Atlantic States Marine Fisheries Commission

Atlantic Menhaden Management Board

November 10, 2026; 2:45 – 5:30 p.m.
November 11, 2026; 2:45 – 5:30 p.m.

Draft Agenda

The times listed are approximate; the order in which these items will be taken is subject to change; other items may be added as necessary.

November 10

1. Welcome/Call to Order (*J. Cimino*) — 2:45 p.m.

2. Board Consent — 2:45 p.m.
   - Approval of Agenda
   - Approval of Proceedings from August 2026

3. Public Comment — 2:50 p.m.

4. Set Specifications for the 2027-2029 Fishing Years **Final Action** — 3:00 p.m.
   - Review Technical Report on Projections *(C. Craig)*

5. Consider Addendum II on Chesapeake Bay Reduction Fishery Cap for Final Approval **Final Action** — 4:45 p.m.
   - Review Options and Public Comment Summary (*J. Boyle*)
   - Advisory Panel Report *(B. Garrity-Blake)*
   - Law Enforcement Committee Report *(J. Boyle)*
   - Consider Final Approval of Addendum II

6. Recess — 5:30 p.m.

November 11

7. Reconvene — 2:45 p.m.
8. Continue: Consider Addendum II on Chesapeake Bay Reduction Fishery Cap for Final Approval **Final Action** — 2:50 p.m.
   - Review Options and Public Comment Summary (*J. Boyle*)
   - Advisory Panel Report *(J. Boyle)*
   - Law Enforcement Committee Report *(J. Boyle)*
   - Consider Final Approval of Addendum II

9. Consider Approval of Fishery Management Plan Review and State Compliance for the 2025 Fishing Year *(J. Boyle)* **Action** — 4:20 p.m.

The meeting will be held at Hotel Viking (One Bellevue Avenue, Newport, Rhode Island; 401.847.3300) and via webinar; click here for details.

Sustainable and Cooperative Management of Atlantic Coastal Fisheries

10. Consider Initiating Management Action for Commercial Quota Reallocation *(J. Boyle)* **Possible Action** — 4:30 p.m.

11. Other Business/Adjourn — 5:30 p.m.

MEETING OVERVIEW

Atlantic Menhaden Management Board
November 10, 2026
2:45 – 5:30 p.m.
November 11, 2026
2:45 – 5:30 p.m.

Chair: Joe Cimino (NJ) Assumed Chairmanship: 5/26	Technical Committee Chair: Caitlin Craig (NY)	Law Enforcement Committee Representative: David Bailey (MD)
Vice Chair: Nicole Lengyel Costa	Advisory Panel Chair: Barbara Garrity-Blake	Previous Board Meeting: August 5, 2026
Voting Members: ME, NH, MA, RI, CT, NY, NJ, PA, DE, MD, PRFC, VA, NC, SC, GA, FL, NMFS, USFWS (18 votes)		

2. Board Consent

- Approval of Agenda
- Approval of Proceedings from August 2026

3. Public Comment – At the beginning of the meeting public comment will be taken on items not on the agenda. Individuals that wish to speak at this time should use the webinar raise your hand function and the Board Chair will let you know when to speak. For agenda items that have already gone out for public hearing and/or have had a public comment period that has closed, the Board Chair may determine that additional public comment will not provide additional information. In this circumstance, the Board Chair will not allow additional public comment on an issue. For agenda items that the public has not had a chance to provide input, the Board Chair may allow limited opportunity for comment. The Board Chair has the discretion to limit the number of speakers and/or the length of each comment.

4. Set Specifications for the 2027-2029 Fishing Years (3:00–4:45 p.m.) Final Action

Background

- The Board sets an annual or multi-year TAC using the best available science.
- The TC completed projection runs for the 2027-2029 years based on recommendations from the Board **(Briefing Materials)**.

Presentations

- Review of 2027-2029 stock projections by C. Craig

Board Actions for Consideration

- Set specifications for the 2027 up to 2029 fishing years

5. Consider Addendum II on Chesapeake Bay Reduction Fishery Cap for Final Approval (4:45 –5:30 p.m.) Final Action

Background

- In October 2025, the Board initiated a draft addendum to consider changes to the Chesapeake Bay Reduction Fishery Cap.
- The Board approved Draft Addendum II for public comment in August 2026. Public hearings were held for ME-NH-MA-RI, CT-NY, NJ-DE, MD-PRFC, VA, and a general hearing (Briefing Materials).
- The Advisory Panel met via webinar on October 21 to provide recommendations regarding Addendum II (Supplemental Materials).

Presentations

- Overview of options and public comment summary by J. Boyle
- Advisory Panel Report by B. Garrity-Blake
- Law Enforcement Committee Report by J. Boyle

Board Actions for Consideration

- Select management options and implementation dates
- Approve final document

6. Recess

November 11

7. Reconvene

8. Continue: Consider Addendum II on Chesapeake Bay Reduction Fishery Cap for Final Approval (2:50 –4:20 p.m.) Final Action

Background

- In October 2025, the Board initiated a draft addendum to consider changes to the Chesapeake Bay Reduction Fishery Cap.
- The Board approved Draft Addendum II for public comment in August 2026. Public hearings were held for ME-NH-MA-RI, CT-NY, NJ-DE, MD-PRFC, VA, and a general hearing **(Briefing Materials)**.
- The Advisory Panel met via webinar on October 21 to provide recommendations regarding Addendum II (Supplemental Materials).

Presentations

- Overview of options and public comment summary by J. Boyle
- Advisory Panel Report by B. Garrity-Blake
- Law Enforcement Committee Report by J. Boyle

Board Actions for Consideration

- Select management options and implementation dates
- Approve final document

9. Consider Approval of Fishery Management Plan Review and State Compliance for the 2025 Fishing Year (4:20-4:30 p.m.) Action

Background

- State compliance reports were due August 1, 2026.

- The Plan Review Team reviewed each state reports and compiled the annual FMP Review (Supplemental Materials).
- Pennsylvania, North Carolina, South Carolina, Georgia, and Florida have requested and meet the requirements for *de minimis*.

Presentations

- Overview of Atlantic menhaden FMP Review by J. Boyle

Board Actions for Consideration

- Accept 2025 FMP Review and State Compliance Reports
- Approve *de minimis* requests for Pennsylvania, North Carolina, South Carolina, Georgia, and Florida

10. Consider Initiating Management Action for Commercial Quota Reallocation (4:30–5:30 p.m.) Possible Action

Background

- According to Amendment 3, quota allocations will be revisited every three years. The current allocations were approved in October 2022 and reviewed in October 2025 where the Board chose to revisit the issue in 2026. A change to the FMP would be needed for any changes to the allocation structure. Maintaining the current allocations would not require action.

Presentations

- Review of current commercial quota allocations by J. Boyle

Board Actions for Consideration

- Consider maintaining current allocations or initiating the management process

7. Other Business/Adjourn

DRAFT PROCEEDINGS OF THE

ATLANTIC STATES MARINE FISHERIES COMMISSION

ATLANTIC MENHADEN MANAGEMENT BOARD

The Westin Crystal City
Arlington, Virginia
Hybrid Meeting

August 5, 2026

These minutes are draft and subject to approval by the Atlantic Menhaden Management Board.
The Board will review the minutes during its next meeting.

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INDEX OF MOTIONS

1. **Approval of agenda** by consent (Page 1).

2. **Approval of Proceedings from May 5, 2026** by consent (Page 1).

3. **Move to approve the Draft Addendum II on Chesapeake Bay Reduction Fishery cap for public comment** (Page 16). Motion by Rob LaFrance; second by Allison Colden. Motion passes (Page 21).

4. **Move to adjourn** by consent (Page 24).

