees with Dustin, NEFSA, MLU, MLA and supports Option B.
- Has been lobster fishing since high school and thinks we cannot go with the measure increase at this time and need to consider other options.
- We have never seen as many egg-bearing lobsters in my life and think things will be different in the next few years.

Clinton Collamore, ME

- Is a fourth-generation lobsterman and has seen a lot. Supports Option B.
- Would like to ask that the committees and commissions just leave the lobstermen alone for a few years. A lot of people don't know what is going on and are confused.

Ryan Ames

- Supports Option B and NEFSA.

Daniel Sawyer, Gauge Manufacturer

- Main concern is the time needed for the manufacturers to produce the gauges and provide them to the industry in order for them to comply. June to July is not enough time to produce the gauges. Recommends that with any implementation of new regs there should be a mandatory time period for manufacturers to produce the necessary equipment.

Sheila Dassat, ME Downeast Lobstermen's Association

- Agrees with the other associations and supports Option B.
- Also thinks we need to wait until the next stock assessment comes out.

Jeff Souza, OCC

- We were on the last ASMFC meeting to make a comment, and they did not let us so we could not make comments about the addendum at that time. We have been on all of the meetings and have not been listened to.
- There should be an option not to do any of Addendum XXVII.
- Once again, the minority is being abused. If you want conservation measures, they need to be done by Maine who is catching 90% of the lobster.

Kenneth Dunn

- It should be noted that Maine catches 90% of all lobsters bought and sold in the US, so how is v-notching not working?

Samuel Blatchley

- OCC is asking to amend Option B to add a provision that exempts the OCC from the v-notch possession definition of 1/8" with or without setal hairs.

Samuel Pickard

- OCC has a larger minimum size and also a continuing trap reduction of 10% of traps bought and sold. OCC also has a shorter season because of whale closures and a smaller trap allotment. Why is OCC always having to adopt more strict conservation measures when we already have an active conservation plan?

Jack Inablocks

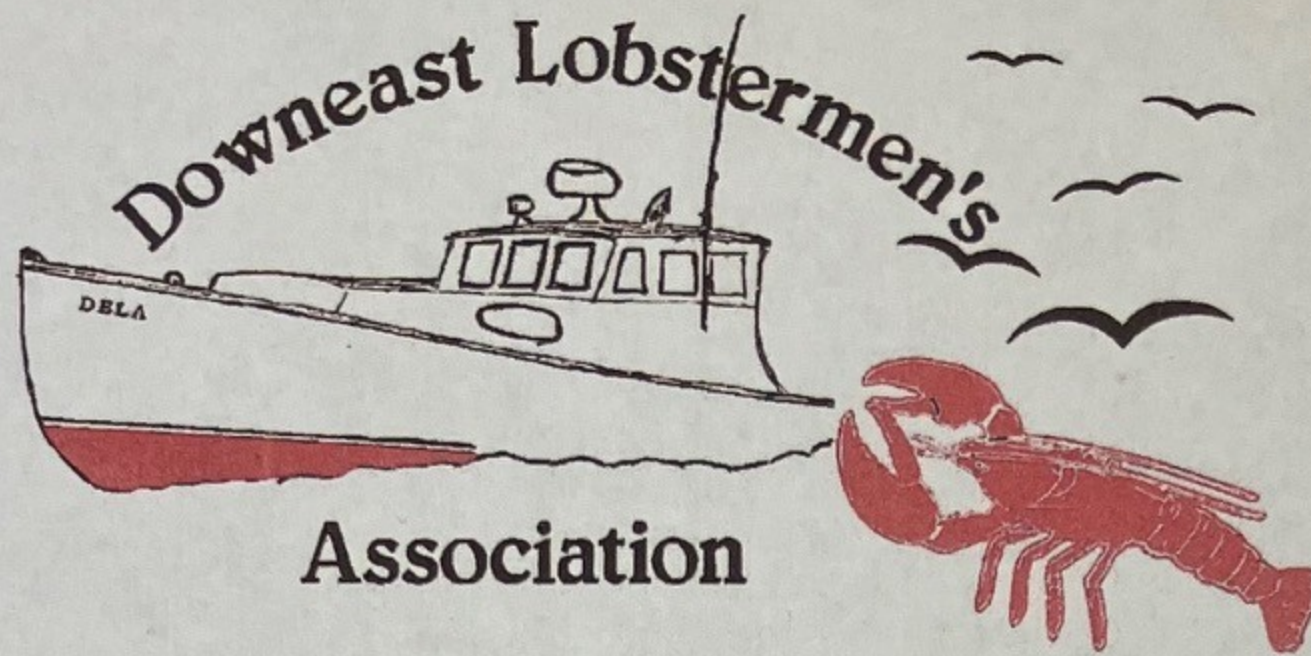
- Entered comments into the webinar chat.
- Supports Option B

Steve Hutchinson, ME, Zone C

- Entered comments into the webinar chat.
- Has been a license-holder for 53 years, and has seen the worst of it and the best of it. From what I'm seeing for tiny juveniles and the amount of fishermen dropping out of the business, the fishery is taking care of itself. Option B is my vote.

Jason Mills, ME, Lobster Zone A

- Entered comments into the webinar chat.
- I support Option B. I also strongly suggest if you want any support in this area (LCMA 1), if we consider a gauge increase in the future we need to get the Canadian fishermen on board as well. Otherwise, our efforts we be useless in our area.



P. O. Box 702
Stonington, ME 04681
August 23, 2025

Caitlin Starks
Atlantic States Marine Fisheries Commission
Suite 200A-N
Arlington, VA 22201

RE: DELA Response to Draft Addendum XXXII

Dear Ms. Starks,

As a Maine lobster association, we have represented our industry for thirty three years and continue to speak for our membership and industry. We have our generations in mind, past, present and future.

Maine has led the conservation in our lobster industry for many years with conservation measures that we started. The zero tolerance V-Notch Rule was established into law in 1948 which was used to mark the egg-bearing females, returning them to the water to protect their reproduction cycle. Then in 1974, Maine required to equip their traps with a vent so that undersized lobsters could escape. This is all an important part of our strict conservation rules.

In Maine, since 1961, drag caught lobster by-catch has been banned. This is also a great conservation measure that Maine has put into place. In 2011, during the reign of Norman Olsen as Commissioner, it was proposed to allow this practice once again to help save the dragger fleet in Portland. Twice, DELA fought this legislation and won the battle.

With all of these measures being said, DELA does not support the implementation of the Addendum XXXII for our near future. We believe in waiting for the results of the next stock assessment in October 2025. There are many variables that may contribute to the decline at this time, such as inclement weather this past season and the presence of invasive sea squirts.

Sincerely,

Hilton Turner, President & DELA Board of Directors

Hilton Turner



MAINE

Lobstermen's Association, Inc.

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Caitlin Starks
Atlantic States Marine Fisheries Commission
1050 N Highland St, Suite 200-A
Arlington, VA 22201

April 25, 2025

Dear Ms. Starks and American Lobster Management Board:

On behalf of the Maine Lobstermen's Association (MLA), I want to thank the Lobster Management Board for your continued engagement with the industry and your responsiveness to our concerns with Addendum XXVII. We appreciate the initiation of Draft Addendum XXXII, which considers the repeal of the gauge and vent size increases. The MLA strongly urges you repeal these measures by adopting Option B in this addendum.

The MLA has repeatedly voiced our members' concerns over the LMA 1 gauge increase. Our members continue to worry that it would negatively impact lobster trade between the U.S. and Canada and exacerbate the disparity in conservation requirements in the Gray Zone. We remain concerned that basing the trigger on a short, three-year reference period established around the most productive lobstering year on record exaggerates the magnitude of the downward trend in the recruit index. Lobstermen never expected the historic high abundance to persist indefinitely, and we believe a broader, more representative reference period should have been used.

Rather than resist change, Maine's lobster industry is stepping forward to be part of a thoughtful solution. Industry leaders have been meeting to discuss the status of the lobster resource and to explore alternative measures that might be considered to ensure the stock remains resilient. The Maine Department of Marine Resources (DMR) held council meetings in all seven lobster zones and it is soon holding its second Lobster Advisory Council meeting to discuss lobster industry feedback to date. Additionally, the Lobster Institute organized a meeting of seven lobster industry associations from Maine, New Hampshire, Massachusetts and Offshore to further discuss this issue. The MLA is committed to participating in these meetings and to engage with our board and members in discussions on how to keep both the lobster resource and industry resilient.

The MLA is encouraged that the last two years of Maine's lobster recruit surveys have been positive. Maine DMR reports that the Stage 4 larval survey has rebounded to previous levels, the Young of the Year Settlement Survey recovered to the survey average in 2023 and 2024, the Ventless Trap Survey increased in all three statistical areas in 2024, and the Fall and Spring Trawl Survey saw an increase in recruit lobsters in 2023 and 2024 (see <https://mainefishermensforum.org/wp-content/uploads/Maine-DMR-Lobster-Science-Update.pdf>). These findings are supported by the observations of Maine lobstermen up and down the coast who are consistently reporting lots of small lobsters in their traps. All indications are that declining trends have reversed and the stock is not overfished.

Considering this information, the MLA respectfully requests that the Lobster Board review the updated survey results through 2024 and the upcoming Benchmark Lobster Stock Assessment before any new management action is formally considered. We also request an economic analysis of any proposed management actions.

Comments heard during the public hearing on Addendum XXXII echoed the frustration we hear regularly from Maine lobstermen. They are upset that the V-notch and oversize lobsters that they must throw back can be legally landed by lobstermen in adjacent management areas. While we understand that other LMA's have implemented alternative conservation programs, the fact remains that lobsters saved by one group of lobstermen for conservation purposes are being caught and sold by others. Those same lobstermen are now being asked to do more.

This frustration harkens back to the intent of the original version of Addendum XXVII in 2017 which was to standardize measures across lobster management areas, to the extent possible, to improve effectiveness of the conservation plan. The Georges Bank and Gulf of Maine lobster stocks were merged into a single stock because data showed that these stocks function as a single biological unit. The management boundaries no longer matched the lobster stock boundaries so inconsistencies in management approaches undermine the conservation benefit of those measures. The stock assessment raised valid concerns that large runs of female and large lobsters landed from offshore waters could impact the reproductive capacity of the stock. These issues have not been fully resolved and lobstermen deserve assurance that the lobsters they put back for conservation purposes are contributing to the sustainability of the fishery.

The MLA requests that ASMFC conduct a comprehensive analysis of the impacts of competing management approaches of the GOM/GBK stock to quantify how much conservation is lost when lobsters that are put back by lobstermen from one area for conservation purposes are landed by lobstermen in another. This would enable ASMFC to further its original goal of standardizing measures across LMA's to maximize conservation of lobstermen's efforts. It would also provide transparency around the cumulative impact of competing management approaches and how it impacts the overall conservation of the lobster resource.

Maine lobstermen are highly invested in the future of the lobster resource. They are determined to protect it so they and future generations can continue this proud heritage.

The MLA thanks you for your willingness to hear the industry's concerns, and we respectfully ask that you adopt Option B in Addendum XXXII. We remain committed to working as an industry to ensure the resource remains resilient.

Thank you for your consideration.

Sincerely,

A handwritten signature in dark ink that reads "Patrice McCarron". The signature is fluid and cursive, with the first name "Patrice" and last name "McCarron" clearly distinguishable.

Patrice McCarron
Executive Director



Massachusetts Lobstermen's Association

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April 9, 2025

Caitlin Starks
Atlantic States Marine Fisheries Commission
Suite 200 A-N
Arlington, VA 22201

Email: comments@asmfc.org

RE: Addendum XXXII

Dear Ms. Starks,

The Massachusetts Lobstermen's Association (MLA) submits this letter of SUPPORT on behalf of its' ~1800 members to the Atlantic States Marine Fisheries Commission on the Addendum XXXII to remove several provisions of Addendum XXVII specifically the gauge and vent size changes for Lobster Conservation Management Areas (LCMA) 1 (Gulf of Maine), 3 (offshore federal waters) and Outer Cape Cod.

Established in 1963, the MLA is a member-driven organization that accepts and supports the interdependence of species conservation and the members' collective economic interests. The membership is comprised of fishermen from New Jersey to Canada and encompasses a wide variety of gear types from fixed gear and mobile gear alike. The MLA continues to work conscientiously through the management process with the Massachusetts Division of Marine Fisheries, Atlantic States Marine Fisheries, Atlantic Large Whale Take Reduction Team, and the New England Fisheries Management Council to ensure the continued sustainability and profitability of the resources in which our commercial fishermen are engaged in.

The MLA strongly advocates that ALL the gauge measures, up and down, be repealed as the ~40 Outer Cape Cod State Waters commercial lobstermen cannot save the resource alone and will be unfairly financially harmed. This should be an all-inclusive effort and not cherry picked.

Thank you for your thoughtful deliberation and consideration of our comments.

Sincerely,

Beth Casoni

MLA, Executive Director



New England Fishermen's Stewardship Association
500 Southborough Dr. Suite 204
South Portland, ME 04106

April 24, 2025

Atlantic States Marine Fisheries Commission
Caitlin Starks, Senior Fishery Management Plan Coordinator
1050 N Highland St, Suite 200 A-N
Arlington, VA 22201

Dear Commissioners of the American Lobster Board,

The New England Fishermen's Stewardship Association (NEFSA) respectfully submits this letter in strong support of Option B in Draft Addendum XXXII, which proposes the removal of the pending minimum gauge and vent size increases for Lobster Management Area 1 (LMA 1).

We recognize and appreciate the Board's intent to promote stock resilience in the Gulf of Maine/Georges Bank stock unit. However, the proposed gauge increase would impose disproportionate economic harm on U.S. lobster harvesters without delivering a clear, corresponding conservation benefit. NEFSA opposes these changes for several well-founded reasons:

1. Disproportionate Economic Impact with Uncertain Benefit

The proposed increase in the minimum legal size from 3 ¼" to 3 3/8" would render a significant portion of the currently legal catch unmarketable, reducing harvester income and processing throughput. According to industry analyses, this could result in losses of tens of millions of dollars annually to LMA 1 harvesters during the early years of implementation—particularly harmful to small and mid-sized owner-operators.

2. Severe Cross-Border Inequity in the Gray Zone

Of particular concern is the persistent and growing inequity in the U.S.–Canada "Gray Zone". Under the proposed U.S. gauge increase, American fishermen operating in this contested area would be subjected to a larger minimum size limit than their Canadian counterparts, who face no maximum size restriction and retain a smaller minimum gauge size. This regulatory imbalance not only undermines U.S. competitiveness but also invites increased exploitation of the resource on the Canadian side, rendering U.S. conservation efforts ineffective and economically damaging. Without a reciprocal binational strategy, unilateral gauge increases will further disadvantage U.S. fishermen, particularly in Washington County and Downeast Maine, where dependence on Gray Zone fishing is high.

3. Scientific Timing and Stock Assessment Considerations

The gauge increase was originally proposed in response to declines in survey data from only three specific indices—from a baseline of banner years, but the next stock assessment is expected in 2025. Implementing a permanent and impactful measure without the benefit of up-to-date biological data risks locking the industry into potentially unnecessary or counterproductive regulations. We believe it is premature to proceed with structural changes before evaluating the findings of the upcoming assessment.

4. Planned Industry-Led Conservation Measures

NEFSA, in collaboration with the Maine Lobstermen's Association (MLA) and other partners, is developing a renewed and targeted v-notch campaign to strengthen protection for egg-bearing females. This conservation method is time-tested, widely adopted, and community-supported, offering a more flexible and culturally appropriate approach to stock resilience than mandated gauge increases.

5. Robust Stakeholder Engagement and Coordination

All seven Lobster Zone Councils in Maine have convened to examine long-term resilience strategies. Concurrently, leading industry organizations representing Maine lobstermen specifically, have met to discuss cooperative management, innovative conservation, and pathways to enhanced profitability. There is momentum within the fleet to design solutions that balance conservation with economic viability, and the industry is committed to this path.

In addition to the Zone Councils and other groups in Maine, all major associations representing lobstermen from Massachusetts to the Canadian border have been actively communicating, with a recent meeting facilitated by the Lobster Institute. The group intends to continue meeting regularly over the coming months to collaborate on strategies for industry resilience.

In conclusion, NEFSA urges the Board to adopt Option B in Addendum XXXII, thereby removing the gauge and vent size increases in LMA 1. We believe this is a necessary step to preserve the economic stability of New England's lobster fleet while allowing time for new science to emerge and for collaborative, industry-led resilience efforts to take hold. The fishery's success has long depended on adaptive, community-rooted stewardship—and we are committed to carrying that tradition forward.

Thank you for your attention to the voices and livelihoods of those who depend on this fishery.

Sincerely,

Dustin W. Delano
Chief Operating Officer
New England Fishermen's Stewardship Association

[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 1:18 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Andrea Tomlinson

Email

andrea@neyoungfishermen.org

State

New Hampshire

Comment

The New England Young Fishermen's Alliance (NEYFA) supports Draft Addendum XXXII and is more than willing to work with other industry partners to develop an efficient, scientifically based, industry- led initiative to ensure our valuable lobster resource is managed appropriately. Several of our young fishermen and women are not seeing a decline in juvenile lobsters on the water and the gauge increase will also act as a deterrent for young people thinking of entering the industry. Countless young people have told me in the past 3 years that the reason they do not want to enter into the commercial fishing industry, including the lobster industry, is because they do not see a future there. They feel it is laden with uncertainty, market fluctuations and regulations that they cannot fully comprehend. We are seeing declining numbers of new entrants in the lobster industry in northern New England each year. According to the Maine Lobstermen's Association (MLA) and Maine Department of Marine Resources (DMR), the Maine lobster industry commercial lobster licenses have declined from 5000 in 2015 to 3800 today. Similarly, there are currently 800 student license holders in Maine, down from 1000 in 2015. In NH, we are also seeing a graying of the fleet in our lobster industry and as a result, we are encouraging young sternmen and women to enter into the Captain's wheelhouse from southern Maine to northern Massachusetts through our Deckhand to Captain training program.

We feel there is a way in which we can generate a passionate commitment from young industry members to participate in the stewardship of our lobster resource. Our Deckhand to Captain training program requires trainees to participate in 15 hours of advocacy and/or collaborative research to complete their course. We have seen several of

our Deckhand to Captain graduates express interest in participating in collaborative research opportunities within the lobster industry. We have also participated in studies led by lobster biologist Jason Goldstein, at the Wells National Estuarine Research Reserve in Maine, where trainees track egger lobster stages while lobstering. This opportunity generated a large amount of interest in our young lobstermen and women to continue with collaborative research in this area. Additionally, several of our young sternmen expressed seeing "more eggers than they had in the past" while participating in this project.

We also feel that if Addendum XXXII was not implemented, that it would create an unfair advantage for Canadian lobsters to flood the US markets. This would increase the uncertainty that young people are feeling about entering the industry. We hope that regulators and industry can build the necessary bridges to move forward with Addendum XXXII so we can work cooperatively and collectively towards supporting our thriving lobster industry in NH and Maine.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Wed 4/9/2025 9:03 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Chris Adamaitis

Email

roughtimes1@gmail.com

State

New Hampshire

Comment

In strong disagreement with the stock assessment numbers based off of the following reasons.

Lobsterman and women are on the decrease themselves, as are the youth generation entering the industry. The amount of traps being fished are dramatically lower than previous years. I personally fish 12 months a year and see the species through out there entire phases week to week. I do believe the wind farms and ocean construction/destruction is displacing a lot of these lobsters and along with changing water temperatures they are migrating different patterns. Just a

Touch over 25 years of working this industry as my only source of income and firmly believe that a gauge/vent increase is completely unnecessary

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[External] Public Comment For Addendum XXXII

From Brendan Adams <fibfab25@yahoo.com>

Date Fri 4/25/2025 10:56 PM

To Comments <comments@asmfc.org>

Cc STEPHEN SMITH <stephens_7@comcast.net>; Jeff Souza <crashseafood22@yahoo.com>; Sam Pickard <lobsterer.sp@gmail.com>; Sam P. Blatchley <sblatchley@ecklandblando.com>; Beth Casoni <beth.casoni@lobstermen.com>; Dana Pazolt <dpazolt@gmail.com>

Hello ASFMC,

I am submitting this public comment in the capacity of president of the Outer Cape Lobstermen's Association. I will keep this brief, I would not waste your time with an eleven page comment at this late juncture. To start off, most of you seemingly keep ignoring our public comments. You are not the only ones. It seems that the Mass DMF and MFAC seem to be often ignoring our comments too. I cannot put into words how frustrating it is trying to go through the official public process, that is only window dressing for the public. It appears that we have no say in the process at the state or ASMFC (that would be federal) level. I am truly sorry that is the case, because it is not as advertised. We do not believe for a second that the we will "only" lose 2% of our catch (income) with the new notch rule you are going to force on us. We believe its more likely a conservative 25% loss of income. Many of us involved with the outer cape lobster fishery have voiced or written our opinions of addendum 27, and now addendum 32. What is happening, in the case of addendum 32, is extremely arbitrary and capricious. In essence you are going to repeal all the conservation measures of addendum 27, except for new v-notch regulation for the outer cape state waters fishermen. All 44 of us. Discriminatory and prejudiced it is, on your parts. There are more than 6000 other lobster licenses that have no repercussions from addendum 32. We are literally the only ones. We have already done our parts in increasing lobster egg production through our 3 3/8' minimum gauge, 2' escape vents, and our trap reduction plan. We helped create our management plan, which works great. Also, the folks that speak against our area need to remember we get the last shot at the lobsters, not the first shot with the smaller minimum gauge. Since it appears, after a couple years of back and forth with you all, that you 'cannot' get rid of the our new (forced) v-notch regulation, that you folks came up with, on addendum. 32, I will suggest your 3 options. Option one is that one of you make a motion to repeal ALL of addendum 27 (every part including the v-notch definition you keep trying to force on us) in addendum 32. Thats what should have happened from the start. Option 2 is you create Addendum 33 where you repeal the v-notch definition you are trying to force on us. I would highly suggest option one or two. Option 3 is we see you in federal court, where we won against ASMFC and Massachusetts DMF back in 2000. You are in violation of that court ruling by changing any of our plan. We will prevail again. Please bear in mind that we are not the only fishermen potentially coming at you (ASMFC, MA DMF, other states) legally at this time, for various reasons. We would prefer that you unravel this now on your own now.

Thank You,

Brendan Adams

President of the Outer Cape Lobstermen's Association

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 8:17 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Alex Benner

Email

rocknroll3986@yahoo.com

State

Maine

Comment

I am in favor of option b of addendum xxxII. There is no need for a gauge Increase or increase of vent size. As many of the other lobsterman have stated the amount of stock that we are seeing warrants no need for an increase in either gauge or vent size. No irrational descion should be made with the flawed data that has been presented.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 2:43 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Harley Alley

Email

busterboo04@yahoo.com

State

Maine

Comment

I think you can't leave well enough alone let the measure and vents stay as is with all the fisherman up and down the coast I think we know best on how to to run our industry

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[External]

From Harley Alley <westernway2000@gmail.com>

Date Fri 4/25/2025 2:45 PM

To Caitlin Starks <CStarks@ASMFC.org>

I just left a comment and forgot to leave this Carl Wilson is any better than Pat not sure why the fisherman can't put some one in office

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

W. William Anderson
702 Dixie Road
Trescott, Maine 04652

207-733-2179

April 10, 2025

Caitlin Starks, Senior Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Omission
1050 N. Highland Street, Suite 200 A-N
Arlington, V. A. 22201

Dear Caitlin:

I would like to provide you with some comments on the Lobster Draft Addendum XXXII.

I testified in favor of the previous Lobster Addendum that was designed to protect our lobster fishery if we saw a decline in landings. While our lobster landings have declined the lobster resource is still relatively healthy. Natural resources have variations in resource abundance due to natural causes. This summer it came to me. Why some of Maine's Lobster Zones are seeing declines while others are quite stable. I will talk about Zone C. Maine has a V-notching law and Maine used to have many tidal lobster pounds, starting around the Boothbay Harbor region on up the coast into Canada. You put lobsters in storage for a few months and feed them. When market were right or the shell quality of the lobster was good these lobsters were taken out and sold. Some lobsters would egg out. A Marine Patrol Warden would go to the lobster pound V-notch these lobsters and release these egg out females into the waters of the inner bays all along the coast of Maine. Maine would pay them for these lobsters out of the Seed Lobster Fund. Funded by part of the cost of purchasing a lobster license. This was the perfect place to be releasing egg out females, in our protected bays. As the waters have been warming it became more and more difficult to run a tidal lobster pound. Warmer waters caused the lobsters to be more active and a higher shrink. Pound owners used to try to keep the shrink under 5%. As the shrinks started to rise to 10, 15 percent and higher these lobster pounds were no longer profitable. This may be the first winter that the State of Maine has no active tidal lobster pounds.

Now some of these pound owner really supported Maine's V-notching laws. Basil Heanssler of Conery Cove Lobster, Deer Isle, Maine put in females so they would egg out, be V-notched and released into the wild. His daughter Cathy who was on the board of directors or The Lobster Institute told me about her father putting just females in one of the smaller pounds so they would egg out. Basil passed away a few years ago and the family sold the company.

It takes about seven years for a lobster larva to grow to a legal lobster. Commissioner Keliher at some meeting in the winter or 2024 talked about how Zone C was seeing the largest decline in landings in 2023. Last summer it came to me that the timing of the loss of the Heanssler family operation could be the reason for the decline of landings in Zone C. As I started talking about this with others in the industry. One person said it is just 6 years since we stopped running our lobster pound. One year we had 38 crates of spawn females floating waiting to be V-notch and release. I know where these pounds were located and if you want to support the health of a lobster fishery this would be an excellent way to support the landings of lobsters in this fishery. The loss of our tidal lobster pounds and their support of our V-notching program. I suspect this could be much of the reason for the decline in lobster landings in Maine. I believe that warming waters is also pushing fishermen into deeper waters in some areas. This also may mean that some of these inner bays which were excellent places to have females release

spawn is now too warm for that to. This could push more of our lobster settlement out of these protected areas and into more exposed areas making juveniles more exposed to storm damage.

Maine has just started to realize this and we are talking about this now. We would like some time to talk about these issues and look for new ways to make up for these changes. Maine protects our V-notched lobsters with zero tolerance meaning that any female with a flipper that is not perfect must be re-notched and returned to the ocean. I v-notch any female lobster without a perfect flipper and other fishermen do the same but many do not. Much of the time I feel like I am the only one in my area that v-notches spawn females or re-notches other females. I have been talking about how our lobster pound owners have been supporting our Lobster fishery. With the loss of these lobster pound and what they used to do. It becomes even more important that all fishermen understand the importance of v-notching all egg bearing females and re-notching other females. To help send this message out to all fishermen we could require that all fishermen have a v-notch tool on the boat.

While I was supporting the need to increase the lobster measure because of our continued declining landings. Then the lobster pound and their V-notching issue came to me last summer. I was also concerned about marketing problems and the loss of the one pound lobster. Jack Merrill has been talking about these problems a gauge increase would cause and I agree with what he has been saying. I did not really like the option of another gauge increase but our landings were declining. I would like to have other options to support the long term health of the lobster fishery.

Most of the lobsters I catch where I fish migrate in from Canadian areas. We have intense fishing pressure in the Grey Zone today. The Island of Grand Mann, Canada has become more and more dependent on the lobster fishery. They used to have many different fisheries on their Island and lobstering was what they did in November, as other fisheries ended. They also fished in the spring until the middle of June.

Working with the Lobster Institute in the past. I have tagged both V-notched and over sized lobsters where I fish about six miles west of Quoddy Head. Tagging them in October and by December of that same year we received information that some of these tagged lobsters were caught around Outer Cape Cod, Massachusetts. This makes me propose that the zero tolerance v-notching definition should spread to all states as our waters are warming. Things are changing, as I have indicated in this letter. A v-notch tool should be required on all lobster boats throughout the range of this lobster resource. We should do this to help send the message of how important it is to protect our spawning females. What I know about lobster migration tells me that all fishermen may have experienced the effect of what a few lobster pound owners who believed in giving back to the resource that supported their operations. All fishermen can start doing more. This is something we could easily do now. As we talk about what else we can do.

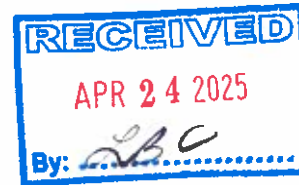
Sincerely,

A handwritten signature in blue ink that reads "Bill".

W William Anderson

W. William Anderson
702 Dixie Road
Trescott, Maine 04652

207-733-2179



April 12, 2025

Caitlin Starks, Senior Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 N. Highland Street, Suite 200 A-N
Arlington, V. A. 22201

Dear Caitlin:

I provided you with some comments on April 10, mailed on April 11, 2025 on the Lobster Draft Addendum XXXII. I have a few more thoughts. I talked a lot about our v-notching program and seed lobster fund. The fee is five dollars added to the cost of purchasing a lobster license. This fee was established back in the days of one dollar per pound for hard lobsters and fifty cents for shredders. As the price of lobsters went up the fee never changed so eventually there was not always enough to pay for all the females that egged out in pounds. So eventually some pound owners started putting in just males while others might fill the small pound with all females or just put in lobsters like they always did. Even though they knew they might not get paid anything for the ones that egged out.

With no pounds left working and how water temperature could be affecting where lobster live and settle out could be changing. I believe Kathleen Reardon may be developing some information about how some fishermen are having to move out into deeper more unprotected waters to catch lobsters. So where our lobsters settle could be changing to. I brought up the thought of zero tolerance enforcement everywhere and requiring every fisherman to have a v-notch tool on the boat. Then I thought ASMFC has sent me a couple of nice checks for different reasons. Could funding be found to mail every fisherman a v-notch tool with a letter about all the changes I have been talking about in my comments on Draft Addendum XXXII. I looked in 2024 Hamilton Marine was asking \$34.99. You could probably get a better price on a bulk purchase. Then enforcement officers could follow up when they are aboard boats. Asking where v-notch tools are and talking about the importance of having one and using one.

Sincerely,

W. William Anderson

[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 9:42 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Andy & Kim Smith

Email

sasi6552002@yahoo.com

State

Maine

Comment

American draft addendum XXII to remove the lobster gauge increase and escape vent size is necessary. Increasing both puts the Maine lobsterman at a drastic disadvantage to the Canadian lobstermen. Our lobster industry is sustainable and thriving. We do not need any new laws or adjustments that negatively affect the Maine Lobster Industry. Just like everything else we have peak catches and lower yield catches. This does not indicate we are unsustainable just the opposite we are in the growing period of lobsters. With Maine implementing the V notch we are every day preserving the future of the American lobster.

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[External] I would like to submit my comment on gauge and escape vent rule i am not in favor of this

From miups1996 <miups1996@gmail.com>

Date Thu 4/24/2025 7:56 PM

To Caitlin Starks <CStarks@ASMFC.org>

Sent via the Samsung Galaxy S22 5G, an AT&T 5G smartphone

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[External] Lobster Draft Addendum XXXII

From maineguy110@aol.com <maineguy110@aol.com>

Date Fri 4/25/2025 11:23 AM

To Comments <comments@asmfc.org>

No increase in measure or changes to vents please

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 8:36 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Norman Bagley Jr.

Email

normanbagleyjr@gmail.com

State

Maine

Comment

I do not agree with the measure and vent increase for American lobster

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Thu 4/10/2025 4:54 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Andrew Balser

Email

cpinkham86@yahoo.com

State

Maine

Comment

I am a fisherman from Friendship Maine, the gauge increase would devastate the whole lobster fishing community in the state of Maine. Not only would it put most if not all fisherman out of buisness but it is completley not needed. If the tow surveys and ventless traps were done in a better way than the reduction in small lobsters percentage would not have been near as bad as what the numbers show. This gauge increase and vent size increase should not even be on the table. Start listening to the fisherman on the water and realize this is something we do not need.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 9:41 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

mike beal

Email

fshrmn43@yahoo.com

State

Maine

Comment

I am definately in opposition of this ruling. It makes no sense to try to fix something thats not broke. Our fishery is doing fine the way that it is

Mike Beal

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[External] Lobster Draft Addendum XXXII

From Thomas Bell <twb3302@gmail.com>

Date Tue 4/8/2025 11:04 AM

To Comments <comments@asmfc.org>

I am writing in full support of Lobster Draft Addendum XXXII.

Addendum XXVII is not needed, and overreaching for many reasons but 3 in-particular.

1. The data collection is based on dated methods of data collection, and therefore may not be indicative of the true lobster stock.
2. Even if the data was accurate, it is being compared to the best ever measured lobster stock. It would seem much more helpful to compare stock data to a 10 or 20 year average.
3. It does not take into account all fish, and in particular, ground fish stocks that seem to be on the rise in many areas of the GOM. Scientific data may not be up to date on this evidence, but fishermen have been saying this for years. It seems unreasonable to not account for rising predation.

And none of this takes into account the economic harm Addendum XXVII would have on coastal communities, which can not be overstated.

For these reasons and many more, I am in full support of Lobster Draft Addendum XXXII.

Thank you.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Wed 4/2/2025 7:16 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Tyler Bemis

Email

tb2199@gmail.com

State

Maine

Comment

My Name is Tyler Bemis I'm a lobsterman from Matinicus Island, Maine.

I oppose the gauge increase, I believe that there can be lobster trap changes that are done to increase bottom settlement as well as increase the healthy handling of undersized lobsters that make it to the surface. I think that an implemented minimum vent size of 1 7/8" vent 2 per trap minimum. And also some sort of claw saver bottom on the parlor end of the trap where the lobsters crawl back too. The reason for this would help small lobsters from getting stuck in the bottom of the trap and minimize damage to claws and other parts of their shells to increase survival when thrown back.

I also believe that if there is to be a measure change it should be in area 3. The lobsters that an area 3 boat can keep are much larger and have a higher percentage of eggs survival over a sub legal or legal lobster in Maine waters. So we are throwing back breeding stock lobsters to just be caught out of state and then the ocean looses top successful breeding lobsters. That to me makes no sense. Those bigger lobsters need to be protected and allowed to breed. We are loosing millions of these lobsters annually. What could bottom settlement be if these lobsters were protected like we already do here in Maine?

Further more, after speaking to lobster dealers and fisherman in the "Grey Zone" a lobster measure change without Canadian's doing the same is catastrophic or a huge market share that the lobster industry has spent 30+ years making. So a change without full market compliance puts US lobster producers at a serious disadvantage. The Lobsterman that fish the "Grey Zone" would be throwing back lobster that a Canadian could bring right to market. So

that measure change wouldn't be adding to lobster settlement, it would add to the disadvantages these fisherman already face in that area.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Wed 4/2/2025 7:23 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Tyler Bemis

Email

tb2199@gmail.com

State

Maine

Comment

To add to my comment before opposing the lobster measure increase.

I would like to see a zero tolerance v notch rule throughout all lobster fishing zones. I believe that would protect all breeding females and keep them producing healthy lobsters and increasing the lobster settlement.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 10:35 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Erik Benner

Email

erikalan2002@gmail.com

State

Maine

Comment

I support NEFSA's position!

Another thing I want to add that still blows my mind, is how long you guys let ventless traps set. Lobsters eat lobsters. I've had traps right next to some of them before and mine were blown full of small ones. But if I were to let them sit for 2 weeks with no way out, then there would be only bigger lobsters left since they (the smaller lobsters) would target the easiest prey first.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Wed 4/16/2025 8:08 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Jeff Blackman

Email

fvtaralynn@gmail.com

State

Massachusetts

Comment

I am not for the lobster gauge increase. I think you should just leave things alone the fishery is fine thanks 🦞

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 9:24 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Mark C Brewer

Email

madlobsterman@yahoo.com

State

Maine

Comment

Please refer to your predator, pray module? if you research farther enough back, you should see that when a species of certain ground Fish rebound to healthy levels ,Their number one source of food is the lobster Lavi and baby juvenile lobsters. My grandfather and father taught me this as a kid as reference back in the 80s and late 70s, the majority of lobsters were on the hard bottom because of the ground fish abundance in the mud and in the gravel? I am in support of an increase of the minimum size and maximum size of lobsters, but it only works if it's reciprocal to Canada and the southern Lobster States ? as you know, we are all competing for the same markets if Maine does this alone we will be the biggest loser and ultimately lead in my opinion to the biggest collapse in history of the Lobster industry thank you very much, Mark Brewer

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[External] Lobster Draft Addendum XXXII

From Elijah Brice <briceboatworks@gmail.com>

Date Thu 4/24/2025 3:04 PM

To Comments <comments@asmfc.org>

Addendum XXXII is unnecessary and will have detrimental effects to our fishing industry. We see large numbers of juvenile lobsters and release many NEW, freshly notched, egg bearing female lobsters every day. A gauge change will not increase the lobster population, but simply reduce the amount we can legally keep in our catch.

We need third party verification for proof of low juvenile lobster stock, more research on any potential benefits from this change, and a thorough analysis of how useless this would be on the international border with Canada if they don't adopt the same gauge size as us. The effects of predatory ground fish should also be studied. It is very apparent to us on the water that cod, pollock, sea bass and other species populations have been growing stronger again, and Black Sea bass/striped bass are migrating north. These species prey heavily on juvenile lobsters. Is this a lack of conservation measures for our lobster stock or mismanagement of predatory species that prey on the lobster stock that we are great stewards of?

Our release of oversized lobsters is already a futile effort with Canadians being able to keep them just over the border. It will be the same with undersized lobsters. We will not see an average lobster size increase like other areas of New England. We will release our new undersize lobsters, they'll migrate over to Canada in the winter, then get caught and never return. The effort would be useless.

- Elijah Brice

Zone A Maine Lobsterman License #7248
Eastport, ME

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[External] Re: Lobster Draft Addendum XXXII

From Elijah Brice <briceboatworks@gmail.com>

Date Fri 4/25/2025 7:35 AM

To Comments <comments@asmfc.org>

April 25, 2025

Atlantic States Marine Fisheries Commission
Caitlin Starks, Senior Fishery Management Plan Coordinator
1050 N Highland St, Suite 200 A-N
Arlington, VA 22201

Dear Commissioners of the American Lobster Board,

The New England Fishermen's Stewardship Association (NEFSA) respectfully submits this letter in strong support of Option B in Draft Addendum XXXII, which proposes the removal of the pending minimum gauge and vent size increases for Lobster Management Area 1 (LMA 1).

We recognize and appreciate the Board's intent to promote stock resilience in the Gulf of Maine/Georges Bank stock unit. However, the proposed gauge increase would impose disproportionate economic harm on U.S. lobster harvesters without delivering a clear, corresponding conservation benefit. NEFSA opposes these changes for several well-founded reasons:

1. Disproportionate Economic Impact with Uncertain Benefit

The proposed increase in the minimum legal size from 3 ¼" to 3 3/8" would render a significant portion of the currently legal catch unmarketable, reducing harvester income and processing throughput. According to industry analyses, this could result in losses of tens of millions of dollars annually to LMA 1 harvesters during the early years of implementation—particularly harmful to small and mid-sized owner-operators.

