

This form letter was submitted by an additional 538 individuals from 5 PM October 21 - 10 AM October 24

James Boyle

From: dylansleter1999@everyactioncustom.com on behalf of Dylan Sleter <dylansleter1999@everyactioncustom.com>
Sent: Friday, October 24, 2025 9:58 AM
To: Comments
Subject: [External] For MMB Distribution: Setting Specifications for the 2026-2028 Fishing Years

Dear ASMFC Menhaden Management Board,

I'm writing to urge you to maintain the integrity of the Ecological Reference Point (ERP) framework for Atlantic menhaden. To uphold your commitment to science-based, precautionary management, I respectfully ask you to:

- Adopt the updated ERP values from the 2025 stock assessment.
- Set the 2026–2028 Total Allowable Catch (TAC) at a level with less than a 50 percent probability of exceeding the new ERP F target.
- Initiate an addendum to address Chesapeake Bay management to avoid concentrating half of the entire coastwide menhaden quota inside the ecologically and economically important Bay ecosystem.

These decisions will help balance economic and ecological priorities, safeguard predator populations like striped bass, and uphold the integrity of ecosystem-based fisheries management along the Atlantic coast.

Thank you for your consideration.

Sincerely,
Dylan Sleter
York, PA 17404
dylansleter1999@gmail.com

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James Boyle

From: Clifford Baker <user@votervoice.net>
Sent: Friday, October 24, 2025 7:12 AM
To: Comments
Subject: [External] Cut Atlantic Menhaden Quota by 54%

Dear FMP Coordinator Boyle,

As a recreational angler on the Atlantic coast, I am writing to urge the Menhaden Management Board to adopt science-based, equitable management measures that reflect the 2025 benchmark assessments and the Technical Committee's projections.

Recreational fishing is more than just a pastime—it is a cultural tradition and an economic powerhouse for our coastal communities. The Atlantic striped bass fishery alone generates nearly \$13 billion annually, supports over 100,000 jobs, and sustains thousands of businesses that depend on healthy coastal ecosystems.

The latest science shows that under current harvest levels, menhaden are being overexploited at a rate that leaves predator species like striped bass without the forage they need to recover and thrive. However, industrial menhaden harvest continues to rise, threatening both recreational fisheries and the livelihoods tied to it.

That's why I strongly urge the Board to:

- 1) Adopt the updated Ecological Reference Point (ERP) values, including an ERP fishing mortality target of 0.15 and threshold of 0.46 and the corresponding fecundity reference points; and
- 2) Set the 2026–2028 Total Allowable Catch (TAC) at no greater than 108,450 metric tons—a level consistent with peer-reviewed science and ecosystem-based management.

This is not just about managing one species—it's about protecting the integrity of the entire ecosystem, ensuring fair treatment across fisheries, and safeguarding the economic and cultural value of recreational fishing for future generations.

The recreational community has made difficult sacrifices to conserve striped bass. Now we call on you to show reciprocal leadership by managing menhaden responsibly, within the bounds of the best available science. Our fisheries, our communities, and our way of life depend on it.

Sincerely,

Clifford Baker

35 Leonard Rd

Butler, NJ 07405

xarlesbarkley@me.com

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This form letter was submitted by 41 individuals.

James Boyle

From: Mark Piper <mpiper1123@roadrunner.com>
Sent: Friday, October 24, 2025 9:02 AM
To: James Boyle
Subject: [External] Atlantic menhaden quota

To: James Boyle, Menhaden FMP Coordinator

Dear Commissioner,

I am writing to urge the Commission to reject the proposed 55% reduction in the Atlantic menhaden quota. This drastic cut is not supported by science and would cause serious economic harm to menhaden crews, bait-dependent fisheries such as lobster and crab, and the working waterfronts that sustain our coastal economies.

Atlantic menhaden are not overfished, and overfishing is not occurring. The fishery has earned Marine Stewardship Council certification, confirming that it is sustainable and responsibly managed. The current Total Allowable Catch (TAC) already limits harvest to a level that ensures long-term stock health.

A 55% quota reduction would not meaningfully improve conservation outcomes but would devastate communities across the Atlantic coast that rely on menhaden for bait and income. The ASMFC should instead follow federal best practices—preventing overfishing while also considering the economic and community impacts of its decisions.

The ASMFC's own risk policy allows managers to weigh social and economic factors for sustainably managed stocks such as menhaden. Ignoring those factors now would contradict both sound management principles and the April 17, 2025, Executive Order on Restoring American Seafood Competitiveness, which calls for reducing unnecessary regulatory burdens and supporting the U.S. seafood supply chain.

I urge the Commission to adopt a fact-based, modest quota reduction of no more than 10%—a balanced, science-driven approach that protects both the resource and the people who depend on it.

Thank you for considering these comments and for supporting sustainable, community-focused fisheries management.

Sincerely,

Mark Piper

Hancock, Maine

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October 24, 2025

James Boyle - FMP Coordinator
Atlantic States Marine Fisheries Commission
1050 N Highland Street, Suite 200
Arlington, VA 22201

RE: ASGA Comments for Immediate Menhaden Action in Atlantic and Gulf

Mr. Boyle, ASMFC Menhaden Board Members, LWFC Members and Public Officials,

The American Saltwater Guides Association (ASGA) represents conservation-minded fishing guides, private anglers, and fishing businesses who advocate for "Better Business through Conservation." Our Association is deeply concerned by errors in the previous assessment update for Atlantic Menhaden which have the potential to reverberate on two coasts.

In the Atlantic:

A tremendous error occurred in the stock assessment. Improved science shows us that the natural mortality (M) estimate used in the 2019 Atlantic Menhaden assessment ($M = 1.17\text{yr}^{-1}$) drastically overshot the average historic M estimate ($M = 0.51\text{yr}^{-1}$) by over two times, despite all using the same dataset. By using the positively biased M estimate in the 2019 assessment, M was inaccurately assumed to be much greater than it truly was, resulting in an extreme overestimation of available Atlantic Menhaden biomass. This ultimately means far fewer menhaden are present in the Atlantic than previously assumed. Consequently, an additional countereffect of M being overestimated is that fishing mortality (F) has a much greater effect on the Atlantic Menhaden population than estimated in the 2019 assessment. Furthermore, four flaws were found in a large-scale tagging study including, underreporting fishing effort by 33.5%, 28% of tags not included, tag recovery efficiency was overstated, and tag reporting underreported by 13%. This all adds up to what fishermen have been saying for years, far too many menhaden are being removed from the ecosystem.

The current information corrects these errors and requires a 55% reduction in the Total Allowable Catch (TAC) for the Atlantic. The menhaden fishery has not caught their quota in recent years. In 2023, they fell 22.2% short of the TAC. In 2024, they were 29.4% below the TAC. Any reduction of less than 30% will save zero fish. On paper, the 55% reduction looks daunting, but this action will only result in a 34% reduction in harvest.

The reduction must be taken at the Menhaden Management Board meeting on October 28, 2025. The implications of these decisions will alter industry from Maine to Louisiana. Our community relies on abundant oceans, and so we ask for the following:

- An immediate reduction in the TAC from 233,550mt to 108,450mt.
- The TAC has increased by 27% with 4 separate increases since 2013. None of the increases were "phased in". There is no reason to not take the entire reduction at once. If managers can instantaneously grant the right to harvest more, they can do the same to harvest less!
- We recommend that the Board initiate an addendum to address reallocating the catch from the reduction to the bait fishery
- In 2022, USFWS and NOAA Fisheries voted twice in support of a more-conservative TAC, even when relevant data painted a brighter picture. In the face of extremely concerning data updates

showing a depleted fishery, we urge federal representatives to maintain that conservative mindset with their voting.

In the Gulf of America:

On November 6th, the Louisiana Wildlife and Fisheries Commission will meet and consider initiating a Notice of Intent to open closed areas (buffer zones) to the reduction fishery.

Recreational anglers in Louisiana have supported new restrictions on redfish, speckled trout, and flounder in recent years. The buffer zones were the only limitation on a menhaden fishery that harvests approximately a billion pounds of menhaden per year with no upper limits. This cannot continue. We all share the resource. The bias on regulations is tangible and undeniable. Louisiana is working towards adopting the Ecosystem Based Fisheries Management model from the Atlantic. Members of ASGA worked on EBFM for years. We hope Gulf managers can learn from the tremendous mistakes made in the Atlantic. Reductions in the harvest of menhaden in the Atlantic could result in increased effort and landings in the Gulf if precautionary action is not taken.

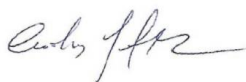
With extreme concerns about the fallout of pending action in the Atlantic, we call on Gulf managers for the following:

- Maintain existing area closures (buffer zones). Consider the expansion of the buffer zones to include time and area closures to protect spawning aggregations of fishes, including species of high recreational importance.
- Establish an annual quota (Total Allowable Catch) for the Gulf menhaden fishery averaging the last five years of harvest. This quota can be reevaluated after the next gulf menhaden benchmark stock assessment.
- Implementation of standardized extruder devices on reduction fleet ships to minimize bycatch, as per the most recent bycatch study.
- We strongly suggest a review of the offshore shrimp fishery as the bycatch of adult redfish is 5 to 10 times that of the menhaden reduction fleet.

The cascading impacts of removing billions of forage fish from our oceans are still not fully understood. The ecosystem has needs and menhaden are a critical link between photosynthesis and protein for predatory animals. Fisheries managers tend to push fisheries too far and then struggle to rebuild. Menhaden are a foundational component of the food web and outdated, reactive management approaches will have cascading effects throughout our oceans. We cannot afford any more mistakes and must take the reductions in the Atlantic while implementing guardrail management in the Gulf.

Please Note: This letter is being submitted on Friday, October 24, 2025, due to the extremely short timeline between the release of this news and deadline for inclusion in documents. ASGA will be submitting a copy of this letter signed by thousands of participants from our "Call to Action" directly to managers and public officials in the coming days.

On Behalf of the ASGA Community,



Tony Friedrich
President & Policy Director
tony@saltwaterguidesassociation.org



CHESAPEAKE BAY FOUNDATION
Saving a National Treasure

October 24, 2025

James Boyle
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 N. Highland Street
Suite 200 A-N
Arlington, VA 22201

RE: Atlantic Menhaden Fishery Specifications and Chesapeake Bay Addendum

Submitted via email only to: comments@asmfc.org

Dear Mr. Boyle,

On behalf of our approximately 200,000 members, the Chesapeake Bay Foundation (CBF) appreciates the opportunity to provide comments ahead of the pivotal October 28th Atlantic Menhaden Management Board Meeting. For more than two decades, CBF has advocated for precautionary science-based management of Atlantic menhaden, recognizing the invaluable role this forage fish plays within the Chesapeake Bay's ecosystem and along the Atlantic coast. Thanks to the leadership of this Board, Atlantic menhaden management has advanced significantly since the implementation of the first coastwide quota in 2012 through the adoption of ecological reference points (ERPs).

CBF strongly supported the implementation of ERPs in menhaden management, and we continue to applaud that decision as one of the most on the most significant advancements to fisheries management in the United States. Like any scientific process, however, the ERP framework has and will be continuously improved with new science and data.

The 2025 ERP and single-species assessments implement noteworthy data updates, including a revised estimate of natural mortality (M). This new, lower M reflects more than a year of robust scrutiny and the best available science. This data update resulted in a biomass estimate nearly 40 percent lower than the previous assessment. Further, the terminal year 2021 biomass estimate that informed 2023-2025 specifications estimated to be 60 percent lower in the 2025 assessments, implying the 233,550 mt TAC and its associated risk probability estimates were overly optimistic. As a result, Technical Committee TAC projections with a 40-60 percent probability of exceeding the ERP F target as requested by the Board for 2026-2028 are substantially lower than the current TAC,

ranging from 52.5-54.6 percent lower than the current TAC. Major catch reductions are needed to ensure fishing rates from 2026-2028 do not exceed the ERP F target.

According to the current ERP definition, catch limits that are expected to exceed the ERP F target may not provide enough menhaden to support the full suite of predators in the ecosystem. Though striped bass are the focal species of the ERP definition, they are a proxy for the more than 30 species included in the NWACS-MICE model. Some of those species, specifically osprey, have been suffering from lack of forage availability in tidal reaches of the Chesapeake Bay; therefore, maintaining menhaden biomass at ERP target levels is critical to ensuring ERPs achieve their intended function. Accordingly, the Board has a responsibility to set a TAC with no more than 50% probability of exceeding the ERP F target. Deviations from managing menhaden to the ERP F target threaten the Atlantic coast ecosystem and undermine the conservative management approach of this Board.

CBF supports the selection of a 2026-2028 TAC that maintains a no more than 50 percent probability of exceeding the ERP F target, a practical standard within fishery management and one to which this Board has committed. This results in a 2026-2028 TAC of 108,450 mt, which is a significant yet necessary reduction to coastwide removals to support a productive ecosystem.

While the 108,450 mt TAC is informed by the best available science and will support marine ecosystems, it would create an untenable situation in the Chesapeake Bay unless action is taken to modify the Chesapeake Bay Reduction Fishing Cap. In the scenario that the Board approves the standard 50 percent TAC—108,450mt—nearly half of total menhaden removals could come from the struggling Chesapeake Bay estuary. Even if the Board selects a reduction less than 54%, reducing the coastwide TAC without a commensurate decrease in the Chesapeake Bay reduction fishing cap would significantly increase the relative proportion of the overall quota that could be removed from Virginia waters of the Chesapeake Bay.

CBF strongly urges the Board to initiate Addendum II to the Atlantic Menhaden Fishery Management Plan to consider modifying the Chesapeake Bay Reduction Fishing Cap along with other management strategies identified in the Chesapeake Bay Precautionary Management Work Group Report.

The Chesapeake Bay continues exhibiting intense signs of stress—osprey productivity is cratering in the saltier portions of the Bay where menhaden historically were the primary prey item, small-scale menhaden fisheries are seeing catch declines, striped bass are struggling to rebuild amid seven consecutive years of poor spawning, and pollution and

habitat challenges worsen with climate change. While there have been warning signs for the health of menhaden in the Chesapeake Bay for several years, those warning signs are now present along the coast borne through the 2025 stock assessments.

Given the robust nature of the ERP science, CBF implores the Board to approve a 2026-2028 TAC that maintains a 50 percent probability of not exceeding the ERP F target and initiate an addendum that considers further actions to protect the menhaden resource in Chesapeake Bay. Only through taking these strong, data-driven actions can the Menhaden Management Board reaffirm its commitment to ecosystem-based management and uphold the objectives of the Atlantic Menhaden FMP.

Sincerely,



Chris Moore
Virginia Executive Director
Chesapeake Bay Foundation



Will Poston
Forage Campaign Manager
Chesapeake Bay Foundation

cc: Alison Prost, Senior Vice President for Programs, Chesapeake Bay Foundation

James Boyle

From: CT Charter and Party Boat Association <ctcharterpartyassoc@gmail.com>
Sent: Wednesday, October 22, 2025 8:25 PM
To: James Boyle
Subject: [External] [New] Menhaden reduction

Dear Commissioners,

Before the science confirmed that menhaden had been overharvested, our captains already knew. The change was evident on the water. Common conversations among For-Hire Captains recalled that *“every harbor in Long Island Sound was filled with menhaden until 2019–2020.”* By 2021–2023, only the Connecticut River held some remaining schools. In 2024–2025, there were none. Birds and game fish starved or migrated elsewhere in search of food.

We are writing to express our **strong support for the proposed 55% reduction in the Atlantic menhaden harvest**—and to urge that this reduction be applied entirely to the **industrial reduction fishery**, Omega Protein, rather than to the traditional bait sector.

Menhaden are a **vital keystone species** in the Atlantic ecosystem. They are the foundation of the food web, serving as the primary forage for striped bass, bluefish, tuna, and many other prized game fish. Protecting their population is essential not only to maintain healthy recreational fisheries, but also to preserve the ecological balance of our entire marine environment.

Beyond their role as forage, menhaden provide an invaluable **ecosystem service** by naturally filtering our waters. A single adult menhaden can filter up to 30 gallons of water per hour, reducing excess nutrients and improving water quality in our bays and estuaries. At a time when coastal water quality faces increasing pressure, we cannot afford to lose this natural filtration capacity.

We strongly believe that the **full 55% reduction is necessary**, and it is equally critical that the **bait fishery not bear the burden**. Lobstermen, crabbers, and other small-scale fishermen depend on menhaden as bait to sustain their livelihoods. These fisheries are an integral part of coastal economies and have a far smaller ecological footprint than industrial reduction fishing.

In contrast, the vast majority of menhaden harvested today are taken by **Omega Protein** for use in animal feed and other non-essential products. This industrial operation removes hundreds of millions of pounds of menhaden from the ecosystem each year, providing minimal benefit to coastal communities while contributing to ecological collapse.

It is both fair and necessary that any harvest reductions be directed at the **industrial reduction sector**, not the local bait fishermen who use this resource responsibly and sustainably.

Thank you for your time, consideration, our livelihoods that depend upon it.

Respectfully,

Officers of the Connecticut Charter & Party Boat Association (CCPBA)

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James Boyle
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 N. Highland St. Suite 200
Arlington, VA 22201

Re: Specifications for Atlantic Menhaden 2026-2028 Fishing Years

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

On behalf of the Natural Resources Defense Council and the Conservation Law Foundation, we provide these brief comments urging the Menhaden Management Board (Board) to **establish a 2026-2028 total allowable catch (TAC) for the Atlantic menhaden fishery that has a *less than* 50% probability of exceeding the updated ecological reference point (ERP) fishing mortality rate target (0.151).**¹ Given updates to the best scientific information available that indicate recent overharvest of Atlantic menhaden, and broader concerns about the dire state of forage fish populations along the Atlantic coast (including depleted stocks of Atlantic herring, Atlantic mackerel, and river herring), the Board must take decisive action to reduce harvest and sustain the menhaden stock and coastal ecosystems and economies that rely on it.

As the Board is aware, the Atlantic Coastal Fisheries Cooperative Management Act (ACFCMA) requires the Commission to ensure that coastal fishery management plans “promote the conservation of fish stocks throughout their ranges and are based on the best scientific information available,” 16 U.S.C. § 5104(a)(2). Conservation is defined as “the restoring, rebuilding, and maintaining of any coastal fishery resource and the marine environment, in order to assure the availability of coastal fishery resources on a long-term basis.” 16 U.S.C. §§ 5102(4). Under the Interstate Fishery Management Plan (FMP) for Atlantic menhaden, the Commission must meet the following objectives, among others:

- Maintain the Atlantic menhaden stock at levels which sustain viable fisheries and support predators which depend on the forage base;
- Ensure sufficient menhaden spawning stock biomass to prevent stock depletion and recruitment failure; and
- Implement regulations based on the best available science and coordinate management efforts among the Atlantic coast jurisdictions.²

Pursuant to the FMP, the Commission uses ecosystem modeling and resulting ecological reference points to determine a TAC that considers both menhaden harvest and the needs of predators such as striped bass and bluefish (both of which are in rebuilding plans).³

¹Atlantic Menhaden Technical Committee and Ecological Reference Point Work Group, [Letter to Atlantic Menhaden Management Board](#) at p. 7, Table 3 (Oct. 9, 2025).

² Atlantic States Marine Fisheries Commission, [Atlantic Menhaden Amendment 3](#) at 29 (2017), <https://asmfc.org/resources/management-plan/atlantic-menhaden-amendment-3/>

³ *Id.* at 1-2.

The peer-reviewed SEDAR 102 2025 benchmark stock assessment, which represents the best scientific information available, showed a drastic 37% decline in average menhaden biomass (age 1+) compared to prior assessments, and provided the basis for reduced ERPs, including an ERP fishing mortality (F) target of 0.151, ERP threshold of 0.458, and corresponding fecundity reference points.⁴ In order to ensure that the F target is not exceeded, maintain the integrity of the ERP framework, and account for additional management and scientific uncertainty,⁵ we urge the Board to accept the new ERPs and set the 2026–2028 TAC at a level that ensures a probability ***below 50%*** of exceeding the F target.⁶ Only such action would be based upon the best available science and best meet the objectives of the Interstate Fishery Management Plan for Atlantic menhaden.

It is difficult to overstate the importance of menhaden to the health of the Atlantic coastal ecosystem and the vibrant marine economy it supports. Once so abundant that they may have exceeded the biomass of all other east coast fish stocks combined, menhaden still serve as the prey base for many commercially and recreationally important species, including striped bass, tunas, weakfish, and bluefish, as well numerous marine mammals, sharks, and seabirds.⁷ We appreciate the work of the Board and the Commission in managing this critically important stock, and urge you to act expeditiously on the best available science.

Thank you for the opportunity to comment on this critical decision. Please do not hesitate to contact us if you have any questions.

Sincerely,

Molly Masterton
Senior Attorney, Fisheries, Nature
Natural Resources Defense Council
Tel: 646-823-2371
Email: mmasterton@nrdc.org

Erica Fuller
Acting Vice President, Ocean Conservation
Conservation Law Foundation
Tel: 508-400-9080
Email: efuller@clf.org

⁴ Atlantic Menhaden Technical Committee and Ecological Reference Point Work Group, Letter to Atlantic Menhaden Management Board at 4 (Oct. 9, 2025); Atlantic States Marine Fisheries Commission, [2025 Atlantic Menhaden Stock Assessment Update](#) at 11(2025).

