United States Department of the Interior
U.S. Geological Survey
Office of the Director
Reston, Virginia 20192

The Honorable Robert J. Wittman
Vice Chair, Committee on Natural Resources
U.S. House of Representatives
Washington, D.C. 20515

Dear Vice Chair Wittman,

This is in response to your letter dated February 21, 2025, requesting the U.S. Geological Survey (USGS) assist the Committee in better understanding osprey abundance in the United States, particularly in the Atlantic and Chesapeake Bay regions. The Committee requested a briefing from Tom O'Connell, Center Director, USGS Eastern Ecological Science Center; David Ziolkowski, Jr.; and Barnett Rattner. That briefing was held on April 16, 2025. The Committee also requested responses to the following questions:

1. Table 1 from Watts (2024),[8] reproduced below, demonstrates a decline in provisioning in terms of total fish per ten hours of foraging between the 1970s and 2020s, as well as illustrating the proportion of menhaden as a percentage of total diet increased between the 2006-07 study and the 2021 study. Could the decrease in nest deliveries of all prey fish suggest broader factors relating to the environment are impacting the availability of all types of fish or, alternatively, impacting male ospreys' ability to forage effectively? Can such causal factors be ruled out by Watts' research?

TABLE 1 Mean (± standard error) estimates of osprey reproductive rate, clutch size, brood size, nests monitored (N) and one-way ANOVA results from the lower Chesapeake Bay.

Parameter	1974-75	1985	2006-07	2021	F-statistic	p value
Nests (N)	75	68	132	68		
Clutch size	2.7 ± 0.08	3.0 ± 0.09	3.0 ± 0.27	2.7 ± 0.09	2.2	0.084
Reproductive Rate	1.7 ± 0.10	1.4 ± 0.11	0.8 ± 0.08	0.3 ± 0.11	34.9	<0.001
Brood Size	2.0 ± 0.10	1.8 ± 0.10	1.5 ± 0.09	1.2 ± 0.17	10.0	<0.001

Estimated reproductive rate required for a stable population within the Chesapeake Bay is 1.15.

Watts et al. (2024) presented their prey provisioning and diet results in Table 2, excerpted below, in which they reported significant reductions in prey provisioning rate, Menhaden provisioning rate, and percent of overall diet across time. Although the proportion of Menhaden as a percentage of total diet in 2021 is numerically larger than the 2006-07 value, the two values are bounded by overlapping error bars, and are thus not different in a biologically meaningful way.

TABLE 2 Mean (± 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 ± 0.50	3.5 ± 0.30	2.7 ± 0.30	1.4 ± 0.50	15.6	<0.001
Menhaden rate (fish/10 hr)	-----	2.4 ± 0.32	0.7 ± 0.19	0.4 ± 0.32	17.9	<0.001
Menhaden (% of diet)	-----	67.3 ± 4.07	24.7 ± 4.90	30.2 ± 6.93	19.4	<0.001

Estimated productivity required for a stable population within the Chesapeake Bay is 1.15.

Adult Osprey capture a variety of fish species, and several studies have shown that Osprey diet composition differs in various regions of the Chesapeake (e.g., Table 5 in Lazarus et al. 2016). Preliminary observations made by USGS scientists during a 2024 Osprey nesting study in the vicinity of the Choptank River suggest Menhaden and Striped Bass may be the primary prey type there. Data collected there indicate the principal contributing factor to poor breeding performance was loss of young due to starvation. This was likely caused by limited prey capture and/or prey delivery to nests.

The published research of Watts and colleagues does not explore all the possible causes of nestling starvation. The amount of food delivered to young in a nest can be influenced by many factors, including prey abundance, access to prey, exposure to contaminants, incidence of disease, increased predation risk, parental condition, brood size, and adverse weather conditions. Ecological systems such as this are complex and occur at large scales that make it difficult and sometimes not possible to measure and accurately estimate the influence of all contributing factors. However, as described in more detail below, we have found no indications that disease or contaminant exposure are major contributing factors.

2. Given the 1,800+% increase in the osprey population of the Chesapeake Bay region since the 1960s[9], could density dependent impacts within the resource, either on their wintering grounds or during their migration North to build nests, cause the adults to be in less optimum biological condition to build nests, lay eggs, and forage successfully?

   Estimates of the magnitude of population growth differ by data source, but all indicate that the density of breeding pairs of Osprey in the Chesapeake has grown substantially since the 1970's (reviewed in Watts and Paxton 2007). Question #2 above has two parts. The first relates to a natural population regulation process wherein an increasingly dense population generally experiences an increase in competitive pressure, because more individuals/pairs are present over time and compete for limited resources, such as food, mates, or nesting sites. Such density dependent effects can influence the birth rate, death rate, or both. However, density dependent effects are not only an outcome of population growth, but they can also occur if a previously common resource becomes scarce.

   The second part of question #2 relates to carryover effects, which is when conditions or events in one season influence an individual's success in the following season. Carryover effects are difficult to measure in large migratory birds like Osprey. The density of individuals in these locations may be very different from one another and it is difficult to determine which resources are truly limiting and/or driving competition in each place. While it is possible that body condition on wintering grounds or in migration could influence an individual's performance during the breeding season, we have no direct data to suggest that carryover effects are causing Osprey to be in less-than-optimal biological condition to build nests, lay eggs, and forage successfully in the Chesapeake.

3. Has the average weight of ospreys arriving at their nesting sites declined from previous years, perhaps indicating some impacts either on the wintering grounds or during migrations? Have there been any studies on the conditions for returning osprey?

   We do not have or know of data documenting the condition or average weight of adult Osprey at the time of their arrival at nesting sites in the Chesapeake.

4. Has avian flu been detected in osprey populations? Has there been any research to identify whether various diseases are impacting osprey populations?

   To the best of our knowledge, the incidence of avian influenza in Osprey has not been rigorously studied throughout the Chesapeake Bay. The Virginia Department of Wildlife Resources submitted 3 dead Osprey specimens in August 2024 to the Southeastern Cooperative Wildlife Disease Study unit of the University of Georgia College of Veterinary Medicine for analysis, and these specimens tested negative for highly pathogenic avian influenza and West Nile virus. In addition, we have also obtained records of 158 Osprey admitted to 5 rehabilitation facilities in the vicinity of the Chesapeake in 2024. In the accession records, no infectious diseases are mentioned. Notably, 53 of the 158 accession records provide a diagnosis of "emaciated, debilitated, thin and/or starvation". Disease events (e.g., avian botulism, highly pathogenic avian influenza, West Nile virus), and harmful algal blooms have occasionally affected large numbers of waterbirds in the Chesapeake, but seemingly have not evoked significant mortality of Osprey (e.g., Watts and Paxton 2007; Lankton et al. 2022 and updated to cover the time period 2000 to 2025; Rattner et al. 2022; Southeastern Wildlife Cooperative Disease Study 2024). Notably, there are 210 highly pathogenic avian influenza infection positive cases for wild birds Maryland and Virginia (time period 2020 to 2025; 33 involved bald eagles) but none documented infection in Osprey (USDA Detections of Highly Pathogenic Avian Influenza database 2025).