2. Severe Cross-Border Inequity in the Gray Zone

Of particular concern is the persistent and growing inequity in the U.S.–Canada "Gray Zone". Under the proposed U.S. gauge increase, American fishermen operating in this contested area would be subjected to a larger minimum size limit than their Canadian counterparts, who face no maximum size restriction and would retain a smaller minimum gauge size. This regulatory imbalance not only undermines U.S. competitiveness but also invites increased exploitation of the resource on the Canadian side, rendering U.S. conservation efforts ineffective and economically damaging. Without a reciprocal binational strategy, unilateral gauge increases will further disadvantage U.S. fishermen, particularly in Washington County and Downeast Maine, where dependence on Gray Zone fishing is high.

3. Scientific Timing and Stock Assessment Considerations

The gauge increase was originally proposed in response to declines in survey data from only three specific indices—from a baseline of banner years, but the next stock assessment is expected in 2025. Implementing a permanent and impactful measure without the benefit of up-to-date biological data risks locking the industry into potentially unnecessary or counterproductive regulations. We believe it is premature to proceed with structural changes before evaluating the findings of the upcoming assessment.

4. Planned Industry-Led Conservation Measures

NEFSA, in collaboration with the Maine Lobstermen's Association (MLA) and other partners, is developing a renewed and targeted v-notch campaign to strengthen protection for egg-bearing females. This conservation method is time-tested, widely adopted, and community-supported, offering a more flexible and culturally appropriate approach to stock resilience than mandated gauge increases.

5. Robust Stakeholder Engagement and Coordination

All seven Lobster Zone Councils in Maine have convened to examine long-term resilience strategies. Concurrently, harvesters and leading industry organizations representing Maine lobstermen specifically, have met to discuss cooperative management, innovative conservation, and pathways to enhanced profitability. There is momentum within the fleet to design solutions that balance conservation with economic viability, and the industry is committed to this path.

In addition to the Zone Councils and other groups in Maine, all major associations representing lobstermen from Massachusetts to the Canadian border have been actively communicating, with a recent meeting facilitated by the Lobster Institute. The group intends to continue meeting regularly over the coming months to collaborate on strategies for industry resilience.

In conclusion, NEFSA urges the Board to adopt Option B in Addendum XXXII, thereby removing the gauge and vent size increases in LMA 1. We believe this is a necessary step to preserve the economic stability of New England's lobster fleet while allowing time for new science to emerge and for collaborative, industry-led resilience efforts to take hold. The fishery's success has long depended on adaptive, community-rooted stewardship—and we are committed to carrying that tradition forward.

Thank you for your attention to the voices and livelihoods of those who depend on this fishery.

On Thu, Apr 24, 2025 at 3:03 PM Elijah Brice <briceboatworks@gmail.com> wrote:

Addendum XXXII is unnecessary and will have detrimental effects to our fishing industry. We see large numbers of juvenile lobsters and release many NEW, freshly notched, egg bearing female lobsters every day. A gauge change will not increase the lobster population, but simply reduce the amount we can legally keep in our catch.

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- Elijah Brice

Zone A Maine Lobsterman License #7248
Eastport, ME

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 2:39 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Jerome Briggs

Email

timbriggs57@icloud.com

State

Maine

Comment

Please leave the measure of lobsters as is . Just leave it alone. Slow down natural predation first ,striped bass,cod,and cunners in my opinion are the worst .

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 11:12 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Steve Budrow

Email

stevebudrow@gmail.com

State

Massachusetts

Comment

I am a LMA1 fed-MA lobsterman in favor of repealing the guage increase for now. States are just beginning to discuss better science that will take into account federal sampling (I have taken a state sampler and they refused to sample fed waters as it is now). The science needs to represent the vast fishing areas and evolve to the present day fishery. Especially repeal it now because Canada is not on board and it will devastate us economically where we will not have a better price (less catch) if the Canadians are still bringing in highly marketable catch we cannot. Going forward we would benefit from more collaborative research with specifically federal fishermen to better assess catch, climate factors, species trends, and price factors (if price is high, catch may be less because fishermen don't go as hard, not that the landings are down due to less available catch). Stop looking at landings as an all-in indicator of stock health. Evolve your ventless surveys by requiring fishermen input. Do not sample on the same boat twice. Do better for our data - the states have become complacent with 'it's what we've always done'. The stock has evolved and we need to evolve with it - we are willing research participants wanting to contribute to their longevity. And everyone should be zero tolerance for V Notches.

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[External] Fwd: Lobster Draft Addendum XXXII

From pattymae46@gmail.com <pattymae46@gmail.com>

Date Thu 4/24/2025 6:15 PM

To Comments <comments@asmfc.org>

> I worked for Atwood Lobster for 32 years so I feel I know something about the lobster business. My father and 2 sons were fishermen.

>

> First off, lobsters run in cycles like everything else on this earth. I've seen tremendous years and then a year where the fishermen couldn't pay their bills. With the water warming up, the lobsters are moving to the north a little. I'm pretty good friends with some of the guys from Newfoundland as, we had crews come every year for 9 years until they changed the visa laws. I go up almost every year. They never caught many at all until the last few years and now they're doing really well. The lobster gauges in Canada and Newfoundland are different than ours. They always shipped down smaller gauge lobsters than we were allowed to sell. They would be sealed and we could open them and check for dead's and then reseal them and same with the oversized. It made it a little harder to compete then because of our size difference, so to change the size even more would put us out of the ball park. We've changed our measure once already and if we increase it again, it will put some fishermen out of business. A does not solve the issue.

>

> The biggest problem is that the people that are trying to change things don't really know from experience. They've never hauled for years and so you really don't know the business unless you have. You might think you do but not living the life and experiencing it yourself you really don't know. Some of the problem is wanting to control the industry not really trying to save it. Changing this measure would not only hurt the fishermen but every business around the whole area. This area relies on the income from the lobster industry. If you look back, you will find that the fishermen themselves helped save the industry by passing a V notch law. That has helped a lot over the years. The fishermen don't want to harm their living. Please just leave the gauge where it is.

>

> Patricia Burch

> PO Box 65

> Spruce Head, ME 04859

>

>

> Sent from my iPad

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 3:31 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Ben Burrin

Email

Burrinben72@gmail.com

State

Maine

Comment

The measure an vent increase is not something this industry needs. Us fishermen indeed know more about lobsters than anyone.. something most of us handle year around. The amount of small an baby lobsters I've seen in the last 5 years have increased. I see more an more small lobsters every year meaning the measure we are using now an have for years is working. Why change something that is clearly working. The only thing it will do is bankrupt fishermen. This increase needs to be stopped. We can't take more an more of this bullshit.. I'm just trying to provide for my family an be able to teach my kids what fishing is about a keep the generation of young fishermen an women going.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Tue 4/15/2025 5:13 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Ward Byrne

Email

ltb04@yahoo.com

State

New Hampshire

Comment

No gauge change no vent size ! Get on our boats and do industry based data collection . Things have shifted a bit and you're not looking in the right places ! Also past two years I have never caught so many juvenile lobsters from gray fish size to just under the gauge . I believe the stock is strong and the future looks bright !! If you really want to make a difference stop allowing draggers and gillnetters from taking the big breaders!

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Thu 4/10/2025 7:36 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Howard Calder

Email

fisherman4life73@yahoo.com

State

Maine

Comment

Hello my name is Howard Calder. I am a lobster fisherman from Eastport Maine but I also fish full time on the stern of a lobster boat from Eastport that fishes the grey zone federal area between Maine and Grand Manan Canada. When I first started fishing that area there were 3 Canadian fishermen hauling traps in the area. Last year there were 50 Canadian boats hauling in this area. I believe the amount of lobsters being caught hasn't changed much but a huge majority of the catch is being caught by the Canadian boats. If the American fishermen have a gauge increase and the Canadian fishermen do not we will be put out of business. We would be throwing back short lobster that would be legal for Canadian boats to keep and we fish right along side these guys. We can't throw bigger shorts back and wait for another shed because they will be caught and sold before they would be legal for the US boats to sell them. Please consider this before the gauge and vent size changes for the Maine fishermen. Thank you

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 12:26 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Lewis Cameron

Email

lew7070@gmail.com

State

Maine

Comment

As a fisherman of 40 plus years and having had many scientists on my boat I'll say a couple things for the sake of posterity. Your data collecting is flawed. If you really cared about juvenile lobsters increase you'd bring Canada NH and Mass up to our restrictions by stopping the brood stock from being sold. You won't though because of the hard core lobbying by companies like ShaftMaster. Your all on the take and I can only hope you got audited by the new administration. Open up the COD market. Put some of the money NOAA gave you into the seeding program that used to be done. You won't though because you're too interested in lining each other's pockets and those examples would actually work effectively and you can't have that can you?

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Thu 4/10/2025 8:14 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Luke Cates

Email

catesl23@icloud.com

State

Maine

Comment

The lobster gauge minimum size increases will hurt the fishermen that fish within the gray zone indefinitely. We would never see the trend of catch increasing over the following years that the rest of the state may see, due to the fact that 3 1/4" lobsters will continue being harvested by Canadians on all sides of us. The increase could very well be the final nail in the coffin for us fishermen downeast.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 4:26 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Barry Catlin

Email

catlinshore4320@gmail.com

State

Maine

Comment

Option B. Increase of measure size would increase the amount of lobsters carrying shell disease. If anything decrease the oversize and conserve the brood stock.

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[External]

From spike chip <oldstrider@gmail.com>

Date Fri 4/25/2025 8:07 AM

To Comments <comments@asmfc.org>

The lobster gauge doesn't need to change.. it has been good enough for years.. it might be better spending your time on Canadian lobsters 🦞 coming into the US.. not to mention the mutilated lobsters.. tails and claws.. The lobster industry is hard enough without making more ridiculous laws too justify your government jobs...

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Wed 4/9/2025 11:49 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Tomi colson

Email

plummer.tomi@yahoo.com

State

Maine

Comment

First of all you are going to ruin our states economy worse than it already is. For what? There is no shortage in sublegal lobsters especially in around hard bottom. Canada in my opinion needs to stop being able to harvest oversize lobsters! Those are your breeders. It's no different than what you all have done with the Herrin quota. You allow these guys to fish in areas where there is nothing but spawned Herrin. Fishermen see it and we hate it as well as the lobsters they don't like spawned Herrin. Leave it alone increasing the measure isn't going to help it's going to kill our industry. Most people want a pound pound and a half lobster. Eventually you all are gonna have us catching selects. You all need to get out on boats in the field and take observation and not just once a week! Put your time in! Stop trying to make your observations behind a keyboard. The fishermen are out in it all the time. And another thing, we are not going to have banner years all the time everything comes in waves. There are more codfish now then there ever has been, along with many other species of fish who feed on shedders and eggers. All these factors factor into how well the lobsters are thriving. So no increasing the measure is not going to do a thing. You have to have a balance you guys stopped gill netting and there for all that's done is allow all these fish to make a come back and now there's nothing to balance them out.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Tue 4/8/2025 6:05 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

william conner

Email

wsconner@yahoo.com

State

New Hampshire

Comment

DO NOT IMPLEMENT A MIN SIZE INCREASE

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[External] Lobster Draft Addendum XXXII

From Paula Cook <paulajeff_96@yahoo.com>

Date Fri 4/25/2025 1:34 PM

To Comments <comments@asmfc.org>

Hello,

My family and I support NEFSA's position on this Addendum! It needs to pass for fairness to the industry! Please do the right thing!

Jeff Cook

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[External] Lobster Draft Addendum XXXII

From Tom C <tommy.e.coughlin@gmail.com>

Date Fri 4/25/2025 1:11 AM

To Comments <comments@asmfc.org>

Please do not change the lobster gauge or vent rules. You would be hurting fisherman and their families. There are plenty of baby lobster. If 80 percent of the ocean is unexplored, how can you make any scientific argument ? Lobstering is one of the oldest and most sustainable fisheries. Fishermen invented the v notch rule as gentlemen's code before the government even mandated it. There are wind farms killing off everything around them. There are lies all around us you can bring to light, if you really wanted to protect Mother Earth. Putting small owner operated businesses out of business so cooperate fisheries can take over a food source is not admirable. Eat fresh eat local.

Thank you for your time,
Tom Coughlin
Harwich / Provincetown , MA

Sent from my iPhone

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 12:52 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Andrew Cousens

Email

Acousens7496@gmail.com

State

Maine

Comment

Hello, I am not in favor of the gauge and vent increase. There are many reasons I feel this is a bad idea and would hurt all lobstermen up and down the coast.

1 pound lobsters don't produce nearly as many eggs as bigger lobsters do. That is why we have our oversize gauge and it would make way more sense for everyone to get on board with that then to go the other way.

Eliminating 1 pound lobsters from our market would put us at a big disadvantage. Canada would take that market over and we would see drop offs in our catch. Especially fisherman that border canada.

Lobsters rely so much on the conditions around them. Weather plays a huge role in determining how many juveniles survive and where they might be. Every year is different and to think that some surveys tell us all we need to know about them is quite shallow and ignorant.

We can't expect lobster numbers to keep rising or stay at the high end of our averages. There is many factors when it comes to lobster population and to think this gauge increase is the best thing to do doesn't make much sense to me.

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[External] Lobster Draft Addendum XXXII

From nathaniel curtis <nathanielcurtis@gmail.com>

Date Fri 4/25/2025 10:59 AM

To Comments <comments@asmfc.org>

April 24, 2025

Atlantic States Marine Fisheries Commission
Caitlin Starks, Senior Fishery Management Plan Coordinator
1050 N Highland St, Suite 200 A-N
Arlington, VA 22201

Dear Commissioners of the American Lobster Board,

The New England Fishermen's Stewardship Association (NEFSA) respectfully submits this letter in strong support of Option B in Draft Addendum XXXII, which proposes the removal of the pending minimum gauge and vent size increases for Lobster Management Area 1 (LMA 1).

We recognize and appreciate the Board's intent to promote stock resilience in the Gulf of Maine/Georges Bank stock unit. However, the proposed gauge increase would impose disproportionate economic harm on U.S. lobster harvesters without delivering a clear, corresponding conservation benefit. NEFSA opposes these changes for several well-founded reasons:

1. Disproportionate Economic Impact with Uncertain Benefit

The proposed increase in the minimum legal size from 3 ¼" to 3 3/8" would render a significant portion of the currently legal catch unmarketable, reducing harvester income and processing throughput. According to industry analyses, this could result in losses of tens of millions of dollars annually to LMA 1 harvesters during the early years of implementation—particularly harmful to small and mid-sized owner-operators.

2. Severe Cross-Border Inequity in the Gray Zone

Of particular concern is the persistent and growing inequity in the U.S.–Canada "Gray Zone". Under the proposed U.S. gauge increase, American fishermen operating in this contested area would be subjected to a larger minimum size limit than their Canadian counterparts, who face no maximum size restriction and would retain a smaller minimum gauge size. This regulatory imbalance not only undermines U.S. competitiveness but also invites increased exploitation of the resource on the Canadian side, rendering U.S. conservation efforts ineffective and economically damaging. Without a reciprocal binational strategy, unilateral gauge increases will further disadvantage U.S. fishermen, particularly in Washington County and Downeast Maine, where dependence on Gray Zone fishing is high.

3. Scientific Timing and Stock Assessment Considerations

The gauge increase was originally proposed in response to declines in survey data from only three specific indices—from a baseline of banner years, but the next stock assessment is expected in 2025. Implementing a permanent and impactful measure without the benefit of up-to-date biological data risks locking the industry into potentially unnecessary or counterproductive regulations. We believe it is premature to proceed with structural changes before evaluating the findings of the upcoming assessment.

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cooperative management, innovative conservation, and pathways to enhanced profitability. There is momentum within the fleet to design solutions that balance conservation with economic viability, and the industry is committed to this path.

In addition to the Zone Councils and other groups in Maine, all major associations representing lobstermen from Massachusetts to the Canadian border have been actively communicating, with a recent meeting facilitated by the Lobster Institute. The group intends to continue meeting regularly over the coming months to collaborate on strategies for industry resilience.

In conclusion, NEFSA urges the Board to adopt Option B in Addendum XXXII, thereby removing the gauge and vent size increases in LMA 1. We believe this is a necessary step to preserve the economic stability of New England's lobster fleet while allowing time for new science to emerge and for collaborative, industry-led resilience efforts to take hold. The fishery's success has long depended on adaptive, community-rooted stewardship—and we are committed to carrying that tradition forward.

Thank you for your attention to the voices and livelihoods of those who depend on this fishery.

Sincerely,
Nathaniel Curtis
Aquaculturist
New Harbor, Maine

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 7:26 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

William Dammier

Email

mrdammier@gmail.com

State

Maine

Comment

If this goes through we might as well move to a different state(possibly Canada) because everyone will be affected by this, not only fishermen but literally everyone in this state. The amount of juvenile lobsters are abundant where I fish and the state will not change their way of conducting studies. Lobsters have evolved as to survive so the ventless trap survey is inaccurate whereas the areas that they are conducted do not have lobsters or at least haven't in the past 4 yrs. So I'm not in favor of this

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 7:33 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Dale Damon

Email

kmgdamon@gmail.com

State

Maine

Comment

I support everything NEFSA, MLA, and MLU said and I choose option B, to not increase the measure. I have fished Penobscot bay for the last 10 years. I fish year round. I myself have not seen a shortage of short lobsters. The past three springs that I have fished, the majority of lobsters in my traps are juvenile lobsters, which is more than I have seen in years prior. I think before any new rules are put into place it needs to be looked at closer. I also think increasing the measure is going to put a lot of fisherman out of business, especially with all the whale activist coming after us as well. Lobstering is what I do for a living to be able to provide a comfortable life for my family.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 11:06 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

James Davenport

Email

lobstado13@gmail.c

State

Maine

Comment

Commercial fisherman and lobsterman inshore for 45 years. Where I fish the number of fishermen has gone from 8 to 3 in last 4 years. Landings drop has something to do with less effort. October2024 was best lobster fishing in 10 years. I am opposed to a measure increase. J b davenport me lis 73050

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[External] Gauge increase

From David Reed <davidfinn64@icloud.com>

Date Fri 4/25/2025 9:59 AM

To Comments <comments@asmfc.org>

My name is David Reed I'm a lifelong fisherman of over 50 years. Increasing the measure would absolutely ruin our lobster fisheries. The fallout from such an act would be devastating. The markets would suffer many more fishermen would be forced to sell out and there is no way the price would make up for the loss in poundage. Total insanity. Any given day I personally throw hundreds of pounds of short lobsters. There definitely is no shortage of undersized lobsters on the bottom. The DMR has no idea what they are doing. You need older fisherman up there calling the shots not a bunch of wet behind the ears scientists!!! Far as I can tell they don't want us to make a living anymore. We are way over regulated by shit that hurts us and makes them look good to justify their actions and jobs. What the commissioner and his cronies have and are doing is insane and should be stopped and changed immediately!!!! David Reed.

Sent from my iPhone

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/11/2025 10:36 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Ryan Dennison

Email

ryan.dennison@ymail.com

State

Maine

Comment

The measure increase will cripple the Maine lobster industry. There is more breeding females on the bottom of the ocean than there ever has been before. There is no need for a measure increase.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[External] Lobster Draft Addendum XXXII

From ED DESROSIER <eddesrosier@comcast.net>

Date Wed 4/9/2025 7:20 PM

To Comments <comments@asmfc.org>

I am opposed to the gauge increase. Lobster settlement and recruitment vary over time, and certain plankton that juvenile lobsters depend on are currently in decline, perhaps leading to lower survey numbers. I also know that the oversized gauge has contributed to a substantial breeding population for which we don't get credit. Please leave things as is.

Ed Desrosier
F/V Janet Leigh

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[External] Lobster draft addendum XXXII

From Dixon Smith <fvsize matters@gmail.com>

Date Sun 4/13/2025 12:22 PM

To Comments <comments@asmfc.org>

Hello my name is Dixon Smith. I am against Maine lobster fisherman and I support XXXII to repeal gauge and vent changes.

Thank you

Dixon Smith

Capt FV SIZE MATTERS

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[External] Lobster Draft Addendum XXXII

From Zach Donnell <zdonnell@maine.rr.com>

Date Thu 4/24/2025 7:13 PM

To Comments <comments@asmfc.org>

I am Zach Donnell, I'm a commercial lobsterman from Perkins cove, ogunquit Maine.

I stand with both MLA, NEFSA, and many others by voting , no change on the gauge increase.

Leave the gauge and vents as they are.

Thank you.

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[External] Lobster Draft AddendumXXXII

From Raquel Dorr <rld1998@icloud.com>

Date Thu 4/24/2025 4:42 PM

To Comments <comments@asmfc.org>

I am a 4th Generation Lobsterman's Wife.

Please do not pass this Rule. Listen to the Fishermen. Their input matters. They do not want to see the Industry fold, they abide by the rulings that make sense to sustain the fishery. They are saying this increase is not necessary. They are being honest. Please listen :)

Thank you for your time!

Raquel L Dorr

Wife of Ryan J Dorr, Captain

F/V SCHYLER ANNETTE II

Stonington

Sent from my iPhone

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[External] Lobster vent and measure, 18 year old Maine lobsterman

From Jace Doughty <doughtnme@aol.com>

Date Fri 4/25/2025 4:39 PM

To Comments <comments@asmfc.org>

We've had the same measure in place since 1972 and statewide in 1997 and we've seen no significant issues with juvenile lobster populations egg bearing or not. I find it hard to believe that this drop in juveniles is a direct result of a policy that has been in place for over a 3 decades . Instead, I believe the real issue lies in the increased populations of lobster predators, such as pollock, striped bass, hake, dogfish, bluefish, and more These predator populations have been steadily rising since the early 2000s. In which those fisheries have been regulated almost out of business. Let's be honest the extinction isn't the species at hand it's going to be the fishermen. I have uncles that are ground fisherman who fill their quote on no problem and could do plenty more but they're being regulated so they're unable to one who has been fishing for 50 years and said the stock of fish is as robust as he seen, it For certain species. The threshold for the current measure was set during the peak years of lobster landings in Maine (2016–2018), a period of record landings. However, multiple other regulations have been introduced over time, which allowed for that. For example, the v-notch measure was implemented in 1982, trap limits and licensing came in 1995 and 1996, and maximum size limits were set in 1972.

Even the 2022 update of the American Lobsterman Settlement Index suggests that the measure increase is unlikely to reverse the trend in juvenile populations; instead, it's intended to create a larger buffer. So even the so called experts don't believe this increase will provide any real benefit just a bigger lobster being landed . It seems like a solution to a problem that may not be addressing the core issue. Why should we take a hit to our yearly catch and bottom line for a measure increase that isn't expected to solve the problem that we as fishermen haven't seen but are being told is there by people who don't live the same lives as us or see what we see daily. Instead, we should focus on identifying the true cause of the issue and fixing that.

[Sent from the all new AOL app for iOS](#)

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[External] Comment

From Ryan Drohan <kalyndlobster@gmail.com>

Date Fri 4/25/2025 8:48 AM

To Comments <comments@asmfc.org>

Good morning

I'm an area 1 lobsterman and in favor of option B. Like others I am concerned for the economic impacts of a gauge increase.

Thank you
Ryan Drohan
FV William G Drohan
16 Stockholm Ave
Rockport MA 01966

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Lobster Draft Addendum XXXII

From Comments <comments@asmfc.org>

Date Mon 4/7/2025 10:28 AM

To Comments <comments@asmfc.org>

From: John Drouin <rebbiesmistress@gmail.com>

Sent: Thursday, April 3, 2025 9:02 AM

To: Comments <comments@asmfc.org>

Subject: [External] Lobster Draft Addendum XXXII

To the ASMFC Board Members,

My name is John Drouin, and I am from the far downeast community of Cutler, Maine. I am and have been a commercial fisherman for 46 years.

I am writing to urge you to PASS addendum XXXII.

As you yourselves have mentioned the concerns and implications of addendum XXVII, much more time is needed to fully understand ALL of the issues that would surround a gauge increase....ie, Trade, economic issues and overall actual benefits of an increase. I also believe that the industry can discuss and come up with potential conservation equivalences. But time is needed to discuss what is right for the fishery.

I also would like to take this one step further and give my opinion on where this all is coming from.

Correct me if I am wrong, but ASMFC did NOT initiate the discussion on lobster resiliency or where the juvenile lobster population was at.

This entire gauge increase, or more so the act of trying to protect the lobster stocks, came from the Maine DMR Commissioner, Pat Keliher.

He, in 2017, told the Maine industry that he wanted to come up with a Fishery Management Plan (FMP). I believe that he then used the ASMFC to push along his agenda to try to increase the resiliency of the lobster stocks.

I believe that ASMFC would not have taken up the issue of resiliency if it were not for Commissioner Keliher.

Maine's 7 "zone councils" spoke against a gauge increase, but the Commissioner moved the "plan" forward with the guise that the ASMFC has now said something needs to be done.

We, industry participants, believe that the lobster stock is still very healthy and that the abundance of lobsters is and always will be cyclic. We can not regulate Mother Nature, and besides, Maine has ALWAYS touted that we have the best conservation measures throughout the range of the stocks...that is an undeniably FACT....our conservation measures got us to where we had record catches...sure, a warmer water at the time (water temps have since cooled in the last 10 years) and a lack of predators contributed to the high catches. It is the belief of many that with what we currently have for conservation measures, and with some potential tweaking of others, that the lobster stocks will remain healthy for generations to

come.....more pressing issues are NOAA's upcoming whale rules that will potentially have a more negative impact on the fishery, but the resource is and will remain healthy.

Thank you,
John Drouin
Cutler, Maine

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 1:09 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Scott Duffy

Email

sduffy786@comcast.net

State

Massachusetts

Comment

This addendum will bring devastating consequences to our lobster industry. I am 100% opposed to any of these policies. I've been lobstering for 52 years and I have no doubt if this addendum is passed it will be the end of the lobster industry as we know it.

Scott Duffy

F/V Freedom

Boston, Ma

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/4/2025 10:31 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Kenneth Dunn

Email

kennethdunn1985@gmail.com

State

Maine

Comment

I've been fishing offshore lobster for 10 years myself. But I think the best knowledge of this situation comes from people like my captain donnald simmons sr. 70 years old and has been fishing for all of it. He says they go in cycles, he said the pogies would come back and he was right. They are living, breathing, migrating creatures. With this said. We have never seen better fishing. It is clear to us there is foul play at hand. Money has been exchanged in order to crush our industry's, I proved this when I called pay kelliher out for taking money at the measure meeting and he got all offensive. We know your science is wrong. We know your data collection methods are wrong and we're not standing for it anymore. North Eastern fishermans coalition
And nefsa will hold you accountable. No more lies

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 12:12 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Earl Brewer

Email

scottbrewer7695@yahoo.com

State

Maine

Comment

I got my first Maine Lobster and crab fishing licence in 1969. In the years that followed I have seen the Maine inshore lobster fleet forced to supplement the fisheries of every other lobster fishery in the gulf of Maine. Most notably by the v notch and over sized laws. We diligently kept the fishery well stocked with breeders while practicly every one else sold what we threw back. Now we are being asked to sacrifice even more to benefit the offshore fisheries that still sell what we throw back. Until such time as all lobster fisheries match our conservation laws I cannot support any laws that call for more sacrifice on our behalf. Furthermore the reason that ASMFC lacks federal power is because in typical political fashion ,the paper pushers in charge are more concerned with picking winners and losers than they are concerned with regulations that reflect the best science for the fisheries. This is plainly evident by the way they restrict some states differently from others. Common sense dictates that good fishery science dosnt recognize state borders. Until the organization regulates fairly and equally, I cannot accept that it regulates for the resource and instead regulating for control, power and politics. I simply cannot support that wich I don't trust. So in conclusion I simply state. I do not support the proposed measure and vent increases proposed by ASMFC. Thank you for the oppertunity to offer my opinion. Earl Brewer. Maine lobsterman.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 4:15 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Josh Eaton

Email

joshuaeaton41@gmail.com

State

Maine

Comment

The lobster gauge increase will put 70 percent of lobstermen out of business or worse.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Mon 4/14/2025 3:06 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Erik Hansen

Email

Erikhansen1214@gmail.com

State

Maine

Comment

I've done this once and not sure it ever went through but here we go again. I think it's time to stop regulating us lobster fisherman out of business. Year after year more regulations that we've all complied with, and now a measure increase that's already been shut down. Please don't lay this on us. We farm these lobsters until legal size, small and large go back including v tails for breeding. I'd have to say enough is enough or you may never eat a Maine lobster again! Asking nicely this is not what we need. Thank you Erik

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 9:24 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Nick Faulkingham

Email

nickf3778@gmail.com

State

Maine

Comment

I am a commercial fisherman from Maine.

I am in favor of removing the trigger mechanism all together. The mechanism allows the Atlantic States Marine Fisheries Commission, to much power and control in their decision making.

Addendum XXVII that was meant to increase the vent and measure size, I feel would be the wrong approach to conservation and growth of the lobsters stock. One of the reasons I think this way is, we have an abundance of predators compared to 10 even 20 years ago. The amount of cod , Cunners and stripped bass has dramatically increased in recent years contributing to the pressure on the juvenile lobsters. When fishing, I witness Cunners with lobster eggs in their mouths on a daily basis. the cunners seek female egg bearing lobsters for a meal and for myself, this is a major concern! With this being said the (asmfc) should be looking into ways of controlling the predators to help balance the lobster stocks. Maybe consider a different approach. I do not feel the lobsters would live to meet the measure size that was projected to make a difference in the lobster stock.

Some thing else to consider would be Lobster hatcheries along the newengland coast, this will be a great start in stock rebuilding. It has been done in the past and i think with great success. Many more eggs would live and The juveniles would have a much higher survival rate in a controled environment. This would create jobs and could be tied in with

coastal community schools curriculum enhancing education in the science programs.

There are many other variables to consider too. Marketing would be another major hurdle to get past. putting the US fisherman at a disadvantage.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Tue 4/15/2025 1:42 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Kathi Feely

Email

kfeely14@gmail.com

State

Maine

Comment

Please do not change the vent size! The cost to change the vents and the time needed to do that will be a hardship on lobstermen n women who are just barely staying afloat! Gas n bait do high, wharf prices do low! Please give us a break!

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New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/11/2025 12:43 PM

To comments@asmfc.org <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Ryan Feener

Email

rfeener86@gmail.com

State

Maine

Comment

I support option b no measure increase

[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Wed 4/9/2025 4:51 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Tyler Flynn

Email

flynt226@gmail.com

State

New Hampshire

Comment

While the decline in recruit numbers in the local lobster problem is undoubtedly an issue, addendum XXXII will not in my opinion be an effective solution. Fishermen and the populations they harvest from are a complex balance, but I do not think the right angle is to limit fishermen. The goal should instead be to bolster the lobster population and continue with the current constrictions on commercial fishermen. The current codes regarding legal catch sizes and trap dimensions are plenty, they allow for effective but also regenerative harvesting to occur. To truly address this problem, we need to look at how to help lobsters make it to maturity so they can continue to effectively reproduce and grow the population. One way to do this is to try and improve the health of young lobsters, which can be addressed via their diets. Lobsters will eat anything, but since global warming has changed the metabolic cost of living in their environment, building an adequate shell has gotten more difficult. Because lobsters aren't growing properly strong shells, they're becoming more susceptible to Epizootic Shell Disease, which is currently a scourge of the population which disproportionately affects fecund lobsters and has therefore greatly affected population growth. To build an effective shell, lobsters need the right nutrients (i.e. magnesium), which can be found in most crustaceans' shells. One method that my brother came up with that we've been using, is to use Asian Shore Crabs as bait. They're not only filled with the right nutrients, but by using an invasive species as bait we kill two birds with one stone. By loading our traps with the right dietary needs for these animals, we allow any reproducing females and undersized lobsters to get the right food, and then we return them to their ecosystem. If a larger number of fishermen attempted a similar approach,

we could potentially see a marked increase in youth survival rate and fecund lobsters' life expectancy, without further limiting catch size.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sun 4/13/2025 7:11 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Sean Fogarty

Email

sfogarty72@gmail.com

State

Maine

Comment

I hold a class 2 license in Maine and fish in Zone D. I am opposed to any change to the current gauge and vent size.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Wed 4/2/2025 7:20 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Owen Foye

Email

owenfoye@icloud.com

State

Maine

Comment

Hard to make policy off flawed data, scientists an state officials who take these surveys to gather data, do not know where the lobsters are if they can't catch any for the survey they just plug in whatever number they get , starting with wrong info ending with wrong info blaming the fisherman the whole way trust the science!

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[External] Lobster Draft Addendum XXXII

From Arnold Francis <arnoldfrancis2@gmail.com>

Date Fri 4/25/2025 8:25 AM

To Comments <comments@asmfc.org>

I would like to say I am against the Gage increase. I think we need to do more research on this before making such a big decision.

Sent from my iPhone

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Wed 4/9/2025 10:03 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Charles Gebhardt

Email

charlieg511@hotmail.com

State

Maine

Comment

We don't want any more rules. Asmfc has been saying lobsters were in decline when I started lobstering twenty years ago. That was right before record breaking landings. Your scientific studies are flawed. Every year can't be a banner year for lobster. Things come in cycles. Tons of Jonah crabs this year but no market for them. Why don't you work on getting us a market for crab? What does someone in Arlington Virginia know about lobster fishing anyway? Asmfc has ruined every fishery they manage. Hope you all get fired!

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 5:17 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Kevin Glover

Email

kevinjglover239@gmail.com

State

Maine

Comment

My name is Kevin Glover. I am a lobsterman out of Owl's Head Maine. I am the representative of Zone D, District 8 Owl's Head. I am writing this against the lobster measure increase and vent increase in Maine. The majority of fishermen that I fish with and represent feel the same way about this. I feel that a measure increase of that size would have big impacts on our catch in the upcoming season. With the uncertainty of the whale regulations coming up in 2028 I feel we have to be careful on what we give up now. I would really like to see something that can be done to help out with this as well as the whale regulations, so we might only have to make one change instead of multiple. I also feel that getting the whole new England lobster fishery to work together is a key ingredient to making this a strong fishery. I'm an active member and have sat in many meetings and will continue to do so to help make this a strong fishery for many years to come. Thank you for your time.

Thank You,

Kevin Glover

FV Quick Step

Owl's Head Maine

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/11/2025 9:07 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

David Goetemann

Email

capt-bligh@outlook.com

State

Massachusetts

Comment

The state should have implemented a Trap limit of 600 traps per license years and years ago. It would be a simple math equation as to how many pounds you are saving on a daily basis. This would allow the more conservative Lobster men to survive as opposed to gauge increase, which would be unsurvivable. It's just common sense, which seems to be lacking. It speaks of obvious corruption.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/4/2025 7:53 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Mike Goodwin

Email

mgoodwin42@ymail.com

State

Massachusetts

Comment

I feel as though we should keep the gauge status quo

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Thu 4/10/2025 8:51 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Brent Griffin

Email

brent.qbl@gmail.com

State

Maine

Comment

How is the gauge increase going to work when downeast Maine has to fish beside boats from Canada and there gauge isn't changed so we let them go so they can take them don't seem to be very fare for us on this end maybe if there wasn't a grey zone witch is a different subject that should be addressed there is a Canada US line so why is there a gray zone

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[External]

From Kevin Griffin <kandj2005@aol.com>

Date Thu 4/24/2025 3:07 PM

To Comments <comments@asmfc.org>

A measure or vent increase will not achieve what it intended too.

Sent from my iPhone

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 8:43 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Erik Hansen

Email

erikhansen1214@gmail.com

State

Maine

Comment

This is the last thing our lobster fisherman need with the years of regulation against us. I've been lobstering since 1990, so 35 years. I've complied to all new regs. Why more when things are working fine as is! I'm totally against a measure increase aa it would cut my income by 30 percent atleast. Please listen to the fisherman that know best for our fisheries. Bad science seems to be the cause of all new regulations in all our fisheries. Thank you Erik.Hansen

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 7:44 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Dillon Harvey

Email

dillonharvey2@gmail.com

State

Maine

Comment

I am a seventeen year old lobsterman out of Bremen, Maine. Just last summer I acquired My Maine LMA1 inshore lobster license, And I can inform you that this is everything we don't need! Due to extensive regulations in recent years and an aging workforce in the lobstering industry many lobsterman have already opted for retirement. I have been on the water now every summer for the last 10 years and Was around to see the peak parts of each of those seasons and it seems to me that every year there is less and less fishermen which really should be regulation enough considering that these lobster landing are only low when compared to the all time highs. I believe that if the commission where to look at a graph dating back to 1988 instead of 2018 they would see that we still are very much above all time averages. I also would like to point out that this would have massive impact on the economic side of the fishery, The dock that I sell my catch too has a Connecticut market and that when sorting through my lobster at the end of the day to fill these out of state orders I find that 30 - 40% of my catch is not up to legal length for a 3 1/8" measure. How would the members of the commission fair if 30 - 40% of their yearly pay was cut? Along with this gauge increase I am aware of a vent increase that comes with, This to me is the most concerning part of the whole addendum as a 3 and 3/8" lobster can already escape through the 46mm square vents I use on my lobster traps increasing the size of that vent would allow legal lobsters to free flow through the parlor end of my trap and significantly reduce my daily catch. It is for these reasons I support addendum 32 to overturn the previous ruling that my home state has elected to ignore.

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[External]

From Devin Haskell <devinhaskell@gmail.com>

Date Fri 4/25/2025 10:33 AM

To Comments <comments@asmfc.org>

I support NEFSA position.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 4:12 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Hayden Jones

Email

hjones2723@gmail.com

State

Maine

Comment

My name is Hayden Jones, I am a lobster fishermen from Vinalhaven, Maine. I support Addendum XXXII because lobster fishermen and women need to be able to work together to help preserve our fishery. We eat, sleep and breathe lobster fishing where I live and we know it best. A gauge increase and vent increase would ruin our businesses that we work very hard to build. Years and years of hard work goes into our businesses, not one person I've talked to thinks this is a good idea. The amount of lobsters we would drop off after this increase would surely put me out of business. The lobsters are there on bottom still and plentiful, there are plenty more options to help preserve lobsters. We need to work together to survey and research lobsters. Just because catch is down doesn't mean there isn't lobsters there anymore, they move to different depths and types of bottom every year. Letting some of our groups that we have organized like the MLA and NEFSA come up with ways we can fix this or do the research really can help fix this problem and come to an agreement that would not hurt our businesses. They can even prove that this possibly isn't even a problem. Lobsters come in bursts, there's going to be good years and there's going to be bad years. Working together is what needs to happen, we can't all afford this big of a change.

Thank you,

Hayden Jones

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Wed 4/16/2025 5:20 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Nicholas Heal

Email

nickheal86@gmail.com

State

Maine

Comment

I'm a lobster fishermen from Maine. I oppose the gauge increase. The possible economic impact on the fisherie is not something I'm comfortable with. 1/16 of a inch is to much at one time. We suggested that if we did a gauge increase to do it at 1/32 like last time.