⁵ See [Letter to Atlantic Menhaden Management Board](#) at p. 3 (noting that “these projections do not incorporate any uncertainty around the ERP target and threshold values, because there is not a comprehensive, quantitative way to estimate that uncertainty in the current model framework.”).

⁶ *Id.* at p. 7, Table 3.

⁷ See Buchheister, A, et al., *Evaluating ecosystem-based reference points for Atlantic menhaden (Brevoortia tyrannus)*. 9 MARINE AND COASTAL FISHERIES 457, 467 (2017).



Massachusetts Lobstermen's Association, Inc.

8 Otis Place ~ Scituate, MA 02066
781.545.6984

October 23, 2025

Chair: John Clark (DE)
Atlantic Menhaden Committee,
Atlantic States Marine Fisheries Commission
1050 N. Highland Street, Suite 200 A-N
Arlington, VA 22201

Sent via: comments@asmfc.org

Subject: Comments Opposing Cuts to the 2026–2028 Atlantic Menhaden Total Allowable Catch (TAC)

Dear Chair and Members of the Atlantic Menhaden Management Board,

Table 2. Allocation of the coastwide Atlantic menhaden TAC by state, as set by Addendum I to Amendment 3.

State	Allocation (%)
ME	4.80%
NH	1.19%
MA	2.12%
RI	0.81%
CT	0.33%
NY	0.84%
NJ	11.00%
PA	0.01%
DE	0.27%
MD	1.17%
PRFC	1.09%
VA	75.21%
NC	0.37%
SC	0.25%
GA	0.25%
FL	0.29%

The Massachusetts Lobstermen's Association (MLA) respectfully submits the following comments on behalf of our 1,800 members in strong opposition to any proposed cuts to the 2026–2028 Total Allowable Catch (TAC) for the Atlantic Menhaden fishery.

Established in 1963, the MLA is a member-driven organization that recognizes and supports the balance between species conservation and the economic well-being of our fishing communities. The MLA continues to work collaboratively through the management process with the Massachusetts

Division of Marine Fisheries, the Atlantic States Marine Fisheries Commission (ASMFC), and the New England Fishery Management Council to ensure the sustainability and profitability of the marine resources upon which our fishermen depend.

The MLA **does not support** any reduction to the overall TAC for Atlantic Menhaden. The best available science confirms that the Atlantic Menhaden stock is **not overfished** and that **overfishing is not occurring**. Thousands of individuals employed in the Massachusetts commercial lobster and crab industries rely heavily on a consistent and affordable supply of Atlantic Menhaden for bait. Any further reduction to the TAC would cause significant negative economic impacts to an already challenged and marginalized industry.

Furthermore, the current TAC allocation system is deeply inequitable. There is a vast disparity between states—ranging from as little as **0.01% for Pennsylvania** to as much as **75.21% for Virginia**. Such an imbalance highlights the need for a comprehensive review and restructuring of the allocation system to ensure fair and equitable access among all states and fisheries that depend on this critical resource.

We urge the Commission to maintain the current TAC levels for the 2026–2028 period and to initiate a fair and transparent review of the allocation formula. Protecting both the sustainability of the Atlantic Menhaden population and the economic stability of dependent fisheries must remain central to the ASMFC’s management decisions.

Thank you for your consideration of these comments and for your continued commitment to science-based, equitable fisheries management.

Sincerely,

Beth Casoni

MLA, Executive Director



MAINE

Lobstermen's Association, Inc.

2 Storer Street, Suite 203, Kennebunk, ME 04043
207-967-4555 * www.maine lobstermen.org

Atlantic States Marine Fisheries Commission
Atlantic Menhaden Board
1050 N. Highland Street, Suite 200 A-N
Arlington, VA 22201

Transmitted via email to James Boyle IV, FMP Coordinator

October 22, 2025

Dear Chairman Clark and Menhaden Board Members:

The Maine Lobstermen's Association (MLA) writes to express our serious concern regarding the proposal to reduce the Total Allowable Catch (TAC) for Atlantic menhaden by as much as 55%. Reducing the quota by more than half would have significant and far-reaching negative impacts on Maine's lobster fishery and the coastal economy it supports. Given the stable landings and demonstrated health of the menhaden stock in the Northeast, the MLA strongly urges you to consider regionally sensitive strategies that meet fishing mortality targets while maintaining this essential bait for Maine's lobster fishery.

Maine's lobster fishery, comprised of more than 5,000 license holders, directly sustains more than 10,000 jobs and generates an estimated \$2 billion in economic activity annually. It is the economic backbone of our coastal communities. Yet lobstermen are already navigating numerous challenges, including an eight-year downward trend in lobster landings, steep increases in operating costs, and a looming suite of new federal regulations slated for 2028 intended to protect North Atlantic right whales. A sharp cut to the menhaden quota would be another major blow to a fishery already near its economic breaking point.

According to ASMFC data, 51,773 metric tons of menhaden were landed in 2024 for the bait fishery, with the majority of those landings occurring in the Northeast (Maine 24%, Massachusetts 11%, and New Jersey 42%). We urge you to carefully consider the cascading impacts that drastic reductions to the menhaden quota would have on the bait fishery, the bait market, and, consequently, Maine's lobster industry and coastal communities. Bait has become the single largest expense for Maine's lobster fleet, comprising up to 85% of daily operating costs. Reducing the menhaden quota would

further drive up those costs and threaten the economic viability of this diverse fleet of small businesses, all of which are owner-operators.

Historically, the Maine lobster fishery has relied on a consistent, local supply of fresh bait - primarily herring and menhaden. Herring served as the primary bait until 2018, when the 60,000 MT quota was reduced by more than 50%. As herring quotas have been reduced in subsequent years to less than 3,000 MT, menhaden landings in the Northeast have increased, filling the critical void and becoming the staple bait source for much of the fleet.

While the bait supply chain has made commendable efforts to source alternative frozen bait from both domestic and international markets, these options come at a cost. Many imported baits are subject to tariffs of up to 30%, and the limited freezer capacity needed for storage further drives up prices. As a result, maintaining a dependable supply of local menhaden is crucial to keeping bait affordable and accessible.

Maine's approximately 400 licensed menhaden fishermen, most of whom are also lobstermen, represent a vital link in this local supply chain. A reduction of up to 55% in the menhaden quota would disrupt bait access and eliminate an important supplemental income stream for lobstermen during slow lobster periods.

Importantly, the need to consider such drastic quota reductions appears to stem largely from changes in stock assessment model inputs rather than evidence of overharvest. There is a stark divergence in the results of the updated 2025 single-species assessment model compared to the updated 2022 model, namely, a near 60% decline in estimated abundance. This decline appears to reflect modeling adjustments rather than actual changes in stock health. Despite the 2025 model prediction that abundance is less than half of the previous estimate, under the current TAC, the new stock assessment determined that Atlantic menhaden are *not overfished* and that *overfishing is not occurring*. The Northeast portion of the stock has remained stable.

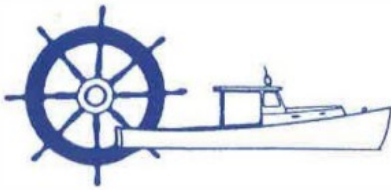
The MLA urges the Menhaden Board to thoroughly consider regionally sensitive strategies that maintain this essential bait supply for Maine's lobster fishery while meeting fishing mortality targets. Given the economic importance of menhaden to the lobster fishery, and the demonstrated health of the menhaden stock in this region, the MLA strongly urges the Board to minimize quota reductions for the Northeast.

Thank you for your attention to this critical issue and for your continued stewardship of the Atlantic menhaden resource.

Sincerely,

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

Patrice McCarron
Executive Director



**NEW HAMPSHIRE
COMMERCIAL FISHERMENS ASSOCIATION**
P.O. BOX 601, RYE, NH 03870

To: James Boyle, Menhaden FMP Coordinator

From: New Hampshire Commercial Fishermen's Association

The New Hampshire Commercial Fishermen's Association strongly urges the Commission to reject the proposed 55% reduction in the Atlantic menhaden quota. This drastic cut is not supported by science and would cause significant economic harm to bait-dependent fisheries—particularly our lobster industry—and to the working waterfronts that sustain New Hampshire's coastal communities.

Atlantic menhaden are not overfished, and overfishing is not occurring. The fishery has earned Marine Stewardship Council certification, affirming that it is sustainably and responsibly managed. Current management measures and the existing Total Allowable Catch already ensure long-term stock health and ecosystem stability.

In recent years, New Hampshire has experienced exceptionally strong local abundance of menhaden. Our state reached its initial allocation early and required multiple quota transfers from neighboring states—an extraordinary situation for a state with the smallest coastline and one of the fewest numbers of menhaden vessels. These facts demonstrate that the fishery is healthy and that management practices are working as intended.

A 55% reduction would not meaningfully improve conservation outcomes but would have devastating ripple effects on our region's fisheries and seafood economy. The ASMFC's risk policy allows managers to weigh social and economic considerations for sustainably managed stocks, and doing so is consistent with sound fisheries management and recent federal directives supporting seafood industry resilience and competitiveness.

We respectfully urge the Commission to adopt a balanced, science-based approach—no greater than a modest 10% adjustment if necessary—that sustains both the resource and the fishing communities that depend on it.

Thank you for considering our comments and for your continued commitment to responsible, community-focused fisheries management.

Sincerely,

Damon Frampton

President

New Hampshire Commercial Fishermen's Association

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Chesapeake Bay Foundation's Menhaden Blame Game Isn't Backed by CCB Findings

Wednesday, 08 October 2025 01:30 PM

Topic: Environmental, Social and Governance

Osprey nest failures occurred prior to menhaden fishing

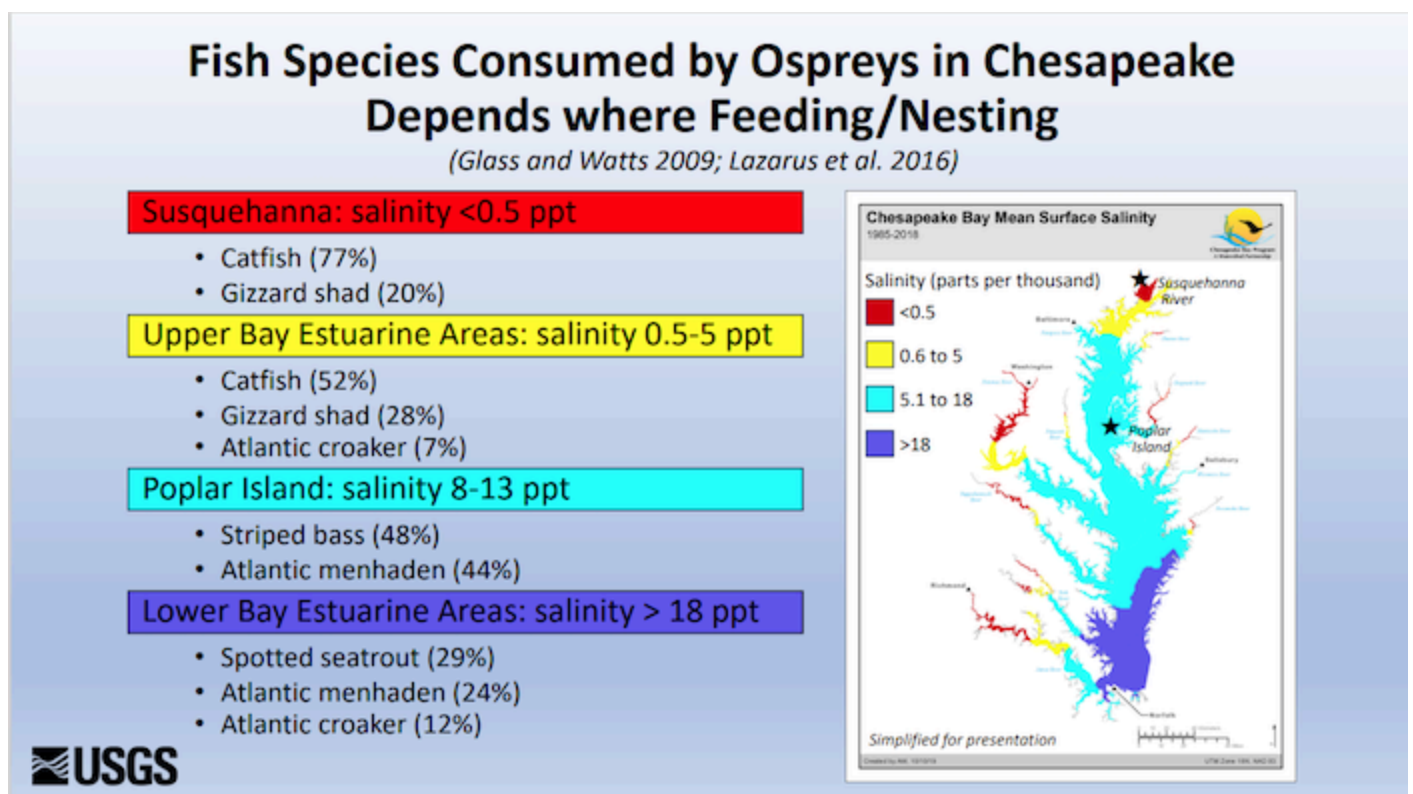
PORTSMOUTH, VA / [ACCESS Newswire](#) / **October 8, 2025** / As Virginians, we share the public concern about [the poor 2025 osprey breeding results reported by the Center for Conservation Biology \(CCB\)](#). But the Chesapeake Bay Foundation's (CBF) attempt to pin

those outcomes on the menhaden fishery misstates the timeline, overextends the CCB advisory's inferences, and ignores other environmental factors that CCB itself noted.

What CCB actually reported

CCB's news advisory organizes 2025 results by salinity (used as a proxy for local fish communities) and finds that higher-salinity sites had low productivity while low-salinity sites exceeded population-maintenance thresholds. CCB explicitly states "salinity is a proxy for the fish community" and that ospreys in high-salinity areas are *believed* to rely more on menhaden. CCB also documents many pairs that did not lay clutches in 2025, arriving on time in late February-early March, then abandoning territories in significant numbers, with many returning in June (a first for the Bay population). Finally, CCB notes that food stress showed up as single-chick broods (67% of broods in waters with salinity levels above 5 parts per thousand) and widespread post-hatch losses.

A presentation given by US Geological Survey scientists to the Menhaden Board of the Atlantic States Marine Fisheries Commission in August 2024 shows that past research, including research by CCB Director Dr. Bryan Watts, identified other species as being the primary prey of osprey in the higher salinity areas of the Bay. To make the leap that menhaden is the singular problem is not supported by the data.



Slide from presentation given by US Geological Survey scientists at the August 2024 meeting of the Atlantic States Marine Fisheries Commission Menhaden Management Board

Timeline facts that CBF ignores

- By [Virginia law, purse-seine fishing for menhaden is closed until the Sunday before the first Monday in May](#) (i.e., there is no fishing until early May).
- According to Ocean Harvesters' fleet logs provided to state regulators, menhaden fishing did not begin in the Bay until the week of May 26 in 2025, reflecting late arrival/availability of menhaden that is controlled by nature.
- CCB states in a photo caption that: "Most young that starve in the nest die within the first two weeks after hatching." If chicks hatch in April/early May, those deaths occur before fishing started.
- CCB records pairs arriving late February-early March; many never laid eggs at all, events that obviously precede any fishing and indicate that birds may not return to the area in good health.

Taken together, CCB's description of timing, plus the dates of the legal fishing season, make clear that early nest failures and the chick mortalities in the first two weeks after hatching occurred before the menhaden fishery began harvesting.

Where CBF goes beyond the CCB advisory

[The Chesapeake Bay Foundation's press statement](#) asserts that CCB's results "indicate insufficient local food availability in areas where the osprey diet relies on forage fish like menhaden." CBF points to a decline in bait landings and juxtaposes those figures with the industrial reduction fishery's annual catch to imply cause and effect.

That is CBF's biased interpretation, not CCB's conclusion. CCB does not directly blame the menhaden fishery; it infers food limitation from breeding metrics and salinity as a prey proxy.

- CCB itself reports weather-related nest losses (high winds, extended rains) and notes that even low-salinity areas performed worse than recent years, evidence that multiple environmental drivers were at work in 2025.
- Ospreys are generalist fish-eaters that take a range of species of suitable size; when menhaden aren't present inshore, ospreys use other prey (e.g., gizzard shad, catfish). CCB's map/photo captions and standard references reflect this dietary flexibility.
- Fleet operations and observations indicate menhaden have arrived late in recent years, a function of environmental conditions, not fishing. The fishery has no mechanism to delay migration or in-Bay availability.
- While menhaden bait landings may be lower in the Bay than in the past, CBF fails to consider the level of effort. There are documented instances of pound netters who have stopped fishing over the past few years through a combination of factors including higher costs for equipment and the inability to find dependable (and affordable) labor.
- Bait landings reflect harvest effort and market conditions and are not a direct measure of local fish abundance or near-shore availability to osprey.

CCB's 2025 advisory shows food stress signals in higher-salinity waters, but the timing and the text do not support CBF's misleading narrative that the regulated menhaden fishery caused this year's early nest failures and first-weeks chick mortalities. Those events occurred before the season opened and menhaden boats were still at the dock. Environmental factors, weather-driven nest losses (high winds/extended rains) and widespread post-hatch starvation, are plainly implicated in CCB's account and must be part of any honest discussion, despite the self-interested view of a special interest group like the CBF.



About Ocean Harvesters

[Ocean Harvesters](#) owns and operates a fleet of more than 30 fishing vessels in the Atlantic Ocean and Gulf of Mexico. The company's purse-seine fishing operation is exclusively engaged in the harvest of menhaden, a small, nutrient-dense fish used to produce fish meal, fish oil, and fish solubles. Both its Atlantic and Gulf Menhaden fisheries are certified sustainable by the Marine Stewardship Council. Committed to responsible fishing operations, Ocean Harvesters is proud to be heir to a fishing legacy that extends nearly 150 years.

Press Contact

Stove Boat Communications

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From Osprey to Pound Netters: A Shift in Purpose at the Atlantic States Marine Fisheries Commission Menhaden Board Meeting

Monday, 11 August 2025 08:55 PM

Topic: Environmental, Social and Governance

WASHINGTON, DC / [ACCESS Newswire](#) / August 11, 2025 / One year ago, scientists from the U.S. Geological Survey (USGS) presented data to the Atlantic States Marine Fisheries Commission (ASMFC) showing that osprey reproduction was under stress in multiple regions across the country—including on the West Coast and along parts of the East Coast where no menhaden fishing occurs at all. Their findings suggested that while the Chesapeake Bay osprey decline was real, it likely stemmed from a complex

array of ecological stressors, not simply the availability of menhaden. In fact, USGS explicitly did not attribute osprey declines to menhaden harvest pressure.

Despite hearing from the USGS experts, the ASMFC formed a Work Group focused on menhaden management in the Chesapeake Bay, spurred by osprey concerns. The group was tasked with exploring precautionary management measures-such as time-area closures-to protect piscivorous birds and fish during critical life stages. That Work Group presented its report at the May 2025 board meeting.

Heading into the August 7 meeting, many stakeholders expected the discussion to focus squarely on the osprey topic and how-or whether-to pursue management options justified by the Work Group's findings. Instead, what unfolded was a striking pivot in purpose, led by Maryland's representative, Commissioner Lynn Fegley.



Commercial menhaden fishermen at work.

Fegley's Presentation: A Bait and Switch

When Ms. Fegley took the floor, she offered only a one sentence acknowledgment of the original concern that launched the Work Group-mentioning the word osprey just twice and the USGS presentation once. From there, she quickly reframed the entire, year-long conversation around a new issue: anecdotal reports from Maryland pound net

fishermen suggesting that menhaden were no longer appearing in northern Chesapeake Bay waters during the summer months.

Instead of returning to the ecosystem-based concerns outlined by the Work Group (and the explicit osprey focus it was formed to address), Fegley built a case around fishery access issues, claiming that the increase in mid-Bay harvest activity by the menhaden reduction fleet was possibly creating a "gauntlet" that menhaden must pass through-limiting escapement to areas where smaller fisheries operate. This narrative was tied to the original Work Group report only by a reference to one table from the document, repurposing its data to support a new narrative: that Maryland's pound net fishery-not its birds-was in crisis.

This narrative shift culminated in a motion to task the Plan Development Team (PDT) with creating management options to redistribute the Chesapeake Bay reduction harvest quota more evenly across the fishing season.

The Motion: A Departure from the Agenda and Original Charge

The agenda item under which this discussion occurred was titled:

"Discuss Technical Committee Direction in Response to Work Group Report on Precautionary Management in Chesapeake Bay."

The stated intent of the Work Group, per its original charge in 2024, was to:

"...consider and evaluate options for further precautionary management of Chesapeake Bay menhaden fisheries, including time and area closures to be protective of piscivorous birds and fish during critical points of their life cycle."