ATTENDANCE

Board Members

Megan Ware, ME, proxy for Carl Wilson (AA)
Rep. Allison Hepler, ME (LA)
Renee Zobel, NH (AA)
Doug Grout, NH (GA)
Dennis Abbott, NH, proxy for Sen. Watters (LA)
Nichola Meserve, MA, proxy for D. McKiernan (AA)
Raymond Kane, ME (GA)
Rep. Sarah Peake, MA (LA)
Nicole Lengyel Costa, RI, proxy for J. McNamee (AA)
Eric Reid, RI, proxy for Sen. Sosnowski (LA)
Matthew Gates, CT, proxy for S. Madsen (AA)
Robert LaFrance, CT, proxy for B Hyatt (GA)
Rep. Joeseph Gresko, CT (LA)
Marty Gary, NY (AA)
Emerson Hasbrouck, NY (GA)
Monica Martinez, NY (LA)
Joe Cimino, NJ (AA)
Adam Nowalsky, NJ, proxy for Sen. Gopal (LA)
Kristopher Kuhn, PA, proxy for Dr. Schaeffer (AA)
Loren Lustig, PA (GA)
Jordan Zimmerman, DE (AA)
John Clark, DE, proxy for Roy Miller (GA)
Michael Luisi, MD, proxy for k. Charbonneau (AA)
Robert Brown, MD, proxy for R. Dize (AA)
Allison Colden, MD, proxy for Del. Stein (LA)
Joe Grist, VA (AA)
JJ Minor, VA (GA)
Del. Adele McClure, VA (LA)
Chris Batsavage, NC, proxy for K. Rawls (AA)
Ben Dyar, SC, proxy for B. Keppler (AA)
Malcolm Rhodes, SC (GA)
Chris McDonough, SC (LA)
Doug Haymans, GA (AA)
Spud Woodward, GA (GA)
Garry Jennings, FL (GA)
Ron Owens, PRFC
Max Appelman, NMFS
Lowell Whitney, US FWS

(AA = Administrative Appointee; GA = Governor Appointee; LA = Legislative Appointee)

Ex-Officio Members

Caitlin Craig, Technical Committee Chair
David Baileyl, Law Enforcement Committee Rep.

Staff

Bob Beal
Toni Kerns
Tina Berger
Madeline Musante
Alexander Law
Caitlin Starks
Emilie Franke
Tracey Bauer
James Boyle
Chelsea Tuohy
Katie Drew
Jeff Kipp
Samara Nehemiah
Jainita Patel

The Atlantic Menhaden Management Board of the Atlantic States Marine Fisheries Commission convened in the Jefferson Ballroom of the Westin Crystal City Hotel, Arlington, Virginia, via hybrid meeting, in-person and webinar; Wednesday, August 5, 2026, and was called to order at 1:45 p.m. by Chair Joe Cimino.

CALL TO ORDER

CHAIR JOE CIMINO: I'm going to call the Atlantic Menhaden Management Board to order. Welcome, everyone. My name is Joe Cimino. I am the Administrative Commissioner for New Jersey and the current Chair of this Board, and a lot of people know it, hundreds of e-mails have proved that.

I appreciate every one of those e-mails. I've actually been trying to respond to as many as I can. I will be completely honest that my bias has been, I've been trying to respond to New Jersey residents first. A lot of the e-mails are in regards to concerns for osprey. I want to assure them that New Jersey DEP is doing as much as possible to find some answers there.

Obviously, this Board is doing that as well. But I want to set some expectations. We have an agenda before us today. We are looking to approve a draft addendum to go out to the public for public comment. We will be talking about the total allowable catch in the future years. This Board has the ability to set their total allowable catch for up to three years.

We will have a discussion on that later in the agenda. I want to set expectations on all the, please act now, comments that have come in. Those are the things that we will be talking about. I am going to look to Toni to see which Board members are online, and as we get through agenda items, we will have a public comment period for items that are not on the agenda.

I need to see the total number of folks that are interested in making comments on items not on the agenda, and then we will set an allowable amount of time to get through those reasonably. After that, when we take action on whether or not the draft addendum is ready to go out to the public. Once we have a motion on that I will allow the public to speak on that item separately. With that, to Toni for Commissioners that are online, please.

MS. TONI KERNS: There are a lot of folks online, so I apologize if I miss any Commissioners, because not everybody has 00 in front of their name. I have Chris Batsavage, Ron Owens, Russ Dize, Marina Owens, Monica Martinez, Sarah Peake and J.J. Minor.

CHAIR CIMINO: Great, thank you, Toni, appreciate that. Full Board. I also wanted to mention.

MS. KERNS: And Malcolm Rhodes.

CHAIR CIMINO: Oh, hi, Malcolm. Also wanted to mention that we are being filmed, a student in the back of the room here was here at our last meeting as well, so welcome to you, thank you for being here.

APPROVAL OF AGENDA

CHAIR CIMINO: With that we will move into the agenda items. First up is the approval of the agenda. Do any Board members have any additions or edits to the agenda? Jordy, or John? Sorry, Jordan.

MR. JORDAN ZIMMERMAN: I was just curious about the order of these agenda items. To me, the review of the CESS Report could somewhat be informative to approval of the Draft Addendum II.

CHAIR CIMINO: Okay, I appreciate that, Jordy. I think, you know we had a working group that put in a lot of work, we will talk about that in a bit. The fact that this is an item going out to the public and not final action on an addendum, I think may be enough. I would hope that the timing of that isn't quite as important to switch those around. You know whether or not the decision to take this out to the public, I hope wouldn't necessarily be influenced by that, but I'll look to Toni.

MS. KERNS: Joe, if there was a compromise, maybe we could do the presentation on the addendum. I can go over to the CESS room and tell them that we want them a little early, let them give the presentation and then the Board can debate the Addendum going out to public comment. Is that a reasonable path forward?

MR. ZIMMERMAN: Yes, I just really wanted to ask the question and leave that to the pleasure of the Chair.

CHAIR CIMINO: Thanks, Jordy, it's a very good question. Then in that case we might do that. We might give Andrew a heads up that we will like to bring him in before we take final action. Okay, thank you, I appreciate that. With that are there any other concerns or additions to the agenda? If not then as noted, we will actually bring that agenda item into our other agenda item, and before we take final action, we will get that CESS Report.

I also want to apologize. I think we should rename that group, because I don't think CESS is a great acronym. I had two years as Chair of the Commission and I probably should have pushed that then, but anyhow, sorry, we'll move on.

APPROVAL OF PROCEEDINGS

CHAIR CIMINO: We'll go to approval of the proceedings from the May 2026 meeting. Are there any edits that Board members have for the proceedings from the May meeting? Not seeing any, okay.

I think as we go through out agenda items, James will be doing a bit of a recap of what happened in previous episodes, including the May meeting and as far as how we got here on this second try at getting this draft addendum out.

PUBLIC COMMENT

CHAIR CIMINO: With that, I am going to look to the public to see how many folks would like to speak on items not on the agenda. We will get a total number of hands before we make a call. I see two in the room right now and two online, okay three online, very good. I'm going to go ahead and allow three minutes per speaker, sorry, two minutes. We will be cutting off after that, so please try to be efficient. We can start in the room. Front row, I happen to know, Peter, your name. But folks, when you come, please state your name for the folks in the room, and then we will be calling names online, so go ahead, Peter.

MR. PETER HIMCHAK: Thank you, Mr. Chairman and members of the Board. My name is Peter Himchak, I am the fisheries scientist for Omega Protein Ocean Harvesters. I just wanted to give you an update of the second project that was funded through the Science Center for Marine Fisheries on the National Science Foundation for a team of scientists, I call them the roadmap team, you all know them, Latour, Gartland, Nesslage, Wilburg and Amy Schuler.

In the second project that was funded this spring, I think it is fair to say that the first year of all their deliberations they have realized that it is a necessity to do a menhaden tag and recapture program to serve as the foundation for abundance and exploitation. Tagging menhaden is a very challenging species of fish to tag. They realize that they have to use passive integrated transponder tags, referred to as PIT tags.