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New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 9:12 AM

To comments@asmfc.org <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Tyler Hodgdon

Email

hodgdon007@gmail.com

State

Maine

Comment

I fish the Sheepscot River in midcoast Maine. I and all the fishermen I talked to have seen an overabundance of short lobsters. A gauge/ vent increase is not necessary. If there is still concern about the lobster population, perhaps shrinking the gauge from the upper end would protect more prolific "breeders".

[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 8:25 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Austin Houghton

Email

austonhoughron1982@gmail.com

State

Maine

Comment

Your new rules are made up ro hurt fisherman not help thats all you do is try to hurt the fisherman. Canada an area 3 can take larger lobsters so either let us take them or stop them from taking them its not fair.

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[External]

From Whitney Hupper <hupperwhitney@gmail.com>

Date Fri 4/25/2025 6:46 AM

To Comments <comments@asmfc.org>

If you guys increase our vent size and measure it's gonna hurt our industry in so many ways I think Maine lobstering industry should be regulated by Maine lobstermen , you know the ones that's actually out on the water day in and day out and sees how everything changes with cycles don't destroy our way of life

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 2:39 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

jeff souza

Email

crashseafood22@yahoo.com

State

Massachusetts

Comment

Addendum XXXII to remove partial measures put forth from addendum XXVI should remove all measures put forth from XXVI not just partial. These addendums started as a "conservation" measure but now it is clear that conservation is not the priority. Outer cape is the only one getting any changes to the management plan. It doesn't make sense to change a rule for the smallest area in all of Massachusetts and all of the lobster zones that ASMFC advises on. To make a change to 44 licenses instead of the 6000 in other areas does not make any sense. Outer cape fishery is a unique fishery and has picked a different management plan compared to Area 1 years ago and took gauge increases and trap reductions. Outer cape's fishery plan is to allow the smaller lobsters to breed before they hit our minimum size. Other areas take lobsters that are smaller than the average size needed to breed.

Area 1 v-notch definition states "V-shaped notch of any size with or without setal hairs", Outer capes new definition will be "1/8 with or without setal hairs". This definition needs to say a V- shaped notch such as area 1 wording. Without a wording of v shaped notch it will be very subjective interpretation. A v shaped notch is clearly defined and easy to recognize and would be a definite wording that could be used in enforcement. This new wording for Outer cape will put us more of a zero tolerance than area 1.

Back when ASMFC was working on XXVII they discussed v-notching and a male only fishery. It was stated by ASMFC

at the time that these strategies raised concern for the reproductive dynamics and could throw the sex ratio off and be detrimental to the future growth of the population. There were also concern over the possible impacts of elevated water temperature on v-notched lobster and the potential for bacterial infections is also noted. In addition, either measure would increase the level of regulatory discards in the fishery and the potential for accelerated environmental stress from more frequent trap hauls. Yet Maine's whole management plan hinges on V-notching even with ASMFC's concerns about these management measures. If Maine wants to always say that they catch 90% of the lobsters then obviously what they are doing for management is the tool that is not working.

Addendum XXXII should repeal all changes brought forth from Addendum XXVI not just partial changes. And if ASMFC wants to have conservation measures it should be the change that will increase the YOY the most not the smallest area just because they are an easy target. During the ASMFC meeting to discuss XXXII it was stated in the beginning of the meeting for public comments as long as it is not a topic that was on the agenda. After the board discussed XXXII they never then allowed for public comment before they voted so there was no way to discuss outer cape changes.

-Jeff Souza

Outer Cape lobstermen.

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[External] Lobster Draft Addendum XXXII

From Chip Johnson <chipneta@comcast.net>

Date Fri 4/25/2025 7:06 AM

To Comments <comments@asmfc.org>

To Caitlin Starks,

I agree and stand with the position of NEFSA, in favor of option B on draft Addendum XXXII.

Chip Johnson
C W Johnson Inc
www.cwjohansoninc.com
207-833-6443

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 5:45 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Stuart Jones

Email

sjones9283@yahoo.com

State

Maine

Comment

I am not in favor of a vent or gauge increase. I think a very small decrease in oversized gauge would make more sense, since they are the brood stock and produce more eggs. I also think adding a mandatory 3 vent would help juveniles escape quicker and unharmed. I ultimately think that area 3 is the cause of the decrease since they have had big landing in the last 5 years. I've personally caught multiple tagged lobster from area 3, inside 3 miles. All females. I think they come inside to drop eggs and breed. I've seen less oversized females in the spring, in last 5-10 years inside.

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[External] Gauge increase

From Shannon <sljoyce@myfairpoint.net>

Date Fri 4/25/2025 6:12 PM

To Comments <comments@asmfc.org>

I am a fishermen out of Stonington Maine. I have been fishing for over thirty years. I am not for the measure increase. We have seen no reason for this. We have thrown back so many small lobsters out of our traps. We have seen no data on needing a measure increase.

Thank you for your time,

Mark Joyce

F/V Family Tradition

Sent from my iPhone

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 10:31 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

John Jones

Email

jaylinlucas.jj@gmail.com

State

Maine

Comment

My traps are full of snappers within 16th of a inch guys are getting older and not going as much the ventless traps are always on flat mud where no guys fish! I have 4 kids all in school 3 boys that would like to go fishing as well i would like to see them around me fishing as I did around my dad uncles and grandfather around every corner we have regulations coming at us to go that's the personal things that effect me other things it will effect is the economy the people it would put out of business from the coast to as far inland as you can guess snowmobile families up Northern Maine i buy parts for my business all over Maine trailers,oil, rugs ,wood, electronics the list goes on and on lobsters are plentiful along with other species scallops,fish,shrimp etc all of witch is see come up in my traps I have gps coordinates to all the spots I'm 39 years of age all my money invested in fishing to take that from me now would make me lose everything

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[External] Lobster Draft Addendum XXXII

From Chad Jordan <chadjordan94@gmail.com>

Date Thu 4/24/2025 9:12 PM

To Comments <comments@asmfc.org>

Dear ASMFC,

From experience and opinion I believe the lobster measure increase was triggered too early with not enough research. Too many factors play a role, one I have seen is our stripped bass stock being abnormal high inshore and offshore in Casco Bay forcing lobsters to hole up for extended periods in rocky bottom. Two, I think state observers would be more effective than any test tow, too many fisherman have a different approach and they would much rather prove the real science vs. change everything after we have proven this size to be sustainable time and time again in just landings. Three, moving currents and water temperatures are crucial, for the Labrador slope water dropping our surface temperatures I believe will shift some of these lobsters back down after our 12-13 years of rising temperature and potentially bring the grass and lobsters back ashore in the Summer.

Sincerely,

Chad Jordan

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Tue 4/1/2025 10:52 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Jason Joyce

Email

lobstermobster729@yahoo.com

State

Maine

Comment

Dear ASMFC Commissioners,

Thank you for listening to Maine's lobstermen and dealers, NEFSA, DELA, MLA, Maine's zone councils and LAC as the overwhelming majority of Lobstermen in Maine have continuously opposed the guage and vent increase for Area 1.

The Maine Lobster industry continues to lead through example with a strongly enforced zero tolerance v-notch law, the smallest oversized guage (5 inches) and a vent big enough that allows small legal lobsters to escape. Protecting Maine's healthy broodstock has always been a priority. The survivability of eggs produced from large females are greater than eggs from sub-legal and small legal lobsters. A study in Canada also determined that large females deliver 2 batches of eggs per mating.

I encourage you to pass the draft Addendum and consider a broader approach to Lobster Conservation throughout the eastern seaboard based on the generations old Maine method of zero tolerance v-notching and a reduction in the large measure to 5 inches to protect the brood stock.

Thank you,

Jason Joyce

Swan's Island Maine Lobsterman

207-479-6490

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[External] Lobster measure vent increase

From Robert Judecki <shutupanfish@gmail.com>

Date Fri 4/25/2025 5:46 AM

To Comments <comments@asmfc.org>

This would put a lot of Maine Lobstermen out of business and the trickle effect threw all other local and small businesses that rely on us Lobsterman. There should be more ground finishing to prevent all the fish from eating the baby lobsters.

And the abundance of seals around that feed on the soft shell lobsters. This would devastate our family's, community, all local small businesses and our state.

Sent from my iPhone

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Tue 4/15/2025 5:38 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Joshua Kane

Email

joshkanefisherman@yahoo.com

State

Maine

Comment

For conservation measures it would be worthwhile to come down on the max 5 inch measure. Any breed stock we leave on bottom is integral to the survival of our industry. 4.5 inches would be fine with myself and others I have spoken with. That lobster is worth so much more in the water than on a dinner plate. Id also like to see the two stocks separated again. I am not sure why George's and gulf of maine are the same stock. They are not. Lobsters travel, yes , but not enough to consider them the same management stock. I'm more concerned about Canada and the Grey zone than I am George's bank. It's a travesty for mainers to release those jumbos and have Canada keep them. Much fewer travel to George's to be caught. It happens, yes, but fewer lobster travel over 100 miles to George's than cross the imaginary line to Canada. And has anyone considered effort and the graying of the fleet as another reason landings are down. Highliners in my harbor are aging and changing the way they fish. Fewer guys are hammering it offshore than they used to. They haul less days per week, set out later and don't fish the winters. We are victims of our own success. Even if we dropped to 50 million pounds I'm fine with that. I don't care if you can't sustain a million dollar boat. That's bad business planning. We can all still eat and feed our families if we live within our means. No one is entitled to 100k lbs a year. If we can catch that due to our diligence, good. But if we have some down years it's no reason to throw the baby out with the bath water. If some people go out of business that's capitalism. Tough. Shouldn't have over extended yourself. Lobsters are going to fluctuate, groudfish will come back and predate on them. Warming waters and ocean acidification may not help us. But the stocks where I am look healthy. Plenty healthy ro support a

reasonable fishery and feed our families if we live and fish within our means. If it's ever possible there should be a standard size measure everywhere from maine to new jersey and preferably Canada.

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[External] Lobster Gauge increase proposal

From Joshua Kay <jk1832@gmail.com>

Date Fri 4/25/2025 7:15 AM

To Comments <comments@asmfc.org>

Dear asmfc I have been a lobsterman for 41 years now I started when I was only 10.Ive seen alot of changes in the industry since then.I thoroughly belive from my own observations that a gauge increase is not necessary at this time.You have to take all variables into consideration when doing something like this and I do not believe that has been adequately done.Juvenile lobsters face many challenges including predators such as water fowl,striped sea bass,codfish and of course seals all which have been thriving or making a significant comeback.Therfore I do not believe increasing the gauge would make any difference in helping the population of the species. I more then anyone do not want to see the collapse of or lobster industry it is my life and livelihood and I feel very blessed to be a fisherman and steward of the ocean.I strongly believe this would have a devastating effect on our industry at this time and is not adequately warranted as I believe this will do nothing to help the threats that juvenile lobsters face.I would strongly suggest accessing and reevaluating both the striped sea bass and inshore codfish population and look to change regulations in these species to allow more allowable catch increases and manage those fisheries.I strongly believe this needs to be taken heavily into consideration and is a significant part of this equation. Sincerely, Joshua Kay

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[External] Lobster measure increase

From Mack Kelley <mack6394@icloud.com>

Date Thu 4/24/2025 5:59 PM

To Comments <comments@asmfc.org>

To whom it may concern.

Hello my name is Mack Kelley. I am a lobster fisherman out of dyer bay in Steuben. I am writing to oppose the lobster measure increase. I fish year round. From 5 fathom of water right out to 120 fathom. I see lobster in every stage and every area. I think the stock is in great shape, just yesterday my sternman commented how many short lobsters we were catching. I have taken sea samples in the last year and they agreed with me that the stock is in good shape and the measure increase seemed unnecessary. Thank you for your time and consideration!

Mack Kelley.

F/V Fifth generation

Sent from my iPhone

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[External] Lobster Draft Addendum XXXII

From Jim Kimbrell <jimthepotter002@yahoo.com>

Date Thu 4/10/2025 1:15 PM

To Comments <comments@asmfc.org>

Hello

I am in favor of changing the measure. Lobsters are unique in the fishing industry. You can catch them and throw them back so they can grow larger, then catch them again later. You can't do that with most fishing techniques .

If you throw a lobster back that was just a little short. It will sometime shed its shell and then it will be bigger, and weigh more. So if this measurement change makes you loose 20% of what you would have caught. Once those 20% get bigger, you will have 30% more weight. Changing the measure is going to make you catch more.

There are lobster dealers who say they need these small lobsters. There will still be small lobsters. I always wondered why a larger lobster sold for more money per pound than small lobsters.

I saw just today a lobster guy was launching his new 42 foot boat, that had a 1000 horse power engine. Some lobstermen are doing very good. I think they are far from going bankrupt if the measure is changed. There are a lot of lobstermen who are doing very good. There are some who for some reason don't do as good. They might not have there traps in the right place. It is not easy.

Don't make decisions based on who shouts the most. There are people who think changing the measure is a good conservation idea. They are reluctant to speak up for fear of retaliation from some hot head.

Change the measure.

Signed. Jim Kimbrell
Lamoine, Maine

Sent from my iPad

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[External] Lobster measure comment

From Jim Kimbrell <jimthepotter002@yahoo.com>

Date Fri 4/25/2025 6:39 AM

To Caitlin Starks <CStarks@ASMFC.org>

I think you should change the measure, The minimum size is the conservation measure that helps keep the industry going

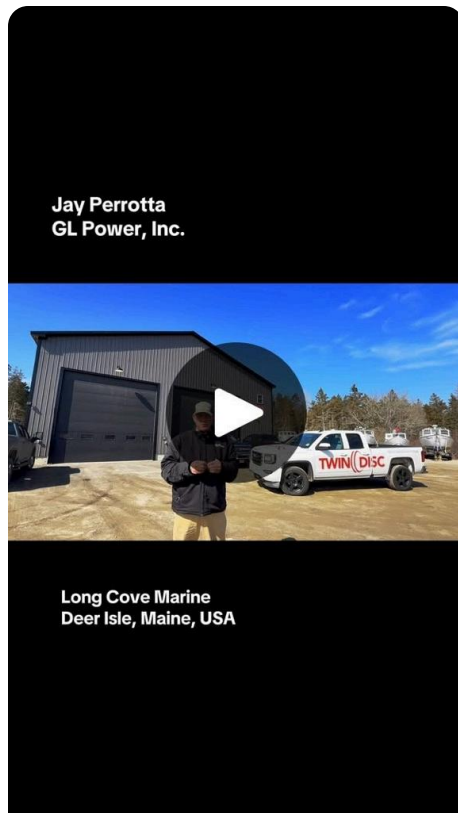
No one will go broke, I think they will actually catch more weight.

This link will show you how much money some lobstermen make.

Sincerely

Jim Kimbrell

Lamoine, Maine



Travis Perry Repower! | Big repowah! Travis Perry's Wesmac 50', 1900hp CAT/Twin Disc repower at Long Cove Marine on Deere Isle. #jayperrotta #twindisc #lobsterboat | By Jay Perrotta | Facebook facebook.com

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[External] Lobster measure

From Jim Kimbrell <jimthepotter002@yahoo.com>

Date Fri 4/11/2025 7:02 AM

To Caitlin Starks <CStarks@ASMFC.org>

I vote, Yes, change the measure.

The argument not to change the measure are, " I will go bankrupt ". I see people getting new boats 42 feet, with big diesel engines. Those are not beginners boats. They have been lobstering for a few years. Lobstering is good for some people, very good for others.

I know of a guy who changed out a good running 350 horse power diesel for a 500 horse power diesel engine. He is making lots of money to do that.

There are lobstermen who only haul trap for 6 months the year. The rest of the year I assume they have a second job.

If you held a lobster in your hand and measure it and it is short with the newer bigger size and the other is Short, You probably could not see the difference in size, They would appear the same size. They argue there will be no small lobsters to sell. That is a poor argument to hold up an important conservation, change the measure.

Signed. Jim Kimbrell
Lamoine, Maine

.

Sent from my iPad

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 7:48 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Zachary Knapp

Email

zknapp92@gmail.com

State

Maine

Comment

As a commercial fisherman I am strongly opposed to the gauge increase. I also strongly oppose the change in the vent increase.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Tue 4/15/2025 9:22 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Thea LaMastra

Email

thea.lamastra@gmail.com

State

Maine

Comment

I would like to see the addendum XXXII passed because I am concerned what the impact of the measures in addendum XXVII would do to the communities that exist because generation upon generation are able to make a living fishing. From what I understand the total measure increase alone, not to mention vent increases, that would go into effect would cut out approximately 25% of all the lobsters landed. The costs of bait and fuel are not getting cut by 25%, and while some of the bigger more established boats would be able to recover from that kind of financial hit to their business, there are many small boats that would effectively be pushed out of the industry. It is not sustainable or healthy to reduce the diversity of the lobster fleet. A big part of what makes the Maine lobster fishery such an important part of the state's economy and backbone of coastal communities, is that there is a pathway to make it possible for young people to make a career out of lobster fishing. The owner operator structure of Maine's lobster fishery means that there are no large companies that own whole fleets, there are just individuals who have the autonomy of doing meaningful work that they love, bringing healthy food to the market. If young people and other small boats are no longer able to participate in this industry because legislation has pushed them out, making their businesses unviable, it will destroy communities. I do believe that resource conservation is important. But I believe that evolving the methods of science used to collect data, to reflect the shifts seen by fishermen is important so that the data collected accurately reflects the lobsters that are out there where they are, and not just data from the places they historically have been. Because I do not disagree that things shift, and the lobster population may be shifting, other more competitive species may be moving in, causing lobsters to spread into historically less favored habitats and further off shore. I feel like we

need better reflective science to tell the full story of what is going on with the lobster stock. And most importantly, if we do need to implement new conservation policies, to carefully consider the potential unintended consequences they will have on the industry. I want fishing to continue to be a viable career option, and not cost prohibitive to enter, so that the youth of coastal and island communities are not forced from their hometowns in order to find work.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Thu 4/3/2025 8:14 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Michael Lane

Email

fvtimemachine@icloud.com

State

Massachusetts

Comment

I worry about the effects of the gauge increase will not meet the needs to bring the stock assessments up. My whole life I have been told to protect the bigger lobster for they are the breed stock, and have seen an increase in the stock since the implementation of the maximum gauge. Now with a downturn in the young lobster I think it has more to do with water quality. Ex. Pesticides and lawn fertilizers. The last 5 years of an algae bloom which is choking off oxygen in the inshore settlement areas for lobster is a big concern. I feel as though a decrease in the maximum gauge would do more for recruitment, seeing as though we have been taking the smaller lobster and saw an increase in production before the decline in 2017. Also rules should be in place across all areas lobsters are caught including Canada.

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New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 8:37 AM

To comments@asmfc.org <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Alyssa Lapointe

Email

alyssalapointe@yahoo.com

State

Maine

Comment

I believe we should leave our gage and vents alone . This would disrupt so many things on all levels of the industry.

[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 10:26 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Larry Smith

Email

larold1992@gmail.com

State

Maine

Comment

WE must choose option B. The meer fact the fisherman are seeing tons of juvenile lobsters in there traps and being ignored by the people that do the testing. Lobsters move and change patterns if u don't change the testing with them then u get false information. The measure increase would only take from the fisherman. If u wanted to increase stock the measurement should be decreased for large lobsters the ones with the most eggs and success rate of hatching them. Taking from the bottom one hurts fisherman and doesn't help the fishery in my opinion.

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New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Tue 4/15/2025 3:02 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Russell Leach

Email

Fvmygirls@yahoo.com

State

Maine

Comment

My opinion not that it matters what I think ..but anyways I feel we leave the measure alone ..if anything I feel a trap decrease would be the way to go... why send our smaller lobsters back overboard for the canadians to catch and ship back here processed

[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 7:50 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Gary Libby

Email

portclydecowboy@gmail.com

State

Maine

Comment

I'm a lobster fisherman from the state of Maine. I'm opposed to the increase of the 3 1/4 inch current minimum size of a legal american lobster. I think it would be devastating to the Maine fishery, for both fishermen and processors we would lose important chick market while the Canadian fishery would benefit.

The fishermen from the eastern area called the grey zone would be impacted greatly.

As for the fishermen that fish farther offshore in MAFC1 it would take away a part of their fishery and put more pressure on the inshore fishery in Maine state waters that I fish in.

I think before anything is done about the supposed decline in the lobster fishery there should be more data collected.

Although ASFMC numbers show a decline I think it's a hasty decision. I know there was a few less lobster caught here in Maine but it was a lot higher than in the 80s and 90s as I remember it.

I am asking you as regulator's to think this issue through before using a gauge in crease as the only management tool. If something needs to be done and I'm not sure if there is a problem please think of something that won't do great harm to this fishery, I think the gauge increase would do this harm.

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[External] Lobster measure and vent increase

From Gary Libby <portclydecowboy@gmail.com>

Date Fri 4/25/2025 4:54 PM

To Comments <comments@asmfc.org>

GARY LIBBY

I'm a lobster fisherman from Maine I have been fishing my whole life.

I'm opposed to any increase of the lobster measure and the increase of the lobster vents.

I think this would cause most fisherman to lose their fishing businesses.

I also see a big problem for the United States lobster dealers they will be competing with the Canadian dealers. They would be selling the same lobster we would be throwing back over board. The fisherman that live down east by the Grey zone the larger league lobster would harm them the most but everyone that fishes I'll just say it will be bad.

I think if anything needs to change it has to be something that wouldn't cause fisherman so much hardship. I think the lobster board should come up with a better solution to this problem that they believe exists, I personally don't believe there is a emergency and something could be done without upsetting the whole northeast lobster fishery.

Please consider something besides lobster measure and vent increase.

Captain Gary Libby

Never stop fighting till the fight is done.

Live long, live strong, eat seafood.

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[External] Lobster Draft Addendum XXXII

From Tom Luce <luce.tom@gmail.com>

Date Thu 4/24/2025 12:56 PM

To Comments <comments@asmfc.org>

Hello, I'm a lobsterman with an Outer Cape Cod MA State only permit with a maximum allotment of 406 traps/tags. I've been commercial fishing for 37 years in various fisheries.

I've never seen a management policy regulation that solely singles out a small group of lobstermen as the OCLMA state only Management area. The people who voted for this should be embarrassed. Less than 5% of total Lobster landings come from this area. 95% of the Lobster fleet got Status Quo for the 2025 season.

The cost of operating a fishing vessel during the past 5 years, regardless of size, has increased 30-35%. The cost of living has increased 25-35%. And the dock prices for catches have decreased 30-35%. Yet, ASMFC failed to analyze the economic impact for MA state only OCLMA. But they valued the economic impacts for 95% of the fleet. It's a total lack of consideration and respect for this small group of lobstermen.

The regulation measure affecting the OCLMA MA state only should be repealed and tabled-just like the rest of the lobster management areas!

Thomas Luce

F/V Sea Win

Sent from my iPhone

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Wed 4/2/2025 6:49 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Jason Ludwig

Email

ludwigjm6@gmail.com

State

Maine

Comment

I'm writing to support this motion to remove the gauge increases and vent changes. I believe the science that pushed us toward those changes fails to account for predatory changes and other ocean conditions.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 9:45 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Nicholas Lunt

Email

lobsterlunt@gmail.com

State

Maine

Comment

I strongly believe Maine does not need any more gage or vent changes implemented.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[External] Lobster Draft Addendum XXXII

From Susan MacCready <nina.sue619@gmail.com>

Date Fri 4/25/2025 9:24 AM

To Comments <comments@asmfc.org>

Atlantic States Marine Fisheries Commission
Caitlin Starks, Senior Fishery Management Plan Coordinator
1050 N Highland St, Suite 200 A-N
Arlington, VA 22201

Dear Commissioners of the American Lobster Board,

The New England Fishermen's Stewardship Association (NEFSA) respectfully submits this letter in strong support of Option B in Draft Addendum XXXII, which proposes the removal of the pending minimum gauge and vent size increases for Lobster Management Area 1 (LMA 1).

We recognize and appreciate the Board's intent to promote stock resilience in the Gulf of Maine/Georges Bank stock unit. However, the proposed gauge increase would impose disproportionate economic harm on U.S. lobster harvesters without delivering a clear, corresponding conservation benefit. NEFSA opposes these changes for several well-founded reasons:

1. Disproportionate Economic Impact with Uncertain Benefit

The proposed increase in the minimum legal size from 3 ¼" to 3 3/8" would render a significant portion of the currently legal catch unmarketable, reducing harvester income and processing throughput. According to industry analyses, this could result in losses of tens of millions of dollars annually to LMA 1 harvesters during the early years of implementation—particularly harmful to small and mid-sized owner-operators.

2. Severe Cross-Border Inequity in the Gray Zone

Of particular concern is the persistent and growing inequity in the U.S.–Canada “Gray Zone”. Under the proposed U.S. gauge increase, American fishermen operating in this contested area would be subjected to a larger minimum size limit than their Canadian counterparts, who face no maximum size restriction and would retain a smaller minimum gauge size. This regulatory imbalance not only undermines U.S. competitiveness but also invites increased exploitation of the resource on the Canadian side, rendering U.S. conservation efforts ineffective and economically damaging. Without a reciprocal binational strategy, unilateral gauge increases will further disadvantage U.S. fishermen, particularly in Washington County and Downeast Maine, where dependence on Gray Zone fishing is high.

3. Scientific Timing and Stock Assessment Considerations

The gauge increase was originally proposed in response to declines in survey data from only three specific indices—from a baseline of banner years, but the next stock assessment is expected in 2025. Implementing a permanent and impactful measure without the benefit of up-to-date biological data risks locking the industry into potentially unnecessary or counterproductive regulations. We believe it is premature to proceed with structural changes before evaluating the findings of the upcoming assessment.

4. Planned Industry-Led Conservation Measures

NEFSA, in collaboration with the Maine Lobstermen's Association (MLA) and other partners, is developing a renewed and targeted v-notch campaign to strengthen protection for egg-bearing females. This conservation method is time-tested, widely adopted, and community-supported, offering a more flexible and culturally appropriate approach to stock resilience than mandated gauge increases.

5. Robust Stakeholder Engagement and Coordination

All seven Lobster Zone Councils in Maine have convened to examine long-term resilience strategies. Concurrently, harvesters and leading industry organizations representing Maine lobstermen specifically, have met to discuss

cooperative management, innovative conservation, and pathways to enhanced profitability. There is momentum within the fleet to design solutions that balance conservation with economic viability, and the industry is committed to this path.

In addition to the Zone Councils and other groups in Maine, all major associations representing lobstermen from Massachusetts to the Canadian border have been actively communicating, with a recent meeting facilitated by the Lobster Institute. The group intends to continue meeting regularly over the coming months to collaborate on strategies for industry resilience.

In conclusion, NEFSA urges the Board to adopt Option B in Addendum XXXII, thereby removing the gauge and vent size increases in LMA 1. We believe this is a necessary step to preserve the economic stability of New England's lobster fleet while allowing time for new science to emerge and for collaborative, industry-led resilience efforts to take hold. The fishery's success has long depended on adaptive, community-rooted stewardship—and we are committed to carrying that tradition forward.

Thank you for your attention to the voices and livelihoods of those who depend on this fishery.

I fully support NEFSA!

Dr Susan MacCready

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 7:27 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

matthew moody

Email

mbmoody@roadrunner.com

State

Maine

Comment

Dear Commissioners of the American Lobster Board,

The New England Fishermen's Stewardship Association (NEFSA) respectfully submits this letter in strong support of Option B in Draft Addendum XXXII, which proposes the removal of the pending minimum gauge and vent size increases for Lobster Management Area 1 (LMA 1).

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2. Severe Cross-Border Inequity in the Gray Zone

Of particular concern is the persistent and growing inequity in the U.S.–Canada “Gray Zone”. Under the proposed U.S. gauge increase, American fishermen operating in this contested area would be subjected to a larger minimum size limit than their Canadian counterparts, who face no maximum size restriction and would retain a smaller minimum gauge size. This regulatory imbalance not only undermines U.S. competitiveness but also invites increased exploitation of the resource on the Canadian side, rendering U.S. conservation efforts ineffective and economically damaging. Without a reciprocal binational strategy, unilateral gauge increases will further disadvantage U.S. fishermen, particularly in Washington County and Downeast Maine, where dependence on Gray Zone fishing is high.

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The gauge increase was originally proposed in response to declines in survey data from only three specific indices—from a baseline of banner years, but the next stock assessment is expected in 2025. Implementing a permanent and impactful measure without the benefit of up-to-date biological data risks locking the industry into potentially unnecessary or counterproductive regulations. We believe it is premature to proceed with structural changes before evaluating the findings of the upcoming assessment.

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All seven Lobster Zone Councils in Maine have convened to examine long-term resilience strategies. Concurrently, harvesters and leading industry organizations representing Maine lobstermen specifically, have met to discuss cooperative management, innovative conservation, and pathways to enhanced profitability. There is momentum within the fleet to design solutions that balance conservation with economic viability, and the industry is committed to this path.

I have been lobster fishing off shore in LMA1 for 15 years. Every year since I began fishing out there the stock has increased so much we can fish there year roudn now and still make a living. The numbers you have do not account for this shift in the biomass to deeper water year round. Yours number sdo not refect what is happening and how robust the lobster stock is from juvenile to brood stock in the deeper waters of the Guolf of Maine.

In addition to the Zone Councils and other groups in Maine, all major associations representing lobstermen from Massachusetts to the Canadian border have been actively communicating, with a recent meeting facilitated by the Lobster Institute. The group intends to continue meeting regularly over the coming months to collaborate on strategies for industry resilience.

In conclusion, NEFSA urges the Board to adopt Option B in Addendum XXXII, thereby removing the gauge and vent size increases in LMA 1. We believe this is a necessary step to preserve the economic stability of New England’s lobster fleet while allowing time for new science to emerge and for collaborative, industry-led resilience efforts to take hold. The fishery’s success has long depended on adaptive, community-rooted stewardship—and we are committed to carrying that tradition forward.

Thank you for your attention to the voices and livelihoods of those who depend on this fishery.

Matthew Moody

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[External] gauge and vent increase repeal

From DOUG MAXFIELD <dougmaxfield@comcast.net>

Date Fri 4/25/2025 7:17 AM

To Comments <comments@asmfc.org>

To whom it may concern,

Please stop trying to fix things until they are broken. Lobstermen are up against enough from blatantly unnecessary and ineffectual closures to nonsensical endline requirements; Bait prices through the roof and a market with more uncertainty then ever; An impending buoy less movement that spotlights how little our 'mangement' understands or cares to understand what we do; The constant fear of gear, bottom and biomass loss at the hands of offshore wind; and the list goes on...

In my 30yrs as a fishermen out of Gloucester ma I can't recall a time when there wasn't a 'sky is falling' call regarding the lobster stock. Keep calm and carry on. Ebb and flow. A gauge increase would cripple a large percentage of the current fleet. A vent increase would just throw fuel on the inferno that is constantly evolving state of our gear that we are no longer allowed to manage properly. Death by a million little cuts is getting old. Not every year is supposed to be the best ever, and management utilizing 'the best available science' has proven itself just far enough behind the curve to do more harm than good. Option B is the right option.

sincerely,

Capt. Doug Maxfield

F/V Sarah Day

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[External] Lobster Draft Addendum XXXII)

From Linda McGrath <Linda.McGrath@gc.nh.gov>

Date Tue 4/15/2025 3:58 PM

To Comments <comments@asmfc.org>

Cc Matt Sabourin dit Choinière <Matt.Sabourin@gc.nh.gov>; Aboul Khan <A1B2Khan@msn.com>; James Spillane <James@JamesSpillane.org>

ASMFC,

I oppose increasing the lobster length due to the devastating impact on our fishermen and the industries that depend on them.

Linda McGrath

NH State Representative

District #40

Linda.McGrath@gc.nh.gov

Truth has no Agenda

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[External] Lobster Draft Addendum XXXII

From Jared McIntire <jaredmcintire603@gmail.com>

Date Fri 4/18/2025 4:22 PM

To Comments <comments@asmfc.org>

Public comment:

Statement from the New Hampshire Commercial Fishermen's Association

The New Hampshire Commercial Fishermen's Association fully supports Draft Amendment XXXII, option B for the repeal of Amendment XXVII concerning gauge and escape vent measures.

We believe that stock assessments must be conducted over longer timeframes and should not be the sole source of data used in decision making. More importantly, assessments from within the lobster industry itself are invaluable. Fishermen who are out on the water every day have firsthand knowledge and insight that no survey can fully capture. Lobster behavior is highly variable and shifting not just year to year, but often day to day. Therefore, observations from the industry across the entire range, from New Jersey to the Canadian border in Maine must be taken seriously.

Stock assessments alone cannot paint an accurate picture of lobster viability. It is unrealistic to expect that lobstermen can set traps in the same locations year after year and see consistent results. Our work is dynamic; we are constantly adapting and moving with the lobster stock. Factors such as water temperature, time of year, and other environmental variables which many still are not fully understood, play a significant role in catch success. If we could always predict lobster locations, this would be a gold mine industry, but that's not the reality of fishing.

Therefore, industry-based data must play a leading role in shaping future management decisions.

The lobster industry is already a model for sustainable commercial fishing. Practices like returning breeding females, strict size limits, and near-zero mortality rates during harvest demonstrate our commitment to conservation. Increasing the gauge size would only harm the livelihoods of hardworking lobstermen and jeopardize a proud cultural heritage.

Our industry is already undergoing change. With an aging workforce and declining interest among younger generations, there are naturally fewer traps in the water. In New Hampshire, we are seeing this impact firsthand. Rising fuel and bait prices, coupled with increased operational costs, are forcing many to fish fewer days and leave traps in longer between haul backs, Resulting in lower landings but better cost-to-profit ratios. These realities must be accounted for when proposing new regulations.

It is unacceptable to base sweeping changes on limited data sets. The lobster industry is far more complex and nuanced than that. Furthermore, the proposed gauge increase does not guarantee the outcome the scientists hope to achieve. Using the fishermen's livelihood as a scientific experiment to

test a theory is both irresponsible and unacceptable. We urge decision-makers to fully incorporate the voice of the industry and the expertise of the fishermen who live this work every day.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Wed 4/2/2025 6:02 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Thomas McLennan

Email

bugga3119@hotmail.com

State

Maine

Comment

Dear ASMFC Commissioners,

Thank you for listening to Maine's lobstermen and dealers, NEFSA, DELA, MLA, Maine's zone councils and LAC as the overwhelming majority of Lobstermen in Maine have continuously opposed the guage and vent increase for Area 1.

The Maine Lobster industry continues to lead through example with a strongly enforced zero tolerance v-notch law, the smallest oversized guage (5 inches) and a vent big enough that allows small legal lobsters to escape. Protecting Maine's healthy broodstock has always been a priority. The survivability of eggs produced from large females are greater than eggs from sub-legal and small legal lobsters. A study in Canada also determined that large females deliver 2 batches of eggs per mating.

I encourage you to pass the draft Addendum and consider a broader approach to Lobster Conservation throughout the eastern seaboard based on the generations old Maine method of zero tolerance v-notching and a reduction in the large measure to 5 inches to protect the brood stock.

Thank you.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Wed 4/2/2025 3:13 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Douglas McLennan

Email

lobstarz@hotmail.com

State

Maine

Comment

I would like to see the measure and vent increase removed from the addendum. Maine has done our conservation right over the last 100 years. Maine has been using the 3 1/4 current measure since 1989. The Maine Lobster Industry has had some pretty good years under the current measure. In all fisheries you have highs and lows, and cannot regulate changes that may or may not have an effect. The whale rules will be back in motion in 2028. To do anything before that time would be a possible death to the industry. Maine has an aging demo-graph of fishermen, with the younger kids in coastal towns moving away from lobstering, or all commercial fisheries. The climate from the regulators and the conservation groups has caused a huge cloud of uncertainty over the future. Couple that with rising cost, high interest rates, and shrinking infrastructure, people are not eager to invest in commercial fishing ventures. This is a sad state of affairs, to think that management on a federal level, that was designed in its creation, to ensure we would have robust and resilient communities to continue to provide jobs and seafood for food. There are many things I could get into, but I just wanted to get my point across on the measure increase not being enacted. I have been a Lobster Zone Council Member for 20 years, and have been a fisherman all my life, as 13 generations before me have, and my sons and grandsons can hopefully continue on as so if they desire. Thank You Members of ASMFC for taking the time to read my comments, and for your consideration. Douglas McLennan Spruce Head Maine

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New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 8:50 PM

To comments@asmfc.org <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Robert McMahan

Email

lobsterrob10@gmail.com

State

Maine

Comment

When you took the herring quota away the smallest lobsters 🦞 ant size are not getting the food they need to survive that I'd the reality of why the stock is down so let's take a look at getting some quota back for the herring fishermen logic is what we need from the overseers

[External]

From James McMillan <redsky3262@gmail.com>

Date Fri 4/25/2025 6:56 AM

To Comments <comments@asmfc.org>

I am a Maine lobsterman fishing zone b state waters. I support option b in draft addendum 32. No Guage increase.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/11/2025 4:27 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Jesse Mcphail

Email

mcphail_jb@yahoo.com

State

Maine

Comment

I'm in opposition of a gauge increase! I fish rite along side the Canadian fisherman On the line way up east near west quoddy head, I would be put at a disadvantage by throwing those lobsters back and they can keep! Also financially would cut my catch b a 1/3 or more! I think factors of older fisherman retiring or cutting way back , and new fisherman allowed in not catching nearly what they used to starting out are reasons of see declines in catch! I'm I'm starting my 6th season on my own and every yr for myself has increased! Just my 2 cents!!

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 3:04 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Eric Meschino

Email

tripl2jbe@gmail.com

State

Massachusetts

Comment

We don't need this unnecessary regulation

One simple point: if this regulation were so imperative, how was the lobster population able to reach historic levels under the current regulatory regime?

This is the most sustainable and well regulated fishery in the USA, if not the world. Stop creating unnecessary burdens on producers by pushing bad ideas based on faulty information substantiated, in no way, by environmental reality.

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[External] Lobster Draft Addendum XXXII

From Anthony Mielcarz <Anthony.Mielcarz@outlook.com>
Date Fri 4/25/2025 9:35 AM
To Comments <comments@asmfc.org>
Cc coo@fishermenstewardship.org <coo@fishermenstewardship.org>

Dear Atlantic States Marine Fisheries Commission,

My name is Anthony Mielcarz, I am an MA lobsterman. I am one of the small businesses you seek to dismantle.

Dealing with regulation changes in this industry, has left most fishermen feeling like our own defense litigators rather than an actual Captain. Fortunately, we have folks like NEFSA there to advocate for us.

With that said, I would like to comment alongside NEFSA, **in favor of option B** at this time, to repeal all carapace increases and vent changes proposed, and in agreement with all other comments they have added at this time.

Please take into consideration that these addendum changes are just some of MANY changes the industry has been told to comply with over the years. ("Told to", never given options) or else...

Seemingly new rules for buoy line changes every season. break aways and other contrivances, line markings.