Maryland's pound netters, while economically important, are neither piscivorous birds nor fish. The motion that ultimately passed had little to do with protecting wildlife or following the technical direction envisioned in the Work Group's mandate. Instead, it asked the PDT to examine a quota partitioning scheme that will threaten the reduction fleet operations under the justification of alleviating fishery bottlenecks for Maryland harvesters.

This raises a significant procedural and governance concern: the motion that passed did not match the scope of the agenda item, nor did it reflect the original justification for the Work Group's existence. Rather than a technical discussion of wildlife protection or stock assessment, Ms. Fegley drew the Board into a policy discussion about fishery allocation and timing, prompted not by new data, but by anecdotal reports and political pressure.

It is important to note that at no point over the last year's worth of meetings has any scientist reviewed this process or made any determination that there is an actual problem with menhaden availability in the Bay. The process is being forced on the Commission by the Maryland delegation, led by Fegley and the Chesapeake Bay Foundation's Allison Colden.

Procedural Irregularities: Should the Motion Have Been Ruled Out of Order?

Given the mismatch between the agenda title, the Work Group's formal mandate, and the motion that passed, a strong argument could be made that the discussion and resulting motion were out of order. The Board had been convened to review scientific and technical direction stemming from an osprey-centered report-not to debate harvest redistribution in favor of a specific user group.

Moreover, the choice to bypass the Technical Committee, which was identified in the agenda as the committee which was to be given direction, and instead assign the work to the PDT adds further complexity. This shift in responsibility-framed as necessary because "this isn't a technical issue"-adds further grounds to argue that the entire discussion and eventual motion was out of order. It appears that the ASMFC wants to unjustly pick winners and losers among its menhaden stakeholders.

Maryland's Shifting Narrative: From Incidental Bycatch to Directed Fishery

The fishery Maryland now claims must be "saved" from interception by the Virginia reduction fishery is not the fishery it described when the 20% coastwide quota reduction was enacted in Amendment 2 to the Atlantic Menhaden Fishery Management Plan. It is not a directed menhaden fishery at all, but an incidental bycatch fishery-a designation created as a direct result of Maryland's own efforts and arguments at the Atlantic Menhaden Management Board.

In [December 2012](#), Ms. Fegley described the state's pound net fishery as, *"These are pound nets where they're fishing primarily for striped bass in November"*, with menhaden taken only as incidental bycatch. She explained that pound nets set for striped bass might "get a slug of menhaden" simply due to the nature of the gear. This was the context for her motion to raise the bycatch allowance for nondirected fisheries from 2,000 to 6,000 pounds per day-allowing pound-net operators to keep incidental menhaden catches after Maryland's quota was met. At the time, the framing was explicit: this was a nondirected, stationary gear fishery, and the higher allowance was meant to avoid waste and dead discards, not to enable a targeted menhaden harvest.

Yet Maryland is now recasting the same fishery in a very different light. At last week's meeting, Ms. Fegley said, *"we're hearing from commercial fishermen they're not even setting their nets in the Potomac because the fish aren't there."* She was referring to

pound netters fishing in the summer months-a different seasonal fishery entirely from the Fall striped bass pound net fishery she described in 2012. Back then, Maryland argued that menhaden in the pound nets were unavoidable bycatch that should not count against their Total Allowable Catch, and ASMFC created an exception so these post-quota bycatch landings required no payback.

Now, when fishermen report low summer menhaden catch, Maryland frames the pound net fishery as a targeted menhaden fishery under threat from Virginia's "intercept" fleet-itself an incredible stretch to suggest six menhaden fishing boats "blockade" the lower Chesapeake Bay. When landings are high and risk closing the fishery, pound nets are described as incidental bycatch gear to justify keeping menhaden beyond quota. This shifting narrative is inconsistent at best and deliberately misleading at worst. Maryland spearheaded the 2012 coastwide reduction in menhaden landings while securing a special bycatch carveout for its own pound nets. Today, they insist that this same "incidental" fishery-whether fall striped bass nets with unavoidable menhaden or summer nets now cast as a directed fishery-must be preserved as if it were a primary target fishery. When it's Maryland's quota on the line, pound nets are just bycatch gear; when they want to limit Virginia's fleet, pound nets are suddenly a vital directed fishery. This two-faced position underscores a pattern of selective framing, dishonesty, and self-interest.

Were There "No Menhaden" or An Abundance?

Last year, at the [August 2024 ASMFC meeting](#), when arguing for restrictive measures on large purse seine vessels and the creation of the work group on menhaden and osprey, Maryland's two delegates painted a stark picture of forage fish scarcity in the state's waters. Governor Appointee Russel Dize stated flatly, "In Maryland, this year we have no menhaden, none," citing a friend's pound-net catch as evidence. Ms. Fegley echoed the point: "There are no menhaden in Maryland. The artisanal stationary gears that Maryland watermen fish are not capturing bait for our crab fisheries."

Yet, in the weeks that followed, two events directly contradicted those claims. In early September, roughly 24,000 dead menhaden floated to the surface of Baltimore Harbor-[a fish kill](#) that the Chesapeake Bay Foundation attributed to low-oxygen conditions from poor water quality, not to a lack of menhaden in the ecosystem.

Then, in October, [Maryland DNR's annual juvenile striped bass survey](#) reported that menhaden abundance was nearly equal to 2023 levels, which had been the highest recorded since 1990. Far from supporting the ASMFC testimony that Maryland waters hold "no menhaden," these events demonstrate that menhaden were present in substantial numbers-enough to produce a large fish kill and to sustain historically high abundance in a statewide survey. The commissioners' declarations stemmed from a

preconceived bias against Virginia's historic menhaden fleet, and were not borne out by the subsequent ecological evidence from their own waters and their own agency's science.

A Cautionary Note on Process and Precedent

Ms. Fegley's presentation led the Board to pivot discussion from unproven osprey allegations to economically motivated redistribution of harvest quotas. This should raise concerns for all stakeholders and marks a troubling moment for the ASMFC.

The Commission allowed one commissioner to use an unproven ecological allegation as the gateway to initiate a discussion on a new form of management. In bypassing the original scope and purpose of the Work Group, the Board risks setting a precedent where new management measures can spring from unrelated commission work groups to benefit narrow regional interests, without transparent scientific justification or procedural safeguards.

About the Menhaden Fisheries Coalition

The [Menhaden Fisheries Coalition](http://www.menhaden.org) (MFC) is a collective of menhaden fishermen, related businesses, and supporting industries. Comprised of businesses along the Atlantic and Gulf coasts, the Menhaden Fisheries Coalition conducts media and public outreach on behalf of the menhaden industry to ensure that members of the public, media, and government are informed of important issues, events, and facts about the fishery.

Press Contact

Menhaden Fisheries Coalition

(202) 595-1212

www.menhaden.org

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Maryland ASMFC Delegates Once Again Claim "No Menhaden" - But Baltimore Fish Kills Show Otherwise

Monday, 29 September 2025 06:00 AM

Topic: Environmental, Social and Governance

WASHINGTON, D.C. / [ACCESS Newswire](#) / September 29, 2025 / For the second year in a row, Maryland's top delegates to the Atlantic States Marine Fisheries Commission (ASMFC) claimed menhaden were absent from Maryland's upper Chesapeake Bay, blaming Virginia's commercial fishermen for intercepting the fish. Yet within weeks of their irresponsible statements, tens of thousands of menhaden turned up dead in a series of massive fish kills in Baltimore Harbor, directly contradicting their testimony.

At the [August 7, 2025 ASMFC Atlantic Menhaden Management Board meeting](#), Maryland Department of Natural Resources Fisheries Director Lynn Fegley and veteran waterman Russell Dize painted a bleak picture. About menhaden, Fegley told fellow commissioners that *"they just are meeting maybe an outsized gauntlet" of concentrated harvest and "are in the Bay ... but they were not where we are,"* warning of *"lower availability" and "intensive effort" that she said was "creating less escapement for these fish to get through to these small-scale gears."* Dize reinforced the point, saying, *"There's a reason why the menhaden aren't coming in the Bay, and we need to find [it]."*

These 2025 comments closely echoed their testimony a year earlier. At the [August 2024 ASMFC summer meeting](#), Dize flatly asserted, *"In Maryland, this year we have no menhaden, none... One half a bushel, Maryland has no menhaden,"* while Fegley added, *"There are no menhaden in Maryland. The artisanal stationary gears that Maryland watermen fish are not capturing bait for our crab fisheries."*

Yet in both years, nature quickly told a different story.



Dead mature menhaden wash ashore on the banks of the Patapsco River near Fells Point in Baltimore Harbor, during the second of three fish kills in August & September 2025

Baltimore Fish Kills Prove Menhaden Are Present

Just weeks after the 2025 meeting, Baltimore experienced three major fish kills, each comprised largely of menhaden. According to the Maryland Department of the Environment (MDE), about 61,000 fish died on August 22, at least 120,000 on August 28, and another 25,000 on September 24 from Canton to Locust Point ([CBS Baltimore](#)).

Eyewitness posts on [Reddit](#) and [YouTube](#) confirm that menhaden were the species involved.

[Blue Water Baltimore's](#) Leanna Frick told [WBAL Radio](#), *"One silver lining is that if there aren't fish in the harbor, you don't see them in a fish kill ... there are a lot of menhaden in the harbor, which are food species for other animals."*

The same pattern emerged after the 2024 ASMFC meeting. In early September 2024, about 24,000 dead menhaden surfaced in Baltimore Harbor; coverage of the fish kill included [Chesapeake Bay Magazine](#), [What's Up? Media](#), and [National Fisherman](#). This was followed in October 2024 by a Maryland DNR juvenile striped bass survey [reporting near-record menhaden abundance](#), contradicting the commissioners' "no menhaden" statements.

Blaming Virginia Fishermen While Overlooking Home Waters

Fegley and Dize have repeatedly suggested, absurdly, that Virginia's menhaden reduction fleet, comprised of just six fishing vessels, is intercepting all the fish before they reach Maryland. But environmental experts point to Maryland's own water-quality failures as a more direct culprit. The EPA has found zero progress on stormwater runoff, according to the Chesapeake Bay Foundation's Gussie Maguire, who warned that *"pollution from stormwater has outpaced any management improvements due to increased development pressure and more intense rainfall from climate change"* ([What's Up? Media](#)).

National Fisherman likewise reported Maguire's statement that *"Maryland's failure to adequately conduct stormwater management means pollution continues to degrade the waterway,"* compounding problems for wildlife and fisheries ([SeafoodSource / National Fisherman](#)).

Bottom line: For two consecutive years, Maryland's own ecological events and scientific

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Maryland's Annual Striped Bass Survey Finds Menhaden Abundant in Chesapeake Bay for Third Consecutive Year

Wednesday, 15 October 2025 08:00 PM

Topic: Environmental, Social and Governance

SUMMARY: The Maryland DNR's 2025 survey confirms Atlantic menhaden in the Chesapeake Bay are "widespread for the third consecutive year." This reinforces last year's finding that juvenile menhaden were at their highest levels since 1990 and directly contradicts claims from the same agency that menhaden are absent from Maryland waters.

WASHINGTON, DC / [ACCESS Newswire](#) / October 15, 2025 / The Maryland Department of Natural Resources (DNR) released its [2025 Chesapeake Bay Young-of-](#)

[Year Striped Bass Survey Results](#), and for the third year in a row, the news is clear: Atlantic menhaden remain widespread and abundant throughout the Bay.

According to DNR's announcement, "Biologists captured more than 36,000 fish of 55 different species while conducting this year's survey. Positive findings include three important forage species that were documented in abundance during the survey. Atlantic menhaden and bay anchovies were widespread in the Bay for the third consecutive year."

This continues a strong trend observed in DNR's 2024 and 2023 surveys. In last year's results, the agency reported that "Menhaden abundance was nearly equal to last year, which was the highest measured since 1990." This year's menhaden result is the third highest since 1991.

These findings from Maryland DNR further confirm what scientists and fishery managers have said repeatedly: Atlantic menhaden are abundant and sustainably managed. Despite repeated claims to the contrary, science and state data show menhaden remain plentiful throughout the Chesapeake Bay and along the coast.

The Atlantic States Marine Fisheries Commission (ASMFC) has determined that menhaden are not overfished and overfishing is not occurring, and the fishery is certified sustainable by the Marine Stewardship Council, the global standard for responsible fisheries.



In August and September of this year, Baltimore experienced three major fish kills, largely consisting of menhaden and totaling over 200,000 fish.

Striped Bass Reproduction Remains Below Average

While the DNR's findings are positive for key forage species like menhaden, bay anchovy, and Atlantic silversides, the survey also reported continuing struggles for striped bass reproduction. According to the agency, the 2025 young-of-year index for striped bass was 4.0, an improvement over recent years but still well below the long-term average of 11. "This marks the seventh consecutive year of below-average spawning success for striped bass," DNR wrote.

As the ASMFC has documented, striped bass declines have been driven primarily by recreational overfishing, environmental changes, and disease, not by menhaden harvest levels.

Maryland's Data Contradicts Its Own Delegates' Claims

These official results from Maryland DNR again contradict repeated statements by the state's own representatives to the ASMFC, who have claimed there are "no menhaden in Maryland waters," bringing into question whether politics is playing a role in fisheries management of the important species. In August 2025, Maryland DNR Fisheries Director Lynn Fegley and Commissioner Russell Dize claimed that menhaden were not reaching Maryland because of Virginia's fishing fleet. But just weeks later, massive menhaden fish kills in Baltimore Harbor demonstrated the opposite, with tens of thousands of fish turning up dead in multiple events, reinforcing the species' abundance in Maryland waters.

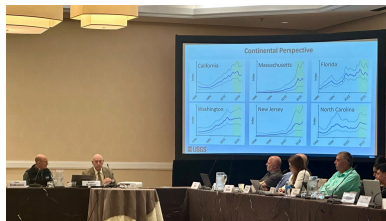
A Science-Based Picture of the Bay

Forage fish like menhaden are important to the Chesapeake Bay ecosystem, serving as prey for species such as striped bass, bluefish, ospreys, and marine mammals. Their abundance over three consecutive years underscores that the Bay's food web remains robust, and that the ecological reference points now used in menhaden management are effectively ensuring that enough fish remain in the water for predators.

About the Menhaden Fisheries Coalition

The [Menhaden Fisheries Coalition](#) (MFC) is a collective of menhaden fishermen, related businesses, and supporting industries. Comprised of businesses along the Atlantic and

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Ocean Harvesters Responds to Chesapeake Bay Foundation's August 7 Press Release

Friday, 08 August 2025 06:20 PM

Topic: Environmental, Social and Governance

WASHINGTON, D.C. / [ACCESS Newswire](#) / August 8, 2025 / A press release [issued yesterday](#) by the Chesapeake Bay Foundation (CBF) continues a multi-year pattern of gross dishonesty, as it presented an incomplete and misleading narrative regarding menhaden management in the Chesapeake Bay. CBF's misleading release includes a statement from Virginia Executive Director Chris Moore that ignores and disparages the published science, and the regulatory framework that ensures the fishery remains sustainable and responsibly managed.

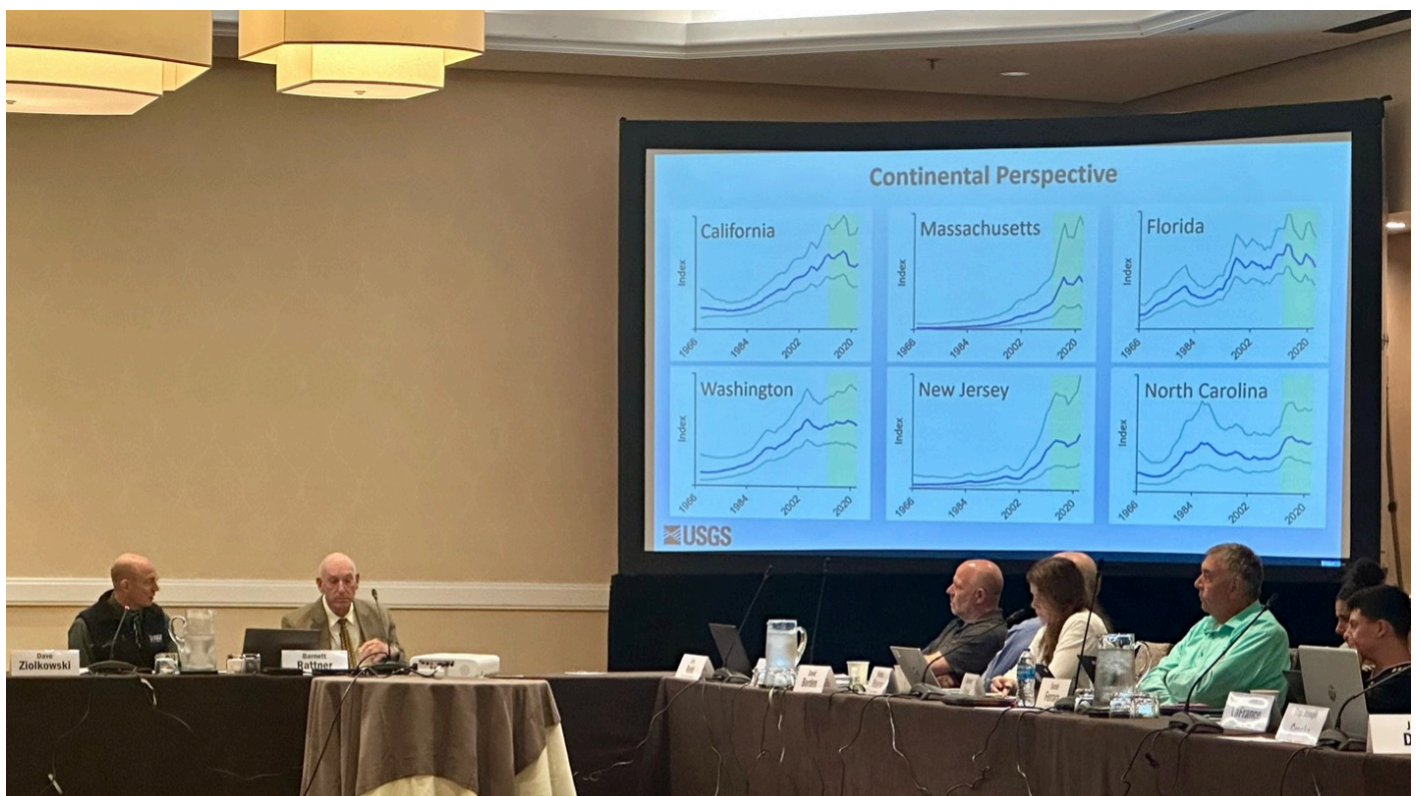
In response, Ocean Harvesters has issued the following:

The CBF release refers to "growing warning signs around the Chesapeake Bay":

"There are clear signs of peril in the Chesapeake, and menhaden are one of the connecting threads."

This claim is not supported by any independent, peer-reviewed science, but rather represents the biased opinion of a special interest group. The assertion that "there are clear signs of peril in the Chesapeake, and menhaden are one of the connecting threads" overstates both the available scientific evidence and the known ecological dynamics of the Bay. While ecosystem concerns merit monitoring, attributing broad Chesapeake Bay challenges to already conservative menhaden harvest regulations is not supported by the best available science.

In 2024, the U.S. Geological Survey (USGS) presented data to the ASMFC on osprey populations which showed osprey reproduction challenges and nest failures occurring on both the Atlantic and Pacific Coast, including many areas with no menhaden fishery at all. In a [letter to Congress](#) earlier this year, USGS said it found no direct link between regulated menhaden harvests and declining osprey populations. The federal agency emphasized that multiple, complex factors, including weather, predation and prey access, contribute to ecological trends in the Bay.



Scientists from the U.S. Geological Survey present a slide to the ASMFC showing that the recent leveling-off in Maryland and Virginia osprey populations, after years of explosive growth, is a phenomenon also being seen in states across the nation, on both the East and West Coast.



Ocean Harvesters menhaden fishermen.

The statement includes: *"This new timing of intense fishing pressure may be contributing to the problems facing the Chesapeake Bay."*

Any adjustment in the timing of Bay fishing is minor and reflects natural shifts in the seasonal population dynamics of menhaden, not a quantifiable increase in harvest pressure or ecological harm. No scientific evidence has established any link between this timing shift and the broad ecological challenges described in the release.

While the press release references anecdotal concerns from Maryland fishers, it omits mention of well-documented water quality issues in Maryland that may also explain the localized fishery observations cited.

Another claim in the statement reads: *"One foreign-owned company consistently prevents progress in Virginia, and now coastwide at the ASMFC."*

This statement is inaccurate. Omega Protein is a Virginia-based processing company, and the menhaden are harvested by Ocean Harvesters, a separate American-owned and operated company whose crews are overwhelmingly local, unionized, and multi-generational, represented by UFCW Local 400, AFL-CIO. This domestic fleet works in full compliance with harvest controls, vessel reporting, and ecosystem-based management thresholds set by the ASMFC. CBF is clearly attempting to mislead the audience with

distorted information and is crossing a very serious ethical line of misinformation that merits further scrutiny.