Right now, they are experimenting with a variety of PIT tags, they give out a signal and they go in the body, I mean they are not external streamers like we tag striped bass. They are trying a variety of PIT tags, they are not that many that are good for menhaden, go with menhaden when they get tagged.

The tag has to maintain its integrity both during the fishing and the processing, and you need to put on receptors, it gives out a signal with the tag, so you need receptors on the fishing vessels and at processing facilities. That's two minutes? Okay, so we are working in cooperation with them at Reedville to be able to detect the tags, whatever one they choose for menhaden, thank you.

CHAIR CIMINO: Thank you, Peter, and I know you can continue to share that information and updates with the Board. Through James we will make sure to disseminate all of that. I appreciate that. We do have one other hand, go ahead and please introduce yourself, thank you.

MS. ROBERTA KELLAM: My name is Robert Kellam, I live in Northampton County, Virginia, on the eastern shore. I think this is like my third time I've come here to tell you about our Osprey Reproduction Seasonal Report. This is 2026 and the third year in a row had a very bad year on the Eastern Shore.

Sixty-one pairs, only 16 fledged, for a reproductive rate of 0.26, which is well, well, well below what the rate was during the DDT era. Again, it's just another indication of the crisis. The lower Rappahannock was 46 pairs. They only fledged one chick. I know you said you're from New Jersey, so that issue is actually happening.

Now that people are looking at it, they are finding that in all of the areas where the osprey colony, why can't they all be present. I'm not a scientist, but the reports that are coming in that areas where menhaden were the primary food source for the osprey, those nests are having high reproductive failure. But the main reason for actually coming today. I drove four hours each way, nobody pays me to be here. I just wanted to express my concern about the science. We had recently been looking for funding for the menhaden study that was supposed to include osprey research in Virginia.

The General Assembly finally funded it, and now VIIMS is saying that oh, they are not going to include the osprey/menhaden connection. I'm concerned about the funding that I know you all got that, what part of that will be allocated for osprey relationship? That is my comment, osprey/menhaden connection.

CHAIR CIMINO: Thank you, Ms. Kellam, I appreciate that. Perhaps, Loren my friend, thank you so much. Make that mic not live, much appreciated. I do appreciate the comments. Yes, this issue does appear to be something that we're seeing up the coast.

I think each state agency will not only be working individually, but I hope through an organization like this that we can kind of concert our efforts on understanding the problem better in time, and finding solutions. Any other hands in the room? I didn't see any when we set the times. I'm going to go to the folks online and call them in the order that I see them. The first hand I have is Matt Joyce, go ahead, Matt.

MR. MATT JOYCE: My name is Matt Joyce; I am the Conservation Science Manager for the Connecticut Audubon Society. I appreciate the committee is well aware of the issues surrounding osprey, however, I would like to bring to light the state of Connecticut's osprey population is now showing serious runs of decline as well.

We've run a statewide osprey monitoring program, Osprey Nation for 12 years, thanks to the tireless dedication from over 400 volunteers we have a high-resolution dataset which to monitor population trends. This year's data, while admittedly incomplete is beginning to paint a grim picture.

By the first of August last year, a year in which we had our lowest level of breeding success. Of the 706 nests we had up to date reports for, 113 failed at the ratio of 1 in 6.26. By that same date this year the ratio is 1 in 4.16. It's almost a quarter of all nests failing. We worry that 2026 heralds Connecticut joining a growing list of states, people watching osprey chicks starve to death on nests.

We acknowledge that there is a myriad of factors that could contribute to a species decline, however, there is a well-documented downward trend occurring over multiple years, occurring in geographic area in with strong evidence a lack of menhaden being provided to chicks is responsible.

Therefore, as the ASMFC convenes to discuss menhaden harvest, we respectfully ask that they seriously consider the health of the osprey and

other predator populations up and down the coast. We request they prioritize their survival by supporting significantly increased catch limits, and continuing to scientifically search until a balance is found between environmental and commercial influence. Thank you.

CHAIR CIMINO: Thank you, Matt, for your comments and your incredible efficiency in getting out that input and information, much appreciated. Next up is Phil Zalesak, go ahead, Phil.

MR. PHIL ZALESAK: Mr. Chairman, my name is Phil Zalesak, I am president of the Southern Maryland Recreational Fishing Organization. Three months ago, I sent the entire Board a letter documenting localized depletion of Atlantic menhaden in the Chesapeake Bay. I have five points, but only have time for two.

First, according to the Potomac River Fisheries Commission, in 2012, 100 commercial pound net fishermen harvested almost 6 million pounds, 5.8 million pounds of Atlantic menhaden. The same number of fishermen harvested 0.17 million pounds in 2025. That is a 97% reduction in harvest, which documents a dramatic localized depletion of Atlantic menhaden in a major Chesapeake estuary.

Second point, on June 8, 2026, 10 marine scientists published a research paper titled Widespread Reproductive Deficits in the Chesapeake Bay Osprey. The scientists documented poor reproductive performance of osprey in the mainstem of the Chesapeake Bay. These ospreys are dependent on Atlantic menhaden as forage fish for their survival.

The minimum reproductive rate of osprey in the mainstem of the Chesapeake Bay needs to be 1.15 active chicks per nest. These scientists measured half of that in high salinity mainstem of the Chesapeake Bay. They concluded the following. Reduce availability of Atlantic menhaden as a primary driver of poor reproductive performance within high salinity waters.

I do have; I'll give you a third point. There is no data or science which supports allocating 75% of the Atlantic Coast total allowable catch of Atlantic menhaden to Virginia, none. Further, Virginia allocates 90% of its quota to Omega Protein, a Canadian subsidiary.

Therefore, Omega Protein is allocated over two-thirds of the Atlantic menhaden total allowable catch for the entire Atlantic Coast. I've got four seconds, given that you gave 20 more seconds to Omega Protein. Two more sentences here. Therefore, I could only conclude that this Commission makes its decision based on politics, not science or empirical data.

Last sentence, the solution to localized depletion of Atlantic menhaden in the Chesapeake Bay is to limit reduction harvesting of Atlantic menhaden to federal waters three nautical miles off the Virginia Coast. I thank you for your time.

CHAIR CIMINO: Thank you, Phil, I appreciate that. I do see a couple other hands that are coming up now, so we'll try and get through everyone. Next, I have Paul Eidman, go ahead, Paul.

MR. PAUL EIDMAN: Good afternoon, members of the Board. My name is Paul Eidman; I am the founder of Menhaden Defenders. The signs of trouble are unmistakable. The experts are catching bunker. Omega Protein are now flying spotter planes hundreds of miles from Reedville to Cape Cod Bay, Massachusetts, searching for what remains of the adult biomass so they can maximize yields. Their vessels steam hundreds of miles to New York and New Jersey Bight, only to return with partial loads, almost entirely consisting of pre-spawned juveniles which are just 6 to 8 inches long. These fish have never contributed a single egg to the future of this stock. Across the coast the ecosystem is signaling distress. Osprey nests are failing, striped bass, bluefish, weakfish and fluke are at historic lows.

Whale watching vessels are struggling to find marine mammals, and coastal waters are looking increasingly lifeless. Outdoorsmen, fishermen,

birders and whale watchers are all demanding action, because they see this collapse happening in real time. The largest estuary on the east coast, the Chesapeake Bay is dying before our eyes.

This was once called the jewel of the east coast. It is being exploited while its key forage fish are being ground up into dog food. Taking the most vital source out of the estuary and out of the mouths of striped bass, osprey chicks and more, makes zero sense. This is insane. What I'm saying is straightforward.

For years ASMFC has catered to Omega Protein's push for the highest possible harvest yields. Yes, we recognize this stock is not classified as overfished at this moment, but the record shows exactly where this approach leads, right back to overfishing and ecosystem decline.