Seasonal closures with opening dates that change with little notice.

Now, we are looking at possible expenses into the near future with talks of some serious technological upgrades for on-demand buoy systems if we want to be allowed to fish a full season. Top that off with inflation of fuel, material, bait and other operational costs, coupled with ever-expanding area closures. By themselves, these are all small change orders, but they add up to a whole lot in the end.

With all these factors considered, the proposed changes to catch requirements to the US based fishermen has serious potential to be the proverbial "straw" that is capable of **crippling us little guys in lieu of farming out the US lobsterman's job directly to the Canadian Lobstermen**, and in my experience when work gets farmed out like that it never comes back.

I hope this email finds you well and thank you all for taking comment on this matter.

Anthony Mielcarz
F/V Genepi
1(978)-807-5390

34 Pulaski st. | Peabody Ma, 01960

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[External]

From Lyn Mitchell <lynem1969@gmail.com>

Date Fri 4/25/2025 10:36 AM

To Comments <comments@asmfc.org>

I stand with NEFSA on the vent and gage changes. I do not agree with the increases. Lobstering is in danger by all of the new regulations and I can barely make a living as it is. Leave us the heck alone. Please.

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Fw: [External] Draft addendum XXXII

From Caitlin Starks <CStarks@ASMFC.org>

Date Fri 4/18/2025 9:55 AM

To Comments <comments@asmfc.org>

From: David Moody <davemoody46@gmail.com>

Sent: Friday, April 18, 2025 9:20 AM

To: Caitlin Starks <CStarks@ASMFC.org>

Subject: [External] Draft addendum XXXII

I'm a lobsterman from Harpswell with over 40 years in the business. I support option B and strongly agree with statements on this issue made by NEFSA, MLA & MLU. Thanks. David Moody

Sent from my iPhone

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 11:11 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Tim Morgan

Email

fvcarsonj2016@gmail.com

State

Maine

Comment

I fish downeast in zone A where all fall I'm looking at Canadian boats and fishermen. to increase the gauge and throw lobsters over that will swim 100 yards and be kept by Canadian fishermen just dosent make any sense at all. I am 100% against the increase the only way this would ever work is if Canada went along with the increase even then we should wait more then 2 years between the increases to see if it even works.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Tue 4/15/2025 12:12 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Michelle Muschamp

Email

micmuschamp@gmail.com

State

Maine

Comment

I am disheartened to hear someone, somewhere is still insisting in increasing the lobster measure.

Lobstering is not a nine to five job. The lobstermen need to have a steady income to keep going! Their cost of living is far above everyone else's. The fact that DMR is not using the correct catch number doesn't help them. Nor does the fact that Canada's laws don't coincide with Maine's laws. Its shameful.

would like the records to be accurately reported for this years catch, then make a decision for next year. What's the hurry? Give them a break.

Thanks for this opportunity.

Michelle Muschamp

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[External] Lobster Draft Addendum XXXII

From Northeast Lobster <info@northeastlobster.com>

Date Fri 4/25/2025 9:01 AM

To Comments <comments@asmfc.org>

Hello,

We support NEFSA's position. They have been heavily involved communicating with stakeholders and proactively working towards maintaining this sustainable industry.

Thank you,
Adam



The Nor'Easter Pound & Market

www.northeastlobster.com

10 Huntington Road, P.O. Box 883, Northeast Harbor, Maine, 04662

info@northeastlobster.com

T: (207)-276-8035

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Wed 4/16/2025 3:43 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

chris nunan

Email

remington1238@yahoo.com

State

Maine

Comment

I am a lobsterman from Maine and I am against amendment XXXII.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/4/2025 11:08 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Scott Oliver

Email

lobstertrapper982@gmail.com

State

Maine

Comment

If you do this change you will put everyone out of business on the coast of maine!!! I have been fishing for 45 years in maine. Please don't kill us !!!!

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Thu 4/10/2025 7:23 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Annie-Kate O'Neal

Email

kate.o67@yahoo.com

State

Maine

Comment

I am a lobster fisherman from Stonington Maine. I am extremely against any gauge and vent changes. The science used is not what lobster fishermen are actually seeing. I agree with repealing this addendum. Option B I agree with.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 8:54 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

BENJAMIN PAIGE

Email

fvagnesd@gmail.com

State

Maine

Comment

With the price of fuel bait and help on the boat so high. with the price of LOBSTER back to the boat so low. and the cost of living so high the increase of a mausre is insane of even thinking about it the lobster industry is steady leaving it alone is not hurting anyone or anything. The reason you're yearly catch is down lots of fisherman are choosing not to go because of this

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[External]

From Dana Pazolt <dpazolt@gmail.com>

Date Wed 4/9/2025 7:46 PM

To Caitlin Starks <CStarks@ASMFC.org>

Meeting doesn't matter because Dan didn't remind the change in the OC v notch. You will be served shortly with a law suit to deal with this nonsense.

Sincerely,

Dana Pazolt

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[External] Lobster Draft Addendum XXXII

From Andrew Pellechia <awp04107@gmail.com>

Date Thu 4/24/2025 10:33 PM

To Comments <comments@asmfc.org>

The idea to increase the measure does not fall in line with what we, the fishermen, see on a day to day basis. The research and observations we do every day on the water all points to the abundance of juvenile lobsters. We have never had our traps so full and lively with undersized lobsters as we have the last few years. This goes to show the juvenile stock is flourishing and our current regulations are not only satisfactory in sustaining the lobster population, but actually boosting it. If the measure were to increase, we would lose 30-40% of our income. This would be devastating as our business models already operate on such tight margins with the ever increasing cost of expenses. The measure increase would be completely unnecessary as well as destructive. Please consider us fishermen and our livelihoods going forward with this decision, and do NOT move forward with a measure increase at all. Thank you.

Very Respectfully,

Andrew Pellechia

Maine Lobsterman

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[External] No to increase

From robbie pinkham <pinkhamr613@gmail.com>

Date Thu 4/24/2025 7:44 PM

To Caitlin Starks <CStarks@ASMFC.org>

There is zero reason to increase measure .. we have soo many sort lobsters in each traps .. every trap is full of lobsters to keep only 1 .. or 2 .. not a good idea to increase the measure.. it will just gove Canada full.control

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[External] No to the measure increase

From robbie pinkham <pinkhamr613@gmail.com>

Date Thu 4/24/2025 7:40 PM

To Comments <comments@asmfc.org>

Im in opposition of the measure increase .. not only would it give Canada full reign of the lobster market ..it would cost us our season as well .. we would have to wait around 2 years for the stock to grow ..in the mean time they would be moving around and Canada would catch what we are waiting for to grow .. Canada is not increasing their measure size.. they keep everything .. way of shore area 3 is allowed to catch everything .. I do t think it's a good idea to increase the measure when there is soooo many short close lobsters around ..

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[External] No to increase

From robbie pinkham <pinkhamr613@gmail.com>

Date Thu 4/24/2025 7:43 PM

To Comments <comments@asmfc.org>

There is soo many shirt close lobsters . Babys all the way up to almost keepers.. literally tons and tons .. hauling full traps ..20.lobsters a trap to keep maybe 1 or 2 if your lucky.. there is zero reason to increase the measure .. all it will do is give Canada full control over our market .. definatly not a good idea .. we have. Managed the fishery for decades .. there is zero reason to increase it ..

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 6:28 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Christopher Porter

Email

chris@patriotlobster.com

State

Massachusetts

Comment

I support the Amendment XXXII as a gauge increase will be devastating to the industry in all aspects from harvesting, buying, distributing and consuming. We have already been hurt by the winter closures and importing lobsters is not viable for small dealers and distributors. The infrastructure is with small companies working the water front from the mechanics, boat builders, bait dealers, fish and lobster dealers, supply houses, fuel operators and so much more. Restaurants that feature lobster and who support the fishermen year round are very worried that this will hurt their business as they have built their business around the lobster industry. They would have to change their operation and it may put them out of business. They would have to increase prices. Due to high costs and the Inflation, restaurant prices are already at an all time high. There are less patrons going out to casual dining and this will Make it more difficult for the ones that are.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 8:24 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Keith Potter

Email

atvrida12@gmail.com

State

Maine

Comment

Maine does not need the measure increase fisherman have seen more and more undersized lobsters in their traps as the years have gone on and are throwing away an insane percent of shorts compared to legal and oversized lobsters

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[External] Lobster Draft Addendum XXXII

From Dillon Reed <dillon_reed20@yahoo.com>

Date Fri 4/25/2025 10:35 AM

To Comments <comments@asmfc.org>

Hello,

My name is Dillon Reed, I am a lobster fisherman from Friendship, Maine. I am with the state of Maines decision to not make any measure and vent changes. It would have devastating effects up and down the coast for fisherman. The price of everything else fishing, living related is too much now a days.

Thanks,

Dillon

Sent from my iPhone

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 6:44 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Rex Benner

Email

rexbenner73@gmail.com

State

Maine

Comment

I'm in support of addendum xxxII option b to stop any guage and vent increase in lma 1. As a fisherman that sees ample amounts of shorts I feel that it's not a nessary measure needed not to mention the economic impact along with the complications it would cause I'm the marketing end of the lobsters!! I feel better data is critical before imposing such a drastic action.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 12:51 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Hugh Reynolds

Email

hugh@greenheadlobster.com

State

Maine

Comment

April 24,2025

Atlantic State Marine Fisheries Commission

To all the board members of Atlantic States Marine Fisheries Commission:

I am writing to support addendum XXXII option B.

Appealing the gauge and measure increases adopted in addendum XXVII is critical to the survival of this industry. This will allow us more time for scientific understanding and collaboration with other industry stakeholders. We are very appreciative of the boards understanding our concerns. We understand the ASMFC commitment to sustainability. However, at this time, the industry cannot bear the unforeseen and destructive consequences of addendum XXVII

Regards

Hugh Reynolds

Its President

Greenhead Lobster LLC

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 10:11 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

larry robbins

Email

larryeric06@icloud.com

State

Maine

Comment

I've grown up on the coast of Maine my whole life lobstering is my life has been sense I was a kid. these regulations your trying to put on the industry will not only cripple my state economy but put thousands of people's lifelong career and passion in jeopardy. lobstering not just a job but way of life if it was needed then yes but landing are down because bad weather last year delaying and destroying many doc and not as many people fishing there may be many license holds but thousands of license holds don't even fish just need more true actual data from people with actual knowledge that's are out there day in and day out in past lobster landing have gone up and down just leave thing the way they are leave Maine alone go after the factory fleets like little bay lobster company who come up into the Gulf of Maine and fish and take all the migratory big lobsters that go to the deeper waters from the coast in the winter time that's where all the brute stock breeding is in the large male lobsters and females and v notches, no matter what size v notches not in the little lobsters and places like little bay lobster company, and many other fleet like companies in New Hampshire and Massachusetts are the problem

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[Phish?] [External] [Phish] There is plenty of young lobster on bottom and maybe you guys should consider that states should make their own laws and we don't need people from a different state telling us what to do or how to manage our fisheries thank...

From Robert Beal <robbeal71@icloud.com>

Date Thu 4/24/2025 3:02 PM

To Comments <comments@asmfc.org>

Sent from my iPhone

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[External] Comment lobster addem

From fvtiedtogether@yahoo.com <fvtiedtogether@yahoo.com>

Date Fri 4/25/2025 7:11 AM

To Comments <comments@asmfc.org>

Hi, I'm writing to express that i completely agree with NEFSA. I second everything single point they've raised in opposition. I do not support the Guage increase nor any other new regulation passed during the biden administration. I.e. tracker bill for lobsterman in lma 1. The seasonal closure zone in lma 1. All founded on inaccurate false data. Case, MLA vs NOAA presided by judge boasberg.
Michael Ross, Maine lobster fisherman

[Yahoo Mail: Search, Organize, Conquer](#)

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 11:48 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Matthew Sabourin dit Choinière

Email

matt4NH@outlook.com

State

New Hampshire

Comment

I support NEFSA's position.

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[External] Lobster Draft Addendum XXXII

From Sam Pickard <lobsterer.sp@gmail.com>

Date Fri 4/25/2025 10:35 PM

To Comments <comments@asmfc.org>

Cc Brendan Adams <fibfab25@yahoo.com>; Sam Blatchley <sblatchley@ecklandblando.com>; marine.fish@mass.gov <marine.fish@mass.gov>; Bill Souza <jlobsters@comcast.net>; crashseafood22@yahoo.com <crashseafood22@yahoo.com>; sefatia.romeo-theken@mass.gov <sefatia.romeo-theken@mass.gov>; Xfinity Email <stephens_7@comcast.net>; dan.mckiernan@state.ma.us <dan.mckiernan@state.ma.us>

To whom it may concern.

My name is Samuel Pickard, and I am the Vice President of the Outer Cape Lobstermen's Association. I am writing to you today in disgust of the finalization of the proposed Addendum XXXII. Both Addendum XXXII and XXVII were created not only to promote conservation for the lobsters caught in the Commonwealth of Massachusetts but in all of the states where lobster is caught on the east coast of the U.S. This finalized plan does not promote this, but instead targets and discriminates against 44 state lobstermen who currently make their living in the Outer Cape Cod Lobster Management Area.

Massachusetts has the second highest cost of living in the United States, just falling short of Hawaii which comes in as number one. We do not have the luxury of moving away from the coast to find more affordable housing, as states such as Maine and New Hampshire do, which makes not only living here difficult, but keeping year round help next to impossible. From an economic perspective, the proposed changes in Addendum XXXII will only affect a few, as Maine and New Hampshire will once again remain unaffected, but for us in the outer cape it will be costly. We already have a larger minimum gauge than the rest of Massachusetts, New Hampshire and Maine Area 1 lobster fishery, ours is 3 3/8ths of an inch, while theirs is 3 1/4. This 1/8 of an inch might not seem like much, but the young of the year reproduction rate goes from 40% to almost 80%. Also, the 2% v-notches that MADMF Director Dan McKiernan states we will lose is far far less than the actual poundage that will be lost. Instead of 2%, we stand to lose up to 25%, and when this was brought before him, he stated it was preposterous, we were conjuring numbers out of thin air.

I ask why is our management plan being affected? As it is already more strict due to the smaller trap allocations, shorter fishing season, larger minimum size and an ongoing 10% trap reduction everytime allocation is bought or sold? Our average trap allocation is only 393 in state waters, compared to Area 1's 800. We have a healthy conservationist plan for our area, which was championed by the MADMF in the late 1990's and the early 2000's and then later challenged in court in *Outer Cape Lobstermen's Association v. Atlantic States Marine Fisheries Commission, et al., Civil Action No. 1:98-cv-10165-WGY* only to find out that just last week the Massachusetts Division of Marine Fisheries can not locate any files or paperwork associated with our agreement.

Moving forward we have now regrouped the Outer Cape Lobstermen's Association, and have begun the paperwork to once again sue MADMF as well as the ASMFC for the right to continue to sustainably

fish here on Cape Cod as we all agreed upon over 24 years ago. I hope my comment does not fall of deaf ears, as unfortunately public comments usually do.

Respectfully,
Samuel Pickard
Vice President of the Outer Cape Lobstermen's Association

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 2:14 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Sara Eaton

Email

sara.eaton.se@gmail.com

State

Maine

Comment

My name is Sara Eaton. Lobster License Harvester #1936 from Stonington, ME.

I am in favor of option B.

Our current gauge and vent size has worked effectively for decades. Lobsters may change and travel with climate but there has been no shortage of juvenile lobsters. Changing the sizing would impact us in a very negative way. Our catch would be down around 30% . Our expenses are too high to survive that kind of hit.

Not only would the gage & vent increase affect lobstermen, it will affect the state of Maine as a whole. It could put us fishermen out of business. Maine families and towns would struggle to make ends meet. We all rely on each other. We would have to sell our houses and move away. There would be no future generation. And believe me, we are all for EXTENDING our livelihoods in the lobster industry.

Please conduct thorough and valid research before making this kind of "change" to our industry. Let us help educate you. We need more sampling and testing to be done before this kind of decision is made. It truly needs more time.

We are harvesters and farmers of the sea . We want nothing more than to keep our industry sustainable and plentiful.

If we felt we needed this increase you would have our full support, but you don't. This change will devastate us and would be far too costly to implement. Our current sizing is working fantastic. Please remember once again how long it has been in place for and how well it has worked thus far.

Please, please reconsider the repeal of your upcoming gage and vent increase and consider what it could do to the State of Maine.

Thank you for your time.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 2:39 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Wayne Sawyer

Email

waynesawyer12@yahoo.com

State

Maine

Comment

The measure and vent size needs to stay the same , the oversized vent we have now I can pull legal lobsters out of now . Not to mention the impact on the amount of money lost would be devastating to the industry that is already struggling trying to keep up with all the other government restrictions being put on us as is . We the fishermen are the real people on the water and see the real results of what's going on out there

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 8:47 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Sean Leach

Email

smleach1401@yahoo.com

State

Massachusetts

Comment

Hello

I am a OCLMA Permit holder and lobsterman with a trap allocation of 720 traps. I have been commercial lobstering and fishing for over 20 years.

The recent alterations to the American Lobster Addendum XXVII via Draft Addendum XXXVII are alarming considering the original Addendum was written with the intention of saving the LMA 1 lobster fishery through measures and gauges that effected them, whom are the majority the industry. However in the last minute ASMFC decided to pull all upcoming regulations on all LMA's except the state only segment of OCLMA. This LMA only accounts for 35-40 active permits averaging roughly 500 traps per permit. Considering this Addendum was originally only written with conservation in mind, how is placing this burden on such few lobstermen going to make any conservation difference.

Cherry picking an original addendum at the last minute to punish a small LMA is not a precedent that should be set in ASMFC. This was originally designed to be an equal and fair cut across all LMA's to make a difference in the lobster population and futures stocks. In the end it turned into a mechanism to go after a small LMA that has already made trap reductions and continues to do so with trap taxes on transfers to this day.

I ask that ASMFC considers to also include no changes to the OCLMA state V notch definition. We have a unique seasonal fishery that has built in conservation measures that preserves lobster stocks vs other areas. There has been a minimal investigation into the economic impact of the OCLMA and it is unknown what impact this will have.

I also ask that you think long and hard and ask yourself if you feel this is an appropriate way to do business. Today it's

only OCLMA that is impacted by this, but maybe going forward another states fishery overseen by ASMFC could be last minute affected by a blindsided motion. Please consider making a motion to continue the OCLMAs current lobster regulations.

Thank you

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Thu 4/10/2025 7:23 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Shaun McLennan

Email

fvthunder@gmail.com

State

Maine

Comment

I support option B

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Wed 4/2/2025 9:09 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Jeremy Smalley

Email

jeremysmall@icloud.com

State

Maine

Comment

I disagree with everything on this amendment.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 10:32 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

christian Smit

Email

smitchristian553@gmail.com

State

Maine

Comment

To whom it may concern. I do not find it necessary or appropriate for fisherman and folks outside of fishing to have to deal with the complications this would bring on one of Maine's strongest industries. Every one of us strive for excellence in what we take a passion doing for a career every day. We take pride in knowing we can wake up every day to do what we love doing. This isn't an appropriate way to go about things. The data brought forward is flawed against what fisherman see in stock of lobster every day. I am against this proposal and I don't want to see the industry and local companies that strive off the industry go bankrupt due to the swipe of a pen.

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FW: [External] Addendum 27 options

From G2W2 <G2W2@asmfc.org>
Date Fri 4/18/2025 12:12 PM
To Comments <comments@asmfc.org>

 2 attachments (5 MB)

Scanned_20250303-1649.pdf; Scanned_20250403-0826 (1).pdf;

From: Xfinity Email <stephens_7@comcast.net>
Sent: Friday, April 11, 2025 10:09 AM
To: G2W2 <G2W2@asmfc.org>
Subject: [External] Addendum 27 options

To the ASMFC:

As former Outer Cape Lobstermen Association's president and Conservation Management Team representative I am sending a couple of attachments for your edification. I was the principal representative at the Federal Court which led to the agreement between ASMFC and the OCLA. The first attachment gives you just some of the details and should assist you in researching the history.

The second attachment is an article reported in a Portland Maine newspaper with comments from Maine lobster biologists. I believe one is now the latest ME DNR Director, Carl Wilson. The title is **V-notched lobster decline is a threatening sign in Maine**. Essentially, the article states that mandatory v-notching is not being complied with in Maine.

In the OCLMA the minimum size increased to 3 5/16" in 2002 as conservation equivalency to v-notching and, an additional 1/32" would be added if Maine increased to 3 5/16". Since that time there has been 100% compliance in the OCLMA. In the meantime Maine was out-of-compliance with mandatory v-notching by 20013. As the article states each Zone had different compliance rates. Zone A was only 50% compliant. More troubling was that these rates were declining over all years. Massachusetts was doing even worse.

Why hasn't ASMFC been informed of this or maybe why does ASMFC look the other way? ASMFC does seem quite attentive to the small OCLMA with its successful trap and gauge size plan. An explanation from ASMFC would be helpful.

I am now requesting the complete Maine DNR v-notch records from 2002 - 20023. These will be needed in Federal Court to demonstrate that ASMFC did not enforce their mandatory v-notch regulation on Maine. The OCLA will be able to put their compliance record on display also.

Since the OCLA is preparing for court there are likely other requests I will make before the August 25th deadline.

Thank you.

Stephen Smith

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Atlantic States Marine Fisheries Commission

1444 Eye St., NW, 6th Floor

Washington, DC 20005

(202) 289-6400 phone

(202) 289-6051 fax

MEMORANDUM

TO: American Lobster Management Board
FROM: Amy Schick *AS*
RE: Outer Cape Proposal
DATE: March 28, 2000

The Lobster Board will review a proposal for the Outer Cape at its April 4, 2000 meeting. The proposal is a result of mediation on the Outer Cape lawsuit. The Plaintiffs have requested that conservation equivalency be allowed for the v-notch provision in Amendment 3. Jim Fair will present the proposal to the Board on behalf of the Outer Cape fishermen (attached).

The prohibition on possession of v-notched lobsters is a measure that can only be changed by a plan amendment. Similar to the non-trap gear provision, conservation equivalency for the v-notch provision could be considered under Amendment 4. If approved under Amendment 4, conservation equivalency would allow any state to propose alternative management measures that achieve the same level or more restrictive conservation as the v-notch provision. The Lobster Board would decide whether to approve the state proposal for an alternative management program. If the Board approves a proposal, the state would implement the alternate measures to replace the prohibition on possession of v-notched lobsters.

cc: Paul Lenzini

American Lobster Management Board

Atlantic States Marine Fisheries Commission

Tuesday, April 4, 2000

3:00 pm – 5:00 pm

Alexandria, VA

DRAFT AGENDA

1. Welcome / Announcements
2. Approval of agenda
3. Approval of minutes – February 2000
4. Public comment
5. Overview of the stock assessment peer review process (Lisa Kline)
6. New Jersey request for exemption from portions of Addendum I
7. Discuss proposal for Outer Cape
8. Discuss proposal for revised lobster management program operations
9. NMFS status report
 - Response letter from Pat Kurkul
 - Other business
10. Discuss transferability of trap tag allocation
11. Update on right whale issues
12. Update on recent public comment letters concerning Area 3
13. Other business / Adjourn

LAW OFFICES OF
WILLIAM C. HENCHY, P.C.

155 CRANBERRY HIGHWAY
ROUTE 5A
ORLEANS, MA 02553

TELEPHONE: (508) 255-1636
FACSIMILE: (508) 255-1325
INTERNET: whenchy@capecod.net

By Telefax and First Class Mail

March 9, 2000

Mr. James Fair
Assistant Director
Massachusetts Division of Marine Fisheries
100 Cambridge Street
Boston, MA 02202

RE: Outer Cape Lobstermen's Association v. ASMFC and Coates; Settlement Proposal

Dear Mr. Fair:

As we agreed following the mediation session at the U.S. District Court, my clients have put together their proposal for resolving the dispute with the ASMFC and the Division. We appreciate the prompt assistance from Bruce Estrella and Robert Glenn in providing technical review of various conservation equivalency measures.

My clients' proposal is enclosed, along with a copy of Mr. Glenn's equivalency review. As you can see, what my clients suggest results in a gain in egg production of over two and a half times greater than that presently provided under the Commission's management measures. Adoption of this proposal is a gain for the resource, and a gain for the fishermen on the Outer Cape. It is sound fisheries management..

I appreciate your continuing courtesies, and hope that you are able to obtain a favorable vote of the Commission to include these measures in the proposed Amendment No. 4 to the Interstate Lobster Management Plan.

If you should have any questions, or if I may be of any further assistance, please do not hesitate to contact me, either directly, or through Mr. Hammond at the Attorney General's Office, as Mr. Hammond may deem appropriate.

Very truly yours,

William C. Henchy
WCH:fs

cc. Assistant Attorney General Daniel Hammond
Steve Smith
Brian Gibbons
James O'Malley

PROPOSAL FROM OUTER CAPE LOBSTERMEN'S ASSOCIATION

Proposed resolution to Outer Cape Lobstermen v. ASMFC and Commonwealth of Massachusetts

Following Court ordered Mediation on the pending litigation, the Outer Cape Lobstermen's Association asked the Commonwealth's Division of Marine Fisheries to provide technical review of the conservation equivalency of V-notch protection versus minimum size increases in the Outer Cape Lobster Management Area. Copies of the results are attached.

At present levels of v-notched lobsters observed in sea sampling data, egg production gains over status-quo equal 0.0502 (i.e. 0.502 %).

The Outer Cape Lobstermen's Association proposes that v-notch protection be made an optional measure, and that in the Outer Cape Lobster Management area, the minimum size be raised immediately to $3 \frac{5}{16}$ ", and that thereafter, the Outer Cape Minimum size would remain $\frac{1}{32}$ " above that which the Atlantic States Marine Fisheries Commission requires coast wide, but in no event less than $3 \frac{5}{16}$ ".

Egg production gains from this measure would immediately rise by 1.338 %, an amount **over two and one half times** the gain provided by v-notch protection. Moreover, as can be seen by the accompanying chart, egg production gains become particularly strong as the gauge rises above $3 \frac{5}{16}$ ".

Adoption of this proposal by the Commission would promptly end the pending litigation; serve the interests of the Commonwealth of Massachusetts, and result in a gain for conservation of the resource.

Portland Press Herald

https://www.pressherald.com/2014/05/08/v-notch_decline_is_a_threatening_sign_

THE PRESS HERALD LOVES FOOD. SUBSCRIBE FOR ALL
OF OUR LOCAL FOOD COVERAGE.

\$2.50/WEEK

V-notched lobster decline is a threatening sign in Maine

Maine's lobstermen must mark and return egg-bearing females to the water, but compliance is falling and that puts the industry at risk.

Posted May 8, 2014

Jessica Hall

Staff Writer

Lobstermen's efforts to mark egg-bearing female lobsters with a V-notch on their tail have been on the decline since 2008, which could put pressure on the future health of the state's most lucrative fishery, state officials said.

If a female lobster is caught while carrying eggs, a V-notch tool or knife is used to remove a very small, triangular portion of the tail flipper. That lobster is then returned to the water. V-notching began in Maine in 1917 and has been mandatory since 2002, but the practice is very difficult to enforce, officials said.

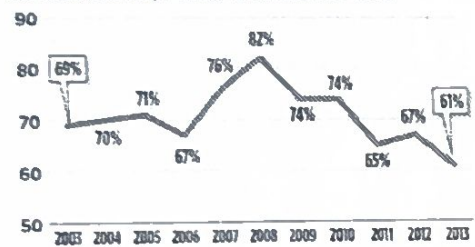
ADDITIONAL PHOTOS



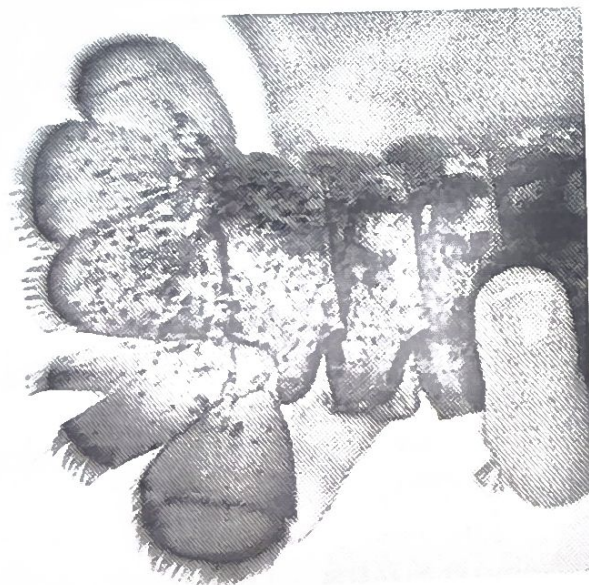
X

Lobsters with a v-notch

The number of egg-bearing lobsters that have had notches cut into their tails by lobstermen to identify and protect them has declined steadily since 2008. If the trend continues, officials say the breeding stock of lobsters could be decimated, imperiling the state's most lucrative fishery. Here's the percentage of notched female lobsters identified in catches from May through October, 2003-2013.



SOURCE: Maine Department of Marine Resources STAFF GRAPHIC BY MICHAEL FISHER



This is a detailed view of a female lobster with a freshly V-notched tail. The lobster will be put back in the ocean to reproduce and sustain the industry.

By throwing back the V-notched female lobsters, it allows them to grow larger and reproduce in future years. A V-notch lasts for about two molts or roughly two to three years – depending on the size of the cut – and acts as a signal for the next harvester that catches the lobster that it should be returned to the water to keep the reproductive cycle going, according to Kathleen Reardon, lobster scientist for Maine's Department of Marine Resources.

"It creates a buffer for sustainability for the population," Reardon said. "Because of V-notching, we're protecting the reproduction cycle of the population." "Because of V-sized lobster back to the water to reproduce."

The percentage of egg-bearing lobsters with a V-notch peaked in 2008, when 82 percent of those sampled statewide were marked. That average has declined nearly every year and dropped to 61 percent in 2013. Last year, the prevalence of V-notching was higher in Zone F, which had a rate of 70 percent. The compliance rate hit a low of 50 percent in Zone A.

Zone F runs from the Presumpscott River to Small Point, while Zone A is in the east from Schoodic Point to the Canadian border.

“Previous generations of lobstermen made financial sacrifices on your behalf by V-notching lobsters, essentially putting some landings in the bank for the future,” Patrice McCarron, executive director of the Maine Lobstermen’s Association, said in the trade group’s April newsletter. “If lobstermen continue to choose not to V-notch, the lobster resource could be headed for a serious decline.”

According to projections from the DMR, the lobster fishery could collapse within 10 or 20 years if lobstermen stopped the practice of V-notching lobsters and throwing the egg-bearing females back into the water, Reardon said. If lobstermen simply cut in half their participation from the 2007-2011 levels, the fishery would still collapse, but the decline would take about 30 years, she said.

Such forecasts, however, aren’t perfect and the lo
several other factors such as water temperature at
would be from historically high levels, state offici

According to an annual survey of young lobsters in 11 locations in the Gulf of Maine, juvenile population settlements have fallen by more than half since 2007, according to research by the University of Maine. The American Lobster Settlement Index is used as a predictor of trends in the fishery.

The two issues contribute to the cautious outlook for the state's lobster industry, state officials said.

"We've seen a meteoric increase in landings since 1980, when we were at about 20 million pounds. Now, we're at 125 million pounds. We can't expect to be at record levels forever," said Carl Wilson, the DMR's top lobster biologist. "These are extraordinary times. The key is how this fishery reacts to change. The decline in V-notching is not a positive trend."

Wilson cautioned that V-notching is just one factor affecting the lobster fishery.

"We can't attribute all the success of the fishery to V-notching, nor can we say that it gets all the blame for any potential decline. By not V-notching, that's taking a tool out of the toolbox that's been beneficial in the past," Wilson said. "By participating in V-notching, you are participating in the future. We need to double down on the investment in the future."

The decline in the V-notch participation rate was observed as part of the state's sea sampling program. That program, which started in 1985, sends observers to measure the catch on boats from May to November. There are three trips a month in each of the state's seven harvesting zones. The observers measure every lobster caught, including the immature lobsters that get thrown back.

"There's a number of potential reasons for the decline. Attitudes may be changing. Fishermen may be doing their own stock assessment and the attitude is that there's enough V-notches on the bottom," Reardon said.

Another factor that may be deterring lobstermen of lobsters being harvested and the time crunch, s

Last year, nearly 126 million pounds of lobster val state. That catch was down slightly from the 127.2 million pounds caught in 2012, when the value of the harvest totaled \$341.8 million.

Wilson said that due to the boom in the lobster population, the absolute number of V-notched lobsters may be the same or higher than in the past. On a percentage basis, however, there's fewer V-notched lobsters, he said.

"There are so many unknowns and variables. I don't think it's a big deal. There's a large portion of large, female lobsters already notched," said Brendan Ready, co-owner of Ready Seafood in Portland. "I don't think it will affect anything on the sustainability of the fishery. There's no predator to consume these (notched) females."

Maine has long-prided itself on its conservation efforts. Massachusetts fishermen notch lobster, but at a lower participation rate than Maine, Wilson said. The Massachusetts Division of Marine Fisheries did not return calls seeking comment.

"Back in the 1930s, 40s, and 50s, there was an evolution of the fishery from a 'take anything' fishery to a modern fishery based on conservation. Maine fishermen were participating in V-notching and landings were stable," Wilson said. "Then, with declining predators and increasing water temperatures, we saw a boom. Rather than saying we know why – we can at least say the conservation efforts allows the resource to double, and then double again when favorable conditions were present."

"I notch. A lot of fishermen do. It's a close-knit community. Everyone knows who notches and who doesn't. Some people of the younger generation don't take the time and effort to do it. You'll find that those in their 40s or older do. They see notching as protecting the future," said Rocky Alley, a lobsterman in Jonesport and president of the Maine Lobstermen's Union.

Jessica Hall may be reached at 791-6316 or at:

X

jhall@pressherald.com

Twitter: @JessicaHallPPH



Copy the St

[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 8:53 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

William Smith sr.

Email

billsherries@yahoo.com

State

Maine

Comment

A gauge increase and vent increase would make it extremely difficult to make a living wage for me and my crew
PLEASE No GAUGE INCREASE

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Wed 4/9/2025 10:08 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Richard Smith

Email

blueweapon283@yahoo.com

State

Maine

Comment

I fully support the implementation of American Lobster Draft Addendum XXXII, due to the many issues and shortcomings of the previous American Lobster Draft Addendum XXVII.

American Lobster Draft Addendum XXVII is an ill-advised measure that seeks to address an unproven problem, at the cost of a significant portion of the catch and therefore income of commercial lobster fishermen. While being touted as a reasonable measure in a number of ways, Lobster Draft Addendum XXVII comes with many problems:

1: The research that led to Addendum XXVII is inherently flawed, due in part to the inability of researchers to listen to the input of commercial fishermen. Fishermen have been noticing for several years that the amount of male and female juvenile lobsters caught in their traps is increasing in deeper water farther from shore, and many of us have conveyed that message to scientists and officials involved with industry management, but the research programs seem deeply rooted in a "look where they aren't, because that's where they were and therefore where they must be" mentality. Things change, and Mother Nature is a tricky creature. Juvenile lobsters seem to be shifting to deeper water, possibly due to increased storm activity or warmer inshore waters. Research efforts need to be expanded and diversified, in order for science to be able to see the patterns that fishermen observe in the pursuit of the fishery that we love and care for.

2: Decades of research have led to the conclusion that larger lobsters, especially the lobsters larger than many Atlantic states' MAXIMUM limit, produce exponentially larger amounts of eggs than smaller lobsters. These larger lobsters are also more resilient to predation than smaller lobsters, therefore logically their eggs are more likely to make it to dispersion stage than the eggs of the more vulnerable juveniles. Addendum XXVII seeks to increase the minimum measure for some Atlantic states, but neglects to bring the states with larger MAXIMUM measures down to the 5" maximum gauge, which would be far more beneficial to maintaining lobster stocks.

3: For commercial fishermen in affected states, for at least the first few years, implimentation of Addendum XXVII would decrease the annual catch by a very noticeable amount. The Spring hardshell fishery would be devastated, as a large percentage of legal-size Spring hardshell fall in the measurement range that Addendum XXVII would seek to prohibit. This loss of landings during Spring, when the price is normally still near it's Winter/Spring high point, could cost some fishermen 10s of 1000s of dollars, which translates to less money for their employees and their community. In a time when tariffs and political unrest could very negatively effect lobster demand and price, the loss of income promised by the measures in Addendum XXVII could exacerbate the outcome from a possible lean season into an absolute financial tragedy.

4: To add insult to injury, Addendum XXVII follows up two ill-advised measure increases with a touch of absolute stupidity: The vent size increase. The current legal vent size of 1-15/16" rectangular or 2-7/16" double-round is already larger than it needs to be for our minimum measure. Lobsters 1/4" to 3/8" above the minimum measure are routinely caught as a trap is brought onto deck, falling freely out through brand-new vents that show absolutely no wear. Our current vents would be adequate for both proposed gauge increases, possibly still larger-than-necessary. An increase in escape vent size would enable lobster in the 1.75 pound range, possibly larger, to escape the trap. This, piled on top of a poundage loss from the measure increase, would make an already horrible financial loss even worse.

Maine DMR's decision, driven by fishermen input, to pull out of Addendum XXVII is the prudent decision to make for the industry, and the communities supported by the industry. The fact that New Hampshire and Massachusetts followed suit shortly after should make it obvious that Addendum XXVII is ripe with flaws that would devastate coastal communities, while providing no benefit to the lobster stocks, and needs to be scrapped.

In closing, I reiterate: I FULLY SUPPORT THE IMPLEMENTATION OF AMERICAN LOBSTER DRAFT ADDENDUM XXXII

Thank you for your time,

Richard Smith
F/V Bad Behavior(owner/operator)
Big Red's Wire Trap(owner/operator)
Beals, ME 04611

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[External] Lobster Draft Addendum XXXII

From CHERYL ANN SOUZA <jlobsters@comcast.net>

Date Thu 4/24/2025 6:46 PM

To Comments <comments@asmfc.org>

My name is Bill Souza and I have been fishing the outer cape for over 40 years and I can tell you that we have a vibrant fisheries in the outer cape. Even though we have a good fisheries if you people think that putting the v notch on a handful of fishermen will solve the problem that you think there is in the stocks then you are sadly mistaken .

I have taken state observers many many times and they always tell us that we have the best fisheries in the state. They do other areas in the state and they know that our area is the best managed.

The v notch is a failed experiment from Maine. If it worked so good then there would not be a problem with the stocks. Maine just wants to keep taking the babies before they get a chance to breed.

By v notching you are taking mostly males and putting more pressure on the male population. We have noticed less males over the years since they started v notching and I do believe that you need both to breed.