CBF's repeated implication that the industry has obstructed scientific research misrepresents the actual facts. Ocean Harvesters supported a comprehensive ecosystem study of the menhaden fishery developed by the Atlantic States Marine Fisheries Commission (ASMFC) in 2021. However, the proposal that later emerged in the Virginia General Assembly used a lower cost, novel methodology that had not undergone scientific peer review. The industry raised legitimate concerns-not about research itself, but about relying on an untested approach for such a politically charged issue. CBF has repeatedly and inaccurately characterized this as blanket opposition to science. In fact, the industry continues to support the original, science-based study design developed by ASMFC, and no menhaden research could be conducted without longstanding industry cooperation.

The statement concludes: *"The Chesapeake's fisheries and predators can't wait. Menhaden are key to a thriving Chesapeake Bay, and a healthy, productive Chesapeake is vital to the entire Atlantic coast."*

There is simply no Chesapeake Bay crisis that would threaten fisheries or predators. The menhaden fishery is already one of the most scientifically scrutinized in the United States.

The menhaden fishery is currently:

- Not overfished, and overfishing is not occurring, as confirmed by repeated stock assessments.
- Certified sustainable by the Marine Stewardship Council (MSC)
- Governed by ecosystem reference points that account for predator-prey relationships
- Subject to real-time reporting, seasonal harvest caps, and rigorous monitoring under ASMFC's management plan

Here is the true threat: CBF's statements add up to nothing more than scare tactics that threatens the livelihood of hundreds of blue collar, multi-generational employees, many of whom are minority and UFCW Local 400 union workers, in Virginia's Northern Neck.

About Ocean Harvesters

[Ocean Harvesters](#) owns and operates a fleet of more than 30 fishing vessels in the Atlantic Ocean and Gulf of Mexico. The company's purse-seine fishing operation is exclusively engaged in the harvest of menhaden, a small, nutrient-dense fish used to produce fish meal, fish oil, and fish solubles. Both its Atlantic and Gulf Menhaden

fisheries are certified sustainable by the Marine Stewardship Council. Committed to responsible fishing operations, Ocean Harvesters is proud to be heir to a fishing legacy that extends nearly 150 years.

Press Contact

Stove Boat Communications

(202) 595-1212

contact@stoveboat.com

SOURCE: Ocean Harvesters

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Omega Protein and Ocean Harvesters Urge Science-Based Review Before Imposing New Menhaden Restrictions

Tuesday, 29 July 2025 09:00 PM

Topic: Environmental, Social and Governance

Letter from Veteran Biologist Addresses Scientific Questions Over Osprey Declines

WASHINGTON, DC / [ACCESS Newswire](#) / July 29, 2025 / In a [letter submitted to the Atlantic States Marine Fisheries Commission](#) (ASMFC), Peter Himchak, Senior Scientific Advisor to Omega Protein, warned that "there has been an inordinate amount of focus

on menhaden generally, and the reduction fishery in particular" in discussions about recent osprey declines in the Chesapeake Bay.

Omega Protein, which processes menhaden into fishmeal, fish oil, and related nutritional products, is supplied by Ocean Harvesters under a long-term harvesting agreement. Himchak submitted the letter on behalf of the company ahead of the ASMFC's Summer Meeting.

Himchak, who served for 39 years as a fisheries biologist with the New Jersey Division of Fish and Wildlife and as a long-time advisor to both the ASMFC and the Mid-Atlantic Fishery Management Council, sat on the ASMFC's Atlantic Menhaden Technical Committee and Stock Assessment Sub-Committee from 1988 until 2006.

In the letter, Himchak criticized the ASMFC's Work Group on Precautionary Management in Chesapeake Bay for proposing "draconian management recommendations 'without determining if there is or is not an adequate supply of menhaden to support predatory demand in the Bay.'" He warned that moving forward with such actions without first determining whether there are, in fact, fewer menhaden in the Bay or whether the fishery has any impact on osprey "risks gravely impacting a more than 150-year-old industry and hundreds of jobs while doing nothing to improve the osprey situation."

Himchak wrote that the ASMFC's Technical Committee (TC) already has a significant workload in advance of the Commission's Annual Meeting, but raised four areas of scientific inquiry the TC could investigate that would provide the Board with more complete information.

1) He asked whether "the phenomenon of reduced osprey production [is] confined to the times and areas in which the menhaden reduction fishery operates," referencing USGS data showing declines in osprey abundance in coastal areas of multiple states—not just the Chesapeake—and increases in interior regions. He also noted that the fishery does not begin fishing until May or later—after migrant ospreys arrive in the region from late February to early March and begin building nests from mid-March to mid-April—raising questions about how the fishery could influence osprey's months-earlier decisions about where to nest.

2) He wrote that there have been sizable increases in populations of multiple menhaden-dependent predators since at least the turn of the century, and that a stomach contents analysis of striped bass, which are only somewhat dependent on menhaden, indicated they "are not starving and would be considered healthy." Therefore, he asked, "is it more likely that ospreys are being outcompeted or that the reduction fishery uniquely impacts osprey?"

3) Regarding eagle-osprey interactions, he noted a recent Maryland DNR release announcing "large increases in the state's bald eagle population." He referenced myriad studies finding that bald eagles are "kleptoparasitic"-a term used to describe their well-documented habit of attacking hunting osprey to steal their food or prey on adults, young, and eggs. Citing a study from Voyageurs National Park, he wrote that "increased numbers of eagles were associated with a reduction in the numbers of osprey nests, their nesting success and heronry size," and asked whether "issues of competition and depredation [can] be ruled out as a cause of osprey's lack of breeding success." He further pointed to "significant scientific and anecdotal evidence of the dominant and adverse impacts eagles have on osprey."

That concern was echoed in a newly released *Saving Seafood* special report titled **"Bald Eagle Recovery in Chesapeake Bay Raises Red Flags for Osprey."** The report compiled over three decades of peer-reviewed research, field observations, and published accounts documenting instances in which eagles had a negative impact on osprey populations. In one study, researchers found "eagle abundance was negatively associated with nest reuse (i.e., persistence) and success of ospreys." Significantly, the researchers found "little evidence of bottom-up limitations," such as poor weather or declining fish stocks, and emphasized the role of eagle aggression, including harassment and food theft. While this body of research does not prove the resurgence of bald eagles in the Chesapeake to be the cause of osprey reproduction issues, it does indicate it is a possibility deserving of further investigation.

The full report is available at: <https://www.savingseafood.org/science/bald-eagle-recovery-in-chesapeake-bay-raises-red-flags-for-osprey>

4) Himchak also asked the Technical Committee to consider whether osprey foraging success is being affected by climate-driven environmental changes, including storm frequency, shoreline hardening, warming waters, or hypoxia. Citing a 2024 study by Bryan Watts, he noted that "deliveries of all forage species to osprey nests declined steadily from 1974 to 2021," and asked whether "ospreys' apparent lack of foraging success is tied to changes in local conditions that are impacting either local abundance of forage or osprey's hunting success."

He concluded the letter by writing, "The commission must be guided by science. Precipitous actions, taken in the name of precaution, are not always harmless. Neither Ocean Harvesters nor Omega Protein can survive without the current low level of access to the menhaden resource in the Bay. There simply are not enough 'fishable days' - that is, days where the weather and sea conditions allow vessels to operate - in a year to safely conduct a profitable fishery solely in the ocean. The menhaden fishery is managed in the most conservative manner in its 150 year or so history, and the reduction fishery is operating at its lowest sustained levels - in the Bay and overall - for

as long as we have reliable records (i.e., since the 1950s). Precaution is already the policy. Before taking actions that could cause irreversible economic harm to this historic fishery, the Board should ensure that all reasonable avenues of inquiry into the issues facing osprey are explored."



Commercial menhaden fishermen at work. (Photo: Ocean Harvesters)

About the Menhaden Fisheries Coalition

The [Menhaden Fisheries Coalition](#) (MFC) is a collective of menhaden fishermen, related businesses, and supporting industries. Comprised of businesses along the Atlantic and Gulf coasts, the Menhaden Fisheries Coalition conducts media and public outreach on behalf of the menhaden industry to ensure that members of the public, media, and government are informed of important issues, events, and facts about the fishery.

Press Contact

Stove Boat Communications
(202) 595-1212
contact@stoveboat.com

SOURCE: Menhaden Fisheries Coalition



PRESS CONTACT:
Stove Boat Communications
john@stoveboat.com

SCEMFIS Funds Chesapeake Bay Menhaden Research Roadmap to Inform a Scientifically Defensible Bay Cap

Chesapeake Biological Laboratory, Virginia Institute of Marine Science, and NOAA scientists to develop a plan for a scientifically defensible Chesapeake Bay menhaden harvest cap

OCEAN SPRINGS, Miss. — October 23, 2025 — The Science Center for Marine Fisheries (SCEMFIS) has funded a new project that will create a detailed and actionable roadmap that identifies the research needed to develop a scientifically defensible and ecologically meaningful Chesapeake Bay harvest cap for Atlantic menhaden.

The project, funded at the Center's fall meeting, is being led by scientists from the Chesapeake Biological Laboratory (CBL) at the University of Maryland Center for Environmental Science (UMCES), the Virginia Institute of Marine Science (VIMS), and NOAA. The team is experienced in matters related to Atlantic menhaden in the Chesapeake Bay, bringing decades of peer-reviewed research, assessment leadership, and survey design expertise to this work.

What the project will do

Drs. Genevieve Nessler and Michael Wilberg (UMCES), Drs. Robert Latour and James Gartland (VIMS), and Dr. Amy Schueller (NOAA SEFSC), will conduct an extensive review of existing menhaden science, focusing on factors such as estimated menhaden biomass, migration patterns of schooling fish, and the consumption of menhaden and other forage species by Chesapeake Bay predators. The review will identify gaps in available information and propose specific study designs, analytical approaches, timelines, and estimated costs to guide new Bay-focused menhaden research.

Research recommendations will likely involve a combination of new data collection and analyses of existing datasets, including industry data such as landings information and spotter pilot reports.

The roadmap is intended to be practical and actionable, leveraging tools and data already in use and identifying where new information, such as novel tagging, hydroacoustics, and spatial modeling, would add significant value.

Why this matters

Current menhaden management in the Chesapeake Bay is built around a landings limit rather than a Bay-specific biological target. Commercial reduction landings of Atlantic menhaden from the Bay are currently subject to a 51,000-metric-ton Bay cap. This cap is based on the average of 2012–2016 reduction landings from the Bay, but it is not a biological reference point, and thus cannot, by itself, inform managers about the status of the portion of the stock within the Bay or the potential ecological impacts of harvest on other species.

Over time, the Chesapeake Bay menhaden harvest cap has been adjusted as a matter of policy: reduced from 109,020 metric tons (2006) to 87,216 metric tons (2012) and then to 51,000 metric tons (2017). These caps were not based on Bay-specific biological analyses, and were intended as precautionary, interim limits. This project will define the research activities needed to evaluate Bay-specific conditions and ecological interactions so that future decisions about the Bay Cap can be grounded in robust, transparent science.

Economic importance of Atlantic menhaden

Atlantic menhaden support the largest commercial fishery by weight on the U.S. East Coast and play a critical role as forage for predators. The fishery supports a unionized workforce with strong wages and full benefits in a rural region with few comparable opportunities.

Project Team (selected qualifications in Atlantic menhaden & Chesapeake Bay)

- Genevieve M. Nessler, Ph.D., Associate Research Professor, CBL (UMCES)
 - Quantitative fisheries scientist with research focusing on Atlantic menhaden spawning locations and larval dispersal, fishery sampling, survey design, overwintering habitat use, and predator-prey modeling. Former Senior Stock Assessment Scientist at the Atlantic States Marine Fisheries Commission.
- Michael J. Wilberg, Ph.D., Professor of Fisheries Science, CBL (UMCES)
 - Fisheries stock assessment and management strategy evaluation specialist with research focused on Atlantic menhaden movement, mortality, growth, and predator-prey modeling. Lead author of the 2020 survey design for Atlantic menhaden in Chesapeake Bay.
- Robert J. Latour, Ph.D., Professor, VIMS (William & Mary)
 - Quantitative fisheries ecologist focusing on predator-prey interactions, population dynamics, and habitat modeling. Lead/co-author of the 2023 study on female Atlantic menhaden reproductive biology and fecundity and co-author (with Gartland) of Virginia's 2023 Atlantic Menhaden Research Planning report to the

General Assembly.

- James Gartland, Ph.D., Senior Research Scientist, VIMS (William & Mary)
 - Quantitative fisheries scientist with extensive experience in the development of fisheries monitoring surveys, prey consumption models, and ecological indicators, including in Chesapeake Bay. Co-author of the 2023 menhaden fecundity study (with Latour and Schueller) and co-author of Virginia's 2023 Atlantic Menhaden Research Planning report guiding Bay-specific research priorities.
- Amy M. Schueller, Ph.D., Research Fish Biologist, NOAA Southeast Fisheries Science Center
 - Lead assessment analyst for Atlantic and Gulf menhaden and key contributor to the working group on ecological reference points (ERPs) that underpin Atlantic menhaden management.

About SCMFIS

The [Science Center for Marine Fisheries \(SCMFIS\)](#) brings together academic and industry expertise to address urgent scientific challenges facing sustainable fisheries. Through advanced methods, analytical tools, and collaborative research, SCMFIS works to reduce uncertainty in stock assessments and improve the long-term sustainability of key marine resources.

SCMFIS is an Industry-University Cooperative Research Center supported by the National Science Foundation. Industry organizations join SCMFIS through an Industry Membership Agreement with one of the center's site universities and contribute both financial support and valuable expertise to help shape research priorities.

Its university partners include the University of Southern Mississippi (lead institution) and the Virginia Institute of Marine Science at the College of William and Mary. The center also collaborates with scientists from a broad network of institutions, including Old Dominion University, Rutgers University, the University of Massachusetts-Dartmouth, the University of Maryland, and the University of Rhode Island. These researchers bring deep expertise in finfish, shellfish, and marine mammal science.

Demand for SCMFIS's services continues to grow, driven by the fishing industry's need for responsive, science-based support. The center provides timely access to expert input on stock assessment issues, participates in working groups, and conducts targeted studies that lead to better data collection, improved survey design, and more accurate modeling—all in service of sustainable, science-driven fishery management.



October 24, 2025

James Boyle
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 N. Highland St. Suite 200
Arlington, VA 22201

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

Atlantic menhaden is a critical forage fish species and represents one of the last viable prey bases for economically and culturally significant predators in Atlantic coastal waters. As an organization dedicated to the conservation of forage fish and the advancement of ecosystem-based fishery management, Wild Oceans urges the Board to take decisive conservation action for Atlantic menhaden management and the future of healthy Atlantic Coast fishing. Conservative management decisions are even more critical given the recent revelations revealing scientific errors underlying the menhaden stock assessment that confirm the Atlantic menhaden population is far smaller than previously estimated, and broader concerns about the crisis facing Atlantic Coast forage fish caused by large-scale industrial fishing. We request the Board:

- 1. Accept the updated ERP F target (0.151), ERP F threshold (0.458), FEC target (1,758,288), and FEC threshold (1,184,339);**
- 2. Establish a 2026-2028 TAC at 75,616 mt, a level that has a significantly less than 50% probability of exceeding the ERP F target and accounts for additional model and ecosystem risk; and,**
- 3. Initiate an addendum to prohibit menhaden fishing for reduction purposes.**

These recommendations are based on the latest single-species and ERP stock assessment updates and the need to factor in additional risk factors, especially the:

- Decline and overfished statuses of other Atlantic Coast forage fish populations,
- Management history of overestimating the populations of forage species, including menhaden
- Overfished status of striped bass, and
- Outstanding scientific uncertainties related to an inflated natural mortality estimate (M).

Crisis in East Coast Forage Fish Populations

The Atlantic Coast's forage base is in crisis. Key species like Atlantic herring and mackerel have been overfished and are at a fraction of their target populations, with extended and ever-growing timelines for rebuilding. River herring and shad continue to be at historical low levels, unable to recover in significant part because of at-sea bycatch. ASMFC and NMFS scientists have agreed that the Atlantic menhaden population biomass is smaller than was optimistically estimated through SEDAR 69 (2019). This East

Coast forage crisis has significant impacts on recreationally, culturally, and ecologically important species.

Striped bass is the leading driver of a \$138 billion U.S. recreational fishing industry, but recreational catch rates and charters have precipitously declined. Striped bass populations are tightly linked to menhaden harvest levels and are overfished, with spawning stock biomass well below target levels. Measures seeking to rebuild striped bass have already reduced recreational fishing mortality to a 30-year low. To rebuild the striped bass population, menhaden availability and abundance must be increased.

Ospreys serve as a critical indicator of ecosystem health and are a cultural symbol of the Chesapeake Bay. However, osprey reproductive successes in the Bay have plummeted, with one recent study showing this decline since the 1980s is in lockstep with the 10-fold decline in a key menhaden abundance index.

Lower the ERP Values Based on the Best Available Science

The 2025 Atlantic menhaden single-species and ERP stock assessment updates include the latest species' life history data and updated ecosystem models that incorporate predator-prey dynamics. They have undergone peer review and were endorsed for adoption in management. The new ERP values were derived from these assessments, explicitly evaluating tradeoffs between menhaden harvest and predator population outcomes. They form the foundation for determining the TAC. The Board must accept these values to maintain ERP framework integrity and to advance sustainable menhaden stock management, particularly in its role as the key remaining forage species in the Atlantic ecosystem. With these values as the baseline, in determining the final TACs the Board should account for additional risks in the analysis.

Manage Menhaden Below the ERP F Target to Rebuild Striped Bass

Striped Bass are currently overfished with spawning stock biomass below target levels. They are the dominant predator influencing the ERP models, and menhaden harvest levels are explicitly linked to striped bass population outcomes. Any menhaden harvest above the ERP F Target would limit menhaden availability to striped bass at a time when striped bass require sufficient and abundant forage to rebuild. Thus, the Board must maintain menhaden fishing mortality well below the ERP F Target to ensure additional forage is left in the ecosystem, increasing prey availability to support striped bass growth, survival, and recruitment. This management strategy will also help account for ecosystem risks including uncertainty in predator-prey interactions and environmental variability, thereby increasing the likelihood that striped bass can rebuild to their biomass target within the required rebuilding timeline.

As the best available science has made clearer now more than ever before, to facilitate striped bass rebuilding the ASMFC must coordinate management of striped bass and menhaden – it must control both striped bass fishing mortality and menhaden fishing mortality. The Striped Bass Board has already reduced fishing pressure to a 30-year low, with striped bass fishing mortality now well below the target and threshold. Striped bass fishing mortality is no longer the limiting factor for rebuilding. As the ERP model shows, because striped bass are heavily dependent on menhaden, menhaden must be managed below the ERP F Target to provide sufficient prey biomass for striped bass rebuilding. Setting the menhaden TAC at a level less than the 50% probability of exceeding the ERP F Target is necessary to ensure rebuilding of the striped bass stock. This approach reflects the best practice for managing key

forage species, the science underlying the ERP framework, and is reasonable to provide a buffer against uncertainty. Failure to manage menhaden below the ERP F Target would undermine striped bass rebuilding and undermine the ASMFC's commitment to ecosystem-based management.

Set the 2026-2028 TAC at 75,616 mt to Account for Additional Assessment Risks

The Board should set the TAC at 75,616 mt. This level would factor in ecosystem risks, as well as additional scientific and stock assessment risk to adequately account for the pattern of scientific errors that have consistently overestimated stock size. These errors were identified through analysis by Drs. Ault and Luo of the University of Miami in a forthcoming peer-reviewed paper (Ault, J.S., Luo, J. 2025. Fisheries Research) evaluating the menhaden natural mortality rate (M) adopted in 2019 (SEDAR 69). While the Atlantic Menhaden SAS and TC (SEDAR 102) updated the models to correct several identified errors, their paper shows that additional errors remain and that even the reduced M, which drove much of the decrease in ERP values, is still nearly twice as high as it should be. Drs. Ault and Luo's estimated M should be adopted in the single species assessment and represents a considerable risk factor in the proposed ERP values and associated TACs. It is consistent with over a dozen prior peer reviewed M estimates as well as observed menhaden ageing data showing that menhaden live well past the age of 10 in the absence of fishing. In contrast, the erroneous 2019 and revised 2025 M estimates are both several standard deviations above all other M estimates and inconsistent with life history estimates, projecting to a maximum lifespan of less than 6 years – one-half or less of the observed scientific data and counter to common sense. For these reasons, the Board should set the menhaden TAC at 75,616 mt to account for the scientific uncertainty still evident in the current stock assessment models.

Initiate an Addendum Prohibiting Menhaden Fishing for Reduction Purposes

The Board should also initiate an addendum to prohibit menhaden fishing for reduction purposes. Removing menhaden from the ecosystem is a poor use of this vital resource. Menhaden are many times more valuable when left in the water to support ecosystems, large marine fish, and coastal communities. Striped bass fishermen have done their part, with fishing mortality now reduced to 30-year lows. New England's lobstermen desperately need stable bait supplies as herring remains scarce. Crabbers throughout the Chesapeake Bay and Mid-Atlantic depend on menhaden bait. Recreational anglers drive billions in coastal economic activity and need healthy predator populations. None of these stakeholders can rebuild what they've lost if Atlantic menhaden continue being extracted at unsustainable levels. To help ensure the long-term sustainability of menhaden, lobster and crab fisheries, striped bass, and all menhaden-dependent predators, the Board must prohibit menhaden fishing for reduction purposes.

