

James Boyle

From: juliekazz@comcast.net
Sent: Friday, August 1, 2025 9:22 AM
To: James Boyle
Subject: [External] Public Comment ASMFC August 2025

August 1, 2025

To the Board of the ASMFC as a submission to the public comment to the Menhaden Management Board.

The Chesapeake Bay is in crisis. This has been ongoing as menhaden stores have been grossly depleted after years of mis-regulation of the largest estuary on the continent.; the Chesapeake Bay.

The crisis has reached the apex predator of the Bay, the osprey. Osprey, **unlike** Bald eagles, rely solely on fish to survive. Osprey have now reached an unsustainable level of breeding. There are not menhaden available to feed them or their offspring. Chicks are dead in the nests up and down the Chesapeake Bay. Osprey breeding in the Bay has been studied for > 40 years. The trend is clear. Osprey will disappear from the Bay if purse seine nets are not removed from the Bay.

Osprey are dead and dying. Menhaden are being taken from Virginia, by a Canadian company to feed Canadian farm-raised fish.

Help me understand why it is allowed for a foreign country to take US fish out of US waters to feed Canadian fish and supplement Canadian wealth?

Not only is the entire ecosystem of the Chesapeake Bay being destroyed, but the financial balance of the Eastern shore of Virginia and other Bay- surrounding communities are collapsing. Virginia Osprey numbers are now in more distress than during the height of DDT in 1964, This is not acceptable.

Virginia is the only state on the east coast to allow purse seine net fishing. Virginia is the only state in the US to see a decimation of Osprey.

Remove purse seine fishing from the Chesapeake Bay. The data is there. Make the correct decision for the environment and the Commonwealth of Virginia.

Respectfully,

Julie V. Kacmarcik
Conservation Chair
Richmond Audubon
804-691-0570

James Boyle

From: Roberta Kellam <Roberta.Kellam@outlook.com>
Sent: Thursday, July 31, 2025 3:53 PM
To: James Boyle
Subject: [External] [New] Menhaden/Osprey Public Comment

Dear Sir: Please submit this public comment to the Menhaden Management Board of the Atlantic States Marine Fisheries Commission

July 31, 2025

My name is Roberta Kellam and I live in Northampton County, Virginia, on the Eastern Shore of Virginia, and I have been volunteering as an osprey watcher for the osprey breeding studies for the past couple of years. I am writing because I'm afraid that we are in an unprecedented crisis with osprey that has now surpassed the worst years of the DDT era. I believe that the breeding osprey population will be rapidly extirpated from the Chesapeake Bay if this Board does not take urgent action.

Nassawadox Creek where I live has always supported about 25 nesting pairs of ospreys (and 2 bald eagle nests). I am an avid bird photographer and I noticed persistent nest failures 7 or 8 years ago. My concerns led me to Dr. Watts at the College of William and Mary and his osprey studies.

This year, we were optimistic when we found 25 nests with eggs in early Spring; with males actively fishing and females incubating, it appeared that all was progressing normally. During the third week of May, 80% of the active nests were abandoned. My observation was that males did not return to the nest with fish for days and the females were begging yet not getting a response; finally leaving to find food. When we surveyed the nests in late May, we found dozens of abandoned eggs and chick carcasses. This seems to confirm that there was no predation. Notably we did not see bald eagles or any schools of menhaden. At our last survey, we confirmed the survival of only 6 chicks.

This year is shaping up to be even worse than last year for the osprey all over the saline part of the Bay. Dr. Watts sent me the survey results for the Urbanna, Virginia study area today – 46 breeding pairs and only 3 chicks survived. According to Dr. Watts, we are also seeing a drastic crash on the seaside of the Eastern Shore of Virginia, where active nests went from 83 to now only 9 -this is along the entire 75 mile long seaside of the Eastern Shore. This is an ecological crisis of a magnitude that I believe none of us have seen in our lifetimes, for any species. Observing the creeks when the ospreys have just vanished with their eggs and chicks left behind is shocking. I am hoping that your Board will now act to address what appears to be a catastrophic deficit in what used to be an adequate fish population to support breeding osprey in the Chesapeake Bay. The exact causes of the lack of menhaden and other fish are not important right now; we know that menhaden have always been critically important to osprey. The Menhaden Management Board has the opportunity to do something to relieve some stress on what is clearly a struggling ecosystem. Please take action at your August 7 meeting to initiate an addendum.

Sincerely,

Roberta Kellam

PO Box 205

Franktown, VA 23354

From: [Chris Tilghman](#)
To: [Info \(ASMFC\)](#)
Subject: [External] [New] Menhaden/Omega Protein
Date: Thursday, July 31, 2025 10:13:47 AM

Please stop the overfishing of Menhaden in the Chesapeake Bay and near shore Atlantic coastal waters.

As an avid fisherman and captain, with a marine science background, and years of observing the results and impacts to the lower Chesapeake Bay due to over harvest, I say enough is enough!