Every Atlantic state has already stopped reduction fishing inside the three-mile line, except for Virginia, which continues to allow roughly a billion menhaden a year to be ground into pet and aquaculture food, and this is happening within an already overfished ecosystem. Nature is not whispering, it's shouting.

The ecosystem is failing in plain sight. You have the authority; you have the responsibility and the obligation to act now. Delay is not caution; delay is collapse. Put the ecosystem first, protect the forage base, and please, do your job. Thank you.

CHAIR CIMINO: Thank you, Paul. I have a couple other hands. Some of these are coming up post decision on the amount of time that we are allocating folks, but I am going to try to get through them. I believe we had Danielle McCulloch's hand up next. Any other hands that I see we will allow one minutes, since those hands came up after the initial request. But go ahead, Danielle.

MS. DANIELLE McCULLOCH: Thank you, Chair Cimino. My name is Danielle McCulloch, I am the Executive Director at the American Littoral Society, so I come to you live from your great state of New Jersey.

I wanted to address what you asked at the top of this, and that was for other items to get to during this meeting. We heard a lot from not just the birding community about osprey decline in areas from like Connecticut to Virginia. But we've also been hearing a lot from bait shops and tackle stores and folks that rely on the bait fishery.

I was hoping that we could direct the Technical Committee to come to the next Board meeting with an analysis for the 2027 through 2029 coastwide total allowable catch, so we could look and see what really needs to be considered to meet the ASMFCs ecological target, because we're not currently doing that. I'm hoping that we can include those options that will maybe address some of the concerns from the osprey and birding community as well as the bait fishery. I also wanted to say, please don't let the need for more research become a reason to delay on any actions that we should take action on today. Thank you so much.

CHAIR CIMINO: Thank you for your comments, we have two others, and again, since your hands came up late, we are allowing one minute for your comment, so please try to be efficient as Danielle just was. I am going to go to Ross Kushner next.

MR. ROSS KUSHNER: Yes, my name is Ross Kushner. I am not an expert; I am a sportsman from New Jersey. I just want to save you folks some time, because you don't need to look at what the bunker population is in New Jersey, because we don't have any. Our adult menhaden have disappeared. I have yet to see one school of adult bunker in New Jersey this year.

We have very few juvenile bunkers in our bays and estuaries, they are almost gone, and the whales are gone and the eagles are gone and the ospreys are gone and the cormorants are gone and the fluke fishing is horrible this year. The stripers went right on by, because there was nothing for them to feed on.

We have all kinds of weird shark coming up on our beaches, bull sharks, tiger sharks, and I think it's because they can't find food. You folks really need

to straighten this out. I mean it's not overfished, abundant, come to New Jersey. Thank you.

CHAIR CIMINO: All right, can't argue with the come to New Jersey part. Thank you, Ross, I appreciate the comment. Last up we have John Turner. Go ahead, John.

MR. JOHN TURNER: Hi, I'm John Turner, I'm a conservation policy advocate for the Seatuck Environmental Association, and I would love to invite you to New York after you visit New Jersey. I just wanted to be very brief to simply say that what you've been hearing about with regard to reproductive failure with ospreys along the east coast has been happening in coastal New York as well.

That despite the fact that for several years now there has been a state law prohibiting purse seine harvest of menhaden in New York waters, and yet the abundance of the fish declined very, very, very significantly in New York waters. We're very concerned. Osprey chicks have starved in many, many nests throughout Long Island that we've been able to document reproductive failure has been pretty much widespread. I certainly urge your significant focus on this very iconic and popular species as you deliberate about the future management decisions as you are doing.

CHAIR CIMINO: Thank you, very much appreciated, all of you thank you for the comments. As I mentioned, before we take action on whether or not the document will go out, we will take public comments on the document for the new addendum. We are moving on from public comments right now, and we are going to go into the next agenda item.

James is up on the Draft Addendum. But before I turn it over to him, I just want to thank the folks that have worked on this document. Marty, I guess I'll start with an apology for tasking you to Chair this once again, but I appreciate the job that you did. Nichola and Nicole, help me out here. Who else did we have? Erica is not here, Allison of course, Allison you are another that got the double duty of that, Rob, you also got double duty. Thank you all for that work, I think, I don't think, I know we have a better document for it. I very much appreciate that, and with that I will turn it over to James.

CONSIDER APPROVAL OF DRAFT ADDENDUM II ON CHESAPEAKE BAY REDUCTION FISHERY CAP FOR PUBLIC COMMENT

MR. JAMES BOYLE IV: All right, so I'll start with a quick overview and recap of the process until this point, and then I'll move on to covering the contents of the draft addendum. I'll start with the reducing the Chesapeake Bay Cap section, the first section of the document, and then I'll stop for questions.

Then I'll do the final two sections together to revisit the Chesapeake Bay section, the last section is pretty short. The goal of today's meeting is to finalize the options in the document and to consider approving it for public comment. For a quick recap of the process.

At the annual meeting last October, the Board initiated Draft Addendum II to develop options to distribute the Chesapeake Bay reduction fishery cap more evenly throughout the fishing season, and to reduce the cap by up to 50%. Also as mentioned in last May, the Board set a work group to work with the PDT to finalize the options and simplify them and simplify their presentation as well, to bring the document back today.

If the document is approved for public comment today then hearings will be scheduled in September and October, and the Board will consider final approval in November. The first issue topic is the level of the Chesapeake Bay cap and how it is set. The options in this section are designed to reduce the cap as a precautionary measure in response to concerns about reduced menhaden availability in the Bay, and consider making the cap more responsive to changes in the TAC.

Option A would maintain the catch Bay cap at 51,000 metric tons and require an addendum or amendment to change. Option B would cut the Bay

cap by up to 50% and still require and addendum or amendment to change. The Board will have the ability to choose anywhere within the range of options, but for public consideration the PDT has drafted Options B1 through B4 on the slide for a 10, 20, 30 and 50% reductions as examples.

For some context, Option B2 applies the same percent reduction with the 20% for the Bay Cap as it applied to the TAC, between 2025 and 2026, and in the range of options greater or less than 20% reflect the uncertainty and how abundance in the Bay relates to coastwide abundance, as well as providing flexibility for the Board to adjust the Bay Cap in response to how it sets the next cap as it is scheduled to occur at the annual meeting, before taking final action on this addendum.

Under Option C, the Bay cap would be set as a proportion of the TAC, meaning that any future change to the TAC is also applied to the Bay cap, as a same percent reduction or increased, unless restricted by an upper or lower limit, which I'll get to in a second. This option is divided into two sets of sub options. C1, a through e, consider a range of Bay cap to TAC proportions from the current 2026 proportion to the proportions that would result if a Bay cap were reduced by 10, 20, 30 and 50%, relative to the 2026 F. This range effectively allows the Board to apply a reduction to the Bay cap similar to that in Option B, the Board locking in that proportion between the Bay cap and TAC moving forward. The Sub Option C2 a through e; consider setting an upper and lower limit to control how low and high the Bay cap could shift as the cap changes.

The upper limit options range from the highest to the lowest bay cap implemented by management, and the lower limit ranges from none to the lower at 95% confidence interval of the mean harvest, reduction harvest from 2012 to 2016, which is the same time period used to calculate the current Bay cap. I'll stop for questions here.

CHAIR CIMINO: Questions from the Board for James? Okay, nothing so far. Toni, nothing online? No hands from the Board, James, do you want to continue?

MR. BOYLE: The next section considers how the Chesapeake Bay cap is distributed throughout the fishing year to prevent a concentration of harvest that may affect other fisheries and menhaden predators. The first component of this section provides options to distribute the Bay cap into quota periods, and the second provides options to resolve overages and underages within those periods.

Regarding quota periods, the Bay cap would be divided into three quota periods defined by one of the sub options in the table. Option B1 and B2 contain quota periods of roughly equal length, with Option B1 intended to provide an equal distribution of harvest over the year, whereas Option B2 gives greater emphasis on delaying harvest until later in the season. Option B3 presents three periods of unequal length, but the same allowed amount of harvest each.