5. Are populations of other nearshore piscivorous birds—like brown pelicans, cormorants, bald eagles, gannets, or others—experiencing the same population trend as ospreys? That is, a dramatic increase since the ban on DDT, followed by an apparent leveling off? Could competition for prey and other resources by piscivorous birds adversely impact osprey provisioning success?

   Most of the large fish-eating bird species that cohabitate the Chesapeake Bay ecosystem had experienced reproductive issues and eggshell thinning caused by DDT. Many of these species specialize in different aspects of their shared environment, such as using different habitats, water depths, fish species and size classes, and times of activity to reduce competition and to coexist. Gannets, in particular, are absent from Chesapeake waters during the Osprey breeding season. Populations of most of these fish-eating birds have rebounded since the ban of DDT. For example, from the 1970s to 2020, the Bald Eagle population in the Chesapeake Bay region increased from 60 pairs to about 3,000 breeding pairs (Watts et al. 2007; US EPA Chesapeake Bay Program 2025). During nearly the same time period, between 1973 and 2020, the Bay's Osprey population increased from 1,450 breeding pairs to about 10,000 breeding pairs (Watts and Paxton 2007; US EPA Chesapeake Bay Program 2025). While most of the Chesapeake's large fish-eating birds have shown an overall increasing trend across this time interval, the trajectory of each within this interval has not been the same because each experienced environmental pressures unique to their ecologies as they recovered.

   It is possible that competition between species for prey could affect Osprey provisioning rates to nestlings, but we are unaware of data that suggest it. Osprey are dependent on live fish and generally capture and consume fish that are 6 to 13 inches in length. By contrast, Bald Eagles have a more diverse diet that includes live and scavenged fish, birds, small mammals,

amphibians, and reptiles. When eagles forage for live fish, they generally pursue larger prey (8 to 29 inches).

6. There are reports that bald eagles are particularly aggressive competitors of osprey. Can you explain the relationship between eagles and osprey and the trends in bald eagle populations in the Chesapeake Bay region?

   Bald Eagles establish territories during the breeding season and are known to be aggressive towards other eagles in defending their territories and nests. They have been observed harassing smaller raptors like Osprey to steal their prey (e.g., MacDonald 1994). However, while eagles are sometimes aggressive, they do not habitually prevent Osprey from accessing resources or territories (e.g., Ogden 1975), and they often coexist, so we would not characterize them as aggressive competitors. Over the past 50 years, Bald Eagle, Osprey and heron populations have jointly recovered in the Chesapeake (reviewed in Cruz et al. 2019). And importantly, in the case of birds of prey, although it might be expected that two large fish-eating species like Osprey and Bald Eagle should compete directly for food, it is possible that their interaction could have the opposite effect and benefit Osprey. For example, it is plausible that the Bald Eagle's consumption of a larger size class of fish, like Striped Bass, reduces the predation pressure on a smaller size class of fish, like Menhaden, which is a food source for Osprey, thereby possibly enhancing the availability of the smaller size class of fish as prey for Osprey.

   It is noteworthy that Bald Eagle density is about an order of magnitude greater in tidal fresh regions of the Bay where Osprey reproductive success is high compared to lower eagle density in the main stem of the Bay where Osprey reproduction is marginal or poor (Watts et al. 2006; Watts and Paxton 2007). However, the number and productivity of nesting Bald Eagles and of Osprey in various segments of the Bay have yet to be rigorously compared. Such a comparison could be undertaken to elucidate the possibility of inter-specific competition affecting Osprey productivity.

7. Could the osprey population reasonably be expected to grow indefinitely once DDT was banned, without regard to environmental limiting factors such as habitat constraints, competition with other species for food and other resources, or other density-dependent factors in its summer or winter habitat?

   No, populations cannot grow indefinitely because the resources they depend on are finite. Generally, a population of low abundance living in a place with high resource abundance will experience increased growth over time. Growth usually continues until the population reaches the maximum population size the environment can support (i.e., the carrying capacity), which can be increased or reduced depending on changes in resource availability.

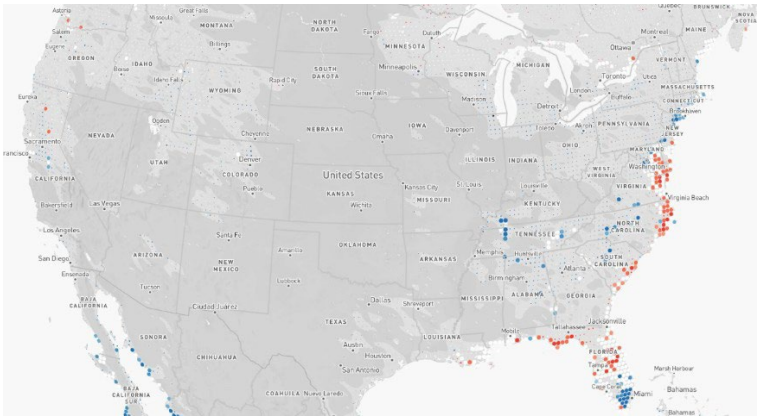
8. Noting that USGS has indicated striped bass are an important food source for osprey in parts of the Chesapeake Bay, could the many factors that impact the status of this stock—which the Atlantic States Marine Fisheries Commission has noted[10]—be impacting osprey's breeding success?

   The USGS has included Striped Bass among the list of prey species captured and consumed by Osprey at some Chesapeake study sites (e.g., Table 5 in Lazarus et al. 2016). Other captured prey species recorded from these sites include Atlantic Menhaden, Atlantic Croaker, Gizzard Shad, and catfish, which are important prey species of Osprey (Glass and Watts 2009, Lazarus et al. 2016). Prey delivered to Osprey nestlings is very much dependent on the salinity and fish species found in proximity to the nest. Many of the factors that affect the status of the Striped Bass stock in the Chesapeake could also have direct or indirect effects on Osprey reproduction.

9. Has Chesapeake Bay water transparency decreased to the point, even just sporadically after severe rainfalls, that forage success by ospreys that rely on sight feeding could become impaired?