Bill Souza

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 3:13 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Zach Spearing

Email

z.spearing2428@icloud.com

State

Maine

Comment

I don't think the lobster measure increase is necessary there is not problem with the amount of lobsters to be caught there in a different area because the waters in the gulf have warmed up there still 8 pounds a trap keepers and 3 or 4 seeders and 10 shorts in every trap where I have seen 40 miles offshore . There just not coming into the state waters where majority of fishermen are reporting from

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Re: [External] Why ask

From Caitlin Starks <CStarks@ASMFC.org>

Date Tue 4/8/2025 1:09 PM

To Kenneth Stanvick <Kennethstanvick@comcast.net>; Comments <comments@asmfc.org>

Thank you for providing input on Draft Addendum XXXII to the Interstate Fishery Management Plan for American Lobster. Your comments will be shared with the American Lobster Management Board for consideration at its next Board meeting, which will occur in May. Upon considering public input, the Board will select final management measures and consider final approval of the Addendum.

[Caitlin Starks \(she/her\) | Senior Fishery Management Plan Coordinator](#)

Atlantic States Marine Fisheries Commission

1050 N. Highland Street, Suite 200 A-N

Arlington, VA 22201

Phone: 703.842.0740 | Fax: 703.842.0741

cstarks@asmfc.org | www.asmfc.org

From: Kenneth Stanvick <Kennethstanvick@comcast.net>

Sent: Monday, April 7, 2025 4:29 PM

To: Comments <comments@asmfc.org>

Subject: [External] Why ask

This is a joke, you should demand demand the governors of both Maine and NH to offer their proposals. Science be damned, anything that reduces the commercial harvest will be a no go.

The tail is wagging the dog yet again.

Nobody owes commercial fishermen a living at the expense of the general public or the environment.

Ken Stanvick

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Losbter Draft Addendum XXXII

From G2W2 <G2W2@asmfc.org>
Date Fri 4/18/2025 12:02 PM
To Comments <comments@asmfc.org>

From: Kenneth Stanvick <Kennethstanvick@comcast.net>
Sent: Saturday, April 12, 2025 8:58 AM
To: G2W2 <G2W2@asmfc.org>
Subject: [External] Comments

Lobsters are a public resource not to be squandered by the selfish actions of the commercial fishermen. I thought the challenge was for the commercial people to come back with their proposal not a kick the can down the road non solution. We all know that option A would not be supported and the goverors of Maine and NH have blocked you from taking the needed action, so why ask a question you already know the answer to. I did not speak because it would not have any impact.

Let's face it you and the general public have no ability to change the existing attitudes of people who are only in protecting their self interest.

This is the same mentality of those we deny climate change as "bad science" because they choose to ignore or deny the accuracy of the data.

Thank you for your continued efforts and I offer no solutions only lots of my own frustration.

Ken stanvick

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Mon 3/24/2025 9:13 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Tiffany Strout

Email

tiffany.strout@yahoo.com

State

Maine

Comment

Dear Atlantic States Marine Fisheries Commission,

My name is Tiffany Strout and I am writing to you today to express my support for Addendum XXXII which would repeal all of gauge and escape vent measure increase as put forth in Addendum XXVII.

In learning more about the Atlantic States Marine Fisheries Commission (ASMFC) I read your mission statement "To promote the better utilization of the fisheries, marine, shell and anadromous, of the Atlantic seaboard by the development of a joint program for the promotion and protection of such fisheries, and by the prevention of physical waste of the fisheries from any cause". I am hopeful as you read this request, you will understand my mission is to help ensure my community is a safe and prosperous community that enables future generations to learn about their heritage and have an opportunity to work and thrive in the fisheries now and in the future. My mission is driven by my sons love of the ocean and the desire to be a part of the fishing community, but also, to help ensure current and future individuals are also able to have the opportunity following in their families' footsteps or like my son, be a first-generation fisherman. Protecting the fishing industry will help to make sure our community does continue to be safe and prosperous for all who live there.

When thinking about prosperity, the value can vary person to person depending on their personal goals. Here is

Washington County, our prosperity may be quite different than other areas where you also oversee. In Washington County, we are a community of people with a deep work ethic that has over the years adapted to season jobs such as blueberry harvesting, wreath making and the fisheries. We have no big industry in the coastal parts so working hard and adapting are part of our core values.

Knowing the Commission relies on data and facts to help them make their decisions, I thought I would provide some about Washington County as most may not be familiar with the area.

Washington County Maine, known as the Sunrise County, has a total population of just over 31,437 (2022 census), includes two cities, forty towns, three plantations, and two Native American areas and is located in the far eastern part of the State of Maine. The county is 5th largest in size with a total area of 2,562.7 square miles and borders Canada both at land and at sea.

As compared to other counties in the United States, Washington County, Maine is considered one of the poorest counties in the United States, consistently ranking among the highest poverty rates in the state of Maine, with a significantly higher poverty rate compared to the national average, meaning, it is considered much poorer than most other US towns when looking at poverty statistics alone. In 2022 the employment rate was 49%.

In reading this you may wonder why this information would be important to the ASMFC when making decisions that effect the regulation around the fishing industry. The simple answer is the fishing industry is the main driver of Washington Counties employment and the main contributor to the economy. Without the fishing industry, Washington County would not exist.

Sea Maine did a report highlighting the impacts of the industry which I have attached to this email and wish to be included in the record for my testimony. If you read the report, you may gain a better understanding of the direct impacts across the state, but I will high light the most important one specific to Washington County and Hancock County, DownEast Region:

“Regionally, the seafood sector in the DownEast region accounted for 45 percent of all direct jobs (and 47.4% of total impact jobs) and supported \$390 million in labor income (16 percent) in 2019. The seafood sector in DownEast supports slightly more jobs than Southern Maine despite having less than one-fifth of the population. DownEast seafood jobs were concentrated in the harvesting subsector — the region accounted for 65 percent of all harvesting jobs in seafood sector statewide in 2019. These estimates are likely conservative as a result of a significant amount of harvesting activity that did not have geographic identifying information attached — accounting for nearly 3,700 jobs.”

Knowing this information, now ties into why what seems like a small proposal in a measure should not play a big part, but the one you are proposing definitely will but not in the way you are hoping.

As mentioned above, Washington County directly borders Canada and fisherman from both Washington County and Canada fish in what is called the “Grey Zone” Washington County fisherman are already at a disadvantage when fishing for lobsters on the oversized measure. As you know, lobsters over 5 inches must be thrown back because we know lobsters become more fertile as they age, and the intent is to make sure there are breeders to sustain the future of the industry. Canada however does not have the same regulations on measure and lobsters that are thrown back by Maine lobstermen can then be harvested by Canadian lobstermen defeating the entire reasoning and hurting the industry.

The same thing will happen with an increase in the small measure. It is estimated the small increase in the smaller measure will have a direct 20% decrease in catch for DownEast lobstermen. This is due to the same reasoning as the over sized lobsters. The fishermen fishing in the “Grey Zone” will throw back the current size lobsters they are allowed to keep, and they will go directly into the Canadian traps to be hauled and sold. There will be no time for them to grow and help with the sustainability of the stock as the intent of the change.

Removing 20% of the catch from the fishermen in Washington County will most definitely have both an impact on the fisherman, but also every business in the community including, banks, stores, bait dealers, truck drivers, carpenters, trap makers and the tourist industry. Also, there are several members of the Motahkomikuk and Sipayik reservations who take part in the fishing industry in Washington County and some may also fish in the "Grey Zone", but even if they are shore fishermen, the effect is still the same with Canada.

While I can respect the intent of ASMFC is to protect the fishing species, I can assure you, there are no better stewards of the sea including the ecosystem and species than those who have relied and need to rely on the industry for their livelihood and more importantly take great pride in their heritage.

Allowing the fishermen to be more of the voice of the science based on years of time on the water learning the migration of the species and working to make sure the industry can continue will be the most beneficial to everyone including the species that live in the ocean.

This model has proven true over the years with things like removing all thousands of miles of floating rope from their gear, using breakaways on their balloons and buoys and probably one of the most important implementations of V-notching the egg bearing female lobsters and returning them to the sea.

A request I have for the commission is to also look at other areas like industrialization of the Atlantic Ocean and how that is impacting the ocean species and ecosystems both now and in the future. There are companies' sonar blasting the bottom for mapping and then there will be 100s of miles of dredging to try to bury all the cables coming to shore.

The intent of Addendum 29 is to help maintaining the lobster stock, but there is not conversation about what the effects of dredging through breeding grounds of all species or even the protected coral areas. There has been no remarks offered by the commission, at least that I could find, related to the danger of the EMF that is emitted from the electrical cables that European studies have shown to deform the lobster larva not allowing the tail to properly develop causing them to be unable to swim or the mesmerizing effect it has on the crab species to cause them to freeze and not move. One of the most concerning futures is the floating offshore wind terminals that require dragging 3 to 4 ginormous anchors across the bottom of the ocean on 3 to 4 sides of the platform to get them to hitch in the ground for anchors. Knowing anything about the ocean tells you that you will need to have slack in the chains going to the platform because well, the ocean is always moving which will be dragging continually across the bottom as it moves side to side. In addition, you will not be able to bury any of the cables connecting to each other or to the shore because again, the ocean is always moving which will create a spiderweb of floating cables through the array. There are many more concerns including the wake and smother effects also both damaging to the ecosystem.

If the commission really wanted to make a difference in the sustainability of the ocean and the species that call it home, they should listen to those who want to protect it for their heritage and livelihood rather than those who want to profit by industrializing the ocean not caring about the species that call it home.

Thank you for taking the time to read my concerns and I hope you have a better understanding about the direct impact accepting Addendum XXXI will have on my community and the people that want to continue to call DownEast Maine home. With new data being collected to show recovery of the stock, further moving the measure adjustment out will allow for more time to gather additional data and if the data shows recovery with the measure currently in place, would changing the measure make any difference to the recoverability of the lobster stock, maybe a better chance in southern Maine, but not in DownEast when fishing with Canadians who are maintaining the current measure but I guarantee the biggest threat to everything in the ocean is industrialization.

Please let me know if you have any questions and I am hopeful the commission will take time to learn more about the effects their decisions have on people.

Tiffany Strout
Mother of a First-Generation Fisherman
Concerned community member
Phone: 207-598-7043
Email: tiffany.strout@yahoo.com

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[External] Lobster Draft Addendum XXXII

From James Sturks <jsturks@yahoo.com>

Date Fri 4/18/2025 9:08 AM

To Comments <comments@asmfc.org>

I wanted to take a minute to let you guys know that the job you have done and continue to do is bullshit! You board members have no idea what it's like to be a commercial fisherman! We go to work everyday wondering what is going to be thrown at us next! We cannot with stand an increase in measure or vents right now! We are already struggling dealing with everything being thrown at us. I fish offshore and Inside and I have not seen this drop in stock like you guys claim! There's more juvenile and egg baron lobsters then ever! I have 2 kids that absolutely love to be on the boat! I'm scared for there future! Please don't take my kids future away by putting more regulations on it! Enough is enough!

[Sent from Yahoo Mail for iPhone](#)

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Tue 4/15/2025 7:34 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Michael William Sweeney

Email

mws13@me.com

State

New York

Comment

I used to work as a Mate on a Charter Fishing Boat, and I respect these people who are Commercial Fishermen/women. I have literally seen them in the ocean, and they care about everything. I support all their suggestions, because they are doing the work.

Thanks for your consideration.

Michael Sweeney

First Mate - Retired

Milky Whey

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[External] Lobster Draft Addendum XXXII

From Hannah Thompson <hannah.thompson2426@gmail.com>

Date Fri 4/25/2025 9:50 PM

To Comments <comments@asmfc.org>

To Whom it May concern:

Changing the minimum lobster Gauge measure from 3 1/4" to 3 3/8" would prove catastrophic for Maine's lobster industry and would fail to fix the supposed decline of juvenile lobster. While ASMFC claims that the increase is "minor" (so many beg to differ!) their claims that it may increase the total egg production of this stock by up to 40% seem more like empty promises that follow zero scientific evidence and conveniently ignore facts and real promising solutions. The Maine lobster industry has proven to be a leader in conservation methods for decades while many other states and areas who also fish the Gulf of Maine continue to fish with less restrictive policies that often seem counterproductive to Maine's efforts. How can we even begin to ask Maine lobstermen to implement stricter regulations when so many others continue to fish under far less regulation and instead follow policies that blatantly disregard proven methods of conservation?

Most license holders here in Maine are individuals who have worked their entire lives building their business from the ground up. Most do not know, nor would want to know, any other way of life. These are people who truly care about the ocean and the future of the lobster industry as they are directly invested in every aspect of it. Their livelihood depends on its survival. When rules and regulations make sense and offer solutions for the greater good of the industry, Maine lobstermen willingly oblige and adapt. ASMFC's current proposals fail to make sense and Maine lobstermen continue to assert that these regulations, if adopted, will prove to be detrimental for so many in Maine's lobster industry.

Maine's current lobster gauge prevents fishermen from keeping lobster stock that is smaller than 3 1/4" and larger than 5". This is a small, yet conservative, margin already. ASMFC's proposal looks to take even more from Maine's extremely conservative gauge while failing to account for those who fish with far less restrictive measures. For example, Area 3's legal minimum is 3 17/32" and their maximum is 6 3/4". To put into perspective, Maine boats have a variance from smallest to largest of an inch and 3/4" whereas Area 3 has roughly 3 and 1/4 inches of variance for lobsters that can legally be kept. Additionally, these boats do not adhere to zero tolerance on v-notches or any mutilated tail restrictions. Instead, these boats are allowed to keep v-notched lobsters that are 1/8" or less with no oversight. Maine adheres to a strict 800 trap limit and follows a zero-tolerance policy regarding female lobster tails which demands that any female lobster that has a v-notch or any irregularity on its tail (even if it does not resemble a v notch at all), gets returned to the ocean in anticipation that those lobsters continue to breed. "Berried" lobsters are required to be v-notched and returned. Science shows that these policies, every single one of them together, sustains the juvenile lobster population through the protection of egg-bearing females and large broodstock who are known to carry thousands more eggs than lobsters of a smaller size.

According to a [mass.gov](https://www.mass.gov/news/hopes-for-increased-egg-production-will-compensate-for-reduced-survival-of-larval-lobsters) article dated 6/29/2023, raising the minimum legal carapace size in two steps over a 3-year period from 3 1/4" to 3 3/8", HOPES that "increased egg production will compensate for the reduced survival of larval lobsters." Yet, it stands to reason, (and science

shows) that the best way to increase egg production is to allow those v-notched lobsters who are known to carry eggs, to continue to breed. The larger the lobster the better, as they will carry many more eggs than their smaller counterparts and due to the larger number of eggs, the odds of survival are in their favor. This appears to be understood as the article continues to say that "a modest decrease in the maximum size allowed for lobsters harvested from offshore waters from 6 ¾" to 6 ½" on a separate schedule." Yet the modest decrease in maximum gauge size allowed to be kept by boats fishing Area 3 and Outer Cape Cod is still significantly larger than the 5"-carapace length allowed by Maine fisherman. The article continues to explain:" A standard "v-notch" possession definition for female lobsters in Area 3 and Outer Cape Cod was enacted: 1/8" indentation with or without setal hairs in the designated tail flipper. Most lobstermen in the Gulf of Maine are required to carve a V-shaped notch into a specific tail flipper of egg-bearing female lobsters, to mark her as a "breeder." This mark protects the female from future harvest. This 1/8" v-notch definition will protect reproductive females (that were notched and released by another fisher) through two molts (in most cases) and will further contribute to the egg production of the stock."

To summarize, ALMOST every lobsterman who fishes the Gulf of Maine adheres to strict v-notch laws where it is illegal to keep a v-notched lobster regardless of the size of the v-notch, and the lobster must be returned to the ocean so that it may breed more juvenile lobsters EXCEPT for those who fish Area 3 and Outer Cape Cod. Area 3 and Outer Cape Cod are legally allowed to keep and sell a female lobster that is v-notched if the v-notch is 1/8" or smaller. But really, who's measuring? The boats that fish Area 3 are owned by approximately 2 or 3 companies, each with its own monopoly. One company owns 12 -13 fishing vessels which are each "captained" by everyday citizens simply hired for a job. The captains of these vessels have hardly any prerequisites and nothing, but time invested in the industry. They essentially, unlike Maine lobstermen, have nothing to lose. If caught with a v-notched lobster that is indeed larger than an 1/8", they maybe lose their job, maybe. On the other hand, a Maine lobster captain could lose everything and face serious fines and/or jail time.

The vessels fishing Area 3 fish essentially 24/7 year-round with each boat landing approximately 30,000 lbs of lobster every 2 weeks. For perspective, 30,000 lbs. is comparable to what many Maine lobstermen catch in an entire season. 30,000 x 13 boats x every two weeks ends up equaling a whole heck of a lot of v-notched and large female broodstock over the course of just one year. This is just one company. One company with 13 boats all run by random "employees" who have nothing to lose. These boats are not frequently boarded by marine patrol, their catch is not gone through randomly or if ever unlike the frequent "checks" Maine lobstermen are subjected to. These are all policies and procedures that help keep those in the industry honest and help protect the industry against those who fail to follow the very laws meant to regulate and protect the industry.

These fishing areas, for some unknown reason, have long-held lax regulations that prove counterproductive to Maine's conservative efforts. From trap limits of nearly 2000 traps compared to Maine's 800 to the extreme difference in allowable lobster size variance, v-notch regulations to even the very license requirements for running the boats that fish these waters and the ability to circumvent state laws in which the vessels land, these lax regulations directly impact and hurt the entire lobster industry and directly impact the dwindling numbers of juvenile lobsters.

This 1/8" v-notch regulation, or lack of regulation, is outrageous and laughable to the very cries from ASMFC that the juvenile lobster population is "dwindling" and that a smaller measure for Maine will provide a solution, when the solution appears very clear. These very regulations are a slap in the face to Maine lobstermen and every other lobsterman who follows conservative v-notch regulations that essentially allows for Area 3 and Outer Cape Cod to catch the very lobsters these fishermen "conserve". Who would ever think that keeping a v-notched lobster

would do anything positive for the juvenile lobster population? Why are the laws restrictive for some and non-existent for others? How can we in good conscience fight against a “declining juvenile lobster population” when we tolerate laws that directly contribute to the issue? In my opinion, these are the changes that should be made and if made, an increased juvenile lobster population would be a guarantee instead of simply a “hope” that lacks any supporting evidence.

Money and monopolies should NEVER dictate right and wrong. These policies are wrong. The regulations ASMFC is proposing on Maine lobstermen are wrong. If the goal is truly to save the “dwindling juvenile lobster population”, the following regulations should be implemented: Zero tolerance on female lobster tails, for EVERYONE, Area 3 and outer Cape Cod included. Zero new regulations for Maine lobstermen until everyone who fishes the Gulf of Maine abides by the same conservative regulations that Maine has abided by for decades. Shrinking Maine’s already conservative measure will do absolutely nothing for the juvenile lobster population. What these proposed regulations will do is put many Maine lobstermen out of business leaving more brood stock on the ocean floor for areas with lax regulations to fish out of existence and guarantee that even stricter regulations will be imposed in the future on the lobstermen who are lucky enough to survive these irresponsible proposals. Changing the laws so that they match Maine’s already conservative policies, mainly zero tolerance on v-notch tails, would preserve the broodstock and increase the juvenile lobster population for our generation and generations to come, would hurt no-one, and instead offers a strong solution that would serve the greater good for the entire lobster industry which is something that every lobsterman can get behind. It makes sense. The solution is simple. Please, do the right thing.

[ASMFC Approves Gulf of Maine Lobster Conservation Plan | Mass.gov](#)

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[External] Lobster Draft Addendum XXXII

From jimtitone@aol.com <jimtitone@aol.com>

Date Fri 4/25/2025 12:50 AM

To Comments <comments@asmfc.org>

Ladies and Gentlemen. On the subject of the Draft Addendum XXXII, I support Option B, the full repeal of the gauge and escape vent measures.

First, I believe the American Lobster Board reacted to quickly in proposing and approving the measures contained in Addendum XXVII. Even though the so-called trigger was reached to enact XXVII, more data should have been required in two or more following years to corroborate the year 1 findings. As it is, and according to the most recent settlement data as published in the August 2024 edition of the Commercial Fisheries News, "All Maine sites saw an increase in settlement - most notably for the northeastern regions, reaching numbers similar to levels last seen in the mid 2000's. Most notable has been the reversal in settlement patterns in Casco Bay." These latest improvements in juvenile lobster settlement strongly support Option B of Draft Addendum XXXII.

Secondly, there has been no buy-in from Canada on any hope for their lobster industry to follow the American Lobster Board's desire to enact regulations similar to those in Addendum XXVII.

Thank you for the opportunity to comment on this very important subject.

Sincerely,

Jim Titone

F/V Fly Girls

Seabrook, NH

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sun 4/6/2025 2:45 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Caitlin Trafton

Email

caitlintrafton@yahoo.com

State

Maine

Comment

178 Atlantic Road
Swan's Island, Maine – 04685
caitlintrafton@yahoo.com

April 6, 2025

ASMFC Commission
1050 N. Highland Street, Suite 200 A-N
Arlington, VA – 22201

Dear ASMFC Commissioners,

Thank you for your time, and the work you all have put in to maintain a healthy lobster population, and hear the individuals-like myself- that participate in this fishery to make a living. My hope is that your decision regarding American Lobster Draft Addendum XXXII will be to repeal the gauge and vent size changes.

The majority of State of Maine lobster fishermen have spoken out against a lobster measure/gauge increase, and our former Department of Marine Resources (DMR) Commissioner – Patrick Keliher agreed with us on this matter. I am one who feels that the DMR data does not correspond with what the lobster fishermen are seeing. In my opinion, there has been very little communication between the ASMFC, Maine DMR, and Maine lobster fishermen.

Moving forward, our new Commissioner Carl Wilson and our DMR have agreed to have more meetings, and more communication. It is my very strong opinion that lobster fishermen can bring a great deal to the table when it comes to studying the species: they are on the water every day, all day, weather permitting. These are the men and women who have spent their lives perfecting the best methods to follow, and trap them; it is in their best interest to see the population to thrive and continue for the generations after them. Please allow us more time to make a plan that works for everyone.

Thank you for taking the time to read my, and other's letters. I wish you the very best as you make these difficult decisions, and I trust that God, if consulted, has the best answers.

Sincerely,
Caitlin Trafton
Swan's Island, Maine – Lobsterman
(207) 951 - 4562

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[External] Lobster Draft Addendum XXXII

From Deborah <sacredarts369@gmail.com>

Date Thu 4/10/2025 10:28 AM

To Deborah <sacredarts369@gmail.com>; coo@fishermanstewardship.org <coo@fishermanstewardship.org>;
Comments <comments@asmfc.org>

 1 attachment (27 KB)

PDF Lobster Mesh size limit2025.pdf;

Thank you to NEFSA for their dedication to preserve and protect our resources and way of life - I have referenced their information for my letter to ASMFC, in support of suspending gauge size reduction for lobster until unbiased research is acquired. I realize my language is less diplomatic. My father worked for, and retired from, Department of Marine Resources; I was married to a commercial fisherman, and I am a true environmentalist and steward of a sovereign way of life. I have attached my letter to ASMFC - feel free to use this. I welcome constructive responses.

Thank you and Sincerely,

Deborah Ann Train

SacredArts369@gmail.com

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April 10, 2025

RE: Atlantic States Marine Fisheries Commission's (ASMFC) proposal to increase gauge size for lobster in primary fishing ground area LMA 1

Dear Politicians and Taxpayer Funded NGO Opposition to Lobster Industry:

We, the concerned citizens of Maine, do not accept the metrics and data that you are using to substantiate and destroy the Lobstering Industry in the State of Maine. We know how the new science works - there are no standards, just the manipulation of data to support the long term goals and agenda of globalization and control of all natural resources, at any expense.

“Flawed Stock Health Metrics. ASMFC relies on three surveys—trawl, ventless, and sea sampling—using a baseline from the best years on record. This has resulted in a reported 44% stock decline, which may not accurately reflect current conditions. A major benchmark stock assessment due in 2025, incorporating a broader range of data over five years, would provide a clearer picture. Implementing a gauge change before this assessment is premature.”
(NEFSA)

Your actions to lobby for policy decreasing the gauge size of lobster harvested by American lobstermen, fishing along side Canadians who will maintain a larger mesh size, will impact and destroy the constitutional rights of the people (American lobstermen) and their ability to make an honest living wage by:

1. Impact Trade/Market. The proposal would give Canadian fishermen a monopoly on the highly sought-after one-pound lobster market (chic lobster market), affecting sales to cruise lines, restaurants, and other buyers. Threaten New England Processors. With a reduced catch, regional lobster processors will struggle to stay in business. Addendum XXX already limits their access to Canadian lobsters smaller than the American minimum gauge size, creating further challenges. Establishing proper grading infrastructure would increase costs for American processors, reducing their competitiveness, drastically. (NEFSA)

Uncertain Conservation Benefits. The stated goal of increasing egg production to boost future lobster stocks lacks supporting scientific evidence. ASMFC has not provided data proving the effectiveness of this approach, with previous efforts, such as in Long Island Sound, **yielding no success**. (NEFSA)

There have been no alternative strategies offered to enhance lobster stock resilience, while more substantiated data is gathered, to protect the lobster/fishing industry from certain destruction. You will be responsible for the annihilation of a sustainable, American food source, via incrementally cutting away their ability to sustainably harvest and market - like the Canadians - a natural resource. You are not protecting the resource, you are using data that is flawed and will cause irreparable damage to an American industry that supports thousands of American families and their communities.

I will conclude in demanding that this government entity, Atlantic States Marine Fisheries Commission's (ASMFC), stop imposing addendums, and all other strategies intended to regionalize and regulate our natural resources, through governmental policy making, until a balanced perspective is attained. Real science is not manipulated - it is acquired through auditing research methodology and processes, and inviting oversight from the industry leaders - people who are actually working in the field of the industry. There are some large, corporate industry voices who align themselves with the ASMFC (stakeholders), but do not represent the majority of the people in the industry, nor do they represent the majority of the people who have made this a way of life for generations.

I demand that you listen to the American lobstermen, experts in this field, who have a vested interest in maintaining and increasing the resiliency of lobster stock, passing this on to his/her heirs, and continuing a way of life that should be respected and revered in this day and age of politically manipulated science and policy. You are responsible, as am I, to preserve and protect our environment.

A grant, NGO, and tax subsidized paycheck, tied to an unsubstantiated agenda or outcome, is a conflict of interest. Taxpayer monies being used to take down the taxpaying, middle class, self employed, independence of a people is wrong. Although the playing field can not be leveled due to your unlimited access to government subsidies, we request public forums - not on a zoom call, but in a public place, face to face, with scientists from both sides at the table. This not only slows the process to a manageable and ethical pace, but introduces transparency, warrants inclusion of locally affected 'stakeholders,' and allows due process for impactful policy making that will cause irreversible damage to an industry and way of life.

I look forward to your response.
Sincerely,

Deborah Ann Train, SacredArts369@gmail.com

[External] Lobster Draft Addendum XXXII

From RD BT <rd.tyner88@gmail.com>

Date Fri 4/25/2025 10:17 AM

To Caitlin Starks <CStarks@ASMFC.org>; Comments <comments@asmfc.org>

I am a career oceanography, and NH citizen who has also lived in Maine - and several times in the DC area.

I urge the adoption of Option B in the Lobster Drsgt Addendum XXXII, thereby removing the gauge and vent size increases in LMA 1.

I concur with all 5 of NEFSA's points. The science basis for changing size requirements is lacking. At a minimum, the 2025 assessment needs to be completed and considered in any reasonable process. Please do not sacrifice the careers of so many dedicated fisherman based on incomplete short-term science. Give the lobster industry a chance to prove implementation of new resilience efforts.

Also, it makes zero sense to place limits on ME/NH fishermen that differ from Canada; they have overlapping fishing grounds! The US & Canada should be sharing science and working together on this! Why isn't the International Joint Commission involved in this discussion? (I can provide you their contact info....)

Robin Tyner
PO Box 471
Freedom NH 03836
757-635-7134

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 12:29 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Corey Wallace

Email

coreywallace6219@icloud.com

State

Maine

Comment

A gauge, vent increase is not a good idea in my opinion . I would rather have less traps or maybe some type of closure like canda does. But honestly I don't think we need any changes I see just as many shorts maybe more than I did 20 years ago where I fish.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 11:43 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Lee Watkinson

Email

lwatkinson@roadrunner.com

State

Maine

Comment

I've commercially harvested lobster for over 35 years and oppose the guage increase. The population of lobster has shifted to deeper water but is still in great shape. I've been part of the Maine sampling and study program taking researchers out to document what's coming up in my traps. Every scientist that has been aboard my boat has acknowledged that the resource is healthy in my area. The downfall with the ventless trap survey is that the sampling sites haven't shifted in the last 15 years. I can be within 200 yards of those traps traps but I'm 250 feet deeper where the lobsters actually are. This has been discussed with several researchers that have been aboard and many agree, that the data gathering needs to be updated. My suggestion would be for deeper and further out sites, away from the shore line. The water temps and lobster patterns have moved from 20 years ago, please adjust with it. My family depends on you making the right decision. Please oppose the guage increase!!!

Thank you

Lee Watkinson

Fv Darcie Lynne

Wooden Ball Island, ME

#4556

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Thu 4/10/2025 7:06 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Shelley Wigglesworth

Email

tomlis@gwi.net

State

Maine

Comment

Why NEFSA Opposed the Gauge Increase:

1. Economic Impact on Fishermen. The proposed 1/16-inch increase is double the size of past changes from the late 1980s, placing a much greater financial strain on fishermen. Suggestions for a more gradual 1/32-inch increase were ignored, leaving fishermen at risk of reduced catches without a corresponding decrease in operating costs. Additionally, dealers fear a drop in lobster prices due to lower demand, as consumers may be priced out of the market.
2. Issues in the Gray Zone. In Eastern Maine's Gray Zone, American and Canadian fishermen work side by side. Canadian lobstermen would remain with the same minimum size requirement, meaning they could harvest the lobsters that Americans would be required to throw back under the new rules. This would severely harm the American lobster industry without yielding conservation benefits.
3. Impact on the Chick Market. The proposal would give Canadian fishermen a monopoly on the highly sought-after one-pound lobster market, affecting sales to cruise lines, restaurants, and other buyers.
4. Threats to New England Processors. With a reduced catch, regional lobster processors could struggle to stay in business. Addendum XXX already limits their access to Canadian lobsters smaller than the American minimum gauge size, creating further challenges. Establishing proper grading infrastructure would increase costs for American processors, reducing their competitiveness.
5. Uncertain Conservation Benefits. The stated goal of increasing egg production to boost future lobster stocks lacks supporting scientific evidence. ASMFC has not provided data proving the effectiveness of this approach, with previous

efforts, such as in Long Island Sound, yielding no success.

6. Flawed Stock Health Metrics. ASMFC relies on three surveys—trawl, ventless, and sea sampling—using a baseline from the best years on record. This has resulted in a reported 44% stock decline, which may not accurately reflect current conditions. A major benchmark stock assessment due in 2025, incorporating a broader range of data over five years, would provide a clearer picture. Implementing a gauge change before this assessment is premature.

7. Lack of Alternative Resiliency Measures. ASMFC has not explored other strategies to enhance lobster stock resilience, leaving the industry without viable alternatives to the proposed gauge increase.

As events unfold, NEFSA will remain actively involved in discussions and advocate for the interests of the lobster industry. Fishermen may need to consider alternative conservation strategies to meet ASMFC or State requirements while avoiding the economic harm of the proposed gauge increase. For now, it is crucial that regulators understand the message sent by the industry: the lobster stock remains healthy and sustainable, and there is no immediate need for drastic changes.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Fri 4/25/2025 7:19 PM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

Jeremy Willey

Email

jlwilley923@gmail.com

State

Maine

Comment

I vote for option B. No changes in vent or gauge size.

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[External] New public comment for American Lobster Draft Addendum XXXII

From ASMFC <info@asmfc.org>

Date Sat 4/12/2025 10:02 AM

To Comments <comments@asmfc.org>

American Lobster Draft Addendum XXXII

Action Title

American Lobster Draft Addendum XXXII

Action URL

<https://asmfc.org/actions/american-lobster-draft-addendum-xxxii/>

Name

William Smith

Email

bjs.2485@yahoo.com

State

Maine

Comment

The measure increase would financially hurt my business

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[External] Comment

From Jace Young <jacey5907@gmail.com>

Date Thu 4/24/2025 8:27 PM

To Comments <comments@asmfc.org>

Jace young
Fisherman of Cushing Maine

This will ruin the fishing industry and especially for inshore guys like myself who are trying to start out. You will ruin young fisherman's chances before they even start. Fishing will become a thing of the past if this is passed. DO NOT PASS THIS.

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MEMORANDUM

TO: Atlantic Striped Bass Management Board

FROM: Atlantic Striped Bass Technical Committee and Stock Assessment Subcommittee

DATE: April 29, 2025

SUBJECT: Board-Requested Sensitivity Runs for Draft Addendum III Projections

The projection scenario that the TC-SAS considered most likely was that fishing mortality (F) would increase somewhat in 2025 and then decline to 2024 levels for 2026-2029 as the above-average 2018 year-class entered the ocean slot in 2025 and then grew out of it in subsequent years, with no strong year-classes behind it over that time period. Recruitment was drawn from the low recruitment regime of 2008-2023. This scenario, referred to as the base run, was used to estimate the reductions needed in 2026 to have a 50% or 60% probability of rebuilding by 2029.

In addition to the TC-SAS's preferred base run for the projections, the Board also requested a set of sensitivity runs to provide context for the base projections. Specifically, the Board requested runs that:

1. Extend base run projections to 2035
2. Use the most recent 6 years of very low recruitment instead of the 2008-2023 values
3. Project a moderate F value for 2026 onwards (i.e., higher than the very low value projected for 2024 but lower than the F target)

The Board was interested in extending the projections to 2035 to better understand the trajectory of the population after the 2029 rebuilding deadline, since the very weak year-classes from 2019-2024 will only just be beginning to enter the spawning stock biomass by 2029. Using a very low recruitment assumption would provide information on what could happen to the population after the 2029 deadline if recruitment continues at current very low levels into the near future. Previous projections showed that fishing at F_{2024} from 2026-2029 resulted in ~50% probability of rebuilding by 2029, while fishing at F target meant the population would stabilize somewhere between the SSB target and the SSB threshold, so Board members were interested in a scenario where F for 2026-forward increased somewhat from F_{2024} but was still below the F target. F_{2024} was considered a low F in this scenario because it is the lowest full F the stock has experienced since the stock was rebuilt, although the TC-SAS considers $F=F_{2024}$ to be the most likely scenario for 2026-2029, absent any management changes.

These runs were completed after the March 2025 TC-SAS calls where the base run scenario was determined, and reviewed by the TC-SAS over e-mail.

Recruitment Scenarios

For the base run, recruitment of age-1 fish in 2024 was predicted from the MD young-of-year (YOY) index value for 2023, and recruitment for 2025 onward was drawn from the current low-recruitment regime years (2008-2023). For the very low recruitment sensitivity run, recruitment was drawn from the most recent 6 years of data, representing the 2019-2024 year-classes, which is a combination of model-estimated recruitment and recruitment predicted from the MD YOY index (Figure 1).

Median recruitment for the base run is 116 million age-1 fish per year, while median recruitment for the very low recruitment sensitivity run is 86 million age-1 fish.

F Scenarios

For the base scenario, the TC-SAS recommended projecting $F=F_{2024}$ for 2026 onward, with a 17% increase in F in 2025 only as the above-average 2018 year-class enters the ocean slot limit. For the moderate F scenario requested by the Board, F was assumed to be equal to the average of F_{2024} and F_{2025} . This scenario, with $F=0.134$, was between the F_{2024} value (0.123) and the F target (0.17), but still consistent with the TC-SAS's most likely scenario where F increases in 2025 and then decreases again for 2026 onwards. In both scenarios, F in each year is drawn from a distribution centered around those values to include uncertainty around F going forward (Figure 2).

Results

The base run projections, drawing from 2008-2023 recruitment and using $F=F_{2024}$ for 2026-2035, resulted in a 49% probability that SSB will be at or above the SSB target by 2029. In this scenario, SSB will continue to increase after 2029 (Figure 3 - Figure 4).

In the scenario where recruitment is drawn from the very low recruitment regime (i.e., the 2019-2024 year-classes) with the same F as the base run, SSB will be close to the SSB target in 2029, with a 44% probability of being at or above the SSB target in that year. However, SSB will begin to decline after 2030, as the 2015 and 2018 year-classes continue to die off due to natural and fishing mortality and are replaced by the weak 2019-2024 year-classes (Figure 3 - Figure 4).

In the moderate F scenario, SSB has a 30% probability of being at or above the SSB target in 2029, although there is a high probability that it will be above the threshold. Under the base recruitment scenario, SSB begins to increase towards the end of the projection as the weak 2019-2024 year-classes are replaced by what are projected to be somewhat stronger cohorts, but if recruitment continues to stay at 2019-2024 levels, SSB will decline after 2029, approaching the SSB threshold more quickly than in the F_{2024} scenario with very low recruitment (Figure 3 - Figure 4).

Figures

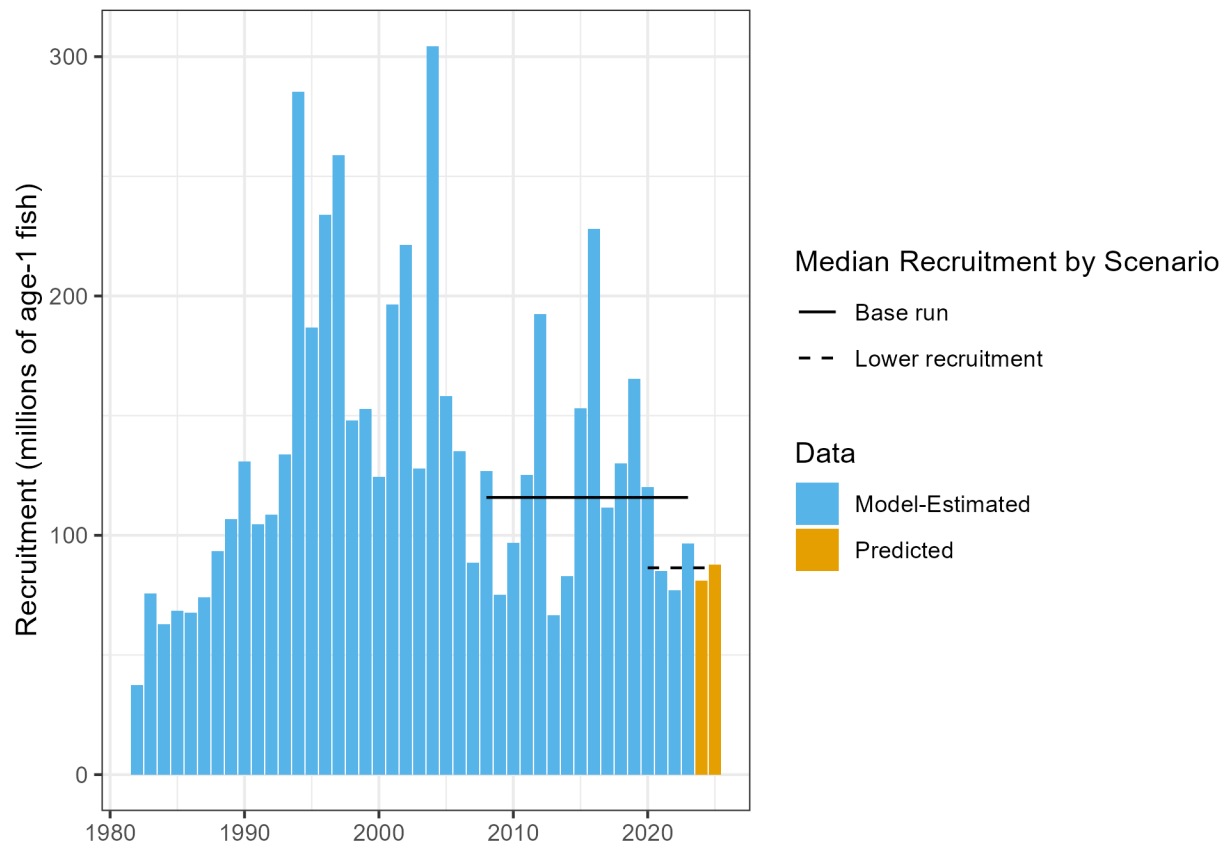


Figure 1. Recruitment time-series used in projections. 1982-2023 values are estimated by the stock assessment and 2024-2025 are predicted from the MD YOY index.