The extended first period would delay some reduction in harvest until later in the year compared to recent performance, while the short middle period allows the fishery to continue to operate at a higher level during what has been the peak period in recent years. I'll also note that the length looks this way, because the fishery goes from the first Monday in May through the third Friday in November, so it changes from year to year, and it also can change by a week in length from year to year as well.

The next section considers how to resolve overages and underages of quota periods, so Option B creates a system where that works with overages and underages together. Under Option B alone, an underage in Quota Period 1 or 2 is rolled to Quota Period 3 at the same year, meaning that if there is an underage once we get to Quota Period 3, the fishery may catch whatever remains of the Bay cap for that year regardless of what the initial allocation of Quota Period 3 was.

If there is an overage of Quota Period 1 or 2, but the total Bay cap is not overharvested, then the following year the quota period overage is deducted from the same period and redistributed to Quota

Period 3. Therefore, the total Bay cap is not reduced if it is not overharvested, but there is a payback in terms of when the fish can be harvested.

The underage, Sub Option 1, would allow an underage in Quota Period 1 to be distributed evenly to Quota Period 2 and 3, rather than all to Quota Period 3, as in the Base Option B. Overages of the total Bay cap would still be paid back the following year as they are currently, by reducing the total amount before resolving any quota period overages. There are many examples in the document of different combinations of scenarios. It also gets into what happens if a period is overharvested by more than the amount of that period.

I won't get into all of them here, but I want to cover just one of the most basic situations. In this hypothetical of the allocation over the year is 5,000 pounds in Quota Periods 1 and 2, and then 10,000 pounds in Quota Period 3. If the fishery has a 2,000-pound overage in Quota Period 1, but then underharvest Quota Period 2 by the4 same or greater.

It does not exceed the total Bay cap at the end of the year, but there was an overharvest in Quota Period 1, then the next year Quota Period 1 is reduced by the overage amount of 2,000 pounds, and Quota Period 3 is increased by that amount, by 2,000 pounds, it still allows full utilization of the cap.

The last section of the document considers an option to have the Board revisit the Bay cap every three years, due to the uncertainty of menhaden status in the Bay, and ongoing work to develop a scientifically based cap. This is similar to the provision in Amendment 3 to revisit the quota allocations every three years, and revisiting the cap does not require the Board to take any action, and the Bay cap can still be reconsidered at any time through the adaptive management process. With that, happy to take any more questions.

CHAIR CIMINO: I'm going to look around the table and online for questions from the Board. No questions yet, very good. With that, that is Jame's summary of the edits and the new editions to the Draft Addendum.

REVIEW COMMITTEE ON ECONOMICS AND SOCIAL SCIENCES REPORT ON BOARD TASK

CHAIR CIMINO: As we mentioned, when we change the agenda, we will ask for the CESS Report.

I believe Dr. Scheld is with us, Andrew, if you're here. There you are. If you can come up, thanks, Andrew, I appreciate that. We will get the report from the Committee on Economics and Social Science on the economic impacts to the bait fishery from changes in total allowable catch. I thought I would end that right as Andrew was sitting down, but I didn't quite line that.

DR. ANDREW SCHELD: Thanks for having me. Thanks for asking the CESS to kind of fill in on what we could offer, what we could sort of synthesize from the information available. I presented on this topic in May, and we just talked about the reduction sector and then the request, the bottom-line request was to add some information on the bait sector, so that is all I'm talking about today, quite quick.

ECONOMIC IMPACTS TO BAIT FISHERY FROM CHANGES IN TOTAL ALLOWABLE CATCH

DR. SCHELD: The charge was, how might the proposed measures in the current addendum influence jobs in the sector. All we did was review a couple of the studies that existed. To really get at this question might involve a bit more of a detailed analysis, but we are lucky that we're in the position that there has been some previous work on this question in this fishery.

We reviewed the two different studies Kirkley from 2011, and the more recent Whitehead report that was funded by the Commission back in 2017. This slide is just redundant with what I talked about in May, but I'll just quickly sum it up. The Kirkley study was very relevant. This is when I took the Bay quota cap that was originally being discussed. Their

analysis was specifically addressed at that question, but exclusively focused on the reduction factors. What were the impacts on the reduction sector and surrounding communities, or the kind of communities be with a Chesapeake Bay quota cap.

They noted that the reduction sector supported 519 full and part time jobs; 347 of those in Northumberland County. They estimated economic impacts about 3.7 jobs per thousand-ton, metric ton reduction, about 2.1 of those in the reduction center. Whitehead and Harrison follow on study wasn't focused on Chesapeake Bay quota cap specifically, just more broadly economic impacts and jobs in the pretty sure more broadly, used basically the same data and the same model, so had analogous results to Kirkley.

Noted employment, changes of employment supported about 1 job per $45,000.00 in landings, which is about $60,000.00 in today's dollars. What is new, what we added to the memo and to this presentation is about the bait sector. Not addressed in the original Kirkley study, but addressed in the follow-on Whitehead and Harrison.

A couple of things I noted, lower volume, of course higher unit price compared to reduction, and lower infrastructure cost compared to reduction. Landings spread throughout the coast, to more communities, obviously involved in this fishery, whereas reductions centered and rebuilt. Importantly, diversified across species so they surveyed members of the bait sector and on average about less than 10% of landings revenues came from menhaden.

They also looked at economic impacts from the bait sector specifically, so $124,000.00 in direct and indirect economic output, so that would be sales output, $36,000.00 in income or earnings, and about 1.5 jobs per thousand metric ton increases in quota. Then they also did a regression analysis, since this came up as a question from you all the last time, looking kind of retrospectively at changes in allocation and impacts on jobs and income.

They did that. They did a regression analysis to look at that, it's essentially a correlation, it's not really a causative type of study. They found a weak, kind of weak support or weak association between employment and income and changes in allowable catch for this sector. Limitations and caveats, so the question of kind of seasonal distribution that is a part of the current amendment or addendum, was not studied or investigating either of those studies, so there is not anything that can be offered there.

You might imagine there could be impacts to seasonal changes and catch efficiency, or costs or other things, but nothing from these studies to shed light on that. The major limitation methodologically of both of these studies is they use this pretty common economic impact approach, the Leontief models, which assume linear responses in cost and employment. Just as an example, let's say an industry or company spends 20% of their gross revenues on labor and 70% on other inputs, and then the remaining 10% is profits.

The way these models are structured is you get that kind of cost and production structure information. Then if you wanted to say forecast, what would the economic impacts be of an increase in output of this company or sector, or a decrease. It's just linearly scaling that up or down. If you are increasing output by a million dollars, 10% of that is profits, 20% is employment, et cetera. It's useful in understanding the structure of an economy and an industry, the interrelations of those sectors. But in terms of forecasting the impacts of big changes it can be more challenging.

In particular for employment. Employment tends to be, I can't say this specifically with respect to menhaden, but employment in many other sectors is a very sticky input, meaning when companies are sort of adjusting, responding to new conditions, they might adjust other production inputs more readily than they would adjust employment.

With that said, there is also I think the potential in this fishery or many fisheries, for a kind of threshold type behavior. If volumes get too low throughput to the plant gets too low, there might be some

trigger at which operations have to shut down or scale down in a dramatic way. I just threw that little kind of graphic up on the side to make that point.

The models that these numbers come from assume that linear response. Landings go down or up, and employments feels linearly, probably it's not like that. Probably maybe that concave where employment doesn't really drop off initially, and then dropped off precipitously, or that kind of threshold where you hit some point of no return and then there is potentially some shutdown.

Then from the bait sector specifically, the regressions between management changes and local level, county level employment and income were again correlative. There are all sorts of stuff that goes on, a background in the economy that can drive changes in income and employment. Just given the level of that study, a lot of those things were not controlled for, so kind of more, I think, work would need to be done to determine a sort of causative response there.