   As described by Harding and colleagues (2019), Secchi depth has shown consistent, decreasing trends for the Chesapeake mainstem oligohaline (upper Bay), mesohaline (middle Bay), and polyhaline (lower Bay) zones from 1967 to 2015 as percent changes, "with the exception" of the oligohaline zone that showed an increasing trend in spring. There are no data to support or refute if the overall trend is impairing Osprey foraging success.

10. The two trend maps from Cornell University's eBird data portal (below) show the near-term coastal decline in osprey is widespread along the coast, suggesting this phenomenon is not localized. Is it more likely that there are common factors (*e.g.,* climate change, carrying capacity, competition, disease, adverse conditions in winter feeding grounds, etc.) that are contributing to this near-term decline or that regional subpopulations are being impacted by unique localized conditions, each with independent adverse effects?



Source: eBird data from 2012-2022. https://science.ebird.org/en/status-and-trends/species/osprey/trends-map

Osprey populations live in a rapidly changing landscape that includes many opportunities and stressors. While some factors like habitat loss, climate change, and pollution could be common drivers of population change across large scales, the specific threats and their relative importance to local Osprey populations can vary markedly depending on local conditions and stressors present. In our August 6 presentation to the Atlantic States Marine Fisheries Commission Menhaden Board, we stated that there are many stressors that can affect Osprey reproduction in the Chesapeake and elsewhere. The list of stressors in order of priority was suggested to be limited food availability, depredation, intra-specific competition for prey or nest sites, inter-specific competition, disease, inexperienced breeders, weather events, environmental contaminants, and water depth and clarity.

Various processes and stressors, such as habitat loss, competition between species, disease, predation, toxicants, and invasive species, can cause declines in bird populations, and in some instances Chesapeake Bay Osprey have been or may be vulnerable to these stressors. Environmental contaminants (e.g., DDT and metabolites, PCBs), that were at one time observed to be substantially suppressing reproductive rates of Osprey in the Chesapeake, no longer seem to be adversely affecting populations (Watts and Paxton 2007; Lazarus et al. 2015, 2016). Disease events (e.g., avian botulism, highly pathogenic avian influenza, West Nile virus) and harmful algal blooms have occasionally affected large numbers of waterbirds in the Chesapeake, but seemingly have not evoked significant mortality events in Osprey (e.g., Watts and Paxton 2007; Lankton et al. 2022; Rattner et al. 2022; Southeastern Wildlife Cooperative Disease Study 2024). Other anthropogenic hazards and activities (e.g., electrocution,

collisions with building and vehicles, shooting, discarded fishing tackle) have affected individual Osprey but without apparent consequence to their population.

Biological carryover effects (e.g., adverse non-lethal events at the wintering sites that affect reproductive performance at nesting sites in the Chesapeake) could potentially contribute to poor Osprey reproductive performance in the Chesapeake, although there are no data to support or refute this hypothesis.

There are many natural structures, duck blinds, and manmade platforms suitable for nesting Osprey in the Chesapeake, and nesting structures are now at a surplus. Notably, in some areas of the Bay, a fraction (~10%) of the manmade Osprey nest platforms (e.g., Choptank River in 2024) are being used by Canada geese (Rattner and Day 2024).

It is certainly possible that reduced prey availability, exposure to environmental contaminants, disease and inter-specific competition could all be contributing to impaired Osprey reproduction and productivity in parts of the Chesapeake. However, based on existing information, limited prey availability, their capture or their delivery to nests is seemingly the principal driver of poor reproductive success experienced in the USGS 2024 study area (Rattner and Day 2024).

Should you have any further questions or require additional information, please do not hesitate to reach out through the USGS Congressional Liaison, Mr. Tommy Elms at telms@usgs.gov.

Sincerely,

Sarah J. Ryker
Acting Director

Identical Letter Sent to:

The Honorable Harriet M. Hageman
Chair, Subcommittee on Water, Wildlife, and Fisheries
U.S House of Representatives
Washington, DC 20515

References

Cruz, J., Windels, S.K., Thogmartin, W.E., Crimmins, S.M., Grim, L.H., Larson, J.H. and Zuckerberg, B. 2019. Top-down effects of repatriating Bald Eagles hinder jointly recovering competitors. ***Journal of Animal Ecology*** 88:1054-1065.

Glass K.A. and Watts, B.D. 2009. Osprey diet composition and quality in high-and low-salinity areas of lower Chesapeake Bay. ***Journal of Raptor Research*** 43:27-36.

Harding Jr, L.W., Mallonee, M.E., Perry, E.S., Miller, W.D., Adolf, J.E., Gallegos, C.L. and Paerl, H.W. 2019. Long-term trends, current status, and transitions of water quality in Chesapeake Bay. ***Scientific Reports*** *9:*6709.

Lankton , J.S. 2022. Wildlife mortality events in counties surrounding the Chesapeake Bay recorded in the Wildlife Health Information Sharing Partnership Event Reporting System (WHISPers) from 2000-2020: U.S. Geological Survey data release. doi.org/10.5066/P9ULAM7G.

Lazarus, R.S., Rattner, B.A., McGowan, P.C., Hale, R.C., Karouna-Renier, N.K., Erickson, R.A. and Ottinger, M.A. 2016. Chesapeake Bay fish-osprey (*Pandion haliaetus*) food chain: evaluation of contaminant exposure and genetic damage. ***Environmental Toxicology and Chemistry*** 35:1560-1575.

MacDonald, J. 1994. Bald eagle attacks adult osprey. ***Journal of Raptor Research*** 28:122.

McLean, P.K. and Bryd, M.A. 1991. The diet of Chesapeake Bay ospreys and their impact on the local fishery. ***Journal of Raptor Research*** 25:109-112.

Ogden, J.C. 1975. Effects of Bald Eagle territoriality on nesting Ospreys. ***Wilson Bulletin*** 87:496-505.

Rattner, B.A., Drovetski, S.V., Lankton, J.S., McGowan, P.C., Wazniak, C.E. and Egerton, T.A. 2022. Review of harmful algal bloom effects on birds and implications for avian wildlife in the Chesapeake Bay region. ***Harmful Algae*** 120: 102319.

Rattner, B.A., and Day, D.D. 2024. Osprey Reproduction in vicinity of the Choptank River. 2024. U.S. Geological Survey data release, IP-170397. https://doi.org/10.5066/P14MRUZC

Southeastern Wildlife Disease Study. 2024. Report for Accession Number W24-00516.