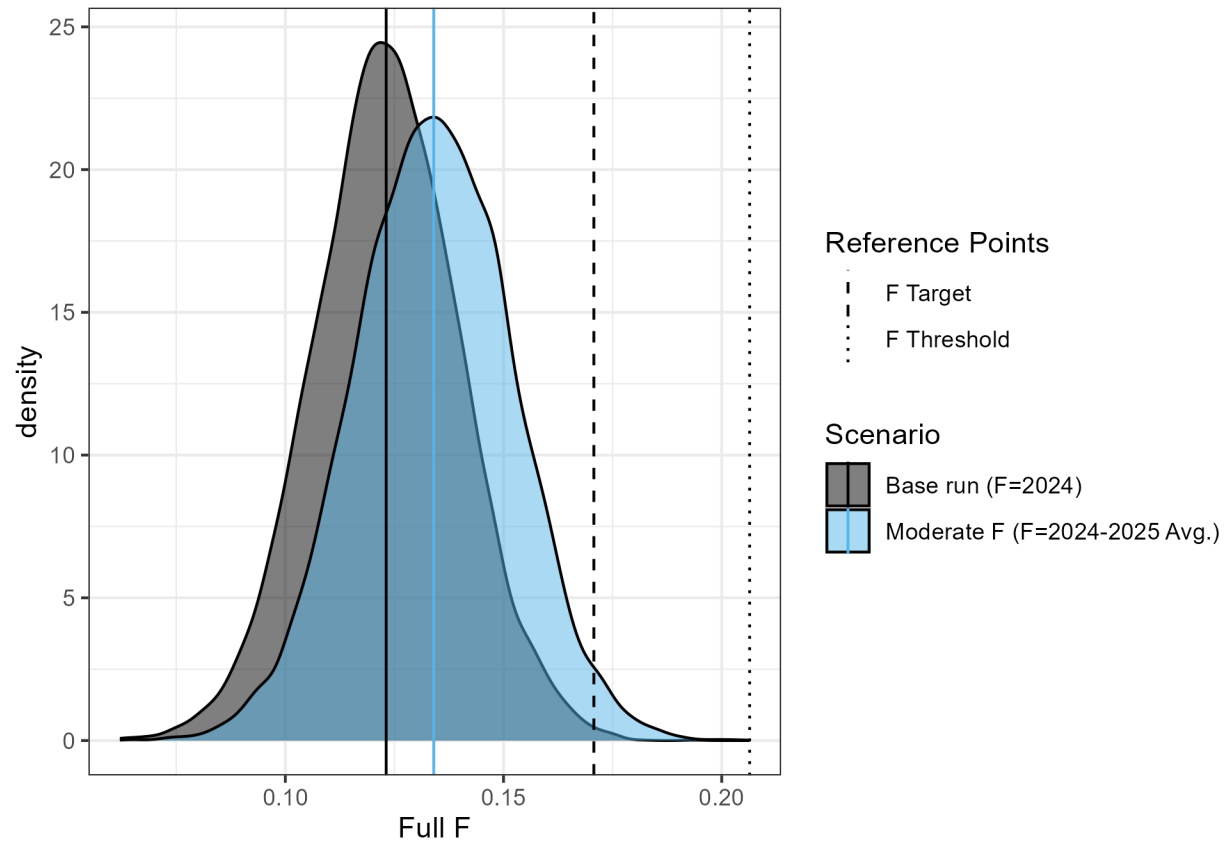


Figure 2. Distribution of F rates for 2026-2035 used in the different projection scenarios plotted with the F reference points.

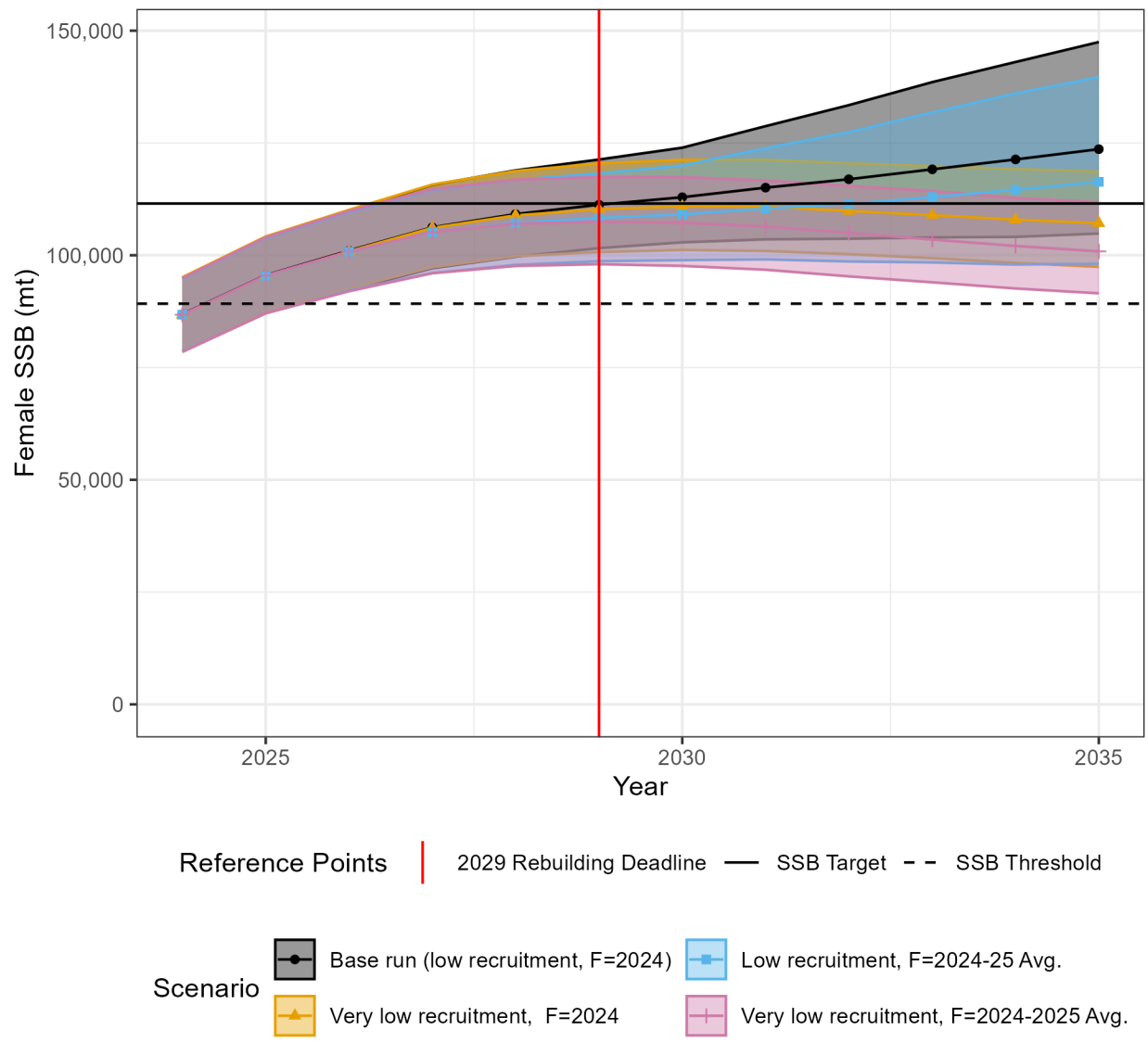


Figure 3. SSB trajectories under different assumptions about future F and recruitment. Shaded areas indicate 95% confidence intervals.

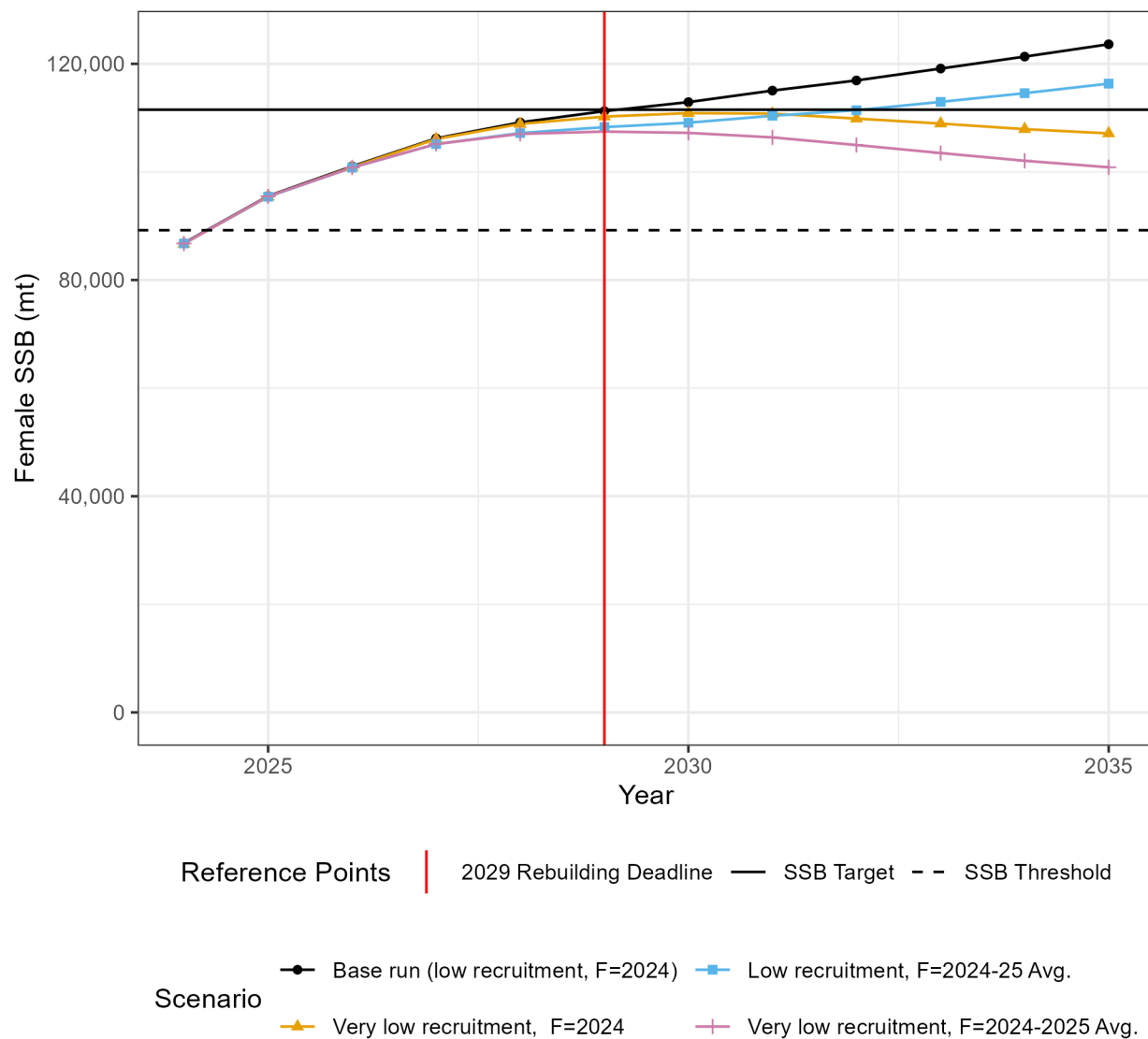


Figure 4. Median SSB trajectories under different assumptions about future F and recruitment, plotted without confidence intervals for clarity.



Wes Moore, Governor
Aruna Miller, Lt. Governor
Josh Kurtz, Secretary
David Goshorn, Deputy Secretary

Maryland Proposal to Reset the Maryland Chesapeake Bay Recreational Season Baseline

*Submitted to the Atlantic States Marine Fisheries Commission
April 28, 2025*

Introduction

Since 2015 when Addendum IV was implemented, the Maryland Department of Natural Resources (MD DNR) has modified their regulations for the Chesapeake Bay recreational striped bass fishery seven times, with changes including size, bag limit, and season modifications as well as gear and targeting restrictions. These changes have built off regulations that were previously in place when each action was taken, which has resulted in newer regulations becoming increasingly complicated through time. In addition, the current understanding of discard mortality rates and environmental stressors within Chesapeake Bay has resulted in stakeholders' desire to have seasons adjusted to better take advantage of fishing opportunities when conditions are favorable to lower striped bass discard mortality (i.e. cooler water with less hypoxia) with the understanding that any increased fishing mortality in one part of the year would need to be offset by reductions in fishing mortality at another time of the year to have the same overall impact (i.e. resulting in the same number of total removals). In order to simplify regulations, which we believe will improve compliance and enforcement, and re-align access to support our anglers' needs, Maryland is proposing a new baseline for possible inclusion in the Atlantic States Marine Fisheries Commission's (ASMFC) Addendum III to Amendment 7 for striped bass. This adjusted baseline would only modify the harvest seasons and/or the catch and release vs. no targeting seasons and would not include any changes to the size or bag limits. It also would not affect any spawning area closures that are in effect March-May.

To determine stakeholder preferences when resetting the baseline, as well as to discuss what tradeoffs would be acceptable for all sectors of the striped bass fisheries in Maryland, MD DNR has convened a Joint Striped Bass Committee to discuss these issues and provide input on a preferred option to present to the ASMFC Striped Bass Management Board for possible inclusion in Addendum III. The first meeting of this group was on March 13, 2025 where potential ideas were discussed. Following this meeting, potential methods to calculate the estimated total removals under various scenarios were finalized and submitted to the ASMFC for review by the Striped Bass Technical Committee and Stock Assessment Subcommittee (TC/SAS). The Striped Bass TC/SAS reviewed the methods over two meetings on March 25 and 28, 2025. The TC/SAS provided recommendations to incorporate more years of data (2021-2024) into the analysis, where possible, to better align the analysis with other draft Addendum III calculations while still calculating the reductions relative to 2024 catch when current seasons, size limits, and bag limits were in place. The TC/SAS also recommended the use of the standard 9% discard mortality rate for the entire year. After updating the calculations in the MD DNR analysis to align with the TC/SAS recommendations, a second meeting of the Joint Striped Bass Committee was held on April 3, 2025 to review specific options that would potentially meet the stakeholders' goals while not increasing total removals beyond those observed in 2024.

The current Maryland Chesapeake Bay recreational season and the new seasonal baseline preferred by the Joint Striped Bass Committee are shown in Figure 1. The new preferred baseline would allow for catch and release of striped bass from January 1-April 30. The harvest season would open on May 1 with a 19-24" slot

limit and a 1 fish/person bag limit. This season would go through July and a no-targeting closure would be in place for the entire month of August. The harvest season would reopen on September 1 with the same size and bag limits (19-24", 1 fish/person/day) and end on December 6. While removals are estimated to increase in waves 2 and 3 from these changes, it is balanced by reductions in total removals estimated in waves 4 and 6 (Figure 2). This option simplifies regulations across the year and brings Maryland's seasons more into alignment with neighboring jurisdictions. If the Striped Bass Management Board agrees to the inclusion of the new Maryland Chesapeake Bay recreational season baseline in Addendum III, this new baseline could be used as the starting point for any additional potential reductions that may be required as part of Addendum III.

Methods

Marine Recreational Information Program (MRIP) catch data were used in these analyses. Harvest and release estimates for the Maryland inland area, all modes combined, for 2024 were used in these analyses as the baseline. These were the most straightforward data to use as the regulations for size and bag limits were consistent with what we'll be starting from in potential future management actions. All estimated changes in total removals by wave under the new baseline were therefore estimated from these values, as the only adjustments that would need to be made are to the season types (catch and release allowed vs. no targeting, as well as harvest vs. closed to harvest).

While the 2024 MRIP data served as the baseline from which estimates of total removals were made, the TC/SAS had recommended using data from 2021-2024 to calculate the average changes expected when switching from a no targeting season back to a catch and release season in waves 2 and 3 and when expanding the number of days in wave 4 under a no targeting closure. Given the data were being used at the wave level, and in the case of wave 2, the month level, the TC/SAS noted that the precision of the data would be improved by pooling data wherever possible when calculating the estimated changes in total removals. These multi-year average estimated changes were applied to the 2024 estimates to account for the effects of the change in season types across the year, assuming that the effort in 2024 would continue into future years given it is the most recent year and most representative of current stock conditions.

The percent standard errors (PSEs) for the 2021-2024 harvest and release estimates for each year and wave used in the analyses are presented in Table 1. For all calculations, a 9% discard mortality rate was assumed.

Changing the April No Targeting Season to Catch and Release

MRIP data from 2021-2024 for wave 2 were split into March and April to determine how the releases per day differed between the March no harvest/catch and release season and April no harvest/no targeting season (see "2021-2024 Avg Calcs" tab of the Excel file). The original methods proposed to the TC/SAS examined the number of releases per day between March and April which in 2024 showed a lower number of releases in April when no targeting rules were in place as compared to March when catch and release was allowed. This relationship did not hold when additional years of data were analyzed. Releases per day were higher in April when compared to March for 2021-2023 and lower in April when compared to March in 2024. This was largely driven by greater fishing effort in April as compared to March. Comparing instead the number of releases per trip in March versus April, however, did generally show that more fish are released per trip in March when catch and release is allowed than in April, with the exception of 2021. Given these differences, the April analysis focused on releases per trip and number of trips per day when calculating the effects of converting from a no targeting closure back to allowing catch and release.

By converting a no targeting period to a catch and release period, we expect releases to increase. To calculate how much the releases per day would increase, the number of trips per day taken in April 2024 were

multiplied by the 2021-2024 average number of releases per trip observed in March when catch and release was allowed. This method assumes that April effort will stay the same as observed in the recent past and that the release rate of striped bass will increase and be the same as observed on average in March.

Expanding the Wave 3 Harvest Season and Changing the May 1-15 No Targeting Season to Catch and Release

May 1-15 were the dates of Maryland's former trophy fishery since Addendum VI in 2020. This fishery was closed in 2024 and the April no targeting season was extended through May 15. The rest of wave 3 is currently open to harvest and is the start of the summer/fall fishery in the Maryland portion of Chesapeake Bay.

To estimate how much harvest would increase by extending the harvest season in the beginning of wave 3 under the current 1 fish/person, 19-24" regulations, the 2024 wave 3 daily harvest rate was used to increase the overall wave 3 harvest estimate by the number of days being proposed to expand the harvest season.

In addition to harvest increasing in wave 3, releases may also increase due to the conversion of May 1-15 from a no targeting season to allowing for catch and release during the newly opened harvest season. While the release rate for the first 15 days of wave 3 could be calculated to see how it compared to the rest of the wave when the harvest season is open, there were concerns about breaking down the wave data to anything less than a month. Instead, a method similar to that described above for wave 2 was used. The number of wave 3 trips per day in 2024 were calculated and multiplied by the 2021-2024 average number of releases per trip in March. These releases were added to the number of releases estimated in the rest of wave 3 in 2024.

Calculations for Increasing the Wave 4 No Targeting Closure

The same methods as have been used previously by MD DNR in the Addendum VI Implementation Plan as well as by the Technical Committee to develop options for the ASMFC Striped Bass Management Board in December 2024 were used in these calculations. Given previous analyses presented to the Technical Committee showing that the "Combined Method" assumptions were valid for Maryland's portion of Chesapeake Bay, only this method was used in the analysis. Under this method, all trips that only targeted striped bass are assumed to no longer occur. All trips that were not targeting striped bass or had no target are assumed to still release all striped bass originally released. Trips targeting striped bass and another species were assumed to still occur but released striped bass at the non-targeted rate.

For expanding the no targeting closure in wave 4, data from 2021-2024 by target species grouping, were used to estimate how the harvest per day and releases per day would change, on average, over those years. The estimated reductions in harvest and releases summed over these four years were converted to proportions in order to adjust the 2024 wave 4 harvest and release estimates to account for the extended wave 4 no targeting closure.

Reducing the Wave 6 Harvest Season Further

As in past striped bass reduction analyses, if additional wave 6 harvest season days were closed to harvest and catch and release still allowed (i.e. not a no targeting closure), the wave 6 daily harvest rate was calculated based on the 40 days the season is currently open to harvest. This was multiplied by the days of additional closure and subtracted from the 2024 harvest estimate. Any previously harvested fish were assumed to now be discarded and were added to the New Releases for wave 6.

Caveats to the Analysis

While this analysis tried to include additional years of data (2021-2024) where possible to determine what the average change in releases would be when converting between no harvest and no target seasons, it

was assumed that effort in the future years would be the same as was observed in 2024, the baseline year of the analysis. The 2024 baseline year was chosen as all regulations on size and bag limit were consistent with current regulations and only the seasons would need to be adjusted. In addition, being the most recent year, it also reflects the most current stock conditions. However, 2024 directed effort, defined as the number of trips where an angler was fishing for striped bass as either their primary or secondary target, was lower than the effort observed in previous years (2021-2023) and it is unclear whether effort will increase or remain steady by reopening April and early May to allow catch and release fishing. As has been noted previously by the TC/SAS, we are not able to predict changes in effort year to year and it may be affected by factors other than just regulatory changes such as stock status, weather, and economics.

In addressing the TC/SAS recommendations and comments on the original methods, MD DNR worked to include 2021-2024 data wherever possible in the analysis while still using 2024 as the baseline year. However, some of the original methods had to be further modified once the full set of 2021-2024 estimates were considered. These methods have been updated from the original proposal sent to the TC/SAS; however, due to timing, these updated methods have not been reviewed by the TC/SAS.

Conclusion

MD DNR is proposing the inclusion of this new baseline (Figure 1) for the Maryland Chesapeake Bay recreational seasons in Addendum III to reduce regulatory complexity, re-align access to support our anglers' needs, and adjust seasons to better consider updated data regarding discard mortality under varying conditions. Based on the assumptions of this analysis, this alternative baseline should not increase total removals as compared to 2024 levels and any additional potential reductions needed in Addendum III could be calculated from this new baseline. Maryland appreciates the ASMFC Striped Bass Management Board's consideration of this proposal for inclusion in draft Addendum III to Amendment 7.

Table 1. MRIP estimates of harvest and releases by year and wave used in the Maryland Chesapeake Bay recreational season baseline analysis. Percent standard errors (PSEs) are presented to describe the precision of the estimates.

		Harvest (A+B1)		Releases (B2)	
Year	Wave	Harvest Estimate	PSE	Release Estimate	PSE
2021	2			272,771	44.2
	3	196,571	17.7	985,977	25.0
	4	140,112	26.9	849,772	37.7
	5	144,129	21.6	918,297	22.7
	6	102,890	23.1	869,453	29.5
2022	2			117,909	36.2
	3	140,995	21.6	966,481	29.1
	4	151,059	27.1	702,055	26.4
	5	250,956	31.7	1,011,618	28.7
	6	99,184	21.6	491,463	30.9
2023	2			437,296	21.1
	3	156,525	28.2	534,970	27.7
	4	129,309	25.9	575,292	37.2
	5	61,020	22.7	526,736	32.5
	6	155,405	28.1	1,058,626	35.8
2024	2			303,551	61.1
	3	55,904	15.8	210,934	28.2
	4	65,958	34.1	207,260	31.9
	5	42,503	23.9	251,496	35.9
	6	43,153	46.4	1,392,202	53.2

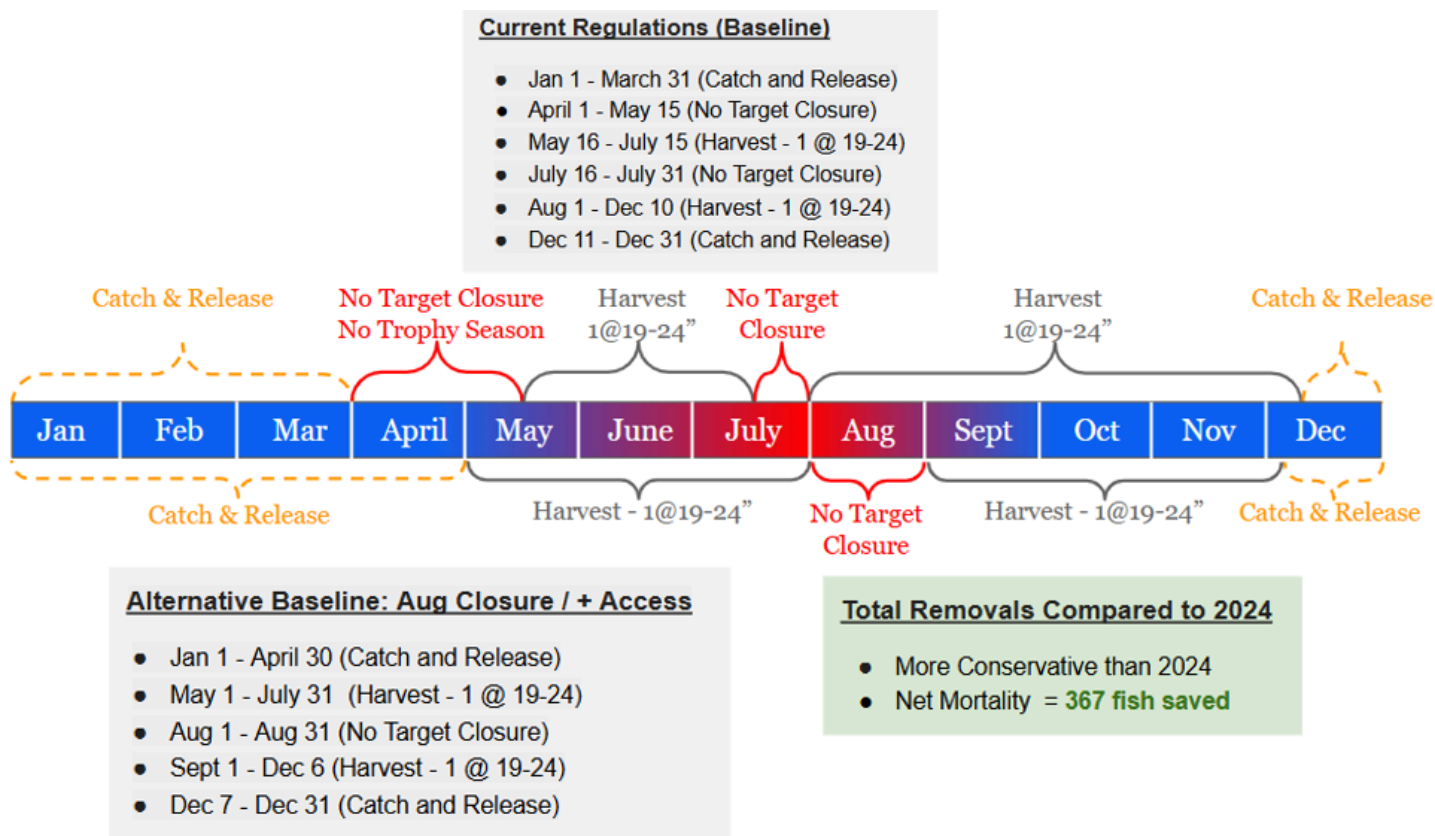


Figure 1. The current Maryland Chesapeake Bay seasons (top) and the preferred alternative Maryland seasonal baseline proposed for Addendum III (bottom). Colors of the brackets align with the different seasons.

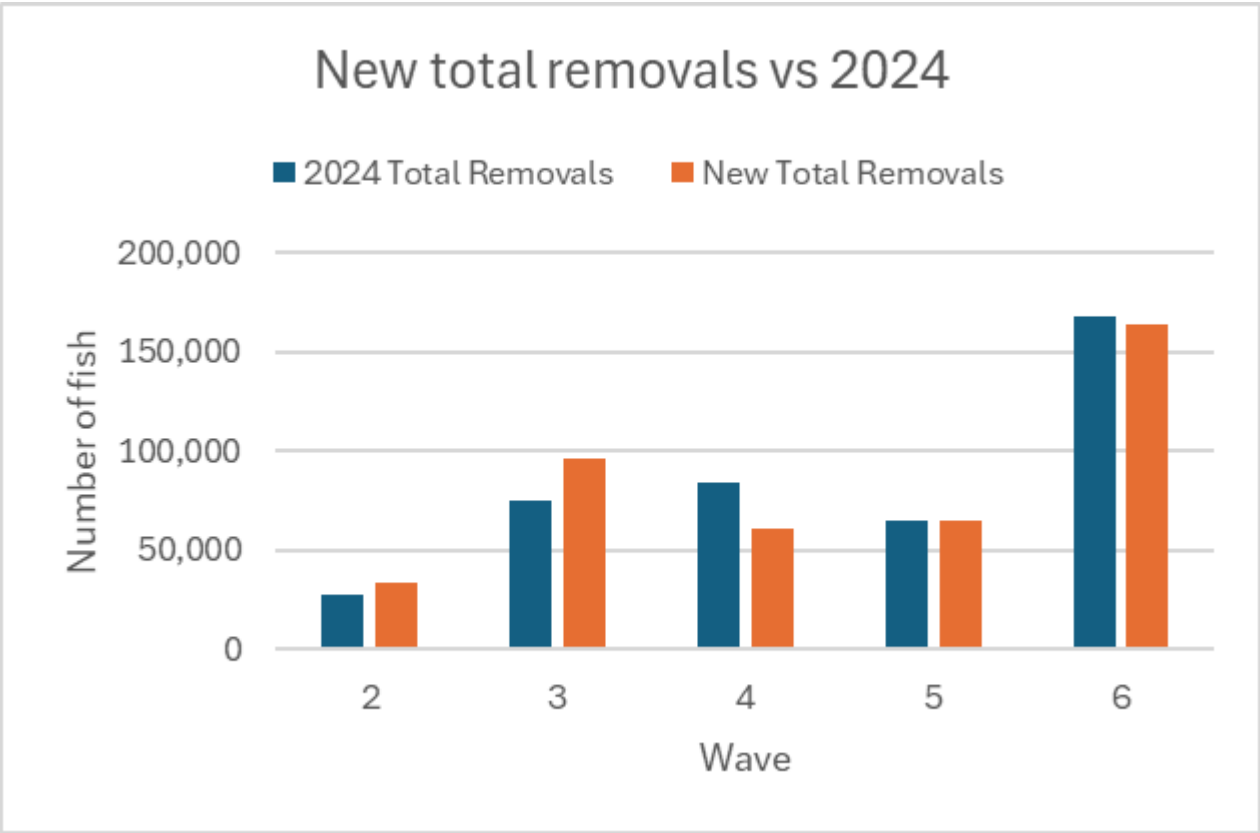


Figure 2. Total removals estimated by MRIP for 2024 vs. those estimated under the proposed alternative Maryland Chesapeake Bay recreational season baseline.



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Atlantic Striped Bass Advisory Panel Meeting Summary

Webinar
April 14, 2025

Advisory Panel Members in Attendance

Bob Humphrey (ME for-hire)	Toby Lapinski (CT recreational)
Peter Fallon (ME for-hire)	Eleanor Bochenek (NJ rec, fisheries scientist)
Peter Whelan (NH recreational)	Tom Fote (NJ recreational)
Patrick Paquette (MA recreational)	Will Poston (DC recreational)
Craig Poosikian (MA commercial)	Kelly Place (VA commercial)
Peter Jenkins (RI recreational)	Jon Worthington (NC recreational)

AP Member Julie Evans (NY commercial) submitted comments via email.

ASMFC Staff: Emilie Franke, Katie Drew

Public in Attendance: Brandon Foor, Chris Batsavage, Corrin Flora, David Sikorski, Elise Koob, Jake Hardy, Kristen Thiebault, Tony Friedrich

The Atlantic Striped Bass Advisory Panel (AP) met via webinar on April 14, 2025 to receive an overview of issues being developed for Draft Addendum III, provide input to the Plan Development Team on requirements for measuring striped bass total length in Draft Addendum III, and elect an AP Chair and Vice Chair. If Draft Addendum III is approved for public comment, an AP meeting will be scheduled during the public comment period to gather AP recommendations on the specific options in the draft addendum.

Staff provided an overview of the types of management measures being considered in Draft Addendum III for options to reduce fishery removals. One AP member noted concern that the Board is not focused on research to determine the underlying cause of low recruitment and to determine whether the male to female ratio is sufficient in the Chesapeake Bay. For recreational options that consider different measures between private vessels/shore anglers and for-hire vessels, one AP member noted concern that separate quotas for modes are not being considered. It was noted that a full evaluation of mode split management should include evaluation of quota allocation.

Staff provided an overview of the commercial tagging option in Draft Addendum III that considers requiring tagging at the point of harvest. This would impact Massachusetts, Rhode Island, and North Carolina where tagging is currently implemented at the point of sale. One AP member noted point of sale tagging has been in place for a long time in Massachusetts, and it may be difficult to determine how many tags each fisherman should receive for a point of

harvest model. One AP member noted all states should have the same type of commercial tagging program.

Staff provided an overview of the option in Draft Addendum III that would implement a coastwide definition of 'total length' as it applies to measuring a striped bass, including requiring the fish be laid flat on a measuring device and requiring squeezing the tail. The Plan Development Team specifically requested input from the AP on whether there are any concerns about requiring fish to be laid flat on a measuring device, for example when fishing from shore or from a pier.

AP consensus is that a standard coastwide definition of total length, including a requirement to lay the fish flat, is reasonable and preferred. AP members noted it is the responsibility of every angler, no matter if fishing from a boat or shore or pier, to ensure they can properly measure the fish. Measuring devices are available in many popular shore or pier fishing areas, and it would be easy for an angler to bring their own measuring device and find a flat platform to lay the fish. All anglers, especially those who intend to harvest a fish, should have a plan for how they will measure the fish. AP members noted the importance of a consistent definition for all states coastwide. One AP member noted the recent discussion of this issue in Massachusetts and the importance of enforcement's input that a standard definition would be beneficial and make it very clear to anglers and to enforcement officers how a fish should be measured. Overall, the AP agreed a standard definition for measuring striped bass should be implemented for all anglers in all states.

The Advisory Panel elected Eleanor Bochenek from New Jersey as the AP Chair and Peter Whelan from New Hampshire as the AP Vice Chair.



Atlantic States Marine Fisheries Commission

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MEMORANDUM

TO: Atlantic Striped Bass Management Board

FROM: Emilie Franke, Plan Development Team Chair

DATE: April 29, 2025

SUBJECT: Supplementary Analyses for Draft Addendum III

Enclosed are two supplementary analyses for Draft Addendum III on state-specific reduction estimates and kind of day closure analysis (weekend and weekday calculations). Due to time constraints, these results were not reviewed by the Plan Development Team (PDT) and Technical Committee (TC) and Stock Assessment Subcommittee (SAS).

State-Specific Reductions

The Board requested estimates of state-specific reductions for season closure options to understand how uniform closures across each ocean region would impact individual states. The draft addendum calculated options to achieve equal reductions by region. The only way to achieve equal reductions by state would be to calculate state-specific closures; the Board noted during the 2025 Winter Meeting that it did not want to pursue state-specific closures for the ocean.

Table 1 provides the estimated reductions by state for a 14-day closure in each wave. The reductions scale linearly, so a 28-day closure would result in double the reduction listed in the table. This table is intended to provide context on state-specific impacts from a regional closure. For example, in wave 3 for a 14-day no-targeting closure (striped bass only trips eliminated) for Maine through Massachusetts, the estimated reduction in Maine is 4.6%, in New Hampshire is 4.6%, and in Massachusetts is 5.8%.

The state-specific reductions depend on the distribution of harvest and releases by wave for each state, the type of removals in each state (percent harvest vs. percent release mortality), and the breakdown of trips that release striped bass for no-targeting closure calculations in each state (trips only targeting striped bass, trips targeting striped bass and another species, trips not targeting striped bass). Note that conducting these analyses at the state-level instead of the region-level reduces the sample size and increases the PSE and the uncertainty in the reduction calculations.

Kind of Day Closure Analysis

As noted in the TC-SAS March 2025 meeting summary included in the Board's [Main Materials](#), the season closure analysis assumes a constant daily savings of harvest and/or releases but in

M25-45

reality, catch is not constant per day. In particular, weekends/holidays tend to have higher effort and catch. The TC-SAS agreed a case study example incorporating weekend vs. weekday would be informative to determine how adding in the weekend/weekday aspect would impact the season closure analysis.

The season closure analysis for ocean-wide closures (all ocean states close during the same wave) was re-analyzed to separate MRIP catch data by kind of day as defined by MRIP with Monday-Thursday as weekdays and Friday-Sunday plus Federal Holidays as weekends. Note that conducting these analyses at the kind-of-day-level instead of combining data across all days reduces the sample size and increases the PSE and the uncertainty in the reduction calculations.

Table 2 summarizes the results for an example 18-day closure for all ocean states in each wave when:

- 1) accounting for weekend vs. weekday for a closure starting on a Monday;
- 2) accounting for weekend vs. weekday for a closure starting on a Friday;
- 3) base case (analysis does not take into account kind of day and data for all days are combined).

The results indicate a less than 1% difference between the analysis types, with the highest reduction estimated for a closure starting on a Friday (more weekend days closed) and the lowest reduction estimated for a closure starting on a Monday. The base case analysis used in the draft addendum combining data across all kinds of days (i.e., not separating weekend and weekday catch data) falls in between. This highlights one of the challenges of trying to account for kind of day in the closure analysis: the expected reduction will depend not just on the length of the closure, but on how many weekend days vs. weekdays are closed. The PDT discussed whether to specify in the draft addendum which day of the week to start a closure on, or include specific dates for closures, so the number of weekend days/holidays vs. weekdays would be known for this type of analysis. However, the PDT preferred not to do so in order to give the regions more flexibility in determining which closure would work for them. This analysis suggests that the uncertainty from different catch rates on different types of days may be minimal in the season closure analysis compared to other sources of uncertainty, especially when the closures are long enough to encompass both weekends and weekdays. The PDT and TC-SAS could discuss this analysis if requested by the Board.