In summary, we urge the Board to adopt the updated ERP values and establish a TAC for 2026–2028 of 75,616 mt. This will lower the risk of exceeding the ERP F Target and account for menhaden's forage role in the diets of predators. These actions together with a prohibition on reduction fishing will help to ensure the long-term sustainable management of Atlantic menhaden, consistent with the ERP framework.

Sincerely,

Rob Kramer
President, Wild Oceans

James Boyle

From: brookssbartlett@everyactioncustom.com on behalf of Brooks Bartlett
<brookssbartlett@everyactioncustom.com>
Sent: Wednesday, October 22, 2025 4:52 AM
To: Comments
Subject: [External] For MMB Distribution: Setting Specifications for the 2026-2028 Fishing Years

Dear ASMFC Menhaden Management Board,

I have watched this catch be abused first hand in New England, Boston harbor and CC. I'm writing to urge you to maintain the integrity of the Ecological Reference Point (ERP) framework for Atlantic menhaden. To uphold your commitment to science-based, precautionary management, I respectfully ask you to:

- Adopt the updated ERP values from the 2025 stock assessment.
- Set the 2026–2028 Total Allowable Catch (TAC) at a level with less than a 50 percent probability of exceeding the new ERP F target.
- Initiate an addendum to address Chesapeake Bay management to avoid concentrating half of the entire coastwide menhaden quota inside the ecologically and economically important Bay ecosystem.

These decisions will help balance economic and ecological priorities, safeguard predator populations like striped bass, and uphold the integrity of ecosystem-based fisheries management along the Atlantic coast.

Thank you for your consideration.

Sincerely,
Brooks Bartlett
Littleton, NH 03561
brookssbartlett@gmail.com

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James Boyle

From: earlchambers3@everyactioncustom.com on behalf of earl chambers <earlchambers3@everyactioncustom.com>
Sent: Tuesday, October 21, 2025 8:38 PM
To: Comments
Subject: [External] For MMB Distribution: Setting Specifications for the 2026-2028 Fishing Years

Dear ASMFC Menhaden Management Board,

This letter is so simple as the science supports the motion and the emotion supports the lay person observations. I'm writing to urge you to maintain the integrity of the Ecological Reference Point (ERP) framework for Atlantic menhaden. To uphold your commitment to science-based, precautionary management, I respectfully ask you to:

- Adopt the updated ERP values from the 2025 stock assessment.
- Set the 2026–2028 Total Allowable Catch (TAC) at a level with less than a 50 percent probability of exceeding the new ERP F target.
- Initiate an addendum to address Chesapeake Bay management to avoid concentrating half of the entire coastwide menhaden quota inside the ecologically and economically important Bay ecosystem.

These decisions will help balance economic and ecological priorities, safeguard predator populations like striped bass, and uphold the integrity of ecosystem-based fisheries management along the Atlantic coast.

Thank you for your consideration.
Earl Chambers DDS

Sincerely,
earl chambers
Stevensville, MD 21666
earlchambers3@gmail.com

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James Boyle

From: Clint Collamore <collamoreclinton@gmail.com>
Sent: Wednesday, October 22, 2025 2:57 PM
To: James Boyle
Subject: [External] [New] Dear Mr. Boyle,

As a fisherman for many decades,I would ask that you reconsider a reduction of 55% to the menhaden fishery. Some of us are very concerned about the bait process as it stands currently. Any more reductions can and potentially devastate our supply. I ask in the name of many who choose not to,and for whatever reason,cannot. Thank you for your consideration Sir.

Sincerely,
Clint Collamore
FV Just Right
Waldoboro,Maine.

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James Boyle

From: jqgriffin01@everyactioncustom.com on behalf of John Griffin <jqgriffin01@everyactioncustom.com>
Sent: Tuesday, October 21, 2025 10:12 PM
To: Comments
Subject: [External] For MMB Distribution: Setting Specifications for the 2026-2028 Fishing Years

Dear ASMFC Menhaden Management Board,

I am a fisherman and bird watcher who has seen the decline in striped bass due to commercial over fishing of menhaden. I have also read of the decline in the osprey population of the Chesapeake bay. You can help these species and many more by maintaining the integrity of the Ecological Reference Point (ERP) framework for Atlantic menhaden. To uphold your commitment to science-based, precautionary management, please:

- Adopt the updated ERP values from the 2025 stock assessment.
- Set the 2026–2028 Total Allowable Catch (TAC) at a level with less than a 50 percent probability of exceeding the new ERP F target.
- Initiate an addendum to address Chesapeake Bay management to avoid concentrating half of the entire coastwide menhaden quota inside the ecologically and economically important Bay ecosystem.

These decisions will help balance economic and ecological priorities, safeguard predator populations like striped bass and osprey and uphold the integrity of ecosystem-based fisheries management along the Atlantic coast.

Thank you for your consideration.

Sincerely, John Griffin
Fisherman and conservationist
39 smith neck road
Old Lyme, ct 06371

Sincerely,
John Griffin
Old Lyme, CT 06371
jqgriffin01@gmail.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.

To:
James Boyle, Menhaden FMP Coordinator
Email: jboyle@asmfc.org

Dear Commissioner,

I am writing on behalf of **B M Matthews Inc., operators of the F/V Ocean Venture and F/V Yankee Mariner**, to urge the Commission to **reject the proposed 55% reduction in the Atlantic menhaden quota**. This drastic cut is not supported by science and would cause severe economic harm to menhaden crews, bait-dependent fisheries such as lobster and crab, and the working waterfronts that sustain our coastal economies.

In fact, we are seeing **record-breaking amounts of menhaden in New England waters**. Our spotter pilot—who has been flying for decades—reported seeing **more fish offshore of Massachusetts this year than ever before**. We also saw **menhaden of all sizes** throughout the last two fishing seasons here in New England. **Menhaden remained present in New Hampshire and Massachusetts waters for several months longer this year than in past seasons**. Migration patterns can shift from year to year, ... This firsthand experience from those actively on the water underscores what the science already confirms: Atlantic menhaden are **not overfished**, and **overfishing is not occurring**.

The fishery has earned **Marine Stewardship Council certification**, confirming that it is sustainable and responsibly managed. The current **Total Allowable Catch (TAC)** already limits harvest to a level that ensures long-term stock health.

A 55% quota cut like this would not make a real difference for conservation, but it would have a huge impact on the people who depend on this fishery. Menhaden are the backbone of many local fisheries along the coast — from lobstermen and crabbers to bait dealers and boat crews. Taking away more than half the quota would hurt working families and small businesses that already operate on tight margins. Those of us on the water see healthy, abundant stocks, and the data supports that. There's no reason to ... The Commission needs to take into account the real-world effects these decisions have on our coastal communities. Fishing families like ours rely on a fair, science-based management plan that protects the resource while allowing us to keep working. The menhaden fishery has been responsibly managed for years, and we simply ask that the ASMFC continue to use common sense — considering both the science and the people who make their living from it.

I urge the Commission to adopt a **fact-based, modest quota reduction of no more than 10%**—a balanced, science-driven approach that protects both the resource and the hardworking people who depend on it.

Thank you for considering these comments and for supporting sustainable, community-focused fisheries management.

Sincerely,

Kimberly Matthews
B M Matthews Inc.
F/V Ocean Venture & F/V Yankee Mariner
■ KJM5291@gmail.com
■ (207) 852-3321

James Boyle

From: Laura McLennan <traditions14@icloud.com>
Sent: Wednesday, October 22, 2025 6:17 AM
To: James Boyle
Subject: [External] [New] Comment for Menhaden Board re. Coast wide Specifications

Menhaden Board Members, I am writing this letter with concern over the proposal to cut the coast wide menhaden quota for the next three years by 55%. I am a commercial fisherman from Maine, multi generational, have my two sons that are commercial fishermen, and three grandkids that also fish commercially. I also represent 150 fishermen in my town on the states Lobster Zone Council, which I have done for 21 years. The menhaden fishery is a very important link in our livelihood, as it provides a domestic bait supply that is affordable for the lobster industry , but also gives us another fishery to participate in to relieve some pressure off the lobster fishery, and diversify many coastal towns incomes. The coast of Maine is changing beyond what anyone has ever expected, and not for the betterment of the fishermen. I would support the proposal put forward by the New England Fisherman's Stewardship Foundation, of a no more than 10% reduction based on the best available science , as this would reduce the risk of overfishing to zero. I know firsthand the pressure from environment groups in the Chesapeake Bay are pushing a reduction because of the Omega Fleet working in the bay. I have had conversations with people from that area about maybe climate change could be a factor , telling them of huge schools of menhaden being caught in Canada by herring fishermen, who didn't even know what they were, and have never in years of fishing had the menhaden in their bays. So the fish are migrating further to the north . Thank You for considering my concerns. Douglas McLennan Zone D Representative, Spruce Head Maine

Sent from my iPad

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James Boyle

From: James McMillan <redsky3262@gmail.com>
Sent: Wednesday, October 22, 2025 3:17 PM
To: James Boyle
Subject: [External] [New]

Dear Commisioner, I am against the proposed 55% reduction in menhaden quota as it will put the Maine lobster industry in an almost impossible situation as far as what we use for bait nowadays. There are so many other options to take that would be less harmful to the lobster industry and it's thousands of fishermen and others that rely on it to exist.

Sincerely, James McMillan. Maine lobsterman.

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James Boyle

From: David Moody <davemoody46@gmail.com>
Sent: Tuesday, October 21, 2025 6:14 PM
To: James Boyle
Subject: [External] [New] Menhaden quota reduction

Mr Boyle, as a lobsterman who relies heavily on the availability of menhaden to bait my lobster traps & thus make a living, I strongly urge you to reject this proposal! This unnecessary reduction in quota will most certainly devastate the lobster fishery up and down the entire east coast.

David Moody

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James Boyle

From: Travis Thompson <travis.thompson@atwoodlobster.com>
Sent: Friday, October 24, 2025 10:01 AM
To: James Boyle
Subject: [External] [New] Comment for Menhaden Board re: Coastwide Specifcations

Hi James,

Please reject this proposed reduction and do more research on this matter. There has been no scientific data that I have found backing up this claim that I have found.

I purchase menhaden from Virginia to Maine to sell to 111 fisherman we have at our docks and supply 20 different wharfs as well we purchase lobster from.

With the reduction of the herring and adding 55% reduction on menhaden the fisherman and other working water fronts will not survive.

Regards,

Travis Thompson
207-542-6737

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James Boyle

From: Kevin Grindle <ldikeving@gmail.com>
Sent: Friday, October 24, 2025 9:54 AM
To: James Boyle
Subject: [External] [New] Comment for Menhaden Board re: Coastwide Specifications

Would like to comment that a cut in menhaden quota would be devastating to myself and the lobster fishermen that I supply bait to. Here in Maine there has been plenty of menhaden to fish on and if anything our quota should be increased. Perhaps the board should consider transferring the existing quota to those of us that have ample stocks to fish on and cut back in the areas where stocks have been depleted. Thank you.

Kevin Grindle
Little Deer Isle, Maine

Sent from my iPhone

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James Boyle

From: Leroy Weed <lweed9051@gmail.com>
Sent: Friday, October 24, 2025 8:48 AM
To: James Boyle
Subject: [External] [New] Opposition to Proposed Atlantic Menhaden Quota Changes

Dear FMP Coordinator Boyle and Members of the ASMFC Menhaden Management Board,

I respectfully submit this comment in strong opposition to the proposed 2025 quota and management guidelines for Atlantic menhaden. I fish pogies off Stonington Maine and think these blanket regulation changes will have drastic impacts on the Downeast Maine community. These guidelines, if adopted as written, will cause serious and disproportionate harm to the small-scale, bait-fish menhaden harvest and the working waterfronts of Downeast Maine, especially in Stonington and Penobscot Bay. The new modelling does not account for population migration or specific availability within the Gulf of Maine.

The proposed measures fail to properly account for Maine's unique fishery profile, local economic dependencies, and the critical role that menhaden (pogies) play as affordable, sustainable bait for the lobster industry — the backbone of Downeast coastal communities. The lack of regional and industrial scale differentiations in the new proposed quotas serve only to harm and carve out small-scale localized fishermen along the coast of Maine while appropriating the lion's share of the quota to larger industrial operations who have the volume of catch necessary to support operations through such drastic quota reductions.

1. Regional and Scientific Misapplication

The ASMFC's coast-wide reduction approach applies a one-size-fits-all quota model, overlooking the distinct differences between:

- Industrial reduction fisheries in the mid-Atlantic, and
- Small-scale bait fisheries in Maine that support the lobster fleet.

Maine's menhaden harvest is limited, gear-restricted, and highly monitored. In 2025, Maine's preliminary allocation is 24,510,314 lbs — roughly 1.7 % of the coast-wide quota. Applying the same percentage reduction to Maine as to large reduction fisheries is neither equitable nor scientifically justified, especially when Maine's catch is consumed locally as bait within weeks, not exported for reduction processing.

2. Economic and Community Impact in Downeast Maine

- The port of Stonington remains Maine's top-valued fishing port, with \$47.87 million in total landings (11.42 million lbs) in 2023.
- Menhaden ranked fourth among Maine's most valuable fisheries in 2024, with landings worth \$13.2 million statewide.
- Maine lobstermen spend an estimated \$95 million annually on bait, roughly 160 million lbs in total volume. Bait is the highest daily operating cost of lobstermen in Maine. With landings decreasing for the past 8 years, local and affordable bait options are critical to supporting our interconnected fisheries.
- Imported bait costs on average 50% more than fresh local menhaden. A lobsterman will spend approximately \$200 on local menhaden barrel. A lobsterman will spend approximately \$400 on imported bait. Packaging of this bait puts additional pressure on tax funded local transfer stations

in small coastal towns. Decreasing the quota will inevitably increase the price of local bait – giving little to no options for lobstermen to decrease operating costs.

- Lobstermen in the islands of Downeast Maine, including Stonington, Frenchboro, Isle au Haut and Swans Island depend on fresh pogie catch for bait supply, especially as shipping costs rise and ferry services are limited. While these communities may not have a large population they are essential to the economy and culture of our area.
- For a Downeast lobster vessel using ~960 lbs of bait per set, that cost difference translates to ~\$192 more per load, or thousands in added annual expense. This directly cuts into harvester margins and ripples through the local economy — affecting bait dealers, wharves, and trucking operators in the Stonington/Penobscot Bay region. Lobstermen with smaller margins spend less at local businesses. Despite tourism in the summer months, winter spending in Maine by locals is critical to the survival of basic services, availability of goods and gathering spaces.

In short: reducing Maine's menhaden quota means exporting jobs and importing bait.

3. Fairness and Regional Equity

The guidelines fail to provide regional differentiation, as emphasized in Amendment 3 to the Atlantic Menhaden FMP, which explicitly allows state-by-state and fishery-type considerations. Applying the same cut to Maine's bait harvesters as to mid-Atlantic industrial processors violates the principles of proportionality and fairness.

A % quota cut in Maine represents a far greater economic blow to small fleets than it does to vertically integrated processors elsewhere, let alone higher %. The ASMFC should not equate local Downeast bait harvesters with large-scale reduction operations. The ASMFC seems to have considered the recreational striped-bass concerns without consideration for the working waterfronts of coastal Maine.

4. Conservation vs Local Practice

Downeast Maine's menhaden fishery:

- Uses short-set gillnets and small vessels (≤ 500 ft nets, 6,000 lb daily limits).
- Has immediate end-use as lobster bait, with minimal bycatch or ecosystem disruption.
- Operates within Maine DMR's strict trip-reporting and emergency pace-management framework.

These controls ensure sustainable harvest and minimal ecological footprint. Imposing coast-wide quota reductions without regionally adjusted management will not meaningfully improve predator forage availability in Maine waters — but it will devastate local livelihoods.

5. New Modeling – Cookie-Cutter Approach Positioning Recreational Fisheries above Localized and Commercial

- The model appears to assume generalized coast-wide behavior, but in places like Maine the menhaden fishery is largely for **bait**, not large-scale reduction (fish-meal/fish-oil) operations. If the model doesn't distinguish between those different fishing sectors (bait vs reduction), then setting quotas without that differentiation can mis-estimate impacts.
- The model also may assume uniform distribution of menhaden, uniform harvest pressure, etc., but coastal conditions (temperature, migration, prey/predator interactions) vary geographically.
- The long coastwide modelling masks regional viability and potential changes in migration patterns of pogies due to broader ecosystem changes. What pogies do in Maine may differ from the Chesapeake Bay system. Using a coast-wide model applied uniformly can miss localized depletion, migration, predator-prey dynamics, or unique regional harvest-use patterns.

6. Proposed Amendments for Maine's Bait Fishery

To preserve both sustainability and community viability, I respectfully propose the following amendments:

1. Regional Allocation Adjustment – Establish a *Downeast Maine carve-out* within Maine’s allocation to protect small-scale bait harvesters in fishery communities.
2. Bait Use Priority Clause – Give quota preference to landings documented for direct bait use rather than reduction processing.
3. Adaptive Harvest Pacing – Use per-vessel or per-day limits to manage pace rather than total quota cuts.
4. Economic Impact Requirement – Mandate an economic impact analysis before any future quota reductions, specifically evaluating bait cost inflation and community impact. ASMFC should assess the funding spent to advocate for the striped-bass recreational fishery in the Mid-Atlantic and not overinflate their needs due to lobbying when compared to the Maine fishery systems.
5. Enhanced Monitoring – Require trip-level data reporting from ports (already underway through Maine DMR).
6. Reassess their modeling – The change in modeling inputs to arise at this new 50% reduction should be analyzed, discussed and reassessed with a broader scientific and fisheries audience. Regional considerations should be utilized rather than blanket considerations for the entire system.

6. Conclusion

While conservation of menhaden as a forage fish is essential, it must be balanced with regional economic sustainability and fair access for small-scale harvesters. The Downeast Maine fishery is a model of responsible, localized management — and should not be punished through blanket quota reductions designed for entirely different fisheries.

The ASMFC should:

- Reject the proposed coast-wide reduction formula,
- Implement regionally tailored allocations, and
- Recognize the unique role of Maine’s bait fishery in supporting one of the most valuable and sustainable lobster industries in the world.

Thank you for considering this comment and for your commitment to fair, science-based management that sustains both the menhaden resource and the communities that depend upon it.

Leroy A. Weed Jr.
Menhaden Fisherman f/v Contender
Stonington, Maine
Menhaden Commercial License #: 34428

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James Boyle

From: serenaleespurling <serenaleespurling@gmail.com>
Sent: Friday, October 24, 2025 8:22 AM
To: James Boyle
Subject: [External] [New] Please Avoid Drastic Cuts to the Menhaden Quota

My name is Richard A. Alley, Jr, Cranberry Isles, lobster fisherman.

I hope you base these cuts on scientific evidence. I hope you realize that these Menhaden are traveling way up in the Bay of Fundy each summer going further East and North each year.

Thanks for your consideration.

Sent from my Galaxy

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James Boyle

From: Cameron Murphy <cameron.murphy4621@gmail.com>
Sent: Friday, October 24, 2025 7:59 AM
To: James Boyle
Subject: [External] [New] Opposition to projected Menhaden quota Cuts

Dear Commissioner,

My Name is Cameron Murphy. I fish commercially out of Long Island Maine. As a state and Federal lobster license holder and State of Maine Menhaden license holder I am strongly opposed to any cut in Menhaden quota. The menhaden fishery in maine is a small scale fishery which provides necessary affordable bait for the lobster fishery. Bait expense is currently the highest expense in my daily lobster operation. The ability to catch menhaden locally greatly helps to offset bait cost that otherwise has to be shipped in from out of state.

Stock assessments show strong stock, given the fishcare local and plentiful I see no reason we should not be able to catch them and fill Maines existing quota. There is no need to reduce quota across the board.

I oppose any cuts to Menhaden Quota

Respectfully,

Cameron Murphy

FV Blue Dolphin II

Long Island Maine

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James Boyle

From: anna palino <avalucille3006@icloud.com>
Sent: Friday, October 24, 2025 7:01 AM
To: James Boyle
Subject: [External] [New] Menhaden quota

Hello my name is Jason lord commercial fisherman in Maine I've seen the proposed cuts from the asmfc I've been involved in this fisherney for the last 7-8 years Maine relies heavily on these fish for lobster bait any proposed cut based on outside pressure from environmental groups and not proven statistical data will be devastating to maines economy
Thank you Jason lord

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James Boyle

From: Paula Lunt <paulalunt@gmail.com>
Sent: Friday, October 24, 2025 6:01 AM
To: James Boyle
Subject: [External] [New] Don't reduce the menhaden catch limits

I am a full-time lobsterman as is my husband and son. We use menhaden for bait to catch lobsters. We catch the menhaden ourselves. Between the lack of other choices and the cost, it's essential we have menhaden. Reducing our quota would be a BIG hardship. Not just with our income but others who handle our lobsters we catch would decrease. Menhaden fishing is done in a eco friendly way. Once we make the set, all the fish stay alive and any we can't keep swim away. Please keep the quotas as they are.