USDA Detections of highly pathogenic avian influenza in wild birds database. 2025. https://www.aphis.usda.gov/livestock-poultry-disease/avian/avian-influenza/hpai-detections/wild-birds#:~:text=View%20the%20latest%20information%20on%20detections%20of,highly%20pathogenic%20avian%20influenza%20%28HPAI%29%20in%20wild%20birds Accessed March 27, 2025.

US Environmental Protection Agency Chesapeake Bay Program. 2025. Bald eagles. https://www.chesapeakebay.net/issues/whats-at-risk/bald-eagles Accessed March 10, 2025.

Watts, B.D., Markham, A.C. and Byrd, M.A., 2006. Salinity and population parameters of bald eagles (*Haliaeetus leucocephalus*) in the lower Chesapeake Bay. ***Auk*** 123:393-404.

Watts, B.D. and Paxton, B.J. 2007. Ospreys of the Chesapeake Bay: Population recovery, ecological requirements, and current threats. ***Waterbirds*** 30:39-49.

Watts B. D., Paxton, B. J., Hines, C. and Anderson, S.K. 2023. Estimating potential menhaden consumption by double-crested cormorants along the coast of North Carolina. ***Frontiers in Marine Science*** 10:1193429.

Watts, B., McGowan, P., Richmond, E., Kearns, G., Pellegrini, A., Colden, A. and Rattner, B. 2025. Response to questions on Chesapeake Bay osprey foraging needs from the Atlantic States Marine Fisheries Commission Menhaden Board. Information IP-177215 Bureau Approved on March 18, 2025.

Delaware-Maryland Synod
Evangelical Lutheran Church in America
God's work. Our hands.

TO: The ASMFC menhaden work group
FROM: Lee Hudson, assistant for public policy to the DE-MD Synod, ELCA bishop
RE: Management of the Atlantic menhaden fishery with attention to industrial Bay operations
DATE: May 1, 2025

The Evangelical Lutheran Church in America committed itself to advocate for sustainable practices in agri- and aqua-culture in 1993:

- According to Genesis 2:15, our role within creation is to serve and to keep God's garden, the earth. "To serve," often translated "to till," invites us again to envision ourselves as servants, while "to keep" invites us to take care of the earth as God keeps and cares for us (Numbers 6:24-26).
- The earth and its fullness belong to the Lord. No person or group has absolute claim to the earth or its products. *The principle of sufficiency means meeting the basic needs of all humanity and all creation*.
- We are pledged. . .to protect species and their habitats; to protect and assure proper use of marine species; and to protect portions of the planet that are held in common, including the oceans and the atmosphere.

Reduction fishing is a mechanized process for taking as many fish as is possible, as fast as is possible. Fishing in this manner in a confined geography to which entire species are obligated is irresponsible in our reckoning of stewardship.

Facts support this reckoning. 78% of Atlantic menhaden are taken in the lower reaches of the Bay. About ninety percent of that is designated to one commercial operation, a violation of the principle that, "No person or group has absolute claim to the earth or its products." Maryland's State fish, the rockfish, designated an **ERP** by **ASMFC**, an **e**cological **r**eference **p**oint is in trouble. Notably, nests of avian Bay residents dependent on menhaden for reproductive success—notably, osprey—have been failing for multiple seasons. They are not the only ones: there is reason to believe that MES survey data from multiple of its management sites suggests the same.

Overfishing a primary provision on which multiple species depend is a reliable method to initiate collapse. We have commented several times for the Maryland General Assembly, the Virginia Marine Resources Commission, and the Atlantic States Marine Fisheries Commission about menhaden over-fishing in the confines of the lower Bay. Menhaden are a natural resource of the entire Atlantic coast. Other states have made regulatory decisions to sustain it. As a chief interstate regulatory authority, ASMFC needs to protect the menhaden nursery that is the Bay, and its stock that is no one's asset and everyone's responsibility. Please establish appropriate management goals to sustain this fishery.

Lee Hudson,
A2B, DE/MD Synod

5699 Meridale Rd. Baltimore, MD 21228 410-230-2860 800-869-5492 fax 410-230-2871

From: Steve Atkinson
To: James Boyle; Tina Berger; Comments
Cc: Thomas Burkett; John Bello
Subject: [External] menhaden-osprey work group
Date: Thursday, May 1, 2025 5:50:00 PM

The menhaden work group has spent many months looking at this important issue in the Chesapeake Bay and we appreciate their efforts.

We are now counting on the menhaden management board to take needed action to address the decline of menhaden. It is important to note that we believe precautionary action can be taken to reduce the menhaden reduction harvest without impacting the bait industry. Clearly, regulation has been primarily by sector as evidenced by a "bay cap" on reduction but not on bait. While Virginia (VMRC) has stated that they regulate by equipment type, a review of the relevant code shows this is simply not accurate.

While science is limited on bay menhaden, there are multiple red flags that point to a problem in the bay:

1. the osprey research
2. for the past few seasons bait shops and commercial crabbers reported they were not able to find menhaden bait during the spring and early summer.
3. the industry was not able to hit their bay cap in 2023 in spite of significant effort...(I do not have 2024 numbers).
4. menhaden recruitment, as measured by seine surveys, while an imperfect measure, have been low for 20 years with the exception of 2024 which showed improvement, but still far below numbers from the 1980's-90's.
5. while striped bass are overfished, we should recognize that having abundant menhaden forage could help them recover. As your scientists have stated..."striped bass are the most sensitive of all fish to declines in menhaden."
6. Anglers like myself have observed a decline in the size and frequency of menhaden schools over the past 20-30 years. Perhaps they are no longer coming into the bay in large numbers as in the past, maybe its climate change or water quality. Either way, we must protect what we have remaining.
7. because reduction fishing is outlawed in every other east coast state, the Virginia bay and ocean coastline gets hammered all summer long. This intense pressure greatly increases the likelihood of localized depletion and harm to the ecosystem.
8. perhaps the biggest red flag is the behavior of the industry itself. They have consistently lobbied against funding the menhaden study proposed by VIMS. (this in spite of being involved in the design of the study itself). Why are they resisting science? what are they afraid of? Supporting needed science should be a requirement for being a good steward of the bay, especially for a foreign owned company.

Finally, menhaden are a vital public resource, yet the public has had little say in their management. It is time for action and we encourage you to put the bay first by taking precautionary measures to reduce the reduction harvest in the bay. With political

donations and industry lobbying, it is now clear that a menhaden study bill will not pass the Virginia General Assembly. Therefore, it is up to ASMFC to do the right thing to protect the bay's ecosystem. Importantly, a reduction in the bay cap or time and area closures will not put the industry out of business as they sometimes claim. In fact, there have been several years in the past decade where they only caught about 50% of their bay cap, yet their business remains solid.