Table 1. State-specific reductions for a 14-day season closure.

	State	No Target (SB only trips eliminated)	No Target (SB trips switch targets)	No Harvest		State	No Target (SB only trips eliminated)	No Target (SB trips switch targets)	No Harvest
Wave 3	Ocean	-3.8%	-2.8%	-2.0%	Wave 5	Ocean	-3.1%	-2.2%	-1.5%
	ME	-4.6%	-2.8%	-1.1%		ME	-7.5%	-6.2%	-1.0%
	NH	-4.6%	-1.2%	-0.9%		NH	-3.8%	-2.8%	-1.1%
	MA	-5.8%	-2.9%	-2.3%		MA	-4.2%	-2.9%	-2.0%
	RI	-7.5%	-6.0%	-2.9%		RI	-4.8%	-3.9%	-1.9%
	CT	-4.5%	-3.4%	-2.0%		CT	-2.5%	-1.2%	-0.6%
	NY	-3.1%	-2.6%	-2.2%		NY	-3.5%	-3.0%	-2.5%
	NJ	-2.6%	-2.3%	-1.8%		NJ	-1.8%	-1.4%	-1.0%
	DE	-0.9%	-0.1%	0.0%		DE	-0.2%	0.0%	0.0%
	MD	0.9%	0.9%	0.0%		MD	0.0%	0.0%	0.0%
	VA	0.0%	0.0%	0.0%		VA	0.0%	0.0%	0.0%
	NC	0.0%	0.0%	0.0%		NC	0.0%	0.0%	0.0%
Wave 4	Ocean	-2.9%	-1.9%	-1.6%	Wave 6	Ocean	-6.6%	-5.0%	-3.2%
	ME	-7.6%	-5.0%	-2.1%		ME	0.0%	0.0%	0.0%
	NH	-12.1%	-7.3%	-3.2%		NH	0.0%	0.0%	0.0%
	MA	-7.3%	-3.7%	-4.6%		MA	-0.6%	-0.5%	0.0%
	RI	-3.2%	-2.3%	-2.0%		RI	-2.2%	-1.7%	0.0%
	CT	-3.1%	-2.6%	-1.7%		CT	-3.8%	-3.5%	-0.1%
	NY	-2.0%	-1.7%	-1.4%		NY	-7.6%	-3.7%	-3.1%
	NJ	-0.1%	0.0%	-0.1%		NJ	-11.2%	-8.4%	-6.6%
	DE	-2.0%	-1.4%	-0.6%		DE	-11.8%	-9.0%	-1.4%
	MD	0.0%	0.0%	0.0%		MD	-14.1%	-13.8%	0.0%
	VA	0.0%	0.0%	0.0%		VA	0.0%	0.0%	0.0%
	NC	0.0%	0.0%	0.0%		NC	0.0%	0.0%	0.0%

Table 2. Reduction estimates for an 18-day closure calculated 1) accounting for weekend vs. weekday for a closure starting on a Monday; 2) accounting for weekend vs. weekday for a closure starting on a Friday; 3) analysis for all days combined (does not take into account kind of day).

18-Day Closure	Wave	Weekend Closure Days	Weekday Closure Days	No Target (SB only trips eliminated)	No Target (SB trips switch targets)	No Harvest
Closure starting on a Monday	2	6	12	-5.0%	-3.8%	-1.9%
Closure starting on a Friday	2	9	9	-5.4%	-4.3%	-2.2%
Closure calculated all days combined	2	18		-5.2%	-4.4%	-2.1%
Closure starting on a Monday	3	6	12	-4.4%	-3.2%	-2.3%
Closure starting on a Friday	3	9	9	-5.4%	-4.1%	-2.8%
Closure calculated all days combined	3	18		-4.9%	-3.6%	-2.6%
Closure starting on a Monday	4	6	12	-3.6%	-2.2%	-2.0%
Closure starting on a Friday	4	9	9	-3.9%	-2.6%	-2.1%
Closure calculated all days combined	4	18		-3.8%	-2.5%	-2.1%
Closure starting on a Monday	5	6	12	-3.7%	-2.5%	-1.8%
Closure starting on a Friday	5	9	9	-4.1%	-2.9%	-2.0%
Closure calculated all days combined	5	18		-4.0%	-2.8%	-2.0%
Closure starting on a Monday	6	6	12	-8.2%	-6.1%	-3.9%
Closure starting on a Friday	6	9	9	-8.8%	-6.6%	-4.3%
Closure calculated all days combined	6	18		-8.5%	-6.4%	-4.1%



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Capt. Nick Butziger

Striped Bass Board,

April 27, 2025

The RIPCBA appreciates the opportunity to provide our comments pertaining to Striped Bass management prior to the May 6th Striped Bass Board meeting.

Reading through the meeting materials, including the Technical Committee (TC-SAS) meeting summaries, we would like the Board to consider the possibility of discontinuing work on the Addendum until after the 2027 management track assessment scheduled for early 2027. The projections developed by the TC-SAS indicate even under a more precautionous approach to management which considers a 60% probability of achieving rebuilding, reductions needed would be less than 10%. The TC-SAS notes changes in measures less than 10% are statistically indistinguishable from the status quo.

As the Board considers the socio-economic impacts of further reductions during its risk assessment, we ask that you reflect on the years of public input describing the need for stability within the for-hire sector of the recreational fishing stakeholder community. Additionally, keeping status quo measures through the potential terminal year of 2027 benchmark assessment may lead to better use of MRIP data and offer better assumptions in that assessment.

The DRAFT Addendum document is pretty long and contains a lot of ideas and alternatives. We feel this could be confusing too many and difficult for the public to weigh in meaningfully. If the Board does in fact decide to move ahead with this action at this time, our recommendation would be to pare down the alternatives significantly. Maybe a few alternatives that create coastwide "No Target Closures" during the warmest water temps to reduce discard mortality from stress to the fish resulting from the warm water and shark depredation. The nature of for-hire businesses, which mainly harvest the fish, could achieve conservation through a larger slot that allows them to move off the fish more quickly and interact with fewer fish overall, so a coastwide alternative with split sector measures could be appropriate to keep in the document.

We feel the other issues and those alternatives could wait until after the 2027 benchmark. Thanks for the chance to offer our input. We are encouraged by the TC-SAS positive projections and are hopeful the board will recognize the contributions the Striped Bass harvest fishery has made to the rebuilding to date by holding steady until the next benchmark assessment.

Respectfully Submitted,

Capt. Rick Bellavance

Capt. Rick Bellavance, President
RI Party and Charter Boat Association



The Connecticut Charter and Party Boat Association is comprised of 40 professional charter boats sailing from ten different Connecticut ports, covering the Western, Central and Eastern Long Island Sound. Our Captains have verified credentials, are held to the highest ethics standards and are out on the water everyday often acting as the Sheppard's of their areas.

Re: Striped Bass Addendum III

MRIP has finalized 2024 Striped Bass Angler effort and harvest. Both Effort and Harvest Coastwide are at an ultra-low level. Far lower than anyone expected. This data will certainly thrust Striped Bass calculations of likely rebuild near 60% or higher by 2029, eliminating the need for any future closures or further reductions.

The Striped Bass board directed the PDT to consider the importance of the Social Economics impacts to the For-Hire mode when they dealt out Addendum III tasks. The For-Hire mode, unlike any other modes, has participated in every Striped Bass reduction resulting in loss of business and loss of income. The PDT and Technical committee completely missed the Board's direction with Addendum III proposed For-hire options. These proposed options are more punitive and difficult to understand. Addendum II proposed For-Hire 28 -33" at the cost of less than .1% in rebuild effort (14.0% vs 14.1% reduction). This option should be re-generated without any seasonal closures to be voted upon in Addendum III.

This coming 2025 season, the 2018 year class enters the slot. Many plan on effort and harvest to greatly increase. If data shows minimal impact again, the "Emergency Action" must be terminated and swiftly return to 28 -35" slot. These reductions proved to be unnecessary and very costly to the For-Hire Fleet coastwide. An immediate return to 28 -35" is imperative to keep the industry viable.

Respectfully Submitted,
Connecticut Charter and Party Boat Association

President- Capt. Marc Berger
Vice President- Capt. Seth Margarale
Treasurer- Capt. TJ Karbowski
Secretary- Capt. Michael Pirri

From: [Earl Granderath](#)
To: [Comments](#)
Subject: [External] Stripes
Date: Tuesday, April 22, 2025 1:27:31 PM

Stop the before George Washington bridge foolish harvest. That's where your spawning fish are getting decimated

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From: [Mike Handte](#)
To: [Emilie Franke](#)
Subject: [External] Striper
Date: Thursday, April 24, 2025 10:28:06 PM

You people are fools and out of touch with reality. Protecting the striper is eliminating all other fish species and blue claw crab populations. Recreational and Commercial Fishermen should be allowed to keep more than one fish between 28-31 inches. It's not worth the effort to get one fish and again it's killing all salt water fishing. I guess that's what you really want though...

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From: [ASMFC](#)
To: [Comments](#)
Subject: [External] New public comment for 2025 Spring Meeting
Date: Tuesday, April 29, 2025 11:41:19 AM

2025 Spring Meeting

Action Title
2025 Spring Meeting
Action URL
https://asmfc.org/events/2025-spring-meeting/
Name
Brian Hardman
Email
Leaddog@rockfishing.com
State
Maryland
Comment
I want to briefly discuss the importance of protecting the female spawning stock during this stock rebuilding in the state of MD Chesapeake Bay

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From: [ASMFC](#)
To: [Comments](#)
Subject: [External] New public comment for 2025 Spring Meeting
Date: Tuesday, April 29, 2025 11:21:24 PM

2025 Spring Meeting

Action Title
2025 Spring Meeting
Action URL
https://asmfc.org/events/2025-spring-meeting/
Name
Eddie Green
Email
greeneddie@verizon.net
State
Maryland
Comment
Stripe Bass Board Members/ Emily Franks, I am going to try and keep these comments short and to the point. Addendum 2- The recommendation and implementation of Addendum 2 has had a severe economic impact on the for hire fleet on the Chesapeake bay. Bookings were down 30%-50% for most in 2024 and they are looking worst this season. Here is some data provided to the Maryland Charter Boat Association by MDDNR. They are from the Facts Pilot Program. You had be registered in the Facts program and have a Charter blanket fishing license to be eligible to catch 2 fish On a Charter Boat. Year # of vessels # of Stripe Bass Harvested # of Stripe Bass Released # of Trips 2022 352 100,997 21,139 11,362 2023 380 92,880 32,373 10,781 2024 392 26,595 12,988 5,412 ALL 2024 # are preliminary as of 9/20/24 The Possession and size limits of this Addendum Just could be the end of a Industry and Heritage on The Chesapeake Bay. Social & Economic Impact- Add. 2 did include a short Economical Impact section noting the potential for SHORT TERM negative economic impact from Add. 2 measures and the potential for LONG TERM positive impact if the stock is not rebuilt. With the Impact we had last year the for hire Industry will not last until 2029. It also relies on the boards perceptive and public comment The ASMFC needs to rethink how they do these statements because they drop the ball on this one. Public Comment- Could ASMFC add a space on the public comment form to declare if you are Recreational, Commercial or For Hire and furnish more information on what user groups are making these comments. Also does the ASMFC take into consideration the overall total number of a user group compared to the number of comments. Add. 3- My vote is no to Add 3. A 9% reduction in wave 4 of 22 days on top of the 16 day reduction we have in wave 4 already would be devastating to the For Hire Industry. Maryland Baseline Change- My vote is no to Changing the baseline. The option presented does not

benefit the Recreational Anglers/ For Hire Industry in any way. Closing 31 days in wave 4 with potential of Add. 3 adding 22 more days of closure in wave 4 in the busy summer season when schools are closed would be totally devastating to the for hire industry. I could go on about this subject but its late i am tierd and iam not a computer person.

Thanks, Eddie Green

Charter Boat Plumb Crazy - Chesapeake Beach MD

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[External] New public comment for 2025 Spring Meeting

From ASMFC <info@asmfc.org>

Date Tue 4/15/2025 2:36 PM

To Comments <comments@asmfc.org>

2025 Spring Meeting

Action Title

2025 Spring Meeting

Action URL

<https://asmfc.org/events/2025-spring-meeting/>

Name

Dale Neal

Email

dalewilliamneal@gmail.com

State

Virginia

Comment

For the Atlantic Menhaden Management Board, Spring Meeting,

Subject: Possible actions for Chesapeake Bay in response to the workgroup report.

Thank you all for considering the impact of commercial menhaden fishing in Virginia, and for all the hard effort the workgroup has put in.

I ask you to please consider that limited spatial closures will do little or nothing to change the current impact of the reduction fishery on the bay. If the purse-seine fleet is allowed to continue to stalk the bay entrance, and adjacent ocean shoreline, with multiple planes and a fleet of seven plus ships, scooping up every available school, it will not matter if you close a few smaller bays for the season or a certain time period.

The issue is the industry's extremely effective fishing techniques, and their almost exclusive targeting of Virginia waters. They leave very few schools to populate the bay.

Here are just a few options that may make a difference:

1. Create a 3-mile buffer for all Virginia Bay and Ocean Coastlines, prohibiting purse-seine activity

2. or, Close the bay and its opening to purse-seine activity, making it an exclusive bait fishery for other equipment
3. or, Delay the current season for 60-90 days for all purse-seine fishing in Virginia waters.
4. or, No longer allow the use of spotter aircraft to assist the purse-seine fleet.

Again, thank you for listening and putting in the work to solve this issue. Menhaden need to be abundant in the bay for the ecosystem to prosper. They are the key. A real solution will be of benefit to the wildlife in the bay, the ecosystem as a whole, smaller menhaden bait fishermen and their customers, the recreational fishing industry in Virginia, and Virginia's tourism industry.

Sincerely, Dale William Neal

Richmond, VA

Advocate for Menhaden and the Menhaden Bait Industry

www.saveourmenhaden.org

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From: [Tom Lilly](#)
To: comments@asmfc.com; [James Boyle](#); [Tina Berger](#)
Subject: [External] Material from the menhaden board meeting May 7, 2025
Date: Tuesday, April 29, 2025 2:09:21 PM
Attachments: [MRC 3 page charts.pdf](#)
[Frontiers Path Cover and 12.pdf](#)
[Saltwater Sportsman Excerpt.pdf](#)
[George first.pdf](#)

To James and Tina...Please send this out to the board in the materials this afternoon (or tomorrow) and if you could just send a reply mail so I know you have it. As usual I hope things are well and thanks.... Tom Lilly 443 235 4465

to the Menhaden Board , John Clark Chairman, James Boyle menhaden coordinator and Marty Garry Chair work group on protective options, and every board member:

I support any option or combination of options that would guarantee that **ALL** of the menhaden migrating to Maryland in the Spring (May-June) get here and **is then protected.** (n.1) **Do Marylanders and their bay deserve anything less?** Please do not open the season for any menhaden purse seine fishing in the bay or Atlantic until June 30th. I know of no other option that will help Maryland other than reducing the cap to zero for May and June and applying it to all Virginia waters. You can do that...the cap has been tested by Omega lawyers and they lost. NOAA has decided the cap serves a "conservation purpose" and with the ERP science in place now there is solid science to support it.

Delaying opening the season or reducing the cap to zero in May and June may not help Maryland enough if you also allow the eight purse seiners and bait boats to just sit outside the bay entrance and catch everything coming in. Keep them away from the bay entrance...I know you can devise an option to do that extending the cap into Virginia coastal waters. They routinely fish as far as NY. Let them fish up there in May and June when the menhaden are migrating into the bay. They have all the gear and refrigerated holds to do it.

I don't see much discussion about protecting the spawning stock of menhaden. Looking at the monthly factory catch (scan one page 2) you see the uptick in catches mid September that is thousands of schools of menhaden headed offshore to age, winter and spawn **but they are caught.**

Also see scan one page one ...last age chart from Beaufort 2017 and 2019) the factory catch averaged 70% age one fish that is **100,000 mt age**

one and younger fish a year that are caught before they spawn once. Please pass an option that **protects this Fall run of spawning stock and future spawners** by ending the season in the bay and mid Atlantic (or within 50 miles of the bay entrance) by September 15. Unless you protect these fish on their way to the spawning grounds I don't see how all these efforts will accomplish very much.

Right now the striped bass YOY in Maryland is one tenth of normal, In the article by Rob Latour and Shanna Madsen and 28 scientists (scan 2) they state based on ERP modeling where there is enough menhaden for striped bass there will be for ospreys as well. Thats what we need to get to. Please take a few more minutes to read the following;

I got into this eight years ago when the five osprey nests on and near my property on the Wicomico River (about 10 miles from Tangier Sound and not far to the Virginia line) were failing and because my two grandsons loved to fish. I learned what was happening in Virginia and tried to take action as you know. I thought the ERP science would change things but it hasn't and now after all this time things have just gotten worse, much worse. For the last two years only three chicks survived out of those five nests and we watched helplessly as this unfolded. I am listening to those ospreys right now as I try to find the words to convince you to care about our bay wildlife, to act to benefit the millions of children and parents that want to enjoy all the wonders of nature Chesapeake Bay should be providing but is not. (n 2) The purse seine owners in Virginia can adjust to any changes ..that is part of what every business does, particularly any weather dependent one such as farming, construction and charter fishing. Are they treated differently? See note 3 for the dollars involved.

Our grandsons still love to fish but the fishing for striped bass is terrible. In those years 19 of the 20 full time charter captains at the state marina in Crisfield have quit and people are going to New Jersey to fish because New Jersey, like New York, has protected their state waters from reduction fishing and have seen the benefits. (see scans 3 and 4) I am waiting to see how the NJ and NY delegates treat Maryland in this process...

See scan one, page 2, for 50% decline in menhaden coming to the bay over last ten years. The extent of the devastation this has caused our bay ecology and the loss of enjoyment and use of the bay for millions of children and their parents (note 2 Southwick data), to our charter captains our striped bass and the hurt and sorrow caused to our ospreys , thousands of them, as they have to select which chick lives and which ones die as they

search 15 hours a day for just one menhaden to keep the chicks alive but don't find it. now multiply that by hundreds of failed nests. We have been depressed and frustrated by the lack of action where the evidence is so compelling. Hopefully that is about to change. Will you now delay opening the menhaden season for all Virginia sectors until June 30th and then protecting the forage that is in the bay by ending purse seine fishing in the bay and the VA coast. Right now is your opportunity to restore some equity between Maryland and Virginia as your charter Section six requires:

(7) Fairness and Equity ii. " Fishery resources **shall be fairly and equitably** allocated among the states "

I have asked the policy board and this board to consider a simple question and I am asking you again. Using ten ton menhaden schools you allow the bait and factory ships to catch 5,000 schools of menhaden in the VA bay. About how many of these schools would have migrated into the Maryland bay to feed our fish and wildlife. 50% ? 30%. If 30% then you have allowed over 3,000 ten ton schools of menhaden forage to be caught in Virginia that would have come to Maryland ,

Over the last 20 years the reduction fishing owners have been given about 30 million dollars worth of bay and near bay menhaden a year.. that is 600 million dollars. And I presume the bait boat owners a good fraction of that. Ocean Harvesters has refrigeration for those days they spend fishing off New York. The bait boat owners can install refrigeration as well. I find it interesting that the "dangers" of fishing in the Atlantic within ten miles of shore in 300 foot ships with 40 foot set boats is mentioned in your summary. For a hundred years cod fishermen have traveled 800 miles to fish the Grand Banks in small boats in some of the worst sea conditions in the Atlantic. The mid Atlantic coastal area in the 8-10 mile out area they operate is very calm by comparison and the ships can return to port very easily. I don't really think some added expenses for some ship wealthy ship owners should influence you decision at all. If there are days that are too rough in the Ocean that is part of any business that depends on the weather from farming to construction to charter fishing why should the purse seiners be any different. Why are they so "privileged"

As we have said you can accomplish most of this by placing a zero bay cap on for May to June and apply it to the Virginia coastal zone as well. You can prohibit purse seining on the Atlantic coast of Virginia in May and June at a minimum. A zero bay cap for May and June will not help anything if all the bait and reduction ships have to do is sit just outside the bay's entrance

and catch every school before it enters the bay.

The present bay cap of 51,000 mt is completely useless in protecting the bay as you know. It operates far too late in the season (last year they never reached the cap) Reducing the cap to even 10 or 20,000mt will not prevent the factory from catching every school migrating into the bay during May and June which is the critical period for our wildlife. Reducing the cap to zero for the bay or even zero for May and June would be a step in the right direction.

Thank you for taking the time to read this...we are hopeful you will make the right decision to protect the Maryland part of Chesapeake bay. Tom Lilly Whitehaven, Md

note 1. Please read above on the ASMFC Charter requirement for equity in allocation between states. How equitable is Virginia 78.66% and Maryland 1.89% and Maryland menhaden watermen could not even catch thatsurrendering a million lbs back to Virginia each year. It wasn't there to catch....Russell Dize told you there were "no menhaden" in Maryland last Summer.

note 2. At scan 1 page 3 are the brutal facts from Southwick about what has happened. ending in our last data from 2009 to 2016 a million striped bass trips were lost a year., the Lovell NOAA surveys show children are on about 8-10 % of trips so in that time period Virginia's kids missed out on one million seven hundred thousand fun filled fishing trips with parent and grandparents and those wonderful moments have been lost forever and it was all completely avoidable by this board.

note 3. According to NOAA survey of the value of fish landed at US ports the catch at Reedville is \$34 million dollars a year. So, roughly speaking, since Canadian Glen Cooke bought Omega Protein in 2017 he has been given well over 200 million dollars worth of our natural resources with all the profits exported to Canada and yet they never thank the people of Chesapeake bay for this or apologize for the damage they do, they just use their lobbyists, their lawyers and their political connections in Virginia to block even the most reasonable restrictions and prevent science from developing. The two owners of the bait boats have benefited in the same way and at least one reacted the same way when the Chesapeake Legal Alliance/ SMRFO Petition for relief was shot down again at the MRC last week.



The Path to an Ecosystem Approach for Forage Fish Management: A Case Study of Atlantic Menhaden

Kristen A. Anstead^{1*}, Katie Drew¹, David Chagaris², Matt Cieri³, Amy M. Schueller⁴, Jason E. McNamee⁵, Andre Buchheister⁶, Geneviève Nesslage⁷, Jim H. Uphoff Jr.⁸, Michael J. Wilberg⁹, Alexei Sharov⁹, Micah J. Dean¹⁰, Jeffrey Brust¹¹, Michael Celestino¹¹, Shanna Madsen¹², Sarah Murray¹, Max Appelman¹, Joseph C. Ballenger¹³, Joana Brito^{2,14}, Ellen Cosby¹⁵, Caitlin Craig¹⁶, Corrin Flora¹⁷, Kurt Gottschall¹⁸, Robert J. Latour¹⁹, Eddie Leonard²⁰, Ray Mroch⁴, Josh Newhard²¹, Derek Orner²², Chris Swanson²³, Jeff Tinsman²⁴, Edward D. Houde⁷, Thomas J. Miller⁷ and Howard Townsend²⁵

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Dean MJ, Brust J, Celestino M,
Madsen S, Murray S, Appelman M,
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Management: A Case Study
of Atlantic Menhaden.
Front. Mar. Sci. 8:607657.
doi: 10.3389/fmars.2021.607657

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Atlantic menhaden (*Brevoortia tyrannus*) support the largest fishery by volume on the United States East Coast, while also playing an important role as a forage species. Managers' and stakeholders' increasing concerns about the impact of Atlantic menhaden harvest on ecosystem processes led to an evolution in the assessment and management of this species from a purely single-species approach to an ecosystem approach. The first coastwide stock assessment of Atlantic menhaden for management used a single-species virtual population analysis (VPA). Subsequent assessments used a forward projecting statistical catch-at-age framework that incorporated estimates of predation mortality from a multispecies VPA while analytical efforts continued toward the development of ecosystem models and explicit ecological reference points (ERPs) for Atlantic menhaden. As an interim step while ecosystem models were being developed, a series of *ad hoc* measures to preserve Atlantic menhaden biomass for predators were used by managers. In August 2020, the Atlantic States Marine Fisheries Commission formally adopted an ecological modeling framework as a tool to set reference points and harvest limits for the Atlantic menhaden that considers their role as a forage fish. This is the first example of a quantitative ecosystem approach to setting reference

The ERP WG evaluated the five ERP models based on their performance (i.e., residuals, sensitivities, and other diagnostics), their strengths and weaknesses, and their ability to inform the fundamental ecosystem management objectives (Buchheister et al., 2017a,b; McNamee, 2018; Uphoff and Sharov, 2018; Nesslage and Wilberg, 2019; Chagaris et al., 2020). The ERP WG ultimately recommended using the NWACS-MICE model rather than the other four for two reasons. First, the EwE framework used by the NWACS-MICE model was the only approach that could address both the top-down effects of predation on Atlantic menhaden and the bottom-up effects of Atlantic menhaden on predator populations, which were required to evaluate the key tradeoffs between Atlantic menhaden harvest and predator needs that were central to the identified ecosystem objectives. Second, the NWACS-MICE implementation was less data-intensive than the full NWACS model, which reduced some of the uncertainty associated with modeling the data-poor predators and prey in the full model. This meant the NWACS-MICE model could be updated more quickly and efficiently, on a timeframe that met manager's needs. Comparisons of the full and MICE versions of the NWACS model indicated that the NWACS-MICE model included the fish predators most sensitive to the menhaden population. Striped bass was the most sensitive fish predator to Atlantic menhaden harvest in both models. In the full NWACS model, nearshore piscivorous birds were also sensitive to Atlantic menhaden F , but their response was similar to striped bass over the range of scenarios explored by the full model (Southeast Data Assessment and Review [SEDAR], 2020b). This choice was consistent with a growing body of literature that has recommended models of intermediate complexity (i.e., MICE) for ecosystems as representing a compromise between complexity/realism and uncertainty for use in management (Plagányi et al., 2014; Collie et al., 2016; Punt et al., 2016). Specifically, the ERP WG recommended using the NWACS-MICE in conjunction with the single-species assessment model, BAM; the NWACS-MICE model would provide strategic advice about the trade-offs between Atlantic menhaden fishing mortality and predator biomass to set reference points, while the single-species model would be used to provide short-term tactical advice about harvest strategies to achieve the ERP F target (Chagaris et al., 2020; Southeast Data Assessment and Review [SEDAR], 2020b). The ERP report was peer-reviewed with the single-species assessment in 2019, and the ERP WG's recommended tool was deemed acceptable for management use by a panel of independent experts (Southeast Data Assessment and Review [SEDAR], 2020b). The peer-review panel also recommended the continued development of the alternative models going forward.

CURRENT MANAGEMENT

The development and implementation of ERPs for Atlantic menhaden was a lengthy process (Figure 4 and Table 1), but in August 2020, ASMFC adopted the approach from the ERP WG for management use. The ERP target was defined as the maximum F on Atlantic menhaden that would sustain striped bass at their biomass target when striped bass were fished at their

F target. The ERP threshold was defined as the maximum F on Atlantic menhaden that would keep striped bass at its biomass threshold when striped bass was fished at its F target. For both reference points, all other species in the model were fished at their *status quo* (i.e., 2017) F rates. Striped bass was the focal predator species for this analysis because it was the most sensitive to Atlantic menhaden F in both the NWACS-MICE and the full NWACS models. Thus, levels of Atlantic menhaden F that sustain striped bass should also sustain piscivorous birds and less sensitive predators, in the absence of significant disruptions to the ecosystem (Southeast Data Assessment and Review [SEDAR], 2020b). With these ERP targets and thresholds, the Atlantic Menhaden Management Board reviewed projections from the single-species model, BAM, and set a quota for 2021 and 2022 of 194,400 mt, a 10% decrease in the quota from 2020.

The ERP WG explored a range of scenarios for the other focal species (i.e., not Atlantic menhaden or striped bass) and found that the NWACS-MICE model was sensitive to the population level of Atlantic herring, resulting in higher F reference points for Atlantic menhaden when Atlantic herring was at its biomass target and lower F reference points when Atlantic herring was below its biomass threshold as compared to the *status quo* scenario. Atlantic herring are an important prey item for striped bass in some seasons and regions. However, this sensitivity is likely due to the lack of seasonal and spatial dynamics in the NWACS-MICE model rather than reflecting true ecosystem dynamics. When a seasonal forcing function was added to the striped bass-Atlantic herring relationship, the sensitivity of the model was significantly reduced and the F target values were similar across multiple scenarios. The *status quo* 2017 scenario most closely approximated short-term conditions for the ecosystem; this assumption can be revisited after additional analysis to incorporate seasonal dynamics into the NWACS-MICE model as part of the next stock assessment, which is scheduled for 2025.

The ERP target and threshold F were lower than the single-species target and threshold F . The F value from the NWACS-MICE model was on a different scale than the F values from the single-species model due to differences in model structure. The single-species model is a statistical catch-at-age model that estimates an annual full F , the instantaneous fishing mortality rate that the fully selected age class experiences, while the NWACS-MICE model is an EwE model that uses an exploitation rate to drive the population based on the proportion of age-1+ biomass removed by the fishery each year. As a result, although both models report an F , estimates of F reference points from the NWACS-MICE model are not directly comparable to estimates of annual F from the single-species model. Therefore, the NWACS-MICE model F values were scaled to the single-species values for use in management. The NWACS-MICE model produced a tradeoff curve relating menhaden F to striped bass biomass, in an equilibrium context. From this relationship, Atlantic menhaden F multipliers were identified that would maintain striped bass at their biomass target or threshold, when striped bass were fished at their F target. The F multipliers that produced these conditions were then applied to the single-species model estimate of full F in the terminal year to produce the ERP target and threshold

FWD: Menhaden

From: George Scocca george@nyangler.com

To: Tom foragematters@aol.com

Date: Mon, March 8, 2021 7:15am

Hello Tom:

I am the person that spearheaded the bill that has kept reduction fishing out of NY waters. The changes here have been unbelievable. I can talk about it all day. My single greatest accomplishment in 35 years of fisheries management.

The availability of bunker throughout our season has seen an increase in both charter and party boats carrying anglers to get in on our great striped bass fishery. Bass stick with their food source and this has kept a healthy population of stripers in our waters. It's sparked a number of for hire boats to carry more anglers than ever before.

It has also had a profound effect on our bird population. We now have about 12 dozen nest pair eagles on long island and the osprey population is thriving. All due to the amount of forage for them to eat.



And lets not forget the importance of their filtering our waters.

Thank you.

George R. Scocca
nyangler.com

Check out my Linkedin profile

✓ SCIENTISTS INCLUDING R. LATOUR AND S. MADSEN SAY WHEN STRIPED BASS AND OSPREYS ARE SUFFERING OVERHARVESTING IS THE CAUSE.

Striped bass was the most sensitive fish predator to Atlantic menhaden harvest in both models. In the full NWACS model, nearshore piscivorous birds were also sensitive to Atlantic menhaden *F*, but their response was similar to striped bass over the range of scenarios explored by the full model (Southeast Data Assessment and Review [SEDAR], 2020b).

THERE ARE 50% FEWER MENHADEN IN THE SPRING THAN JUST A FEW YEARS AGO (SEE CHART NEXT PAGE)

SEVENTY % OF THE OVERALL INDUSTRY CATCH OF 150,000 mt IS ONE YEAR OR YOUNGER EQUALS 1,000 TEN TON MENHADEN SCHOOLS CAUGHT BEFORE THEY CAN SPAWN ONE TIME. OVER 100,000 mt UNDERAGE FISH

Table 2. Percent age composition of the reduction catch in the Atlantic Menhaden fishery, 2016–2020.
*Results are preliminary or incomplete for 2018–2020

Year	Age-0	Age-1	Age-2	Age-3+
2020*	*	*	*	*
2019*	0%	58%	34%	7%
2018*	*	*	*	*
2017	0%	81%	17%	2%
2016	0%	26%	50%	24%

DECLINES IS STRIPED BASS FISHING TRIPS IN VA HAVE RESULTED IN OVER A MILLION LOST TRIPS WITH FRIENDS, FAMILY AND CHILDREN AND MILLIONS OF DOLLARS LOST INCOME FOR VA SMALL BUSINESSES.

Table VA-1. Anglers and angler trips in Virginia

	2009	2016
Total Anglers	907,422	724,276
Total Trips	8,410,827	7,247,361
Striped Bass Trips	1,192,172	436,169
Bass Trips % of total	14%	6%

Table VA-2. Trip distribution by type in Virginia

	2009	2016
For-Hire	4%	4%
Private	79%	68%
Shore	18%	28%



SOUTHWICK
ASSOCIATES

Revised April 12, 2019

Monthly Chesapeake Bay /Atlantic
Landings from the NOAA
Review of the 2017 Fishing Season (Color added)
NOAA Beaufort Lab

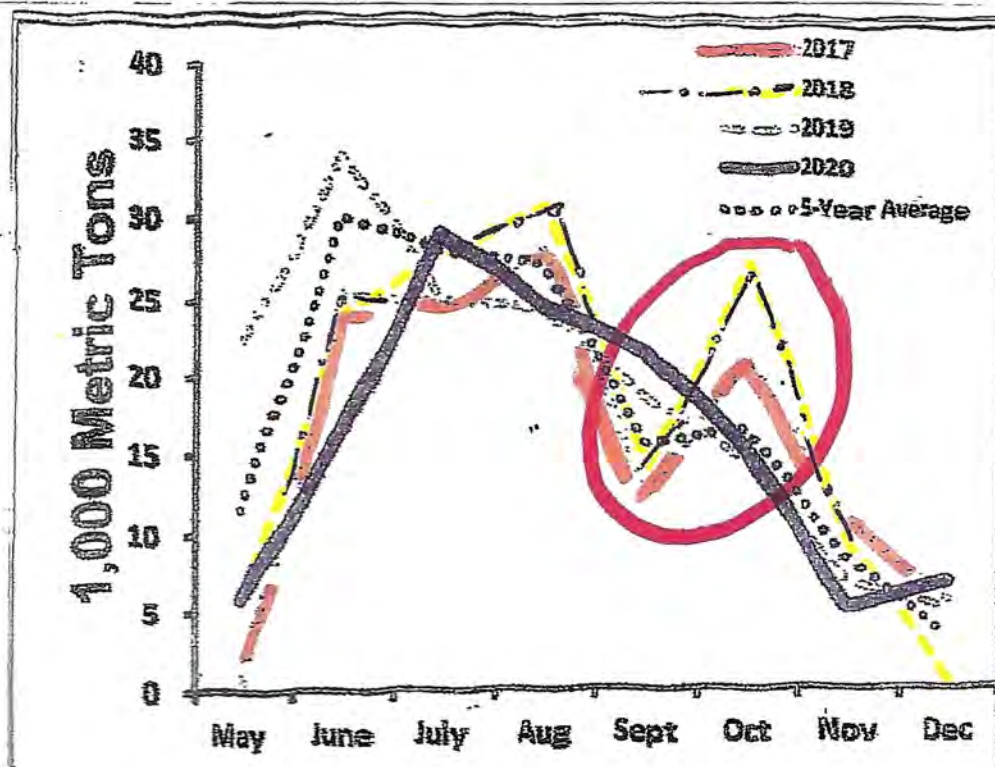
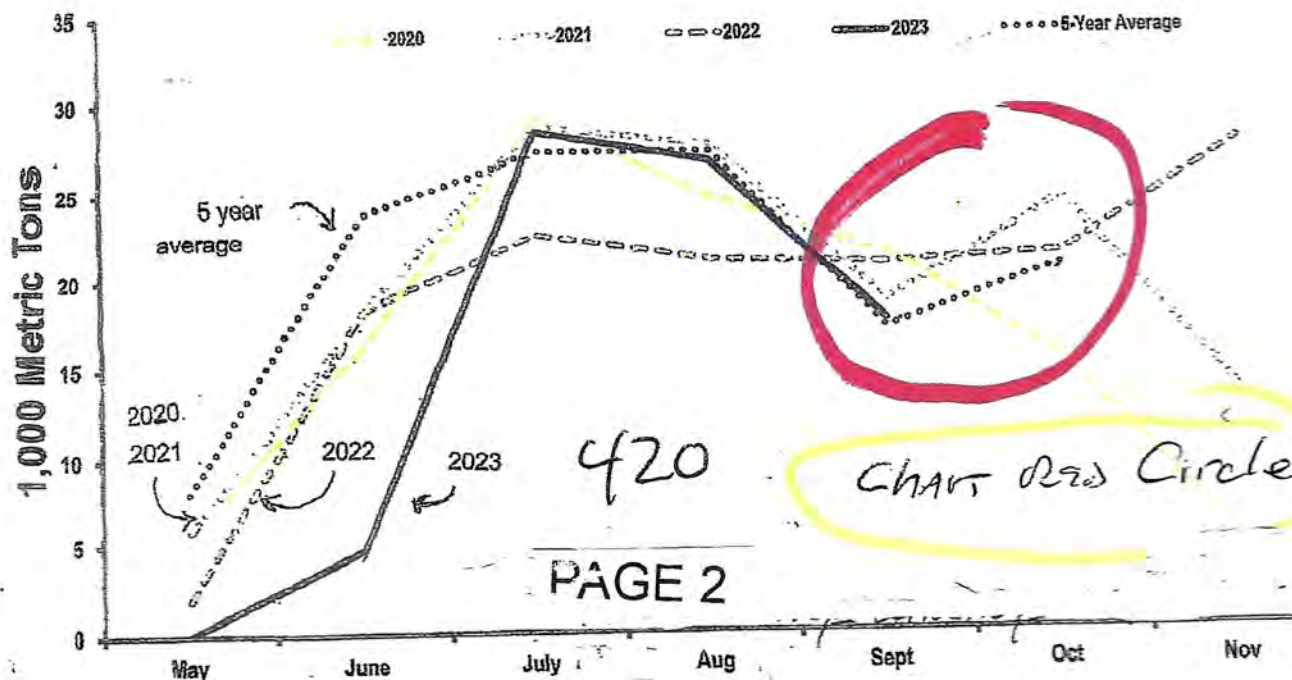


Figure 4. Atlantic Menhaden landings by month, 2017-2020.

Monthly Chesapeake Bay/ Atlantic
Landings from the NOAA Review of the
2020 Fishing Season NOAA Beaufort
Lab*

Reduction Landings by Month



Recreational Economic Impacts

In 2016, \$106.6 million was added to the gross domestic product of Virginia, compared to just over \$240.5 million in 2009. There were 1,444 jobs supported in 2016 and 3,582 jobs supported in 2009.