Capt. Chris Tilghman

Sent from my iPhone

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August 1, 2025

James Boyle
Menhaden FMP Coordinator
Atlantic States Marine Fisheries Commission
1050 N. Highland St.
Suite 200 A-N
Arlington, VA 22201

RE: Initiating Addendum II to Amendment 3 of the Menhaden Interstate Fisheries Management Plan

Dear Mr. Boyle and Members of the Menhaden Management Board:

The undersigned organizations represent conservation, recreational fishing, commercial fishing, tourism, and boating interests throughout the Atlantic coast. Despite our broad geographic range, we are united in our deep concern for the health of the Chesapeake Bay. We understand how critical a healthy forage base, particularly regarding menhaden, is for the Bay and Atlantic coast ecosystems. Unfortunately, warning signs for the health of the Chesapeake Bay continue to mount – menhaden fishermen are failing to meet their quotas, striped bass and other species are wavering, and changing environmental conditions are making Bay health and water quality more challenging and unpredictable.

The Bay's menhaden bait fisheries are primarily executed using small-scale, stationary gears deployed in the same areas year over year, providing glimpses into the availability of menhaden in the Bay. CPUE data from the Potomac River Fisheries Commission and Maryland pound net fisheries have shown steep declines in menhaden harvest over the past 3 years, leaving local bait and tackle shops without fresh bait and forcing commercial crabbers to travel hundreds of miles looking to purchase menhaden for bait. In 2024, Maryland landed less than 10% of its meager 2,705 mt quota.

But the impacts due to a lack of menhaden availability reach beyond commercial harvesters. Virginia charter captains have described the Bay this spring and early summer as being completely devoid of menhaden, particularly in the lower Bay. When menhaden schools began their ingress into the Bay in early July, the industrial reduction fleet was quick to intercept the schools near the mouth of the Bay. Additionally, these same charter captains have observed a smaller/younger age structure of menhaden throughout Virginia's portion of the Bay—few fish are greater than 5" in length. Historically, industry arguments pointed out that the reduction fishery targeted a larger, oilier fish than is typically preyed upon by predators or harvested for bait. We are concerned that the reduction fishery's selectivity may be shifting towards younger, smaller menhaden due to the current availability in the Bay, which could produce other ecological and economic impacts.

Since the Board last took action on menhaden management in Chesapeake Bay in 2017, the Bay has experienced record rainfall, extreme drought, marine heat waves, and record-breaking hypoxic events. We recognize that these impacts are beyond the control of this Board and the Commission. But they are not beyond your consideration. Recognizing these changes and the impacts they are likely having on menhaden migration, survival, and reproduction, and acting in a precautionary manner to buffer against these effects, is entirely within the authority of the Board and the directive of the menhaden FMP.

We recognize that these observations and lived experiences may be difficult to reconcile with the Atlantic menhaden's current stock status according to the Commission's assessments. However, we have no choice but to rely on these local anecdotes and observations, because the recommended menhaden scientific studies in the Chesapeake Bay have not been funded due to political influences. That is precisely why this evidence warrants the attention of this Board. While the root cause may not be known, and is likely multi-faceted, the ecosystem context of menhaden management in Chesapeake Bay is clearly changing, and how to address such changes is deserving of further consideration by the Board.

We urge the Board to initiate an addendum to explore additional precautionary management approaches for the Chesapeake Bay menhaden reduction fishery.

Rapidly changing conditions threaten the health of this critical estuary that supports so many commercially and recreationally important fisheries. The reasons why menhaden population dynamics are changing do not matter; the principles of precautionary management are perfectly applicable and should guide this Board. Menhaden are foundational to a healthy Chesapeake Bay ecosystem, and the only management tool presently available to address broader ecosystem concerns is to reduce directed menhaden fishing pressure in the Bay. We implore this board to initiate Addendum II to Amendment 3 at the Summer ASMFC Meeting and begin developing alternatives that provide relief for the struggling Chesapeake Bay.

Sincerely,

Will Poston
Forage Campaign Manager
Chesapeake Bay Foundation

Chris Macaluso
Director of Fisheries
Theodore Roosevelt Conservation Partnership

Mike Waine
Atlantic Fisheries Policy Director
American Sportfishing Association

Kate Wilke
Mid-Atlantic Seascape Director
The Nature Conservancy

Jason Schratwieser
President
International Game Fish Association

Chad Tokowicz
Government Relations Manager
Marine Retailers Association of Americas

Steve Atkinson
Chairman
Virginia Saltwater Sportfishing Association

Mike Wissel
Chairman
Coastal Conservation Association-MD

Rob Allen
Chairman
Coastal Conservation Association-VA

Greg Jacoski
Executive Director, Research and Policy
Guy Harvey Foundation

Rob Kramer
President
Wild Oceans

Brett Fitzgerald
Executive Director
Angler Action Foundation