Thank you for your attention to this important matter.

Steve Atkinson, Virginia Saltwater Sportfishing Assn.

James Boyle

From: Tom Lilly <foragematters@aol.com>
Sent: Thursday, May 1, 2025 2:22 PM
To: James Boyle; Tina Berger; comments@asmfc.com; Bob Beal
Cc: Thomas Lilly; Philip Zalesak; Dale William Neal; debbie campbell; Bryan Watts; Roberta Kellam; julie kazz; steve atkinson; david Reed; Bill Dunn; pat.schrawd; Joan Millward; Hillary Falk; josh kurtz
Subject: [External] Fw: Using the mandatory charter requirement that there be fairness between Virginia and Maryland in the allocation of menhaden to have the board restore Maryland's fair share of this resource

James and Tina please circulate this to the menhaden board and let me know you have received it Thanks Tom Lilly

To the menhaden board and James Boyle,

Because of my concern that I may not be able to get to make a comment to you on Wednesday about protecting Maryland I am sending this. If this rings true then you are free to ask the board on Wednesday to take action to substantially reduce the menhaden season to restore fairness to Maryland and the Maryland part of Chesapeake bay. Please find the time to read this and think about what the fair thing to do for Maryland is?

> The Commission's Charter section 6 (7) says there is to be fairness and equity in the allocation between the states. So the question is how fair or unfair is the allocation between Maryland and Virginia.
>
> The allocation of about 2% to about 80% speaks loud and clear but what is really happening here in the bay?
>
> We know the reduction fishery is allowed to catch the equivalent of about 5,000 ten ton schools of menhaden in the Virginia Bay starting next week and continuing on for about 24 weeks.
>
> We don't know for sure the percent of those 5000 schools that would have migrated on to Maryland, but let's say half of those schools would have continued on to Maryland if they were not caught. 2,500 schools Maryland lost.
>
> The board should recognize this is gross unfairness to Maryland and act promptly to change it. If you take action there would be a vast difference between the thousands of schools of menhaden that you allow to reach Maryland and the schools they left behind in Virginia.
>
> If Maryland received just 2500 of those 5000 schools, the differences is once they got to Maryland they would be protected because Maryland does not allow reduction fishing. Most of that forage would stay in Maryland the entire season to feed and protect our striped bass and ospreys and to restore the enjoyment of the bay to millions of Marylanders and their children. The schools left behind in Virginia, however, would continue to be targeted by the industry day after day. This change could begin to restore our bay's ecology.

Every week that you shorten the menhaden season you reduce the unfairness to Maryland (as each state shares all the menhaden coming in to it) and begins to satisfy the board's obligation to treat Maryland fairly. If the industry season was shortened to half of what it is now then your obligation would have been satisfied by half. If instead the industry was only allowed to fish in the US Atlantic zone, where they are not taking schools directly from the commingled stock the board's obligation to treat Maryland fairly would be completely satisfied.

. If you agree with what I am saying about unfairness then it would be up to any member of the board to make a motion Wednesday that the current system is inherently unfair to Maryland and should not be continued. You could suggest a moratorium be placed on the reduction fishing or that at the very least the season be closed until July 31st to restore some semblance of fairness and equity to Maryland while further action is being considered.

As we see it what this comes down to is the only management tool the board can use effectively to treat Maryland with the fairness it deserves is to require that the reduction fishing just take place in the US Atlantic zone which will eliminate or greatly mitigate the reduction fisheries from catching from the commingled stream of menhaden flowing into the Bay toward Maryland. There is really no other effective option.

As usual thank you for your consideration.... Tom Lilly Whitehaven, Maryland.

From: David Strout <davidjohnstrout@gmail.com>
Sent: Thursday, May 1, 2025 10:40 PM
To: Tina Berger <TBerger@ASMFC.org>
Subject: [External]

Well, I worked hard to get all of my equipment together to catch menhaden. Got my license and then the state with you took my license. you destroyed my dream and years of hard work . Thousands of years of fisherman and I was just a few years.too late . To much regulations too much corruption. That's why I'm voting for trump

Atlantic States Marine Fisheries Commission

1050 N. Highland Street • Suite 200A-N • Arlington, VA 22201
703.842.0740 • 703.842.0741 (fax) • www.asmfc.org

MEMORANDUM

TO: **Atlantic Striped Bass Management Board**

FROM: **Emilie Franke, Plan Development Team Chair**

DATE: **April 29, 2025** ***Table 1 Revised May 2, 2025 to include Wave 2***

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

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. Revised May 2, 2025 to include Wave 2

	State	No Target (SB only trips eliminated)	No Target (SB trips switch targets)	No Harvest
Wave 2	Ocean	-4.0%	-3.4%	-1.6%
	ME	0.0%	0.0%	0.0%
	NH	0.0%	0.0%	0.0%
	MA	-0.1%	-0.1%	0.0%
	RI	-2.0%	-1.4%	0.0%
	CT	-6.2%	-5.8%	0.0%
	NY	-4.6%	-4.2%	-2.0%
	NJ	-6.4%	-5.6%	-3.1%
	DE	-1.4%	-0.4%	-0.7%
	MD	0.0%	0.0%	0.0%
	VA	0.0%	0.0%	0.0%
	NC	0.0%	0.0%	0.0%

	State	No Target (SB only trips eliminated)	No Target (SB trips switch targets)	No Harvest
Wave 3	Ocean	-3.8%	-2.8%	-2.0%
	ME	-4.6%	-2.8%	-1.1%
	NH	-4.6%	-1.2%	-0.9%
	MA	-5.8%	-2.9%	-2.3%
	RI	-7.5%	-6.0%	-2.9%
	CT	-4.5%	-3.4%	-2.0%
	NY	-3.1%	-2.6%	-2.2%
	NJ	-2.6%	-2.3%	-1.8%
	DE	-0.9%	-0.1%	0.0%
	MD	0.9%	0.9%	0.0%
	VA	0.0%	0.0%	0.0%
	NC	0.0%	0.0%	0.0%
Wave 4	Ocean	-2.9%	-1.9%	-1.6%
	ME	-7.6%	-5.0%	-2.1%
	NH	-12.1%	-7.3%	-3.2%
	MA	-7.3%	-3.7%	-4.6%
	RI	-3.2%	-2.3%	-2.0%
	CT	-3.1%	-2.6%	-1.7%
	NY	-2.0%	-1.7%	-1.4%
	NJ	-0.1%	0.0%	-0.1%
	DE	-2.0%	-1.4%	-0.6%
	MD	0.0%	0.0%	0.0%
	VA	0.0%	0.0%	0.0%
	NC	0.0%	0.0%	0.0%