In closing, the economic impacts likely are different between reduction and bait sectors. The primary driver for that would be the cost structures of the industries. The reduction sector is highly capital intensive, highly fixed cost intensive; and has particularly less ability to absorb shocks, given that they are kind of centrally focused on one species.

On the bait sector it is more geographically diffuse, but potentially impacting more communities, of course. But lower infrastructure costs and more diversified, so potentially more capacity to absorb potential changes. That said, neither of these studies really compared the economic jobs or impacts across these sectors, so that is just interpretation of these studies it's not a direct comparison.

The CESS does recommend additional research would be useful here. Industry employment drivers nailing down things that cause changes in both of these sectors. Cost and production structure so that the Kirkley study was great for its time. You know it was published in 2011, so it's data maybe with 2008 or 2009. It's a little dated at this point.

The bait sector is certainly a lot different than it was back then. Updating that information would be useful. Then better understanding I think bait demand drivers as well as the kind of dependence of the harvest sector on menhaden amongst the other bait species they might target. That's all I have.

CHAIR CIMINO: Questions for Andrew on the CESS Report. I have one, go ahead, Megan.

MS. MEGAN WARE: Thanks, and I do really appreciate all of these CESS reports at this Board meeting, for other species as well. I was trying to, I guess reconcile what I was reading in the report what I would describe as maybe lighter economic impacts from the bait sector versus what I experienced just in Maine.

Where I think the report was saying that 12,000 metric ton increase in the TAC, which is higher than Maine's quota has ever been would be 18 jobs and 1.5 million in direct economic impacts. We're supporting hundreds of fishermen now and over 10 million in ex-vessel value. I first wanted to just make sure I am understanding what the report is saying, and then trying to figure out maybe how that prediction or that outcome is so different from what I've experienced in Maine.

DR. SCHELD: A couple of things. I think your math is probably right if you're like 12-exing those numbers. I think that sounds roughly right, given what this report suggests. I guess what the things that drive employment impacts in these types of models are really cost. It's levels of employment of the primary industry, so bait or reduction, so how many people are actually out working on these boats.

Then all of the indirect employment is driven by cost structures of these industries. I think the main difference with why it looks so different between reduction and bait is that the reduction sector has higher capital expenditures, higher kind of fixed

operational cost. That means there is more sort of auxiliary of support industries on which the reduction sector might depend, people who fix the equipment, fix the boats.

Not that you don't necessarily have those things in the bait sector, but you have it to a greater extent in the reduction sector. I think that the different cost structures and the fact that there is more infrastructure and fixed capital cost in the reduction sector is why the model output is different in that sense.

A limitation of these models would be that the sort of like supply of that bait and the influence it has on all of the interdependent industries would not be counted in this. The fact that they are catching bait that is then supporting other sectors is sort of downstream of where these models would end, if that makes sense. These economic impact models essentially capture production or cost at one point in time, and then look upstream of that.

How many jobs are supported by upstream industries of that particular industry? Upstream of the reduction sector, upstream of bait. Upstream of bait would be like fuel, vessel maintenance, gear, fixing gear and that sort of stuff. I think there is just more because the reduction sector if more capital intensive. Sorry to really belabor this point, but because the reduction sector is more capital intensive there is essentially more upstream industries. On the bait side, arguably you have more downstream industries that are supported, people that are using the bait. But that is sort of absent from this. Does that answer your question?

MS. WARE: Yes, I think so. I guess I'm just looking at ex-vessel value, so I'm not even thinking about cost of fuel or anything like that. The ex-vessel value is higher for our state than the overall bait direct input, and maybe I'm misinterpreting what direct economic output is.

DR. SCHELD: Sorry, so for clarification you're saying like these 124 direct and indirect numbers, if you time it by 12 your ex-vessel landings value is higher than that?

MS. WARE: Yes.

DR. SCHELD: Okay. One, these are in nominal terms, so they would be in 2016 dollars. Some of that might be inflation, a big part of that might be inflation, like that might be what it is. But I don't know if that is totally what it is.

MS. WARE: Yes, well I'll just use this point to agree with you that I think we could use some updates on the bait economics and that information. I acknowledge it was really the New England fishery was coming back online in 2016 so we might not be included in the 2017 report, that would make a lot of sense. But I think this is underestimating the economic impact of the bait sector, at least in Maine. Thank you.

CHAIR CIMINO: Any other questions from the Board? Go ahead, Doug.

MR. DOUG HAYMANS: Thanks for the presentation. Carrying in on your future research needs, right. It goes sort of back to the questions that this Board asked at the previous meeting specifically number one, what we were asking about, an analysis of employment changes over time in relation to the quota and landings, right?

My question for you is, how difficult is that? How consuming is that, and do you have any experience or aware of any other studies where it was a monopoly, one business that you are trying to get at? Anythig you can enlighten us on?

DR. SCHELD: To the first question of the kind of feasibility of doing a study to look at, employment changes in response to management changes. Yes, I mean I think you could do that at multiple levels. I think the level that the Whitehead and Harrison study did it at was essentially correlations, which is maybe the kind of first level to do that at just looking at how the data is correlated or not over time.

Ultimately, you would want to do a more sophisticated model that would control for other things that might be changing in the economy or in

terms of fishing conditions that could influence those. Yes, I think that is feasible in a kind of regular research project type of time span, one to multiple years, without speculating further on what that would really look like. Then, what was the second?

MR. HAYMANS: Well, just the fact that reveal a monopoly, right, and so how difficult would it be do you think. Are we giving bait a share?

DR. SCHELD: Yes, so that is the challenge, right? These are unique, it is sort of a unique fishery in that respect. In order to kind of update the numbers from the prior studies and to sort of do those sorts of forecasts and straight up analysis even would need participation of the industry participants.

MR. HAYMANS: Are you aware of any other industries, any other places where we might could look to see? How do you do that? I'm certainly not an accountant.

DR. SCHELD: Whether it's a more kind of diversified or monopoly or oligopoly type industry, the methods, the kind of analytical approach would be the same. But getting the data would be different, I guess. Certainly, I think the same types of tools that have been applied could be applied and could be refined.

Optimally, really like a slightly different framework, what economists would call a general equilibrium framework that would allow for sort of how shifts in supply inputs and demand of products like reduction products or bait influence business behavior. Optimally, that I think would be sort of a great framework for this sort of thing. The way you approach it, if it was a monopoly or oligopoly type industry, would be the same it just you need the data. It would really require participation on the industry side.

CHAIR CIMINO: Good, Doug. Other hands, Nicole.

MS. NICOLE LENGYEL COSTA: Yes, thank you for that presentation. Given that you said the impacts in both of these studies were strictly upstream, and we're not looking at the downstream impacts. Kind of tying into what Megan was saying. It sounds like we're kind of missing a big piece of the puzzle here, especially in regard to the bait fishery.

But I was also wondering if you could comment just based on the nature of these two studies and how far back they were. I mean In Plan makes changes to their input/output models constantly, they are updating datasets. I am just wondering if you can comment on, would those findings and those relationships, the jobs per thousand metric ton relationship still hold today, or could we be drastically underestimating that impact, given the datedness of the studies?

DR. SCHELD: Yes, I mean it is hard to say. I guess a couple of thoughts. One, the economic kind of multipliers and job impacts definitely do change year to year, depending on kind of revolving economic conditions and changes in industry structure. Thinking back to Kirkley, it was a different economy.

I don't have a good sense of whether it will be necessarily higher and lower. I will say the community in Virginia is still sort of centrally dependent, the local community in Northumberland County is sort of still locally dependent and tied to that industry. I think that the kind of unique vulnerability of that community in dependence on that fishery is probably similar. But whether the scale of the job impact numbers I think is hard to tell. The other thing I would say is, there is not like any error or uncertainty on these estimates, so this is a deterministic model. There are ways to incorporate uncertainty. The kind of standard approach doesn't, and neither of these studies did kind of an alternative approach that would have incorporated that uncertainty.