Captain Paula Jean Lunt
F/V Endurance
Tenants Harbor, ME

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James Boyle

From: rdh3958@aol.com
Sent: Friday, October 24, 2025 5:56 AM
To: James Boyle
Subject: [External] [New] Menhaden quota reduction

Good morning,

My name is Ryan Haskell. I am a fisherman from North Haven Island in Maine. I fish for lobster year round and seine for menhaden. I do not know a lot of the details but I believe this is the place to submit a comment regarding a potential reduction in the menhaden quota in the future.

I'm not going to bore you with regurgitated statements about the science doesn't support any reduction. I have been fishing too long to have much faith in fisheries science. I have seen the "best available information" used too many times. It's a big ocean and we need to protect resources but from what I have seen, there are more menhaden than ever.

The small scale fishery and small weekly quotas in Maine work well.

I would wonder why there needs to be such a drastic cut in quota? It's not for the resource so it must be for another reason.

Any reduction in menhaden quota will be very hard on all of the lobstermen in Maine. The only bait options are frozen bait and menhaden. If there is no menhaden for bait the price and supply of the frozen bait will be devastating to a fishery that is struggling now.

Thank you

Ryan Haskell

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

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James Boyle

From: jimtitone@aol.com
Sent: Thursday, October 23, 2025 11:17 PM
To: James Boyle
Subject: [External] [New] Atlantic Menhaden

Dear Mr. Boyle. Please be advised that I am against any cuts in the quota for Atlantic Menhaden. According to the latest stock assessment and as presented by ASMFC, **the Atlantic Menhaden stock is not depleted and not overfished.** Menhaden go where their food is located. They are not in Chesapeake Bay as there is no feed for them in the bay. From catch results in NH, Menhaden are plying the waters offshore in the EEZ. There have been no catches of any mention in nearshore NH waters. This is due to their food sources residing in federal waters.

Again, NO CUTS IN THE QUOTA FOR ATLANTIC MENHADEN.

Thank you for your consideration of no quota cuts.

Jim Titone
Seabrook, NH
603 394-5794

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James Boyle

From: Jason Joyce <lobstermobster729@yahoo.com>
Sent: Thursday, October 23, 2025 11:08 PM
To: James Boyle
Subject: [External] Proposed menhaden reduction

Dear ASMFC Commissioners,

I am asking for a reduction of no more than 15% to the Menhaden TAC.

The species has been managed in a very conservative manner over the years, and considering the strong recruitment over the last 3 years, a reduction of 15% is a reasonable measure to protect from overfishing in the future.

A reduction in quota greater than 15% will significantly restrict the availability of bait in Maine(which already has a small quota) therefore financially harming our lobster fleet and the island communities like mine that depend almost exclusively on lobster-fishing.

I will be in attendance at your meeting and happy to speak with any Commissioners beforehand about the importance of not advancing a needlessly restrictive quota reduction.

Thank you,

Jason

Capt. Jason Joyce
20 Grindle Road
Swan's Island, ME. 04685
207-479-6490

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James Boyle

From: Shelly E <elmershelly@gmail.com>
Sent: Thursday, October 23, 2025 10:55 PM
To: James Boyle
Subject: [External] [New]

Dear Commissioner,

I am writing to urge you, the Commissioner, to reject the proposed 55% reduction in the Atlantic menhaden quota. Instead I urge you to adopt a fact-based, modest quota reduction of no more than 10%--based on a balanced, science-driven approach that protects both the resource and the people who depend on it.

Thank you for considering this reasonable choice toward supporting sustainable, community-focused fisheries management.

Sincerely,
Shelly Elmer
Palermo, Maine

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James Boyle

From: John Tripp <spindrift4481@gmail.com>
Sent: Thursday, October 23, 2025 9:34 PM
To: James Boyle
Subject: [External] [New] Menhaden

Hello,

I am writing in regards to the potential menhaden quota cuts. My name is John Tripp, I am a commercial fisherman in Maine. I primarily harvest lobster for the main source of my income, but recent diversification opportunities have allowed me to harvest menhaden as well. This ability has become a very important part of my business plan, as rising frozen bait costs and lack of fresh reasonable bait availability has become burdensome.

Almost every single menhaden fisherman in Maine is an owner operator/sole proprietor. A potential cut of 55% coastwide would be devastating to the fishermen who have invested in the ability to harvest the resource in a sustainable manner on the coast of Maine. We are all small scale fishermen running small nets and harvesting 100% of our resource as a bait source for local Maine lobstermen, as well as our own personal bait use. We have become reliant on menhaden as a bait resource in the absence of a herring quota. I would ask that in making cuts to quotas that you take this into consideration, and allow Maine to continue its harvest at the current rate. We are a very small portion of the overall quota, and we are not large corporate owned harvesters.

Our wharf sells primarily menhaden as bait, it makes up over 70% of personal current bait use. It is also the most reasonably priced bait for an industry that is feeling the economic pressure with bait prices bearing down on us and lobster prices not adjusting to compensate. We need this resource to be available, please allow us, as stakeholders and good stewards to continue to harvest this resource. Maine fishermen are not big business, our recently increased portion of the quota is a staple for the Maine Lobster Industry, we need this resource.

Thanks, John Tripp
F/V SkyAnnIra
Spruce Head, Maine

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James Boyle

From: Sonny Beal <sonnybeal@gmail.com>
Sent: Thursday, October 23, 2025 9:12 PM
To: James Boyle
Subject: [External] [New] Menhaden quota

Mr Boyle,

I am writing you regarding the proposed cuts to the current menhaden fishery. Decreasing the Total Allowable Catch for menhaden would be a severe economic hardship on Maine Lobster Fishermen and Menhaden fishermen alike. Maine lobstermen rely heavily on menhaden for bait for our fishery. More so now that the herring quota has basically been eliminated. Our bait costs are astronomical now and reducing the quota would make things even worse. There is no evidence of over harvest and going by a “mistake” in the stock assessment is absolutely ridiculous. I hope that the ASMFC Atlantic Menhaden Board uses common sense and not made up stock assessments when ruling on the TAC. Please leave the quota where it is.

Sonny Beal
Maine Lobster Fisherman

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James Boyle

From: John McCarthy <jmccarthy2388@yahoo.com>
Sent: Thursday, October 23, 2025 8:38 PM
To: James Boyle
Subject: [External] [New] Please avoid drastic cuts to menhaden quota

My name is John McCarthy, I am a lobsterman from Vinalhaven, Maine. I am president of the board of directors at the Vinalhaven fisherman's Co Op. I am also on the board of the Maine Lobsterman's Association. Cutting the menhaden quota would be devastating to not only the menhaden harvesters, but also to the lobstermen that use them for bait. Bait is our biggest expense and this would only drive prices higher. This will hurt the livelihood of all lobstermen and pogie fishermen. Thank you for your time. -John McCarthy

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James Boyle

From: Dan Murphy <fvbantrybay@hotmail.com>
Sent: Thursday, October 23, 2025 8:29 PM
To: James Boyle
Subject: [External] [New] Menhaden

Dear members of ASMFC,

I am a New England fisherman and I am writing to express my concerns about a potential reduction in menhaden quota. Any large reduction in quota will have an adverse ripple effect on many fisheries such as, lobstering, crabbing, seining and not to mention dock workers, crewmen and processors.

The trap fisheries have already been struggling from quota cuts of Atlantic Herring and Mackerel. Menhaden is a bountiful alternative that has kept those fisheries going and are very dependent on them now.

Menhaden off the New England coast have been plentiful and seems to be increasing. I do not believe that they are over fished. I think the fish have changed their traditional habits and are staying farther off shore instead of settling into shoal water bays. For that reason I do not know, but perhaps it could be water temperature or it could be because of the food source. We are also experiencing that the menhaden have been staying on the bottom instead of their traditional habit of being on the surface.

The ocean is changing. When the models show dip in any fishery it is almost always assumed that it is overfished. The real fact of the matter is that some fish are changing their ways to get what they need. We are seeing it in so many fisheries, such as Gulf of Maine Cod, lobster and Gulf of Maine shrimp. Furthermore, Striped Bass have also changed their habits. Most of the Striped Bass off New England stayed several miles offshore.

My final thought, the fish are there, but not in the usually places. They are offshore and deep. Please take this into consideration and make sure you have all the best available Data needed to make this decision.

Thank you,

Dan Murphy
FV Tribiah Lee
Seiner

Sent from my iPhone

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James Boyle

From: Seth Walker <northstar5921@gmail.com>
Sent: Thursday, October 23, 2025 8:00 PM
To: James Boyle
Subject: [External] [New] Menhaden 55% reduction

I think a 55 percent reduction in the menhaden quota would be harmful to the lobster industry. The fishery has received Marine stewardship certification confirming its sustainable and responsibly managed. I urge the commissioner to adopt a fact based reduction of no more than 10 percent a balanced science driven approach that protects both the resource and the people that depend on it thank you for your time . Sincerely Seth Walker commercial lobsterman Harpswell Maine

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James Boyle

From: Tyler McLaughlin <pinwheeltunafishing@gmail.com>
Sent: Thursday, October 23, 2025 7:37 PM
To: James Boyle
Subject: [External] [New] Proposed Menhaden Quote Cuts

Hello I am Tyler McLaughlin a commercial fisherman out of Rye, New Hampshire and Bailey Island Maine. I run a charter boat, the FV PinWheel as well as a commercial bluefin harpoon boat F/V CartWheel. I feel that it is very important to go along with the proposed quota of cuts for next year for the Menhaden fishery. The data that scientist observed with landings of menhaden this past summer, a majority of the fish that were landed were very small in size. I tend to believe as a fisherman that overtime that when the bigger fish that you were catching of years past have been reduced to smaller Fish. It means that you are starting to really thin the herd instead of keeping the quota at the same total allowable catch that it was in 2025. It's best to do a quota reduction and to try and obtain better data on the exact biomass of the species. We are seeing a huge decline in the Atlantic Herring throughout the entire Gulf of Maine majority of the predators in the Gulf of Maine have switched over and are depending on these menhaden to survive I feel that it is critical to protect the resource rather than to over harvest the resource when that data is not available. I really hope that you will stand firm and go along with the proposed quota cuts for 2026

Thank You Very Much,

Capt Tyler McLaughlin
PinWheel Tuna Fishing LLC. Rye, NH & Bailey Island ME

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James Boyle

From: JEREMY THOMPSON <thompsonjeremy56@gmail.com>
Sent: Thursday, October 23, 2025 6:08 PM
To: James Boyle
Subject: [External] [New] Mehandan comments

Hello there

A reduction to the menhaden quota would be devastating to not only the harvesters but the lobster fisherman as well.

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James Boyle

From: Shaun McLennan <fvthunder@gmail.com>
Sent: Thursday, October 23, 2025 6:08 PM
To: James Boyle
Subject: [External] [New] MENHADEN

My name is Shaun McLennan. I am a commercial fisherman from midcoast Maine. I strongly oppose the proposed 50+% reduction of the Menhaden quota. As a lobsterman, I use menhaden for lobster bait. As a Menhaden fisherman I supply my dock with fresh Menhaden during the season for dozens of lobstermen. The income from catching the Menhaden is a large part of my income, and my family depends on it, as well as my crew. The fishery in Maine is healthy, sustainable, and we'll managed by our state. I understand the mid-atlantic has some issues, but we don't want to be penalized for it.

If any change has to be made, I stand with NEFSA and their proposed 10% reduction that reduces any chance of overfishing to less than 4%. I strongly encourage the board to consider the plan of NEFSA. The Maine coast would suffer greatly from a massive reduction in Menhaden quota.

It is probably time for ASMFC to adjust how they manage the Menhaden fishery. A blanket rule for the 2,000+ mile coastline of all atlantic states seems odd. Different areas have different fish in different seasons.

Thank you for your consideration,

SHAUN MCLENNAN
F/V Horizon
Spruce Head, Maine
fvthunder@gmail.com
(207)691-1919

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James Boyle

From: kamano@tidewater.net
Sent: Thursday, October 23, 2025 6:07 PM
To: James Boyle
Subject: [External] [New] Comment for menhaden re:Coastwide Specs

Dear Chairman Clark an menhaden Board ,I am Michael Dawson a menhaden harvester, an a lobster fisherman from new harbor Maine I also represent Maine on the menhaden advisory board for asmfc. Myself an other menhaden fisherman catch all the bait for the coop in New Harbor an also other lobster buying wharves in the area, any reduction in the Quota will have devastating effects on the Maine lobster fleet as it is the main source of bait we use an also the menhaden fisherman income that will be lost if Quota is largely reduced. The stock seems very healthy in Maine waters the past few years an a huge reduction seems uncalled for at this time. Thank you Michael Dawson F/v Lisabeth Ann New Harbor Maine
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James Boyle

From: Brian Billings <brianbillings87@gmail.com>
Sent: Thursday, October 23, 2025 5:54 PM
To: James Boyle
Subject: [External] [New] Menhaden cuts

James Boyle,

Please consider keeping Maines share of quota the same or very close to the amount it has been in the past. Our lobster fishing communities rely on this fresh and cost effective bait source for our independently owned operations. We already get a very small percentage compared to other states. It is sad enough that the majority of quota goes to big companies that allows for huge profits for very few at the top.

Let's be smart and protect the coastal fishing communities along with the recreational fishing operations and not stuff big corporate pockets!

Sincerely,
Brian Billings
Lobsterman. Stonington, Maine.

Sent from my iPhone

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James Boyle

From: Chip Johnson <chipneta@comcast.net>
Sent: Thursday, October 23, 2025 5:51 PM
To: James Boyle
Subject: [External] [New] Drastic cuts to Menhaden Quota?

Dear Mr Boyle,

I have been lobster fishing since 1988. I commercial fished (Grand bank sword-fishing; Georges bank ground-fishing) since 1984.

Please take deep consideration into the effects on a needless reduction would cause the lobster fishery in Maine and elsewhere.

It has become obvious that background un-elected powers are after the independent fishermen. One false thing after another. Cuts are not necessary for the menhaden fishery.

The most recent stock assessment shows that menhaden are not over-fished, and over-fishing is not occurring. The Northeast stock is fine.

Thanks for listening.

--

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

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James Boyle

From: andrew havener <havenerandrew@yahoo.com>
Sent: Thursday, October 23, 2025 4:33 PM
To: James Boyle
Subject: [External] [New] Please avoid drastic cuts to the menhaden quota

Hello,

My name is Andrew Havener and I am a lobsterman fishing out of Friendship, Maine. My father, son, brother and nephew also lobster. Our primary bait source, especially in the summer months, is menhaden (poggies), caught locally by other lobstermen in the town of Friendship. Without the local poggies we would face drastically increased bait prices, bait shortages, and produce a lot of plastic and cardboard garbage by the increased use of frozen bait.

I'm asking that you consider the large economic impact that a 55% menhaden quota cut would have on the lobstermen, and Maine economy as a whole.

Thank You
Andrew Havener
MLA member

Sent from my iPhone

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James Boyle

From: Gary Libby <portclydecowboy@gmail.com>
Sent: Thursday, October 23, 2025 1:06 PM
To: James Boyle
Subject: [External] menhaden quota

I'm a lobsterman from Port Clyde Maine.

I don't think a quota cut by 55% is needed for the fishery. It would be devastating for me and other fishermen who depend on Menhaden for bait for our traps.

--I ask you to please consider the lobster fishery before making such a large cut in the bait supply for our fishery. Thank you for your time you spend working for fisheries.

Captain Gary Libby

Never stop fighting till the fight is done.

Live long, live strong, eat seafood.

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James Boyle

From: Erik HANSEN <erikhansen1214@gmail.com>
Sent: Thursday, October 23, 2025 12:39 PM
To: James Boyle
Subject: [External] [New]

Hi my name is Erik Hansen born and raised in Spruce head ME. Been lobstering my whole life since I was 10years old so 40 years. I think a 55 % reduction on our pogie fishery is un called for especially on the coast of Maine. We need this fisherie for bait since the herring quota was slashed by 90% my concern is why boats from other countries are taking fish from our waters. Seems to be plenty of fish in my area, the local boats catch thier quota daily on open days and it's all used for lobster bait to support the coast of Maine. Please don't let the fishermen of Maine suffer because the government gave the fish to other countries. Thank you Erik.

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James Boyle

From: David Thomas <a1lobster@gmail.com>
Sent: Thursday, October 23, 2025 12:01 PM
To: James Boyle
Subject: [External] [New] Proposed 55% reduction in menhaden quota

Dear Commissioner,

Please vote against this proposed reduction in the menhaden quota. It is wrong for all the reasons NEFSA has stated. I am sure they have been busy making sure of their stance regarding this proposed reduction.

Thank you,

David Thomas

45 Bar RD

Islesford, ME 04646

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James Boyle

From: matthew snow <mattydeeds@yahoo.com>
Sent: Thursday, October 23, 2025 10:31 AM
To: James Boyle
Subject: [External] [New] Please Avoid Drastic Cuts to the Menhaden Quota

To whom it may concern:

My name is Matthew Snow, and I am from South Thomaston Maine. Along with my two brothers, I am a sixth generation lobster fishermen, going out from Spruce Head Island. This lifestyle and industry is important beyond words to my family and future generations.

A 55% cut on Menhaden would dramatically impact our business. Bait is the most significant cost we face, literally every day, that we are in operation. Menhaden have become the most used source of bait. Cutting the limits will skyrocket the price, and most likely force us to seek out other options that may not work as well. I assume it will send prices of other bait up as well, because demand will go up.

The harm this could cause to lobster fishermen's businesses, and as a result their families, will trickle out to the rest of the economy without a doubt. Many will be impacted.

I sincerely hope this idea is reconsidered, and I appreciate you taking the time to hear my sincere concern.

All the Best, Matthew Snow

[Sent from Yahoo Mail for iPhone](#)

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James Boyle

From: Mike G <cgagnon@roadrunner.com>
Sent: Thursday, October 23, 2025 10:29 AM
To: James Boyle
Subject: [External] Menhaden Cuts and effects on our lobster fisheries

-
-
- A cut of up to 55% would have devastating effects on Maine's lobster fishery, bait supply, and coastal economy.
- Menhaden are now the primary bait for Maine lobstermen. Bait is already the largest daily operating cost for Maine lobstermen. If the menhaden quota is cut in half, prices will rise even higher, pushing your small, owner-operator businesses to the breaking point.
- Maine's lobster fishery supports more than 5,000 small owner operator business, providing more than 10,000 jobs and contributing \$2 billion annually to our state's economy. The menhaden fishery itself supports about 400 license holders, most of whom are lobstermen.
- The most recent stock assessment shows that menhaden are not overfished, and overfishing is not occurring. The Northeast stock remains unstable.
- Please take into account the economic impact of cutting the menhaden quota and protect the bait access that sustains Maine's lobster industry and coastal communities.
- As stated above, the cuts to menhaden fishing and all other regulations and cuts being made on Maine lobstermen is slowly but surely killing this industry and putting hardworking small businesses out of business and families out of work.

M Gagnon
Lobsterman and Maine Resident

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James Boyle

From: Dave Earl <dave@midcoastboat.com>
Sent: Thursday, October 23, 2025 9:59 AM
To: James Boyle
Subject: [External] [New] Menhaden Cuts

Hello,

To whom it may concern:

My name is David Earl and I am a Zone D Lobster license holder here in Maine. There is absolutely no reason that the Menhaden catch/quota should be cut down because there is obviously an abundance of them from Maine to NJ and us Lobster fisherman need them immensely for our bait. There definitely needs to be more research done on this before a drastic measure like a cut has been done. I have seen hundreds of schools of Menhaden in Maine that have not been caught so that tells me that there is plenty of fish around. We should be listening to the actual Menhaden fisherman to determine what needs to be done with the fishery because they would know best, not some scientists behind a desk. We as fisherman will fight this tooth and nail because it is not right and should not go through with any reductions. Just think of all the money that is generated for the economy from Menhaden. Its definitely alot of kickback to the local economy. Thank You

Best regards,
Dave

David Earl, Broker
Midcoast Yacht & Ship Brokerage
Spruce Head, Maine 04859
207-594-2201 Office
207-390-5146 Cell - call or text
dave@midcoastboat.com
www.midcoastyacht.com

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James Boyle

From: Jeb Worcester <penbaydivingsalvage@gmail.com>
Sent: Thursday, October 23, 2025 9:45 AM
To: James Boyle
Subject: [External] [New]

My name is Jeb Worcester. I've been pogie fishing for quite a few years now. I was fishing before there was a quota. Im really confused as to why this is happening now. Whats the basis for cutting quota like this? I thought they opened the season way to early this year. The water temp was alot colder then it has been in previous years. Probably like 5 to 8 degrees colder. Usually, later in the year fish were a little harder to catch as the water cooled off. Early in season when it was 65 or 68, they were easy to catch cause they seemed to not move as much. As it cooled off they seemed to move alot more making them harder to get with a seine. This year they were like that all year. But other then that, that's the only real difference I saw. I never really had any trouble finding fish. I did see some smaller fish towards the end. But they've been catching small fish to the south for years. I would just really like to know what's the reasoning for this. And what's the science behind it. And hopefully it's not some person who only goes out on the water a couple times a year, following some computer model that's using data from 1999. There should be people on this decision making board that actually interact with it every day. Anyways, I hope you all listen to what we all have to say. Thank you.