	State	No Target (SB only trips eliminated)	No Target (SB trips switch targets)	No Harvest
Wave 5	Ocean	-3.1%	-2.2%	-1.5%
	ME	-7.5%	-6.2%	-1.0%
	NH	-3.8%	-2.8%	-1.1%
	MA	-4.2%	-2.9%	-2.0%
	RI	-4.8%	-3.9%	-1.9%
	CT	-2.5%	-1.2%	-0.6%
	NY	-3.5%	-3.0%	-2.5%
	NJ	-1.8%	-1.4%	-1.0%
	DE	-0.2%	0.0%	0.0%
	MD	0.0%	0.0%	0.0%
	VA	0.0%	0.0%	0.0%
	NC	0.0%	0.0%	0.0%
Wave 6	Ocean	-6.6%	-5.0%	-3.2%
	ME	0.0%	0.0%	0.0%
	NH	0.0%	0.0%	0.0%
	MA	-0.6%	-0.5%	0.0%
	RI	-2.2%	-1.7%	0.0%
	CT	-3.8%	-3.5%	-0.1%
	NY	-7.6%	-3.7%	-3.1%
	NJ	-11.2%	-8.4%	-6.6%
	DE	-11.8%	-9.0%	-1.4%
	MD	-14.1%	-13.8%	0.0%
	VA	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%

From: ASMFC
To: Comments
Subject: [External] New public comment for 2025 Spring Meeting
Date: Wednesday, April 30, 2025 2:34:05 PM

2025 Spring Meeting

Action Title
2025 Spring Meeting
Action URL
https://asmfc.org/events/2025-spring-meeting/
Name
Gerard Addonizio
Email
gaddoniz@med.cornell.edu
State
New York
Comment
I continue to discuss proposed changes for striped bass management with many fellow anglers. When I ask them about the no targeting proposal for striped bass they all invariably respond by saying that they will be fishing for blue fish. The no targeting of striped bass will not be enforceable. The only effective method would be to ban all fishing during certain periods. This would be a very painful solution but clearly the only realistic one regarding no targeting. A better solution would be to restrict harvesting more extensively and this should include for hire and commercial fishing. If commercial fishing is to be excluded, please make the requirements for a license more stringent so that only people who truly make a living this way can warrant a license.

From: ASMFC
To: Comments
Subject: [External] New public comment for 2025 Spring Meeting
Date: Thursday, May 1, 2025 9:44:30 AM

2025 Spring Meeting

Action Title
2025 Spring Meeting
Action URL
https://asmfc.org/events/2025-spring-meeting/
Name
David Bell
Email
dinger00a@hotmail.com
State
Maryland
Comment

Striped Bass Addendum

Dear Commissioners and Atlantic Striped Bass Management Board,

As a Maryland licensed fishing guide, I am writing to you regarding Maryland DNR's proposed conservation equivalency action to "reset the baseline" of Maryland's striped bass season.

This action includes expanding catch and release through April. In my view, this would be a reckless course of action while the Commission views the stock as overfished with poor recruitment. In my experience, fish drop their eggs after being fought and lifted from the water. We see anglers doing this frequently during the current catch and release seasons.

In 2024, Maryland closed May1-15 "out of an abundance of caution" when the majority of the female spawning stock has left the Bay. And now DNR is considering a complete reversal of regulations in April during the spawn. I fail to see how this makes any sense.

We have been repeatedly misled by DNR during the meetings considering this proposed "baseline change" that in order for fishing to resume May1-15, Maryland needs to reduce removals elsewhere during the season. After discussing this with Emile Franke, this doesn't appear to be true. It should be unnecessary to "pay back" a reduction that wasn't required under Addendum II.

If the board has to consider reductions with Addendum III, the proposed " Option 3 Modified" change to Maryland's season currently under consideration can't be a part of it in our view. Maryland hasn't allowed catch and release in April since 2019. How would the Commission's Plan Development Team make projections with no data from April for the past 5 years?

Finally, this is a conservation equivalency action under the guise of new terminology and is not permitted

under Addendum II. It would undermine the public's confidence in the management process.

For these reasons I'm absolutely opposed to Maryland's proposed conservation equivalency action.

Sincerely,

Dave Bell
410-218-7713

From: ASMFC
To: Comments
Subject: [External] New public comment for 2025 Spring Meeting
Date: Thursday, May 1, 2025 8:39:30 AM

2025 Spring Meeting

Action Title
2025 Spring Meeting
Action URL
https://asmfc.org/events/2025-spring-meeting/
Name
Mark Brown
Email
safarigirlcharters@yahoo.com
State
Maryland
Comment

Dear Commissioners and Atlantic Striped Bass Management Board,

As a Maryland licensed fishing guide, I am writing to you regarding Maryland DNR's proposed conservation equivalency action to "reset the baseline" of Maryland's striped bass season.

This action includes expanding catch and release through April. In my view, this would be a reckless course of action while the Commission views the stock as overfished with poor recruitment. In my experience, fish drop their eggs after being fought and lifted from the water. We see anglers doing this frequently during the current catch and release seasons.

In 2024 Maryland closed May1-15 "out of an abundance of caution" when the majority of the female spawning stock has left the Bay. Now DNR is considering a complete reversal of regulations in April during the spawn. I fail to see how this makes any sense.

We have been repeatedly misled by DNR during the meetings considering this proposed "baseline change" that in order for fishing to resume May1-15, Maryland needs to reduce removals elsewhere during the season. After discussing this with Emile Franke, this doesn't appear to be true. It should be unnecessary to "pay back" a reduction that wasn't required under Addendum II.

If the board has to consider reductions with Addendum III, the proposed " Option 3 Modified" change to Maryland's season currently under consideration can't be a part of it in our view. Maryland hasn't allowed catch and release in April since 2019. How would the Commission's Plan Development Team make projections with no data from April for the past 5 years?

Finally, this is a conservation equivalency action under the guise of new terminology and is not permitted under Addendum II. It would undermine the public's confidence in the management process.

For these reasons I'm absolutely opposed to Maryland's proposed conservation equivalency action.

Sincerely,

Mark Brown
410-207-8362

From: ASMFC
To: Comments
Subject: [External] New public comment for 2025 Spring Meeting
Date: Wednesday, April 30, 2025 8:05:26 PM

2025 Spring Meeting

Action Title
2025 Spring Meeting
Action URL
https://asmfc.org/events/2025-spring-meeting/
Name
Captain. Robert Newberry
Email
rnewberry56@gmail.com
State
Maryland
Comment
I would like to address specific issues concerning striped bass management specifically items concerning Maryland.