It's three jobs, but it's at plus or minus one. You don't have a great sense of what that uncertainty is. Was there another part of the question that I didn't get to? Then I just want to reiterate, sorry to jump in that the kind of downstream stuff is again yet not included.

Of course there would be, especially in the bait sector, other fishing industry that is supported by that. It's hard to quantify right now what that would be without any sort of research on it. There hasn't to my knowledge been research on that. Does that answer all of it?

MS. COSTA: Yes, and just one quick follow up, I guess. I think I heard you say that the biggest limitation to the CESS or anyone else taking on another study to kind of repeat this analysis, but maybe in that analysis include the downstream impacts. It sounds like including downstream impacts would be easier, just because of not as much confidentiality with the data. But repeating a study looking at the upstream impacts just to update it. It would be the data limitation that would most likely make that difficult.

DR. SCHELD: Yes, I think so. I wouldn't say it's easy to do the downstream stuff, but like it could be done. Really that is going to depend sort of on model of sort of bait demand. I think in all, it could all be done, but it would, more so on the bait side it would require. You know if you wanted to get a better understanding of bait class structures and the economic multipliers of that entry, also it would require industry participation, not from just one company but from the sector at large. Yes, I think a path forward will require industry participation on multiple levels.

CHAIR CIMINO: Okay, thank you, great questions so far. We have a hand here, Delegate McClure.

MS. ADELE McCLURE: Yes, Delegate Adele McClure from Virginia. Just curious, so thank you for the information and curious if the study of this aggregate's employment affects by the rapids of the refill shoreside workforce in Northumberland County, also coastwide aggregate net benefit figure can be positive, while the losses concentrate entirely in one community with limited alternative employment. Just curious about the size of the data base.

DR. SCHELD: The original study did not, I don't believe, link in demographics in any way, though the point was raised that the bill is kind of uniquely dependent on it, and could create kind of structural unemployment, because there are limited alternatives. There would potentially be several, sort of upstream impacts and changes. Then the distributional stuff didn't come up kind of beyond noting that the kind of unique position of that community.

CHAIR CIMINO: Any other hands? Yes, go ahead, Allison.

DR. ALLISON COLDEN: Thanks for the presentation, I really appreciate it. I wanted to follow up on Doug's comments and some of the conversation that the Board had at the May meeting, because although I understand some of the limitations and some of the interest for future research, which I think would be really interesting and informative for this Board. I think that particularly the Kirkley study, and tell me if this is misapplied, but we have an opportunity given the Kirkley study and actions that this Board has taken since to look at that retrospectively.

I mean if you just do kind of back of the envelope, you would expect based on changes to the Chesapeake Bay cap that have happened since 2011, that more than half of the Omega workforce would have been laid off by now. Is that something that we have seen based on those changes?

DR. SCHELD: Yes, so you could, I mean I haven't looked at that. You could do just what you're saying. Like does it hold up to kind of retrospective, looking retrospective. My response would be probably that it's because it is not this linear response, right? It's not that the management changes haven't had any impact on industry, it's just that employment is a stickier, less likely to change compared to other.

They are either, I don't know, they are changing where they fish or how they are doing production in some other way eating the profits up. I don't know, but yes. One could do that retrospectively. My guess would be that it doesn't probably map on to

these numbers because employment is traditionally a lot more sticky of an input.

But that said, there is probably some point of no return for that industry, where either cost of getting a pension product and bringing it back for processing or too high or volumes are too low, past which they either shut down or scale back specifically. I think this is not specifically on the CESS recommendations, but this ad hoc zooms in there.

Specifically knowing kind of cost tradeoffs in terms of how much more it might cost to fish not in the Bay, and/or kind of threshold triggers for processing volumes would be really, from my perspective, informative in understanding the economic impact.

DR. COLDEN: A quick follow up then. Maybe some of the reasons why we have not seen in the retrospective what would map directly on to the predictions from the Kirkley model would be that stickiness that you're talking about. Would that fall into adaptive industry behavior?

DR. SCHELD: Yes. The industry likely adapted. I have not looked at this data so I don't know what employment changes have or have not been. But one would expect that businesses would adapt to changes and kind of the regulatory environmental conditions. Some of that adaptation would likely be changes in the kind of use of inputs with employment being one of the last things active. Again, not been studied in menhaden, but in many other industries often employment is one of the last things that businesses will change.

CHAIR CIMINO: Okay, I see a couple hands, both follow ups, and I apologize, because I realize we have more than one Doug. I'm going to go back to Doug Haymans and then to Elliot. Go ahead, Doug.

MR. HAYMANS: I guess this would be directed to Executive Director, but how can you start with a conversation about RFP and several CESS research recommendations? What would be the next step in getting a ball moving and maybe answer the first questions?

EXECUTIVE DIRECTOR ROBERT E. BEAL: Thanks, Doug, for the question. I think everyone knows that Congress appropriated a significant amount of money to menhaden research in the Chesapeake Bay. We don't have access to that money yet; we are still waiting on that grant to come in from the Federal Government.

The Foundation for the use of that money is a study plan that was developed at a workshop in October of 2023 at the Virginia Institute of Marine Sciences with external scientists from other universities and academia and industry and state representatives and others. One of the pieces of that road map, if you want to call it that, is socioeconomic work.

Once we receive that money, we are going to develop an RFP that is going to have ecological pieces to it as well as socioeconomic research pieces, so we can include, and I think including these, sort of more recent recommendations is fair game for that RFP as well.

CHAIR CIMINO: Delegate McClure, and I apologize. I am typically on a first name basis, and I hope somehow, we get there, but Delegate McClure, go ahead.

MS. McCLURE: Something that you mentioned earlier, like the point of no return comment that you made kind of sparked the question in my mind. You know one thing that I really fear with this Addendum is that we are not capturing the full picture. What you presented is extremely informative, especially when it comes to the impacts.

I'm just curious if you had a chance to review how the study is presented in the Draft Addendum, and how it aligns with what you presented here. Then if you can explain maybe why several points were included or omitted from when it comes to regarding the impacts on the reduction fishery, like the point of no return comment that you made. I'm just curious about how it was selected, in terms of what you omit and what you include in that Draft Addendum.

DR. SCHELD: I would have to review. I mean I think some of that text maybe came from me in the draft. I don't know if I can speak specifically to it, because I haven't looked at the Draft Addendum language in a couple of months. But just to the point of no return comment, yes. I think it was maybe worded as like, the community would have high vulnerability and it might create kind of structural unemployment.

I would have to really look at the wording. I will say that when we presented this, we did send the amendment to industry. The original one that was just reduction sector, so we just sent it to the reduction sector industry just to get their take on what we were saying or what our interpretation of the research was.

They did note that a kind of zero Chesapeake Bay quota cap, certainly that would represent sort of a point of no return trigger. But otherwise, I can e-mail you. I would have to go back and look exactly what the language is in the Draft Addendum and see if there is some sort of disconnect in the communication.

MS. McCLURE: Thank you, we appreciate that.

CHAIR CIMINO: Other hands? Not seeing any, I am going to do two things. One, I think, Andrew, I want to thank you again. I think this time we can let you go. I am going to pretend that you guys are having way more fun over there, and don't ruin that for me. Go enjoy. The other thing is, I'm going to kind of pull back the curtain.

James and I had a plan that in between the two agenda items that we have now merged, we were going to take a break. What I am going to do is take a break. Let's take a 10-minute break, and then we will come back to discuss what we want to do with this Draft Addendum. Thank you.

(Whereupon a recess was taken)

CHAIR CIMINO: We are back and officially reconvening the Menhaden Board. I have two quick announcements that I would like to tackle. The first is that we did have a couple of hands from the public regarding the CESS presentation. I want to say that I apologize for not allowing the public to ask questions on that.