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James Boyle

From: Meg Young <megyoung5@yahoo.com>
Sent: Thursday, October 23, 2025 7:32 AM
To: James Boyle
Subject: [External] [New] Public Comments - opposed to 55% Cut

Dear Commissioner,

I am writing to you as a concerned citizen regarding the ongoing Atlantic menhaden fishery assessment. I respectfully urge you to carefully scrutinize the recently proposed 55% reduction in the total allowable catch which presents a significant and unwarranted challenge to the fishery's certified sustainable status.

The Atlantic menhaden fishery holds the Marine Stewardship Council's respected ecolabel, a testament to its sustainable and responsible management. The fishery has met MSC's rigorous, science-based standards, demonstrating that the stock is healthy and that fishing practices do not lead to overfishing. The current management framework, previously validated by your independent assessment, already ensures the long-term productivity of the stock by setting harvest limits that are sustainable.

A drastic 55% quota reduction, as currently proposed, poses a direct threat to the very communities and livelihoods that the MSC's program aims to protect. Such a severe cut, which is not grounded in the existing body of scientific evidence used to certify the fishery, would:

- **Contradict the socio-economic dimension of sustainability:** The MSC program recognizes that sustainability extends to protecting livelihoods and engaging with stakeholders. A disproportionate quota reduction would cause serious economic harm to the menhaden bait sector, devastating the bait-dependent lobster and crab fisheries and the coastal communities that rely on them.
- **Create undue instability:** MSC certification is meant to provide assurance of stability and effective, adaptive management. Imposing a dramatic cut that disregards the socio-economic factors and existing management practices undermines this stability and could erode trust in the management system.
- **Impede the pathway for improvement:** As demonstrated through the MSC process, the fishery has already committed to and achieved improvements in its management. Imposing an extreme measure, rather than the more modest, fact-based adjustments seen in well-managed systems, sends a conflicting signal about the value of the certified process itself.

I instead advocate for a reasonable quota adjustment, of no more than 20% that reflects a balanced, science-driven approach while upholding the principles of the MSC. This position aligns with the effective management framework that has already earned this fishery its certification.

I request that the certification body rigorously evaluate the proposed cut in light of the fishery's certified status and the evidence supporting its current management regime. Thank you for your continued commitment to transparent and sound fisheries management that supports both healthy oceans and healthy communities.

Respectfully,

Meg Young,MS

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James Boyle

From: Lee Moore <leemoore91011@yahoo.com>
Sent: Wednesday, October 22, 2025 8:09 PM
To: James Boyle
Subject: [External] [New] James Boyle, Menhaden FMP Coordinator: Menhaden Reduction Concerns

Dear Commissioner,

My name is Lee Moore. I am a Menhaden Harvester and have been for many years. Throughout the years, if anything, I have noticed an increase in fish stock numbers in my fishing area, which spans from Harpswell to Searsport. So to hear there is a proposal to cut the quota by 55% is, to say the least, a shock. Menhaden are not being overfished and are not in any threat of being overfished. The current quota basis is set in place to ensure that. I am urging you to reject the proposed 55% reduction because of the following reasons:

1. The science does not support this drastic cut.
2. The businesses that rely on Menhaden would be devastated by this proposed quota cut. The businesses I refer to are lobstering and crabbing, as well as wharves and co-ops, and our working waterfronts and coastal economies would suffer greatly if a 55% reduction were implemented.

I do not think our economy and communities that rely on this fishery have been taken into account. The Atlantic States Marine Fisheries Commission (ASMFC) should follow federal best practices. The ASMFC's own risk policy allows managers to weigh social and economic factors for sustainably managed stocks such as Menhaden. Ignoring these factors now would contradict both sound management principles and the April 17th, 2025, executive order on restoring the American Seafood Competitiveness, which calls for reducing unnecessary regulatory burdens and supporting the US seafood supply chain. I ask the Commission to adopt a fact-based quota reduction of no more than 10%, a science-approved percentage that will help the stock and those who depend on it to make their living.

Thank you so much for reading my letter, and I hope you find my insight on this matter fair and informative. Once again, for everyone and their businesses and communities that rely on Menhaden, please do not cut the quota for unjust reasons with no science to back it up.

Sincerely
Lee Moore
Newcastle, Maine

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James Boyle

From: rich rubin <docrubin@hotmail.com>
Sent: Wednesday, October 22, 2025 6:05 PM
To: James Boyle
Subject: [External] [New] Menhaden Fishery

Good Evening Mr Boyle:

I am a 76 year old catch and release angler and have been fly and spin fishing the coast of Massachusetts and Rhode Island since the early 1980s. This was when manhaden /bunker were abundant, blue fish were abundant and Stripers were overfished and essentially nonexistent.

I have noticed for over 25 years the decline of adult menhaden along the shore coincided with a current significant drop of shoreline Blue fish and now Stripers.

I understand that at an upcoming meeting the quota for bunker harvest will be determined.

I urge a total menhaden moratorium , but if not then a substantial reduction of harvest.

Thank you,

Richard Rubin

Amherst Massachusetts

Good health is true wealth

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James Boyle

From: Jim GORIOU <jim@nafisherries.com>
Sent: Wednesday, October 22, 2025 4:27 PM
To: James Boyle
Cc: Jim GORIOU
Subject: [External] [New] Menhaden

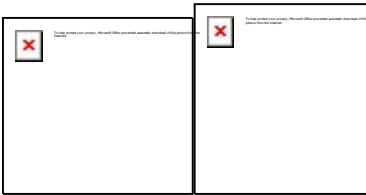
Good afternoon,

We strongly oppose to the project of reducing the Atlantic Menhaden quotas without significant scientific reasons

This fishery is healthy and helps to feed thousands of families in our regions, we want to be able to keep on accessing that resource and respect current quotas as we do currently.

Kind Regards,

Jim Goriou
Ph: +1 401-369-3886



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James Boyle

From: Joe Bruno <surffishing15@gmail.com>
Sent: Wednesday, October 22, 2025 4:26 PM
To: James Boyle
Subject: [External] [New] Menhaden

Re: Urgent Coastwide Action Required — End Reduction Fishing and Cut the Quota to Protect Striped Bass, Bait Fisheries, and Lobster and Crab Fisheries

Dear Members of the Menhaden Management Board,

On behalf of Menhaden Defenders, we write to demand immediate and decisive action to address the ongoing coastwide ecological crisis facing Atlantic Menhaden and the countless species that depend on them.

Forage fish like menhaden are the foundation of our coastal ecosystems — converting sunlight and plankton into energy that sustains nearly every predator we care about, from striped bass and bluefish to ospreys, whales, and dolphins. New science now reveals significant errors in the previous stock assessments that permitted overfishing of more than 275 million pounds annually.

The evidence is clear: Reduction fishing and the current coastwide quota are unsustainable. To give our marine ecosystem a chance to recover and sustain the marine animals and coastal fishing economies, we urge you to:

1. Set the 2026-2028 TAC at 75,616 mt, the current TAC for the bait fishery. This level has a significantly greater than 50% chance of meeting the ERP F target, accounts for additional menhaden stock assessment and ERP model risk, and will help ensure striped bass rebuilding; and,
2. Reallocate all quota to the bait fishery to protect the bait, lobster and crab fisheries, and prohibit menhaden fishing for reduction purposes.

The Striped Bass Connection: Two Fisheries, One Problem

The Atlantic States Marine Fisheries Commission (ASMFC) manages both striped bass and menhaden, and their fates are directly linked through the Ecological Reference Point (ERP) framework adopted in 2020.

Current data shows:

- Striped bass remain overfished (spawning stock biomass = 191 million lbs. vs. 197 million lb. threshold).
- Striped bass fishing mortality ($F = 0.18$) is below the threshold and near target—proof that anglers have taken meaningful reductions.
- Menhaden, the dominant prey species for striped bass and other predators, are now the limiting factor in their recovery.

Recreational anglers and conservationists have sacrificed to support striped bass rebuilding. It is now time for the menhaden industry to share that responsibility.

The Science Demands a Much Greater Than 54% Reduction

According to the ASMFC Technical Committee's October 2025 analysis, the current coastwide menhaden quota of 233,550 metric tons has a 100% probability of exceeding the ERP fishing mortality target through 2028.

Key findings include:

- Menhaden biomass is 37% lower than previously estimated in 2022 due to revised natural mortality data.
- 2023 biomass was 60% lower than the 2021 biomass used to set current harvest levels.
- The ERP fishing mortality target decreased from 0.19 to 0.15, reflecting increased predator demand and shifting ecosystem conditions.

Even at the Technical Committee's recommended 108,450 MT — a 54% reduction — it is estimated there would only be a 50% chance of staying within ERP sustainability limits. Anything less would continue to erode the forage base that supports our coastal ecosystem and gamefish populations. We must manage our key forage stocks with more chance of success than a coin flip.

Moreover, the independent science that recently uncovered the pattern of scientific errors that have consistently overestimated stock size and led to the decreased ERP values shows that additional errors remain and that even the reduced menhaden natural mortality rate estimate is still nearly twice as high as it should be.

A Pattern of Mismanagement

Despite adopting Ecological Reference Points five years ago, ASMFC has repeatedly set quotas that favor industrial harvest over ecosystem health. The coastwide TAC has increased from 170,800 MT in 2013–2014 to 233,550 MT today — a 37% increase — even as total menhaden biomass has sharply declined. This represents a dangerous disconnect between management policy and ecological reality. The result is a coastwide depletion of menhaden that undermines billion-dollar recreational fisheries, wildlife tourism, and the overall balance of the marine food web.

The Economic Stakes

According to NOAA Fisheries' 2021 Economics of the U.S. Fisheries Report, the Atlantic recreational fishing sector supports tens of thousands of jobs, billions of dollars in annual sales, and critical revenue for coastal communities. Striped bass fishermen have done their part, with fishing mortality now reduced to a 30-year low.

New England's lobster industry is valued at over \$1.5 billion annually. Lobstermen desperately need stable bait supplies as herring and mackerel remain scarce, and crabbers throughout the Mid-Atlantic also depend on menhaden bait.

Every ton of menhaden used as bait or left in the ocean supports predators that drive far greater economic value than industrial reduction ever could. Continuing to convert this essential forage into low-value fish meal for overseas aquaculture is both ecologically reckless and economically wasteful.

The Board should immediately initiate an addendum to prohibit menhaden fishing for reduction purposes. Menhaden are many times more valuable to the local and national economies when used as bait for commercial lobster and crab fisheries or when left in the water to support the recreational fishing industry.

Our Demands

Menhaden Defenders calls on the ASMFC Menhaden Management Board to:

1. Set the 2026-2028 TAC at 75,616 mt, the current TAC for the bait fishery. This level has a significantly greater than 50% chance of meeting the ERP F target, accounts for additional menhaden stock assessment and ERP model risk, and will help ensure striped bass rebuilding; and,
2. Reallocate all quota to the bait fishery to protect the bait, lobster, and crab fisheries, and prohibit menhaden fishing for reduction purposes.
3. Implement true ecosystem-based management, integrating predator-prey relationships and ecosystem feedback into quota decisions.

4. Suspend any TAC increases until independent review confirms that menhaden biomass and ERP models are scientifically sound.
5. Prioritize ecosystem health, biodiversity, and public resource value over industrial reduction harvest.
6. Strengthen monitoring and reporting requirements to ensure transparency and accountability in both bait and reduction fisheries.

Conclusion

The science is unequivocal: the current management approach is failing. If ASMFC continues on its current path, we risk the collapse of the forage base that sustains our coastal ecosystems and the gamefish that define Atlantic sportfishing.

Menhaden are the linchpin of the Atlantic food web. Without bold action now, the cascading effects of overharvest will be irreversible. We urge the Board to “take the cut” and adopt a reduction in the coastwide quota to 75,616 mt for the 2026–2028 cycle.

Anything less would sanction the continued slaughter of the most important fish in the sea — and with it, the loss of the vibrant fisheries, wildlife, and communities that depend on them.

thank you
Joseph Bruno
238 Virginia Dr.
Brick NJ 08723

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James Boyle

From: Keven Niland <kevenn43@yahoo.com>
Sent: Wednesday, October 22, 2025 4:02 PM
To: James Boyle
Subject: [External] [New] Menhaden reduction plan

I support this proposal.

Thank you,
Keven Niland
Madbury, NH

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James Boyle

From: Stephen Motta <s.motta@comcast.net>
Sent: Wednesday, October 22, 2025 2:02 PM
To: James Boyle
Subject: [External] [New] Menhaden fishery/quota

To whom it may concern;

As a Maine lobsterman/sternman any reduction in quota would severely impact my family as a whole. My teenage son is just getting started lobstering and we rely on bait the family catches off the coast of Maine for his income and mine. As a former employee of Cooke Aqua I know how they operate and how much money they have. Reducing their quota would be the simple answer as to not effect the "little guys" trying to make it in Maine. Please do not reduce the Maine menhaden quotas.

USCG Licensed Captain, Steve Motta

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James Boyle

From: secondtry1 <secondtry1@yahoo.com>
Sent: Wednesday, October 22, 2025 12:58 PM
To: James Boyle
Subject: [External] [New] Menhaden reduction

Hello,

I am a commercial fisherman in Maine and believe that the resource is healthy. As this highly migratory species extends its territory how can one estimate the total stock. The past few years there has been more in New England waters. There are vast amounts of menhaden in deeper waters where they are not even being harvested. I think it would be short sighted to cut the resource by such a large amount.

Thank you for your time,

Joseph Locurto
F/v Jasmine Marie

Sent via the Samsung Galaxy S23 Ultra 5G, an AT&T 5G smartphone

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James Boyle

From: Scoop Mason <deadmail57@gmail.com>
Sent: Wednesday, October 22, 2025 12:29 PM
To: James Boyle
Subject: [External] [New] Menhaden Quota

Attention Mr J Boyle :

Please leave the Atlantic Menhaden limits alone .

We don't need " the lobsters have feelings too " activist crowd dictating insane conservation requirements to the fishermen .

As if the " whales get tangled in the gear " hoax isn't stressful enough .

WHO is really behind this " regulation " effort ?

I would suspect the Chinese who want more of our fisheries while forcing fellow Americans to take less .

Please do not cripple our lobster industry by further increasing fishing costs .

LISTEN to NEFSA and not the crazy constantly unhappy anarchists who want to destroy everything that they can in the name of some twisted environmental justice .

Respectfully yours .

RFMason
Round Pond Maine

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James Boyle

From: Mike Roeber <meroeber@gmail.com>
Sent: Wednesday, October 22, 2025 12:27 PM
To: James Boyle
Subject: [External] [New] Menhaden reduction

Dear commissioner, please do not accept a 55 percent reduction, the state of maine ,has strict harvest laws already in place . There are plenty of mature stock in maine, no need to reduce quota here. If Chesapeake Bay ,are can't find the fish there they are the ones that need to be reduced. Take there 55 percent reduction and divide it between the northern new England are equally. Thanks.

Sincerely,
Michael Roeber.

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James Boyle

From: Katrina Hamilton Gewirz <kgewirz@aol.com>
Sent: Wednesday, October 22, 2025 12:26 PM
To: James Boyle
Subject: [External] [New] Atlantic menhaden COMMENT

To: James Boyle, Menhaden FMP Coordinator
Email: jboyle@asmfc.org

Dear Commissioner,

I am writing to strongly oppose the proposed 55% reduction in the Atlantic menhaden quota. Such an extreme cut lacks a sound scientific basis and would inflict significant economic damage on menhaden harvesters, bait-dependent fisheries such as lobster and crab, and the working waterfronts that form the backbone of our coastal communities.

Atlantic menhaden are not overfished, and overfishing is not occurring. The fishery has earned Marine Stewardship Council certification—an independent confirmation that it is both sustainable and responsibly managed. The current Total Allowable Catch already maintains the stock at healthy levels, ensuring ecological balance and long-term productivity.

A 55% reduction would not yield measurable conservation benefits but would have immediate, far-reaching social and economic consequences. It would increase bait prices, disrupt supply chains, strain small businesses, and undermine the livelihoods of thousands who depend on this resource. Moreover, such an abrupt policy shift disregards the Commission's own risk policy, which directs managers to consider both environmental and community impacts when a stock is sustainably managed. Sudden drastic reductions without credible evidence erode confidence in science-based management.

I also urge the Commission to heed the April 17, 2025, Executive Order on Restoring American Seafood Competitiveness, which emphasizes regulatory balance and the importance of supporting the U.S. seafood supply chain. A measured approach—such as a modest adjustment of no more than 10%—would fulfill conservation goals while maintaining economic stability.

Finally, I ask that the Commission consider:

- The increasing need for domestic food security and sustainable U.S.-caught protein.
- The uncertain effects of climate change on forage species dynamics—making it unwise to compound variability with unnecessary quota shocks.
- The importance of maintaining consistent, predictable management to sustain investment, jobs, and consumer confidence in American seafood.

Thank you for your careful consideration and for upholding a balanced, science-based approach that protects both healthy fisheries and the coastal communities they sustain.

Sincerely,

Katrina Hamilton Gewirz

James Boyle

From: Judy Sgantas <skipper4953@yahoo.com>
Sent: Wednesday, October 22, 2025 12:12 PM
To: James Boyle
Subject: [External] [New] Regulations on quotas

As a Maine resident and friend of the fisherman and member of NEFSA I am deeply concerned about continued regulations done without adequate research and studies. The quotas are not based on real science and numbers that actually reflect what and where the species regulated are. I don't understand the motives behind this as it will destroy the industry. All factors are taken into account something I know Jerry and Dustin are fighting for. There needs to be a more Titian on all regulations until accurate studies and numbers can be compiled. Once you destroy something it does not always come back. Enough damage has been done for politics and idealogs. The effects of this are long lasting. Please reconsider and table anymore regulations until these studies can be done.

Thank you,
Judy Sgantas

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James Boyle

From: Jeff Mixon <akula673@gmail.com>
Sent: Wednesday, October 22, 2025 11:25 AM
To: James Boyle
Subject: [External] [New] Comment for Menhaden Board re: Coastwide Specifications

Dear Commissioners,

I write to you today to object in the strongest way possible to object to additional restrictions on the menhaden fishery in Delaware.

The recommendations are not based on reasoned science. The damage to the economy of that area far outweighs any proposed benefit.

The menhaden fishery is greatly underappreciated and faces numerous challenges without additional regulation.

For the record, I am in no way connected to the fishing industry.

Sincerely,

Jeff Mixon
Raleigh, NC

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James Boyle

From: Meghan Painton <meghan.painton@gmail.com>
Sent: Wednesday, October 22, 2025 3:06 PM
To: James Boyle
Subject: [External] [New] Proposed new harvest limits for Atlantic menhaden.

Dear Commissioner,

I am writing to urge the Commission to reject the proposed 55% reduction in the Atlantic menhaden quota. This drastic cut is not supported by science and would cause serious economic harm to menhaden crews, bait-dependent fisheries such as lobster and crab, and the working waterfronts that sustain our coastal economies.

Atlantic menhaden are not overfished, and overfishing is not occurring. The fishery has earned Marine Stewardship Council certification, confirming that it is sustainable and responsibly managed. The current Total Allowable Catch (TAC) already limits harvest to a level that ensures long-term stock health.

A 55% quota reduction would not meaningfully improve conservation outcomes but would devastate communities across the Atlantic coast that rely on menhaden for bait and income. The ASMFC should instead follow federal best practices—preventing overfishing while also considering the economic and community impacts of its decisions.

The ASMFC's own risk policy allows managers to weigh social and economic factors for sustainably managed stocks such as menhaden. Ignoring those factors now would contradict both sound management principles and the April 17, 2025, Executive Order on Restoring American Seafood Competitiveness, which calls for reducing unnecessary regulatory burdens and supporting the U.S. seafood supply chain.

I urge the Commission to adopt a fact-based, modest quota reduction of no more than 10%—a balanced, science-driven approach that protects both the resource and the people who depend on it.

Thank you for considering these comments and for supporting sustainable, community-focused fisheries management.

Sincerely,
Meghan Painton Bailey Island Maine

Meghan.painton@gmail.com

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James Boyle

From: mseandel@everyactioncustom.com on behalf of Marco Seandel
<mseandel@everyactioncustom.com>
Sent: Tuesday, October 21, 2025 6:03 PM
To: Comments
Subject: [External] For MMB Distribution: Setting Specifications for the 2026-2028 Fishing Years

Dear ASMFC Menhaden Management Board,

The relative absence of menhaden in my area over the last 2 years is striking and upsetting.

I'm writing to urge you to maintain the integrity of the Ecological Reference Point (ERP) framework for Atlantic menhaden. To uphold your commitment to science-based, precautionary management, I respectfully ask you to:

- Adopt the updated ERP values from the 2025 stock assessment.
- Set the 2026–2028 Total Allowable Catch (TAC) at a level with less than a 50 percent probability of exceeding the new ERP F target.
- Initiate an addendum to address Chesapeake Bay management to avoid concentrating half of the entire coastwide menhaden quota inside the ecologically and economically important Bay ecosystem.