Atlantic States Marine Fisheries Commission

May 1, 2025

Note: The bold and italicized text has been added following the Winter Meeting.

Discussion Paper on Declared Interests and Voting Privileges

Background

Fisheries management decisions at the Atlantic States Marine Fisheries Commission are primarily made through the use of species management boards. The voting membership of each management board is composed of the states, as well as the District of Columbia and Potomac River Fisheries Commission, with a declared interest in the fishery(ies) covered by the board[1]. The Commission has a series of documented procedures on voting practices, declared interests, and other provisions of board conduct. These procedures have largely been unchanged since the approval of the Atlantic Coastal Fisheries Cooperative Management Act in 1993. It's a healthy practice for deliberative bodies to review and, if needed, modify their procedures and guidelines,

This review was prompted by several circumstances. Climate change is affecting the distribution and residency of many species managed by the Commission, which in turn has resulted in (and is anticipated to result in additional) interest by states to alter their participation on one or more species boards. In addition, the mechanisms for conducting management board meetings have expanded in recent years, with the emergence of virtual and hybrid meetings (in addition to in-person). At present, the Commission has limited guidance on the use and operation of these different meeting formats. Guidelines should be developed to better manage future Commission meetings.

Issue 1. Declared Interests

States have an opportunity to declare an interest in a fishery to participate as a voting member of a management board (see Table 1. Declared Interests by Species). The ISFMP Policy Board reviews declared interest requests to determine the membership of each board. The Commission's Rules and Regulations include the criteria used to determine interest in a species, the criteria are:

(a) Such fish are found customarily in its territorial waters;

[1] Federal Partners such as NOAA Fisheries, can have a voting seat on a Board but they do not have to declare an interest in the fishery.

(b) Such fish are customarily or periodically in the territorial waters of such state for the purpose of spawning or in transit to and from spawning grounds; or

(c) The citizens of the state are recorded as having taken 5 percent or more of the total Atlantic coast catch of the species of fish in any of the five preceding years.

The Policy Board has generally accepted requests for declared interest if the requesting state provides basic evidence to support their request.

The Policy Board provides primary oversight of the Commission's fisheries management process and species management boards. Some decisions made by a species boards are recommendations to the Policy Board, such as approvals of Amendments or letters. The same votes that are made at the species board level are then made at the Policy Board level.

Discussion Questions

1. Should the declared interest criteria be modified or further defined?
2. Are changes needed for the Policy Boards' review process for declared interest requests?
3. Should Policy Board voting privileges change as an oversight body of species boards?
4. ***Should criteria (c) be modified or removed from the list?***
5. ***Should declared interests be reviewed and reaffirmed on regular intervals?***

Issue 2. Voting Privileges

The ISFMP Charter states: "Each state with an interest in the fishery covered by the management board shall be a voting member". The Charter does not provide further guidance on voting privileges for states with a declared interest. Four topics for further discussion were raised at the Executive Committee meeting in October 2024.

1. Voting privileges for *de minimis* states
2. Voting privileges by stock unit of a species
3. Voting privileges for states outside the management unit defined in the FMP
4. Voting privileges for states on boards that manage multiple species

Issue 2.1. Voting privileges for *de minimis* states

De minimis [2]states that are members of a management board are currently able to vote on any issues before the board (see Table 2. *De minimis* States by Species). With the changing species

[2] *De minimis* is when fishing activity is so small in a state that its actions regarding a particular fish stock are considered to have a negligible impact on conservation.

distributions, some boards have an increasing number of member states that have *de minimis* status.

Discussion Questions

1. Are changes needed for voting privileges of *de minimis* states?
   (Note: During the February Executive Committee discussion it was suggested that no changes are needed related to de minimis voting.)

Issue 2.2 Voting privileges by stock unit of a species

Many of the Commission-managed species are assessed and managed by stock units that are smaller than the management unit included in the FMP (see Table 3. Stock Units by Species). For example, horseshoe crab's species range extends from Maine through Florida and the stock is divided into four stock units (Northeast, New York, Delaware Bay, and Southeast). The current practice is for all members of a species board to vote on all stock units, rather limiting voting to only stock units off of their coast. The approach is generally used to foster consistency in management throughout the range of a species, as well as to account for mixing of stock units that often occurs at state borders.

Discussion Questions

1. Should voting privileges be modified for species with multiple stock units?

Issue 2.3 Voting privileges for states outside the management unit defined in the FMP

Given the distribution changes of many Commission-managed species, the management units defined in the FMPs may not align with the states with declared interests. For Example, the Atlantic Migratory Group Cobia management unit extends from the Florida-Georgia border through New York. However, due to recreational and commercial catches of cobia in Rhode Island, the Policy Board approved their request for a declared interest in cobia. The current stock distributions have created unique circumstances the Commission will need to consider.

Discussion Questions

1. When should management units in FMPs be adjusted to reflect changes in distribution?
2. Should voting be limited to states within the management unit?

Issue 2.4 Voting privileges for states on boards that manage multiple species

The Commission has a number of boards that manage multiple species. The states with declared interests can vary by species under the management of a single board. For example, the Summer Flounder, Scup and Black Sea Bass Board manages three species. The range of declared interests is not consistent for all three species (See Table 1. Declared Interests).

Discussion Question

1. What should the voting privileges be for multi-species boards?

Issue 3. Virtual and Hybrid Meeting Participation

The Commission adapted to the COVID pandemic by conducting its business virtually. Fortunately, the Commission is now able to meet in-person, but has retained the option to conduct fully virtual meetings or provide a virtual participation option for in-person meetings ("hybrid meetings"). The Commission does not have guidelines on the conduct of hybrid or virtual meetings. Overall, the hybrid meeting process has worked well, but guidelines may be helpful to ensure a consistent approach across all meetings.

Discussion Questions

1. Should Commissioners be able to fully participate (e.g., make motions, vote) virtually if the meeting is held in-person?
2. How should the Commission handle factors outside of its control that impact board member participation? These factors could include weather events, travel issues, or illness. Does it matter by which mechanism the meeting is occurring?
3. What criteria should be used to cancel or postpone meetings if Commissioners are unexpectedly not able to participate?
4. Should Commissioners be expected to participate in-person unless there are extenuating circumstances?
5. Are there protocols that the Board chair could follow to identify Board members who are participating in the deliberation remotely – or are present and not serving on the Board (e.g. being represented by a proxy who is present).

Motion Approved by the ISFMP Policy Board on February 5, 2025

"Move for meetings where the whole of a state delegation cannot attend in person a meeting for reasons beyond their control, the delegation may request to the executive director, commission chair, and board chair, for a postponement of a particular action for consideration at the next scheduled regular meeting or out of cycle meeting."