Table VA-4. 2009 Economic impacts from spending related to recreational striped bass angling in Virginia

	Jobs	Salaries and Wages (\$000s)	GDP (\$000s)	Total Output (\$000s)	State/Local Taxes (\$000s)	Federal Taxes (\$000s)
Direct Effect	2,362	\$95,282.9	\$142,119.2	\$210,982.3	\$19,266.9	\$22,408.3
Multiplier Effect	1,220	\$56,634.5	\$98,401.3	\$171,009.9	\$8,227.7	\$14,301.0
Total	3,582	\$151,917.4	\$240,520.4	\$381,992.2	\$27,494.6	\$36,711.2

Table VA-5. 2016 Economic impacts from spending related to recreational striped bass angling in Virginia

	Jobs	Salaries and Wages (\$000s)	GDP (\$000s)	Total Output (\$000s)	State/Local Taxes (\$000s)	Federal Taxes (\$000s)
Direct Effect	959	\$42,451.4	\$62,924.8	\$90,355.4	\$8,623.6	\$10,016.5
Multiplier Effect	485	\$25,099.3	\$43,698.4	\$75,556.7	\$3,624.1	\$6,350.9
Total	1,444	\$67,550.7	\$106,623.3	\$165,912.0	\$12,247.6	\$16,367.5

Is New Jersey the New Striped Bass Mecca?

Honachefsky

EXCERPT FROM ARTICLE

Jersey (<https://www.saltwatersportsman.com/story/sponsored-post/new-jersey-striped-bass-fishing/>) politicians did one thing right: Getting the Omega 3 bunker boats out of state waters. That has allowed a vast biomass of menhaden to proliferate throughout

the year in Jersey waters. This draws behemoth bass into the bays, river systems and alongshore to fatten up on omnipresent adult bunker.

Walk up to the beach and black clouds of bait are present in the

<https://www.saltwatersportsman.com/howto/is-new-jersey-the-new-striped-bass-mecca/>

Walk up to the beach and black clouds of bait are present in the surf and nearshore from spring through winter. During the fall, massive schools of smaller baits such as peanut bunker, bay anchovies and spearing push out of the backwaters and inundate the surf line. From October through December, sand eels choke the surf waters.

A catch and release striper surf tourney on a small stretch of the Jersey coast last October reported 53 bass from 40 to 52 inches (25 to 52 pounds) released in one day. And that chew lasted for days.



Southern Maryland Recreational Fishing Organization, Inc.

P.O. Box 132

Valley Lee, Maryland 20692-0132

May 7, 2025

John Clark, Chairman of the Atlantic Menhaden Management Board

My name is Phil Zalesak. I am president of the Southern Maryland Recreational Fishing Organization (SMRFO).

My testimony is about federal law which is not on the agenda.

The Atlantic States Marine Fisheries Commission is in violation of federal law, the Magnuson-Stevens Act (a), regarding its management of the Atlantic menhaden fishery for allocating over 75% of the Atlantic Coast total allowable catch of Atlantic menhaden to the Commonwealth of Virginia.

The Virginia Marine Resources Commission is also in violation of this act for allocating over 90% of its quota to a Omega Protein, a Canadian owned company, and the last remaining Atlantic menhaden reduction fishery on the Atlantic Coast.

Omega Protein is therefore allocated over 2 / 3 of the total allowable catch for the entire Atlantic Coast with most of that coming from Virginia waters. That's 158,000 metric tons or 348 million pounds or 3 / 4 of a billion fish be removed mostly from the Chesapeake Bay and its entrance. That's the classic definition of localized depletion.

Federal law does not accommodate the historical harvest of a fishery as a factor in allocating quota.

In fact, National Standard 4 specifically states the opposite:

- **First, "Conservation and management measures shall not discriminate between residents of different states."**
- **Second, "If it becomes necessary to allocate or assign fishing privileges among various United States fishermen, such allocation shall be (a) fair and equitable to all such fishermen;"**
- **Third, "... reasonably calculated to promote conservation;"**
- **Fourth, "carried out in such manner that no particular individual, corporation, or other entity acquires an excessive share of such privilege."**

This Board is in violation of all of these standards and more in the Magnuson-Stevens Act. This has led to an ecological and economic disaster in the Chesapeake Bay and its entrance as documented by NOAA, the 2019 Southwick Associates economic study of Striped Bass, and the Maryland Department of Natural Resources Striped Bass Young-of-Year data for the last 7 seven years.

Finally, if you do nothing, I will be working with lobbyists at the US State Department to facilitate a Presidential Executive Order to end all reduction harvesting of Atlantic menhaden in US state and federal waters.

I thank you for the time.

Phil Zalesak

President

Southern Maryland Recreational Fishing Organization

Corporate Facebook: <https://www.facebook.com/profile.php?id=61552422541232>

Membership Facebook: <https://www.facebook.com/groups/598428253621775>

Email: smrfo2021@gmail.com Twitter (X): @pzalesak44

References: (a) [National Standard Guidelines](#) | [NOAA Fisheries](#)

James Boyle

From: James Boyle
Sent: Tuesday, April 29, 2025 3:47 PM
To: James Boyle
Subject: RE: [External]

From: Joan Millward <admin@virginiaospreyfoundation.org>
Sent: Tuesday, April 29, 2025 1:21 PM
To: James Boyle <JBoyle@ASMFC.org>; Comments <comments@asmfc.org>; Tina Berger <TBerger@ASMFC.org>
Subject: [External]

Dear Members of the Atlantic Menhaden Work Group,
I have attached photos of osprey chicks from last season. These never had a chance to make it to a rehabilitator but the ones that did died as well, all from starvation. The beautiful chick sitting on the grass died within an hour of the photo. These pictures represent only a few of those that died. Please view video in body of this email to witness sibling rivalry. I am also attaching copies of emails from DWR reporting on the necropsies performed on three of our chicks. And last, my comment and recommendation. Please understand that something must be done to conserve our Bay and its natural resources.

Video Link: https://drive.google.com/file/d/1RLvrm_3QiFU4wbCTcj6_1KMeV-zFdV5l/view?usp=drive_web

Sincerely,
Joanie Millward, President
Virginia Osprey Foundation
(540) 220-6387
<https://www.virginiaospreyfoundation.org>



CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

From: Joan Millward, President
Virginia Osprey Foundation
405 Livingstone St.
Colonial Beach, VA 22443

April 29, 2025

To: Members of the Atlantic Menhaden Work Group

Colonial Beach hosts fifty plus Osprey nesting sites in 2.6 square miles. My husband and I have closely monitored these nests since 2023 but have been observing them since 2017 when we moved here. In 2023 we were made aware of the problems the Osprey were experiencing in Mobjack Bay. In 2023 the Osprey in Colonial Beach were doing well as always. We fledged fifty-five chicks. Two nests fledged three chicks, seventeen nests fledged two chicks, and the fifteen fledged one chick. We thought, because of our location, our Ospreys were immune to the devastation of those in the Bay.

In early 2024 it appeared that we were still doing well. Everything seemed normal. In June we banded 25 chicks. At that time, the chicks appeared healthy and well fed. By mid-August 2024, a disturbing trend emerged. Only twenty-three chicks appeared to have reached fledgling size and eight more smaller chicks remained in nests. In the following weeks, seventeen downed chicks were transported to rehabilitators, and eight dead chicks were identified. Four of the dead chicks were necropsied by Virginia Department of Wildlife Resources and it was established that their deaths were caused by starvation. (see attached in email)

Colonial Beach has an Osprey nest cam. The nest we selected for this cam had been successful for at least twenty years. As we observed this nest through the cam, we witnessed three chicks hatch. The last one to hatch died within two days. We then watched as sibling rivalry occurred between the remaining two chicks. Sibling rivalry occurs when there is a shortage of food. (Poole, Ospreys A Natural and Unnatural History, 1989) On July 18 the second chick died at twenty-five days old. At forty-four days old on August 3rd, the female disappears. On August 7, DWR removed the chick from its nest and delivered it to a rehabilitator. On August 8, the chick died.

Colonial Beach was not the only area experiencing a disastrous season. Nassawaddox Creek, Occahannock Creek, and Pungoteague Creek, they too experienced numbers below what is believed to be required for population maintenance.

My recommendation would be to only allow purse seine fishing three miles off the coast of Virginia as every other state affected by Atlantic Menhaden on the east coast does. It is imperative for the health of our ecosystem, for the Bay, for all of our Virginia waters. Please do the right thing.

Joanie Millward



Tracey, John (DWR) <John.Tracey@dwr.virginia.gov>

to Michael, me, Jeffrey, Sergio ▾

Thu, Jan 23, 5:14 PM



Joanie,

You are correct. All 3 birds that were submitted died from starvation/emaciation. Liver iron levels were slightly elevated in 2 of the 3, but this was suspected to be secondary to starvation. No other heavy metals were isolated.

Thanks!

John

Necropsy Report



Joan Millward <admin@virginiaospreyfoundation.org>
to Cindy, JENNIFER, Pam, DONNA

Wed, Sep 4, 2024, 3:37 PM ☆ ↶ ⋮

I received this today.

On Wed, Sep 4, 2024 at 10:20 AM Tracey, John (DWR) <John.Tracey@dwr.virginia.gov> wrote:

Hey All,

The preliminary **necropsy** data from SCWDS would support such a theory. All 4 birds (including the outlier from Smith Mountain) were in poor body condition with very little in their GI tracts. HPAI and WNV testing was negative. They sent the livers out for heavy metal toxicology, but it'll be a while before we get that back. If they find anything else in the tissue when they do the histology, I'll let you know.

Thanks,

John

Joanie Millward, President
Virginia Osprey Foundation
(540) 220-6387
<https://www.virginiaospreyfoundation.org>

















April 29, 2025

Via Electronic Mail

Mr. James Clark
Chair, Menhaden Management Board
Atlantic States Marine Fisheries Commission
1050 North Highland St., Suite 200 A-N
Arlington, VA 22201

RE: Comments on the Atlantic Menhaden Work Group Report

Dear Chairman Clark:

There had been hope among the employees and officials of Omega Protein and Ocean Harvesters following the adoption of ecological reference points and a string of positive stock assessments that the Atlantic States Marine Fisheries Commission (“ASMFC”) would declare victory and turn its attention to fisheries in need of management. We did not foresee that the Menhaden Management Board would consider undertaking management of osprey in the Chesapeake Bay. But here we are.

The Atlantic Menhaden Work Group operated under the flawed assumption that “there is an inadequate supply of menhaden to support overall predatory demand in the Bay”¹ instead of evaluating the impressive amount of information it collected. Rather, the Work Group developed what it considers “feasible management approaches,” leaving it to “the Board to determine if or when it is necessary to implement them.” Whether or not this is a reasonable assessment of the Work Group’s mandate and whether the management recommendations are feasible (many would have significant negative economic impacts on the Chesapeake Bay reduction and bait fisheries and businesses that rely on them), the Report itself lends no support to the proposition that new restrictions are needed.

In summary, the data collected shows that the reduction fishery takes a very small amount of catch during May when most chicks die, especially over the past two years. Moreover, in May and June, it operates north and east of Mobjack Bay. The fishery does most of its fishing at

¹ Atl. Menhaden Work Group, Memo to Atl. Menhaden Mgmt. Bd., “Precautionary Management of Chesapeake Bay” (hereafter “Rpt.”), at 1 (Apr. 23, 2025).

the mouth of the Bay in August and September, when many schools are just as likely to be leaving the estuary rather than entering it.

Perhaps a more important question to ask would have been, “are other predators dietary needs being met?” Striped bass and weakfish are in the healthy range of Fulton’s Index, suggesting they are not food stressed. Populations of brown pelicans and cormorants, each far more dependent on menhaden than ospreys, are growing and expanding their ranges in the Bay. So too are populations of red drum, cobia, spotted seatrout, and Spanish mackerel—all of which have high dependence on menhaden.

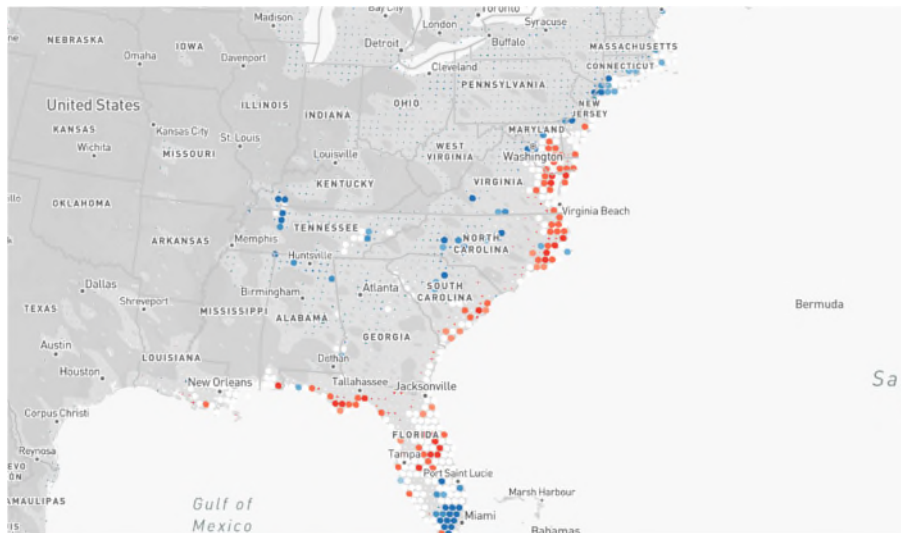
Nor, finally, is the issue of declining osprey brooding success limited to the Chesapeake Bay or areas where the menhaden fishery operates. Scientists with the U.S. Geological Survey Presented the Board with data showing similar dramatic rates of osprey population increases following the DDT-era followed by periods of decline and a stabilization at lower than peak levels. Cornell University’s eBird database show patterns of decline in coastal populations from Florida and Virginia, with increases in freshwater areas inland.

The Chesapeake Bay osprey population increased 1,801% between 1966 and 2022 (USGS). Over the same period, bald eagle populations have likewise spiked. Climate change has likely induced the growth of new piscivorous bird species populations in the Bay and led to the influx of a new set of predators. Population theory suggests a rebounding species will grow rapidly, exceed its carrying capacity, and level off, which is exactly what is happening with osprey in the Chesapeake region. Meanwhile, a host of other menhaden-dependent fish and avian predators are thriving. If anything, it appears that ospreys are simply being out-competed by other species.

Thus, any new management restrictions on the Bay menhaden fishery are unwarranted. Citations from the Report and other sources supporting this position are set forth below.

- **Brood failures cannot be caused by the reduction fishery.**
 - The Report notes: “**Most [osprey] broods are lost within the first 2 weeks of development,**” or sometime in mid- to late May. (Rpt. at 10.)
 - At that time, the reduction fishery operates **north and east of Mobjack Bay.** (Rpt. at 34 (Table 4); Exh. 1 below.)
 - The fishery took a total of **0.01% of the Bay Reduction Fishery Cap in May 2023** and **0.4% in May 2024** due to late arriving large schools of menhaden. (Rpt. at 34 (Table 3).)
 - “Of the 6,257 menhaden Bay purse seine net sets reported on the CDFR’s between 2020 and 2024, **only 113 net sets (1.81%) occurred in just four** of the Watts et al. **2024 osprey study areas** (Fleeton Bay, Mobjack Bay, Eastern Shore, and Piankatank River).” (Rpt. at 13.)

- **Other menhaden-dependent predators are thriving in the Chesapeake Bay.**
 - “The use of Fulton’s Condition Factor as a measure of **the Bay’s Striped Bass population health would indicate the fish are not starving** and would be **considered healthy.**” (Rpt. at 23.)
 - Red drum, spotted sea trout, and weakfish are **all in the healthy range.** (Rpt. at 23.)
 - “Atlantic menhaden make up **50-55% of the diet of cormorants** and **74% of the diet of brown pelicans** by weight.” (Rpt. at 16.)
 - Double-crested cormorants in Virginia **increased** from over **400 pairs** in 1995 to **over 3,000 pairs today.**²
 - “The Brown Pelican was **first found breeding in Virginia** on Fisherman Island **in 1987.**” Today, the Shanks Island colony has **1,753 pairs** and the Wreck Island colony has **1,493 pairs.** (Rpt. at 17.)
 - **Other predators that are consume menhaden** (red drum, Spanish mackerel, and spotted seatrout) **are expanding in the Bay.** (Rpt at 20-21, 54 (Fig. 18), 55 (Fig. 19).)
- **Similar patterns of decline in coastal osprey populations are evident in areas of the Atlantic and Pacific coasts where the menhaden fishery does not operate.**
 - “[A]bundance indices in **other Atlantic and Pacific coast states show similar plateauing and short-term declines** since 2012.” (Rpt. at 9.)



Source: eBird data from 2012-2022. <https://science.ebird.org/en/status-and-trends/species/osprey/trends-map>

² (Rpt. at 16.) The measured population peaked to 5,012 pairs in 2018, but in 2023, “erosion significantly deteriorated Shanks Island, leading to a significant drop in cormorants located within Virginia to just over 3000 breeding pairs.” (*Id.* (citing Watts et al. 2019).)

- **Osprey have been even less successful in foraging for other prey fish.**
 - Academia and Watts, 2023, showed that **menhaden, as a percentage of osprey diet, increased** between the 2006-07 study period and 2021. Deliveries of other prey species declined by 50%, while menhaden declined less than 43%.
 - The lack of osprey foraging success of all species is **suggestive of environmental factors limiting fish availability** in osprey foraging areas; factors such as osprey arriving in **weakened conditions** due to conditions in wintering grounds; and/or **increased competition and depredation**.

TABLE 2 Mean ($\pm$ standard error) estimates of osprey reproductive, provisioning and diet parameters, sample sizes (nests) and one-way ANOVA results from the lower Chesapeake Bay.

Parameter	1974-75	1985	2006-07	2021	F-statistic	p value
Nests (N)	8	7	8	4		
Provisioning (fish/10 hr)	5.3 $\pm$ 0.50	3.5 $\pm$ 0.30	2.7 $\pm$ 0.30	1.4 $\pm$ 0.50	15.6	<0.001
Menhaden rate (fish/10 hr)	-----	2.4 $\pm$ 0.32	0.7 $\pm$ 0.19	0.4 $\pm$ 0.32	17.9	<0.001
Menhaden (% of diet)	-----	67.3 $\pm$ 4.07	24.7 $\pm$ 4.90	30.2 $\pm$ 6.93	19.4	<0.001

Estimated productivity required for a stable population within the Chesapeake Bay is 1.15.
From Academia and Watts, 2023.

###

It often gets lost in the debate, but the Board's management of the menhaden fishery generally and the component that occurs in the Chesapeake Bay is highly precautionary. The overall total allowable catch has been set so there is virtually no chance that the management *target* will be breached, leaving zero chance of overfishing. The original Bay reduction fishery cap itself was established in 2006 as a precautionary measure and has since been reduced twice to less than half that level. Given the reduction in the number of menhaden plants and vessels in this fishery, it is likely that current harvest levels in the Chesapeake Bay at their lowest levels since the 1800s.

Atlantic menhaden is the ASMFC's greatest management success. The stock is thriving and, to date, it is providing both necessary ecosystem services and socioeconomic benefits. Additional and unnecessary new management restrictions, based on scientific information that does not support action, in the most important sector of the fishery threatens to undermine all of the Commission's good work. We urge you to stick to science-based fisheries management and stick with the current management regime.

Sincerely,

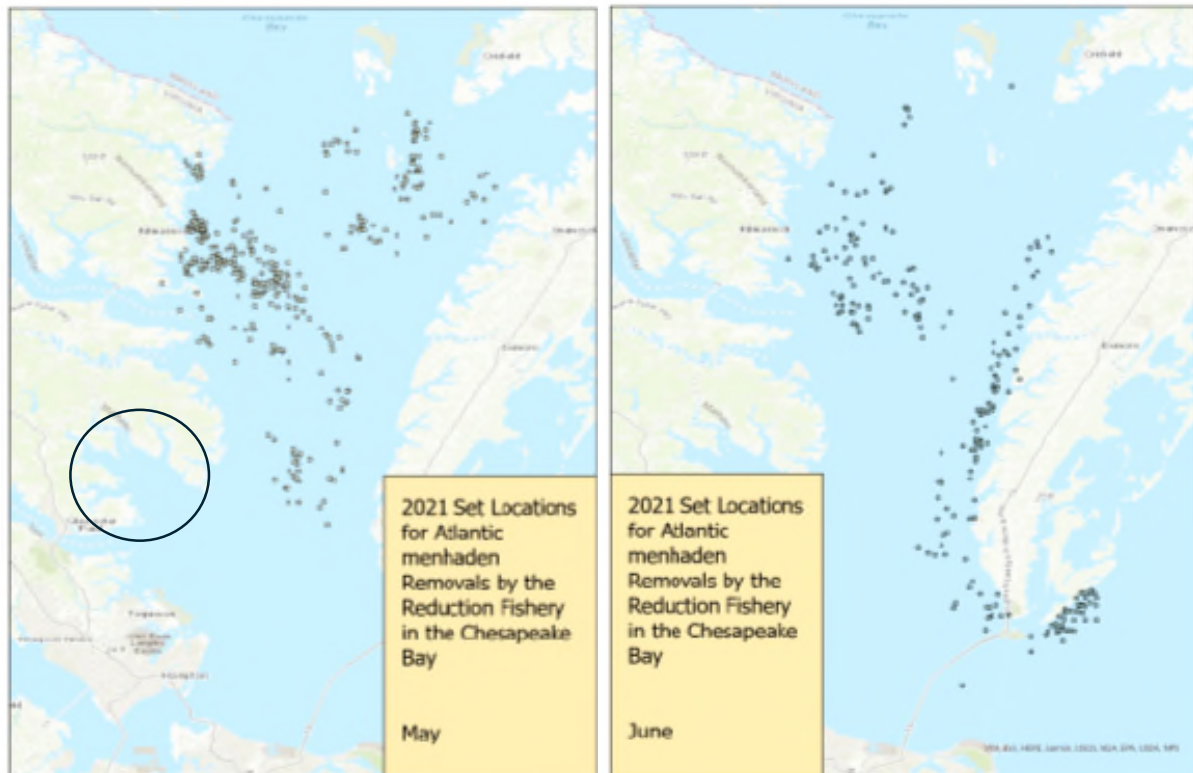
/s/ Shaun M. Gehan

Shaun M. Gehan

Counsel to Omega Protein and Ocean Harvesters

EXHIBIT 1: Ocean Harvester Sets, May & June 2021

The timing and location of the menhaden fishery do not suggest that it could have had an impact on the availability of menhaden in Mobjack Bay during the period of the Academia and Watts study. Dr. Watts indicated that the highest number of nest failures in 2021 occurred in May. However, that month, Ocean Harvester's vessels made all of their sets above the study area, indicating that menhaden had entered the Bay, but apparently did not choose to enter Mobjack Bay in significant numbers. Likewise in June, no sets were made anywhere near the nesting sites.



From: [ASMFC](#)
To: [Comments](#)
Subject: [External] New public comment for 2025 Spring Meeting
Date: Tuesday, April 29, 2025 8:07:53 PM

2025 Spring Meeting

Action Title

2025 Spring Meeting

Action URL

<https://asmfc.org/events/2025-spring-meeting/>

Name

Cynthia Appel

Email

cindyk53@gmail.com

State

Virginia

Comment

I live at Silver Beach Virginia on the Chesapeake Bay just north of the Bay Bridge Tunnel. The 4th of July a couple of years ago a massive fish kill washed up on our shores following Omega Protein ships just off our shore. Omega did not take responsibility, instead accusing another fleet. It took days to clean up the shoreline and polluted our waters.

Following that horrific event, the Omega fishing fleet continued to fish out in front of us close enough that we could, at times, make out the crew onboard, and their planes continued to fly along our shoreline harassing those of us who have spoken out against them.
This is appallingly behavior

But even worse is the devastation of the impact that overfishing of menhaden in the Chesapeake Bay. Starvation of all species that depend the menhaden for their very survival. The Osprey population which was once the largest IN THE WORLD has dwindled to alarmingly low numbers.

It is time to put them IN THEIR PLACE - 3 MILES OFFSHORE OF THE CHESAPEAKE BAY.

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Atlantic States Marine Fisheries Commission

1050 N. Highland Street • Suite 200A-N • Arlington, VA 22201
703.842.0740 • asmfc.org

MEMORANDUM

TO: Horseshoe Crab Management Board
FROM: Tina Berger, Director of Communications & Caitlin Starks, Senior FMP Coordinator
DATE: April 30, 2025
SUBJECT: Revisions to the Advisory Panel Membership

At the previous Board meeting on February 4, 2025, the Board discussed evaluating the composition of the Advisory Panel (AP) and whether there is adequate representation across stakeholder groups. Based on the recommendations that came out of the July 2024 stakeholder workshop, staff suggested the Board aim for an even distribution of stakeholder groups, with 5 advisors each representing the commercial industry, biomedical industry, and conservation interests, and that 2 of the conservation seats represent the Delaware Bay region. It was also recommended that the states review their membership and consider replacing inactive members.

Since that Board meeting, we received 3 nominations to the AP for possible Board consideration – Edwin Chiofolo, a commercial gillnetter and potter from New York; Arthur “Pete” Bender, a commercial dredger and trawler from Virginia; and David Mizrahi, a conservation biologist with New Jersey Audubon.

Staff poses the following questions and suggestions for the Board to consider:

- Does the staff recommended composition of the AP of 5 commercial harvesters/dealers, 5 biomedical representatives, and 5 conservation interests (2 of which are from Delaware Bay region) still make sense to the Board?
- Remove non-participating advisors from the panel due to inactivity (see members with highlighted text)
- Should the open commercial vacancies be removed? Moving forward, should nominations be sought by user group/geographic scope? States could still submit nominations, but those seats would not be viewed as dedicated state seats.
- How would the Board like to handle the new commercial nominations? The addition of the 2 new commercial nominees and the removal of inactive commercial fishermen would result in a total of 6 commercial fishermen representing New England, Mid-Atlantic, and Delaware Bay regions.
- Currently, there are 2 active conservation interests on the Panel – John Turner and Matthew Sarver (both of whom represent the Delaware Bay region) – and 1 new nominee (David Mizrahi). Note: a call for nominations for conservation groups was not conducted. If you agree that there should be 5 conservationists, staff recommends the Commission solicit nominations through a call for nontraditional stakeholders, but

states could still nominate individuals as well. Staff recommends a small work group of the Board be created to review submitted nominations, including the new nomination we already received, and make a recommendation to the Board for action.

- The Board could also task this work group with providing recommendations on the aforementioned questions/suggestions.

Horseshoe Crab Advisory Panel

Bolded names await Board approval
Highlighted text reflects inactive advisors

Massachusetts

David Meservy (comm/inshore otter trawl)
P.O. Box 128
South Chatham, MA 02659
Phone: 508.237.4366
dmese@yahoo.com
Appt Confirmed 8/3/22

Chair, Brett Hoffmeister (biomedical)
Associates of Cape Cod
124 Bernard East St Jean Drive
Falmouth MA 02536
Phone (day): 508.444.1426
BHoffmeister@acciusa.com
Appt Confirmed 2/3/16
Appt. Reconfirmed 8/18

Rhode Island

Vacancy (comm/otter trawl)

New York

John L. Turner (conservation)
10 Clark Boulevard
Massapequa, NY 11762
Phone (day): 631.451.6455
Phone (eve): 516.797.9786
jturner@seatuck.org
Appt. Confirmed 2/10/05
Appt Reconfirmed 5/10; 4/25

Edwin Chiofalo (gillnet/pots; ocean, LIS, South Shore Bays)

16 Blair Lane
Brookhaven, NY 11719
Phone: 631.987.9478
eelingboy@aol.com

New Jersey

Benjie Swan (biomedical)
Limuli Laboratories
Dias Creek, 5 Bay Avenue
Cape May Courthouse, NJ 08210-2556
Phone: 609.465.6552
Swan24@verizon.net
Appt. Confirmed 8/5/10

Delaware

Jordan Giuttari (comm. pot)
3337 Main Street
Bowers Beach, DE 19946
Phone: 302.233.4694
DelBaySeafood@gmail.com
Appt Confirmed 8/3/22

Participation: Inactive; did not attend the only meeting held since his appointment

Matthew Sarver (ecologist; Chair of DE Ornithological Society)
6 Walnut Ridge Road
Wilmington, DE 19807
Phone: 724.689.5845
matt@sarverecological.com
Appt Confirmed 8/3/22
Appt Reconfirmed 4/25

Maryland

George Topping (comm/rawl)
32182 Bowhill Road
Salisbury, MD 21804
Phone: 443.497.2141
george@zztopping.com
Appt. Confirmed 5/16

Jeffrey Eutsler (comm/rawl)
11933 Gray's Corner Road
Berlin, MD 21811
Phone: 443.497.3078
tandje1@comcast.net
Appt. Confirmed 2/4/98
Appt. Reconfirmed 10/02; 10/06; 5/10

Participation: Inactive; 14% attendance rate since 2016; last meeting attended was in 2016

Allen L. Burgenson (biomedical)
8875 Hawbottom Road
Middletown, MD 21769
Phone: 301.378.1263
allen.burgenson@lonza.com
Appt. Confirmed 8/21/08
past chair

Horseshoe Crab Advisory Panel

Bolded names await Board approval
Highlighted text reflects inactive advisors

Sam Martin (comm. mobile tending
gear/biomedical harvest/dealer)
985 Ocean Drive
Cape May, NJ 08204
Phone: 609.381.8892
smartin@atlanticcapes.com
Appt Confirmed 10/16/23

**Participation: Inactive; did not attend 2
meetings held since his appointment**

Virginia

Arthur "Pete" Bender (comm dredge/trawl;
inshore)
6175 Maddox Boulevard
Chincoteague, VA 23336
Phone: 757.350.1271
Harbor.rat@hotmail.com

Christina M. Lecker (biomedical)
FUJIFILM Wako Chemicals U.S.A. Corporation,
LAL Division
Plant Manager - Cape Charles Facility
301 Patrick Henry Avenue
Cape Charles, VA 23310
Phone: 757-331-4240, 757-331-2026
FAX: 757-331-2046
christina.lecker@fujifilm.com
Appt. Confirmed 10/21/2020

1 vacancy - comm/pot/conch

South Carolina

Nora Blair (biomedical)
Charles River Laboratories Microbial Solutions
1852 Cheshire Drive
Charleston, SC 29412
843.276.7819
Nora.Blair@crl.com
Appt. Confirmed 5/1/19

Vacancy - comm/pot/trawl

Nontraditional Stakeholders

Jeff Shenot
7900 McClure Road
Upper Marlboro, MD 20772
Phone: 301.580.4524
JUGBAY@msn.com
Appt. Confirmed 8/2018

**Participation: Inactive; 25% attendance since
appointment; has not attended the last 3
meetings; emailed 4/1/25 to gauge interest
and have not received a response**

David Mizrahi (conservation biologist)
2350 Route 47, Building 1
Woodbine, NJ 08270
Phone: 609.400.3835
David.mizrahi@njudubon.org



ATLANTIC STATES MARINE FISHERIES COMMISSION

Advisory Panel Nomination Form

This form is designed to help nominate Advisors to the Commission's Species Advisory Panels. The information on the returned form will be provided to the Commission's relevant species management board or section. Please answer the questions in the categories (All Nominees, Commercial Fisherman, Charter/Headboat Captain, Recreational Fisherman, Dealer/Processor, or Other Interested Parties) that pertain to the nominee's experience. If the nominee fits into more than one category, answer the questions for all categories that fit the situation. **Also, please fill in the sections which pertain to All Nominees (pages 1 and 2). In addition, nominee signatures are required to verify the provided information (page 4), and Commissioner signatures are requested to verify Commissioner consensus (page 4). Please print and use a black pen.**

Form submitted by: Jesse Hornstein State: New York
(your name)

Name of Nominee: Edwin Chiofolo

Address: 16 Blair Lane

City, State, Zip: Brookhaven, New York 11719

Please provide the appropriate numbers where the nominee can be reached:

Phone (day): 631 987 9478 Phone (evening): 631 987 9478

FAX: _____ Email: eelingboy@aol.com

FOR ALL NOMINEES:

1. Please list, in order of preference, the Advisory Panel for which you are nominating the above person.

1. Horseshoe Crabs
2. _____
3. _____
4. _____

2. Has the nominee been found in violation of criminal or civil federal fishery law or regulation or convicted of any felony or crime over the last three years?

yes _____ no No

3. Is the nominee a member of any fishermen's organizations or clubs?

yes _____ no No

If "yes," please list them below by name.

4. What kinds (species) of fish and/or shellfish has the nominee fished for during the past year?

conch, razor clams

bunkers, stripped bass

Bluefish, weakfish

horseshoe crabs

eels, summer dog fish

hard clams

5. What kinds (species) of fish and/or shellfish has the nominee fished for in the past?

Fluke

blue claw crabs

Lobster

surfclams

oysters

FOR COMMERCIAL FISHERMEN:

1. How many years has the nominee been the commercial fishing business? 38 years
2. Is the nominee employed only in commercial fishing? yes yes no _____
3. What is the predominant gear type used by the nominee? gillnet, pots, clam rake
4. What is the predominant geographic area fished by the nominee (i.e., inshore, offshore)? Ocean, LI Sound, South Shore Bays

FOR CHARTER/HEADBOAT CAPTAINS:

1. How long has the nominee been employed in the charter/headboat business? _____ years

2. Is the nominee employed only in the charter/headboat industry? yes _____ no No

If "no," please list other type(s) of business(es) and/occupation(s): _____

3. How many years has the nominee lived in the home port community? _____ years

If less than five years, please indicate the nominee's previous home port community.

FOR RECREATIONAL FISHERMEN:

1. How long has the nominee engaged in recreational fishing? _____ years

2. Is the nominee working, or has the nominee ever worked in any area related to the fishing industry? yes _____ no _____

If "yes," please explain.

FOR SEAFOOD PROCESSORS & DEALERS:

1. How long has the nominee been employed in the business of seafood processing/dealing? _____ years

2. Is the nominee employed only in the business of seafood processing/dealing?

yes _____ no _____ If "no," please list other type(s) of business(es) and/or occupation(s):

3. How many years has the nominee lived in the home port community? _____ years

If less than five years, please indicate the nominee's previous home port community.

FOR OTHER INTERESTED PARTIES:

1. How long has the nominee been interested in fishing and/or fisheries management? _____ years

2. Is the nominee employed in the fishing business or the field of fisheries management?
yes _____ no _____

If "no," please list other type(s) of business(es) and/or occupation(s):

FOR ALL NOMINEES:

In the space provided below, please provide the Commission with any additional information which you feel would assist us in making choosing new Advisors. You may use as many pages as needed.

Being a Second Generation Fisherman, and have been ^{ON} the water for more than 40 years. I have my own Marine Biology degree by working in a lot of these fisheries Day in and Day out

Nominee Signature: Edwin Chiofalo

Date: 3/18/25

Name: EDWIN CHIOFALO
(please print)

COMMISSIONERS SIGN-OFF (not required for non-traditional stakeholders)

[Signature]
State Director

State Legislator

[Signature]
Governor's Appointee



ATLANTIC STATES MARINE FISHERIES COMMISSION

Advisory Panel Nomination Form

This form is designed to help nominate Advisors to the Commission's Species Advisory Panels. The information on the returned form will be provided to the Commission's relevant species management board or section. Please answer the questions in the categories (All Nominees, Commercial Fisherman, Charter/Headboat Captain, Recreational Fisherman, Dealer/Processor, or Other Interested Parties) that pertain to the nominee's experience. If the nominee fits into more than one category, answer the questions for all categories that fit the situation. **Also, please fill in the sections which pertain to All Nominees (pages 1 and 2). In addition, nominee signatures are required to verify the provided information (page 4), and Commissioner signatures are requested to verify Commissioner consensus (page 4). Please print and use a black pen.**

Form submitted by: Ethan Simpson State: Virginia
(your name)

Name of Nominee: Arthur "Pete" Bender

Address: 6175 Maddox Blvd.

City, State, Zip: Chincoteague, Va. 23336

Please provide the appropriate numbers where the nominee can be reached:

Phone (day): 757 350 1271 Phone (evening): 757 350 1271

FAX: _____ Email: harbor.rat@hotmail.com

FOR ALL NOMINEES:

1. Please list, in order of preference, the Advisory Panel for which you are nominating the above person.

1. Horseshoe Crab Advisory Panel

2. _____

3. _____

4. _____

2. Has the nominee been found in violation of criminal or civil federal fishery law or regulation or convicted of any felony or crime over the last three years?

yes _____ no X

3. Is the nominee a member of any fishermen's organizations or clubs?

yes _____ no X

If "yes," please list them below by name.

4. What kinds (species) of fish and/or shellfish has the nominee fished for during the past year?
horseshoe crab

channeled & knobbed whelk

5. What kinds (species) of fish and/or shellfish has the nominee fished for in the past?

scallops

oysters, clams (inshore)

flounder

croaker, grey trout, menhaden

sea clams

blue crabs

FOR COMMERCIAL FISHERMEN:

1. How many years has the nominee been the commercial fishing business? 38 years

2. Is the nominee employed only in commercial fishing? yes no X

3. What is the predominant gear type used by the nominee? dredge / trawl

4. What is the predominant geographic area fished by the nominee (i.e., inshore, offshore)? INSHORE

FOR CHARTER/HEADBOAT CAPTAINS:

1. How long has the nominee been employed in the charter/headboat business? _____ years

2. Is the nominee employed only in the charter/headboat industry? yes _____ no _____

If "no," please list other type(s) of business(es) and/occupation(s): _____

3. How many years has the nominee lived in the home port community? _____ years

If less than five years, please indicate the nominee's previous home port community.

FOR RECREATIONAL FISHERMEN:

1. How long has the nominee engaged in recreational fishing? _____ years
2. Is the nominee working, or has the nominee ever worked in any area related to the fishing industry? yes _____ no _____

if "yes," please explain.

FOR SEAFOOD PROCESSORS & DEALERS:

1. How long has the nominee been employed in the business of seafood processing/dealing? _____ years
2. Is the nominee employed only in the business of seafood processing/dealing?
yes _____ no _____ If "no," please list other type(s) of business(es) and/or occupation(s):

3. How many years has the nominee lived in the home port community? _____ years
If less than five years, please indicate the nominee's previous home port community.

FOR OTHER INTERESTED PARTIES:

1. How long has the nominee been interested in fishing and/or fisheries management? _____ years
2. Is the nominee employed in the fishing business or the field of fisheries management?
yes _____ no _____

If "no," please list other type(s) of business(es) and/or occupation(s):

FOR ALL NOMINEES:

In the space provided below, please provide the Commission with any additional information which you feel would assist us in making choosing new Advisors. You may use as many pages as needed.

Pete is a long time participant and commercial harvester of HSCs in Virginia waters and personally harvests a large portion of the VA quota. His relationship with commercial wholesalers, other harvesters, & user groups in the whole fishery would make him a valuable addition to the HSC AP.

Nominee Signature: AP Bender

Date: 03/20/2023

Name: Arthur Bender
(please print)

COMMISSIONERS SIGN-OFF (not required for non-traditional stakeholders)

State Director

State Legislator

Governor's Appointee