These decisions will help balance economic and ecological priorities, safeguard predator populations like striped bass, and uphold the integrity of ecosystem-based fisheries management along the Atlantic coast.

Thank you for your consideration.

Sincerely,
Marco Seandel
East Hampton, NY 11937
mseandel@gmail.com

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James Boyle

From: sparks707@everyactioncustom.com on behalf of Grace Silva <sparks707@everyactioncustom.com>
Sent: Tuesday, October 21, 2025 6:30 PM
To: Comments
Subject: [External] For MMB Distribution: Setting Specifications for the 2026-2028 Fishing Years

Dear ASMFC Menhaden Management Board,

Please maintain the integrity of the Ecological Reference Point (ERP) framework for Atlantic menhaden. To uphold your commitment to science-based, precautionary management, I respectfully ask you to:

- Adopt the updated ERP values from the 2025 stock assessment.
- Set the 2026–2028 Total Allowable Catch (TAC) at a level with less than a 50 percent probability of exceeding the new ERP F target.
- Initiate an addendum to address Chesapeake Bay management to avoid concentrating half of the entire coastwide menhaden quota inside the ecologically and economically important Bay ecosystem.

These decisions will help balance economic and ecological priorities, safeguard predator populations like striped bass, and uphold the integrity of ecosystem-based fisheries management along the Atlantic coast.

Thank you for your consideration.

Sincerely,
Grace Silva
North Hollywood, CA 91605
sparks707@yahoo.com

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October 22, 2025

James Boyle

Atlantic States Marine Fisheries Commission

Via email: Jboyle@asmfc.org

Subject: Comment for Menhaden Board re: Coastwide Specifications

Dear Mr. Boyle,

Please accept the following comments for the record of the Atlantic Menhaden Management Board at the ASMFC 83rd Annual Meeting (October 28, 2025).

My name is Ann-Marie R Sokoloski, a Downeast Maine fisheries operations professional who has purchased pogies at the dock and worked directly with bait supply for Maine's lobster fleet. I am submitting these comments on behalf of my own experience and the working waterfronts I serve.

1) Base 2026–2028 specifications on the finalized and peer-reviewed 2025 science. The Board should rely on the best available science—namely the Ecological Reference Point (ERP) benchmark and the single-species assessment update—before adopting any large coastwide cuts. Acting before those results are fully reviewed and incorporated would be premature.

2) Do not adopt drastic quota reductions of the magnitude (up to 55%) that have been discussed. Recent discussions in Maine stakeholder meetings and among advocacy groups have raised the prospect of a 55% coastwide reduction in menhaden quota. Such a cut would be extreme and unsupported by the finalized 2025 stock assessments. A reduction of that size would severely disrupt the bait chain that keeps Maine's lobster fleet working, with ripple effects to dock crews, dealers, trucking, fuel, and ice. If the finalized science shows a need to reduce risk, the Board should consider only modest, time-bound adjustments (on the order of 10% or less) and pair those with targeted Chesapeake Bay precautionary measures rather than sweeping coastwide cuts.

3) Require a clear socioeconomic impact statement for bait-dependent fisheries. Before final action, the Board should publish expected impacts on dock labor hours, bait pricing and availability, and community-level economic effects in Maine and across New England. Decisions at the spreadsheet level become paychecks (or the lack of them) on the pier. The Board could direct ASMFC staff, in collaboration with NOAA's Social Sciences Branch and state agencies, to analyze existing landings and dealer data and model expected impacts under different quota scenarios (e.g., status quo, 10% cut, 55% cut). This would ensure specifications are accompanied by transparent socioeconomic consequences, not just biological projections.

4) Protect access programs and avoid perverse shifts. Maintain small-scale/episodic access and avoid measures that unintentionally push effort into less monitored or less efficient channels. Couple specifications with in-season management tools (landing-day limits, daily/weekly caps, timely reporting) that prevent overages without blanket closures.

5) Keep Maine's bait supply viable. Pogies are now foundational to lobster bait in Maine due to long-term herring constraints. Any specifications should explicitly consider the bait security of the lobster fishery and the resilience of working waterfronts that depend on those landings.

Thank you for the opportunity to comment. I remain available on this issue in whatever way my perspective may be useful.

Respectfully submitted,

Ann-Marie R Sokoloski

Milbridge, Maine • 207-271-0998 • 121saltlife@gmail.com

James Boyle

From: samstonebraker@everyactioncustom.com on behalf of Samuel Stonebraker
<samstonebraker@everyactioncustom.com>
Sent: Tuesday, October 21, 2025 7:53 PM
To: Comments
Subject: [External] For MMB Distribution: Setting Specifications for the 2026-2028 Fishing Years

Dear ASMFC Menhaden Management Board,

I live on Eastern Long Island, which has been one of the fishing and marine ecology hubs of the Northeastern US for centuries. The importance of a healthy marine ecosystem for this and so many other areas of the east coast is so, so important for every aspect of human and natural life. People are drawn to these places and invest in their lands and economies because of the historical natural health and beauty.

But things are changing. There are fewer fish and shellfish than ever before. The water quality on Eastern Long Island is the best it's been in decades, but this hasn't helped fish populations. We need to zoom out to see why, which is at least partially due to declining populations baitfish (I haven't seen bunker in years). The unsustainable harvest of these fish at the bottom of the food chain is leading to a collapse of the marine ecosystem. Short term greed is destroying this for future generations.

It is for this reason that I am writing to urge you to maintain the integrity of the Ecological Reference Point (ERP) framework for Atlantic menhaden. To uphold your commitment to science-based, precautionary management, I respectfully ask you to:

- Adopt the updated ERP values from the 2025 stock assessment.
- Set the 2026–2028 Total Allowable Catch (TAC) at a level with less than a 50 percent probability of exceeding the new ERP F target.
- Initiate an addendum to address Chesapeake Bay management to avoid concentrating half of the entire coastwide menhaden quota inside the ecologically and economically important Bay ecosystem.

These decisions will help balance economic and ecological priorities, safeguard predator populations like striped bass, and uphold the integrity of ecosystem-based fisheries management along the Atlantic coast.

Thank you for your consideration.

Sincerely,
Samuel Stonebraker
Orient, NY 11957
samstonebraker@me.com

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James Boyle

From: Brian Collins <brian.c1@me.com>
Sent: Friday, October 24, 2025 9:42 AM
To: Comments
Subject: [External] Menhaden Annual Meeting Comment ASMFC

Hi Tina here are my comments for the Menhaden and Striped Bass committees next week - thank you so much!

My comment on Atlantic Menhaden management is the following:

- There is no ERP for the Chesapeake Bay
- We need a separate ERP for the bay that measures the health of Striped Bass, Bluefish, Osprey and Gray trout in the Bay
- the Chesapeake Bay is the nursery for Striped bass with 70-90% of all East Coast Striped Bass originating in the Bay
- The Chesapeake Bay is the largest nursery for East Coast Menhaden
- The Chesapeake Bay is the largest nursery for Osprey in America and the world
- there is no size limit for industrial Fishing of Menhaden to protect future generations and it does not count toward their bycatch limits : peanut bunker
- The Bay is a separate ecosystem from The ocean as is the transitional Ecosystem Of the Virginia barrier islands
- ban industrial Fishing of Menhaden in the Chesapeake Bay until an ERP is established to define the minimum Menhaden population necessary to restore the ecosystem
- consider a buffer of industrial Fishing along the Unesco World Heritage Preserve along the Virginia Coastal Reserve Barrier islands as a precautionary step until It can be studied as a major flyway for predator birds and a migratory fishing grounds.

Thanks, Brian
Brian Collins
Brian.c1@me.com

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James Boyle

From: jm3370@everyactioncustom.com on behalf of Judith Murphy <jm3370@everyactioncustom.com>
Sent: Friday, October 24, 2025 8:47 AM
To: Comments
Subject: [External] For MMB Distribution: Setting Specifications for the 2026-2028 Fishing Years

Dear ASMFC Menhaden Management Board,

I am very dismayed to read reports of Chesapeake Bay Osprey starving for lack of food. What's more, they're abandoning nests with live chicks, because they can't find enough food for themselves, let alone a clutch of babies. The name of your group is the Menhaden Management Board, the keyword being "Management". It's not good management to allow wildlife to die while corporations benefit from over-fishing a critical food source.

While I agree with the points below, there's much more. Corporate profits drive much of the policy making decisions. Do you realize how much money is generated by wildlife-related activities? In 2017, the U.S. Fish and Wildlife Service completed a 5-year survey that found 101.6 million Americans—40 percent of the U.S. population 16 years old and older—participated in wildlife-related activities in 2016, such as hunting, fishing, and wildlife-watching. The press release for the survey states: "These activities are drivers behind an economic powerhouse, where participants spent \$156 billion—the most in the last 25 years, adjusted for inflation."

The press release is here: <https://www.doi.gov/pressreleases/new-5-year-report-shows-1016-million-americans-participated-hunting-fishing-wildlife>

If you can't see the importance of reducing the take of Menhaden so that birds and fish that depend on them for food can thrive, at least look at the economic impact of allowing these birds and fish to perish. My husband and I travel to where the birds are to photograph them. We spend money on camera gear, clothing, outdoor gear, a car that allows us to navigate rough roads, hotels, restaurants, parking fees, tolls, etc., etc. If the birds aren't there, neither are we and neither is our money. We support local economies with our wildlife activities, and so do millions of people like us. Please, reduce the take of Menhaden. Allow the birds to thrive, not just survive.

I'm writing to urge you to maintain the integrity of the Ecological Reference Point (ERP) framework for Atlantic menhaden. To uphold your commitment to science-based, precautionary management, I respectfully ask you to:

- Adopt the updated ERP values from the 2025 stock assessment.
- Set the 2026–2028 Total Allowable Catch (TAC) at a level with less than a 50 percent probability of exceeding the new ERP F target.
- Initiate an addendum to address Chesapeake Bay management to avoid concentrating half of the entire coastwide menhaden quota inside the ecologically and economically important Bay ecosystem.

These decisions will help balance economic and ecological priorities, safeguard predator populations like striped bass, and uphold the integrity of ecosystem-based fisheries management along the Atlantic coast.

Thank you for your consideration.

Sincerely,
Judith Murphy
Westminster, MD 21158

James Boyle

From: Ron <tron453@gmail.com>
Sent: Wednesday, October 22, 2025 6:05 PM
To: Comments
Subject: [External] [New] Please forward to Robert Beal

To: Atlantic States Marine Fisheries Commission Menhaden Management Board c/o Executive Director Robert Beal 1050 N. Highland Street, Suite 200 A-N Arlington, VA 22201

Re: Urgent Coastwide Action Required — End Reduction Fishing and Cut the Quota to Protect Striped Bass, Bait Fisheries, and Lobster and Crab Fisheries

Dear Members of the Menhaden Management Board,

On behalf of Menhaden Defenders, we write to demand immediate and decisive action to address the ongoing coastwide ecological crisis facing Atlantic Menhaden and the countless species that depend on them.

Forage fish like menhaden are the foundation of our coastal ecosystems — converting sunlight and plankton into energy that sustains nearly every predator we care about, from striped bass and bluefish to ospreys, whales, and dolphins. New science now reveals significant errors in the previous stock assessments that permitted overfishing of more than 275 million pounds annually.

The evidence is clear: Reduction fishing and the current coastwide quota are unsustainable. To give our marine ecosystem a chance to recover and sustain the marine animals and coastal fishing economies, we urge you to:

1. Set the 2026-2028 TAC at 75,616 mt, the current TAC for the bait fishery. This level has a significantly greater than 50% chance of meeting the ERP F target, accounts for additional menhaden stock assessment and ERP model risk, and will help ensure striped bass rebuilding; and,
2. Reallocate all quota to the bait fishery to protect the bait, lobster and crab fisheries, and prohibit menhaden fishing for reduction purposes.

The Striped Bass Connection: Two Fisheries, One Problem

The Atlantic States Marine Fisheries Commission (ASMFC) manages both striped bass and menhaden, and their fates are directly linked through the Ecological Reference Point (ERP) framework adopted in 2020.

Current data shows:

- Striped bass remain overfished (spawning stock biomass = 191 million lbs. vs. 197 million lb. threshold).
- Striped bass fishing mortality ($F = 0.18$) is below the threshold and near target—proof that anglers have taken meaningful reductions.

- Menhaden, the dominant prey species for striped bass and other predators, are now the limiting factor in their recovery.

Recreational anglers and conservationists have sacrificed to support striped bass rebuilding. It is now time for the menhaden industry to share that responsibility.

The Science Demands a Much Greater Than 54% Reduction

According to the ASMFC Technical Committee's October 2025 analysis, the current coastwide menhaden quota of 233,550 metric tons has a 100% probability of exceeding the ERP fishing mortality target through 2028.

Key findings include:

- Menhaden biomass is 37% lower than previously estimated in 2022 due to revised natural mortality data.
- 2023 biomass was 60% lower than the 2021 biomass used to set current harvest levels.
- The ERP fishing mortality target decreased from 0.19 to 0.15, reflecting increased predator demand and shifting ecosystem conditions.

Even at the Technical Committee's recommended 108,450 MT — a 54% reduction — it is estimated there would only be a 50% chance of staying within ERP sustainability limits. Anything less would continue to erode the forage base that supports our coastal ecosystem and gamefish populations. We must manage our key forage stocks with more chance of success than a coin flip.

Moreover, the independent science that recently uncovered the pattern of scientific errors that have consistently overestimated stock size and led to the decreased ERP values shows that additional errors remain and that even the reduced menhaden natural mortality rate estimate is still nearly twice as high as it should be.

A Pattern of Mismanagement

Despite adopting Ecological Reference Points five years ago, ASMFC has repeatedly set quotas that favor industrial harvest over ecosystem health. The coastwide TAC has increased from 170,800 MT in 2013–2014 to 233,550 MT today — a 37% increase — even as total menhaden biomass has sharply declined. This represents a dangerous disconnect between management policy and ecological reality. The result is a coastwide depletion of menhaden that undermines billion-dollar recreational fisheries, wildlife tourism, and the overall balance of the marine food web.

The Economic Stakes

According to NOAA Fisheries' 2021 Economics of the U.S. Fisheries Report, the Atlantic recreational fishing sector supports tens of thousands of jobs, billions of dollars in annual sales, and critical revenue for coastal communities. Striped bass fishermen have done their part, with fishing mortality now reduced to a 30-year low.

New England's lobster industry is valued at over \$1.5 billion annually. Lobstermen desperately need stable bait supplies as herring and mackerel remain scarce, and crabbers throughout the Mid-Atlantic also depend on menhaden bait.

Every ton of menhaden used as bait or left in the ocean supports predators that drive far greater

economic value than industrial reduction ever could. Continuing to convert this essential forage into low-value fish meal for overseas aquaculture is both ecologically reckless and economically wasteful.

The Board should immediately initiate an addendum to prohibit menhaden fishing for reduction purposes. Menhaden are many times more valuable to the local and national economies when used as bait for commercial lobster and crab fisheries or when left in the water to support the recreational fishing industry.

Our Demands

Menhaden Defenders calls on the ASMFC Menhaden Management Board to:

1. Set the 2026-2028 TAC at 75,616 mt, the current TAC for the bait fishery. This level has a significantly greater than 50% chance of meeting the ERP F target, accounts for additional menhaden stock assessment and ERP model risk, and will help ensure striped bass rebuilding; and,
2. Reallocate all quota to the bait fishery to protect the bait, lobster, and crab fisheries, and prohibit menhaden fishing for reduction purposes.
3. Implement true ecosystem-based management, integrating predator-prey relationships and ecosystem feedback into quota decisions.
4. Suspend any TAC increases until independent review confirms that menhaden biomass and ERP models are scientifically sound.
5. Prioritize ecosystem health, biodiversity, and public resource value over industrial reduction harvest.
6. Strengthen monitoring and reporting requirements to ensure transparency and accountability in both bait and reduction fisheries.

Conclusion

The science is unequivocal: the current management approach is failing. If ASMFC continues on its current path, we risk the collapse of the forage base that sustains our coastal ecosystems and the gamefish that define Atlantic sportfishing.

Menhaden are the linchpin of the Atlantic food web. Without bold action now, the cascading effects of overharvest will be irreversible. We urge the Board to “take the cut” and adopt a reduction in the coastwide quota to 75,616 mt for the 2026–2028 cycle.

Anything less would sanction the continued slaughter of the most important fish in the sea — and with it, the loss of the vibrant fisheries, wildlife, and communities that depend on them.

Thank you Ron a very concerned fisherman.

It's time to wake up and save the fishing industry. Stop omga3 fish oil company's

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James Boyle

From: Jamie Benko <jamie.benko0506@gmail.com>
Sent: Tuesday, October 21, 2025 10:28 PM
To: Comments
Subject: [External] [New] Striped bass

Stop limiting the shore fisherman. If you want the stock rebuilt cut the commercial quota, get the Canadian bunker boats out of our waters and do something about the headboats going out day after day, chasing fish with electronics and radios. Why are so many small fish kept in the Chesapeake bay? I see pictures of boats filled with little baby 20" stripers, how does that help? Meanwhile I'll continue my quest for the elusive 28-31" stripers. Which I've only ever caught and killed one in my 10 years surf fishing the Atlantic coast. I'm all for cuts if it helps the species but not to the regular recreational angler. We're not the problem.

Sent from my iPhone

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James Boyle

From: rustyw@everyactioncustom.com on behalf of Rusty West
<rustyw@everyactioncustom.com>
Sent: Wednesday, October 22, 2025 9:01 AM
To: Comments
Subject: [External] For MMB Distribution: Setting Specifications for the 2026-2028 Fishing Years

Dear ASMFC Menhaden Management Board,

I have been living on the shores of the Chesapeake Bay and Hampton Roads for 68 years. I have been a recreational fisherman for all these years. Over the years I have seen how Omega Protein has flaunted their over harvesting of Menhaden. They admit that they make so much profit that they don't care about the fines for over fishing. Menhaden are an important part of the food chain. They need to be protected from over fishing.

Thank you for your consideration.

Sincerely,
Rusty West
Norfolk, VA 23503
rustyw@vt.edu

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James Boyle

From: Shelley Wigglesworth <shelleyflemingwigglesworth@gmail.com>
Sent: Tuesday, October 21, 2025 6:44 PM
To: James Boyle
Subject: [External] [New] Do not cut the menhaden quota!

Do not cut the menhaden quota!

These harvest limits for Atlantic menhaden lack scientific evidence and will severely hurt the American commercial fishing industry~

Shelley Fleming Wigglesworth

Lead Journalist, The Village Magazine

www.thekennebunkvillage.com

Staff Writer, Kennebunkport Conservation Trust

<https://www.kporttrust.org/>

Staff Writer/Administrative Assistant New England Fishermen's Stewardship Association

www.nefishermen.org

Manager/Mate F/V Nor'easter www.noreasterfishing.com

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James Boyle

From: shariwilliams344@everyactioncustom.com on behalf of Shari Williams <shariwilliams344@everyactioncustom.com>
Sent: Tuesday, October 21, 2025 8:24 PM
To: Comments
Subject: [External] For MMB Distribution: Setting Specifications for the 2026-2028 Fishing Years

Dear ASMFC Menhaden Management Board,

Shari Williams Enterprises LLC
Philadelphia, Pennsylvania
October 21, 2025

Dear Members of the Menhaden Management Board,

On behalf of Shari Williams Enterprises LLC, I am writing to strongly urge you to uphold and strengthen the Ecological Reference Point (ERP) framework for Atlantic menhaden. The ERP represents more than a management tool—it is a promise to protect the balance of our coastal ecosystems and the communities that depend on them.

To remain true to that commitment, I call on the Board to:

- Adopt the updated ERP values from the 2025 stock assessment without delay;
- Set the 2026–2028 Total Allowable Catch (TAC) at a level that ensures less than a 50 percent probability of exceeding the new ERP F target; and
- Initiate an addendum for Chesapeake Bay management to prevent half of the coastwide menhaden quota from being concentrated in one of our most vital and vulnerable ecosystems.

These actions are not optional—they are essential. Allowing excessive harvests or regional imbalances threatens not only menhaden but also the health of predator species like striped bass, ospreys, and bluefish, as well as the livelihoods of those who rely on a balanced marine environment.

At Shari Williams Enterprises LLC, based in Philadelphia, we believe that environmental responsibility is community responsibility. Through our programs in education, innovation, and sustainability, we work to empower the next generation to understand how ecological balance and economic opportunity go hand in hand. Protecting our coastal ecosystems ensures that both people and nature can thrive together.

We urge the Board to stand firm on science, transparency, and long-term stewardship. Protecting menhaden means protecting the integrity of the entire Atlantic ecosystem. Anything less compromises the foundation of sustainable fisheries management and the public trust.

Thank you for your leadership and for making decisions that prioritize the health of our shared coastal future.

With purpose and conviction,
Shari Williams
Founder & CEO
Shari Williams Enterprises LLC
Philadelphia, Pennsylvania

Sincerely,

Shari Williams

Philadelphia, PA 19143

shariwilliams344@gmail.com

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