Table 1. Declared Interest by Species as of February 2024

	ME	NH	MA	RI	CT	NY	NJ	PA	DE	MD	DC	PRFC	VA	NC	SC	GA	FL	NMFS	USFWS	Councils
Managed Species																				
American Eel	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	
American Lobster	*	*	*	*	*	*	*		*	*			*					*		
Atlantic Herring	*	*	*	*	*	*	*											*		NEFMC
Atlantic Menhaden	*	*	*	*	*	*	*	*	*	*		*	*	*	*	*	*	*	*	
Atlantic Striped Bass	*	*	*	*	*	*	*	*	*	*	*	*	*	*				*	*	
Atlantic Sturgeon	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	
Bluefish	*	*	*	*	*	*	*		*	*		*	*	*	*	*	*	*		
Coastal Sharks			*	*	*	*	*		*	*			*	*	*	*	*	*		
Horseshoe Crab			*	*	*	*	*		*	*		*	*	*	*	*	*	*	*	
Jonah Crab	*	*	*	*	*	*	*		*	*			*					*		NEFMC
Northern Shrimp	*	*	*																	
Shad & River Herring	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	
Spiny Dogfish	*	*	*	*	*	*	*		*	*			*	*				*		
Tautog			*	*	*	*	*		*	*			*					*		
Weakfish				*	*	*	*		*	*		*	*	*	*	*	*	*		
Winter Flounder	*	*	*	*	*	*	*											*		
Summer Flounder, Scup and Black Sea Bass Board																				
Summer Flounder			*	*	*	*	*		*	*		*	*	*				*		
Scup			*	*	*	*	*		*	*			*	*				*		
Black Sea Bass		*	*	*	*	*	*		*	*		*	*	*				*		
Coastal Pelagics																				
Cobia				*		*	*		*	*		*	*	*	*	*	*	*		SAFMC
Spanish Mackerel				*		*	*		*	*		*	*	*	*	*	*	*		SAFMC
Sciaenids Board																				
Atlantic Croaker							*		*	*		*	*	*	*	*	*	*		
Black Drum							*		*	*		*	*	*	*	*	*	*		
Red Drum							*		*	*		*	*	*	*	*	*	*		
Spot							*		*	*		*	*	*	*	*	*	*		
Spotted Seatrout							*		*	*		*	*	*	*	*	*	*		
Total # of Species	12	13	18	20	18	19	25	5	23	23	4	17	23	20	15	15	15	23	7	

Table 2. *De minimis* states and management unit by board and species

Board	Management Unit	Current *De minimis* States
American Eel	ME-FL	NH, MA, PA, DC, GA
American Lobster and Jonah Crab		
American Lobster	ME-NC	DE, MD, VA
Jonah Crab	ME-VA	DE, MD, VA
Sciaenids		
Atlantic Croaker	NJ-FL	Com: NJ, SC, GA; Rec: NJ
Black Drum	NJ-FL	None
Red Drum	NJ-FL	NJ, DE
Spot	NJ-FL	NJ, DE, GA
Spotted Seatrout	NJ-FL	NJ, DE
Atlantic Herring	ME-NJ	NY
Atlantic Menhaden	ME-FL	PA, SC, GA, FL
Atlantic Striped Bass	ME-NC	None
Atlantic Sturgeon	ME-FL	?? None, NA?
Summer Flounder, Scup, Black Sea Bass		
Black Sea Bass	ME-NC	N/A
Scup	ME-NC	DE
Summer Flounder	ME-NC	DE
Bluefish	ME_FL	ME, SC, GA
Coastal Sharks	ME-FL	MA
Coastal Pelagics		
Cobia	RI-NJ, DE-MD, PRFC-GA (excluding CT)	Com: RI, NJ, DE, MD, GA, FL; Rec: RI, NY, NJ, DE, MD, FL
Spanish Mackerel	NY-FL	RI, NJ, DE, GA
Horseshoe Crab	ME-FL	SC, GA, FL
Northern Shrimp	ME-MA	N/A
Shad & River Herring	ME-FL	Shad: ME, NH, MA, FL River Herring: NH, GA, FL
Spiny Dogfish	ME-FL	NY, DE
Tautog	MA-FL	DE, MD
Winter Flounder	ME-DE	Com: NJ
Weakfish	MA-FL	MA, GA, FL

Table 3. Management unit and stock units by species

Species	Management Unit	# of stock units	Stock Units
American Eel	ME-FL	1	ME-FL
American Lobster	ME-NC	2	GOM/GBK (ME-RI), SNE (MA-MD,VA)
Atlantic Croaker	NJ-FL	1	NJ-FL
Atlantic Herring	ME-NJ	1	ME-NJ
Atlantic Menhaden	ME-FL	1	ME-FL
Atlantic Striped Bass	ME-NC	1	ME-NC
Atlantic Sturgeon	ME-FL	5	Gulf of Maine, New York Bight, Chesapeake Bay, Carolina, South Atlantic
Black Drum	NJ-FL	1	NJ-FL
Black Sea Bass	ME-NC (north of Cape Hatteras)		ME-NC (north of Cape Hatteras)
Bluefish	ME-FL	1	ME-FL
Coastal Sharks	ME-FL	By species	
Cobia	RI-NJ, DE-MD, PRFC-GA (excluding CT)	1	RI-GA
Horseshoe Crab	ME-FL	4	NE (ME-RI), New York (CT-NY), Delaware Bay (NJ-VA), SE (NC-FL)
Jonah Crab	ME-VA	4	Inshore GOM & Offshore GOM (ME-MA), Inshore SNE & Offshore SNE (MA-VA)
Northern Shrimp	ME-MA	1	ME-MA
Red Drum	NJ-FL	2	Northern (NJ-NC) and Southern (SC-FL)
Scup	ME-NC (north of Cape Hatteras)	1	ME-NC (north of Cape Hatteras)
Shad & River Herring	ME-FL	1	ME-FL
Spanish Mackerel	NY-FL	1	RI-FL
Spiny Dogfish	ME-FL	1	
Spot	NJ-FL	1	
Spotted Seatrout	NJ-FL	NA	NA
Summer Flounder	ME-NC	1	ME-NC
Tautog	MA-FL	4	MARI (MA-RI), LIS (CT-NY), NJ-NYB (NY-NJ), DelMarVa (DE-MD, PRFC-VA)
Weakfish	MA-FL	1	MA-FL
Winter Flounder	ME-DE	2	GOM (ME-MA); SNE/MA (MA-DE)