But as you heard from Andrew, and as I think it was kind of telegraphed, the Board still has a lot of questions. There is a lot more to look into. What I would like to say to the public is, if you do have questions on the economic impacts of all of this, please send those to James, please send them to ASMFC, and we will do our best to either get answers or to make notes on what additional future stuff needs to be looked at.

Second important note that I have, I am going to turn the mic over to Bob Beal. We have two new Commissioners that are sitting at the table, and we would like to do those introductions, since I was remiss to do that earlier on. Go ahead, Bob.

EXECUTIVE DIRECTOR BEAL: I apologize for not doing it earlier as well. I would like to introduce two new Commissioners that are at the table. Jordan Zimmerman is the new Administrative Commissioner from Delaware. Jordy has been around the Commission family a little bit doing different jobs, so welcome, glad that you're here.

The second is Delegate Adele McClure; she is the new Legislative Commissioner from Virginia, and we are sitting in her District actually right now, so she has the best commute of all of us. I just want to welcome both of them, and they are welcome to fully participate as they both will, I'm sure. They don't need much of an introduction, they are ready to go, so thank you.

CHAIR CIMINO: Thank you, Bob, much appreciated. As we reconvene, we are looking on an action item on whether or not this Draft Addendum is ready to go out to the public. With that, and since we hadn't had any other questions on this. I am going to look to the Board, will of the Board on where we are. Do we have any hands, on possible motions on where this draft should be going? I see a hand, Rob, go ahead.

MR. ROB LaFRANCE: I know there has been a lot of discussion. I just want to basically say there has been a lot of work that was done in the work group. I want to thank Marty Gary to my left here for all the work he did, and the amazing work that James has done.

I think we're at the point, we've had some discussions here and then had some presentation. I would like to make a motion, and I had given that to James earlier. I would like to make a **motion that we approve the Draft Addendum on Addendum II on Chesapeake Bay Reduction Fishery Cap for public comment.**

CHAIR CIMINO: What we're going to do is we're going to get the wording of that motion up, so that all can see it, including those online. When we do that, I will also look for a second. We have the motion on the board. Is there a second to the motion? Allison Colden is the second. There we go, we have a motion. Let's build discussion on the motion to the Board. I will first look to the maker and seconder. Rob, do you have anything to add to this?

MR. LaFRANCE: I think I said it. I think we've done a lot of analysis on this. We had a fairly lengthy Board meeting on this last time. I think we came back with a much, much better document, and again, thanks to all the folks who worked on the work group. I am pleased with where we are right now.

I know there are a lot of questions, but that is what I think public comment is all about, and I am looking forward to seeing the public comment, because there are a number of issues that have been raised. I think this document here will be very helpful for us as we get that information from the public.

CHAIR CIMINO: Allison, anything to add?

DR. COLDEN: Just similarly, just want to acknowledge having served on the work group with Rob and others that I do think there were some significant improvements in clarity and background made to the document, with some heavy lifts from a couple of very particular work group members.

Looking back in prepping for this meeting on the web page for the Commission for Atlantic menhaden, noting that we have been sort of kicking off this process that has led to this Addendum for two years now. I think having been part of the initial Chesapeake Bay Precautionary Management Work Group and seeing that all the way through to where we are now. I think we've had a robust discussion. I look forward to hearing what the public has to say about the document. Thanks.

CHAIR CIMINO: I appreciate that. That old Work Group, it was like we got a name after it happened. It's like being in a band and you didn't know you were in the Beatles. I guess we weren't probably the Beatles, but. Further discussion on the motion, looking around the table and online to Board members. Not seeing any. Yes, Nichola, go ahead.

MS. NICHOLA MESERVE: I do support the motion, and I just want to ask James for clarification on one of the figures in the document I believe may still need some correcting. It may have been something left over from the Work Group, since the projections for how the options on the C quotas would influence harvest. My understanding was that that figure still needed to be corrected, so I just wanted to flag that as something that can be corrected still. Then in some of the public comment I saw that a concern had been raised about the Law Enforcement Committee had not been asked to comment on the enforceability of the options yet.

I thought that was kind of natural, because we're just getting to finalizing what the range of options is, so I wanted to get reassurance that the LEC will be looking at this document and be providing a report to the Board before we take final action in November, assuming this motion is approved.

CHAIR CIMINO: To that end, yes. LEC will look at that and we will have that information along with public comment, the Board will. James, any response on the figure?

MR. BOYLE: Yes, I will look into that as it stands. I discussed with two people that worked on that data, and so I think it might be right. But I will double-check width both of them.

CHAIR CIMINO: I had one other hand.

MS. McCLURE: I am very new to the Board, as you all know, but I would be remiss if I didn't provide some thoughts that I just wrote down while sitting in this meeting, to give you some background and context for the record of why I do not support the motion. I represent Virginia, I am a short drive from the Bay.

I love the Bay, I love the workers, and I strongly believe in trying to find a way to strike that fair balance between both, but also based in science. Even just sitting here, and also doing my homework. I have heard a lot of, I think uncertainties versus we know this is happening and we know this is the cause and the correlation.

But I need to know that we are putting out a complete picture to the public. I am completely for transparency, completely for public comment. But I just feel like without that complete picture, without the proper Bay specific data, I feel like that we are putting the cart before the horse, instead of availing ourselves to the upcoming studies and data that could finally guide us.

We finally got that funded in Virginia at 4.5 million dollars. We have three studies, and this could guide us in the context of the science, which is good for both the public, for union workers and the fisheries. I just wanted to say for the record, I believe that the public would be better served as a whole if we had the scientific study results to better inform meaningful comments from the public and input from all parties, especially those closest to the issue and this is speaking as a Virginian.

I think the timing of this addendum is premature in the context of specific science-based evidence. For that reason, I think we need to give more time to the studies that we have invested that almost 5 million dollars in. Therefore, at this time I am going to be voting no to signal my concern for the timing of this addendum, and the need to allow science to move us forward from here, so thank you, Mr. Chairman.

CHAIR CIMINO: We have one other hand from the Board and that is online. J.J. Minor, go ahead, J.J.

MR. JAMES "JJ" MINOR: Good afternoon to all. I stand with the good Delegate, and thank you for making a statement, Delegate. Again, I too have some uncertainty here with what was presented to us today. Not only that, but I still would like to know who wrote the economic analysis in reference to this Addendum. Thank you.

CHAIR CIMINO: Other hands from Board members, John, go ahead.

MR. JOHN CLARK: I am not opposed to the motion, but just following up on Delegate McClure's comments. I am a little uneasy that we are moving ahead with something that could be a big change to a fishery, and we don't really have the science to back that yet. It seems like when we go down these actions that are based on what we think is happening, rather than what we have data for, it can lead to some problems.

I see this as similar to horseshoe crab, where we've had what people think is happening with birds and that is affecting how we manage it. I'm not saying that there could be a real valid scientific basis for taking these actions, but the money has been allocated to do some of these studies. I think it would be good to take it slow, but I certainly understand the concerns in the Chesapeake Bay.

CHAIR CIMINO: Any other hands from Board members? Dennis.

MR. DENNIS ABBOTT: A simple thing is, if not now, when? We've been fooling with this for many years. We've been working on menhaden since I've been here so many years ago. I'm of an opinion that we'll never have adequate science to back up any position that we take. It's so variable and it changes over time. You know we worked on this

Addendum and I think it's time for the public to weigh in. The public wants to see this Addendum and they want to help us make a decision. I support this going out to the public.

CHAIR CIMINO: Not seeing any other hands around the table. As I mentioned at the top of this episode, we'll look to the public. Members of the public that would like to comment on the motion on whether or not this addendum is ready to go out to the public. I will allow one minute. I see one hand so far, so Phil, go ahead.

MR. SALEZAK: Thank you. I just have one question. Has anyone on the Board contacted the Potomac River Fisheries Commission regarding over a 90% decline in the pound net harvest of Atlantic menhaden in the Potomac River since 2012? Anybody? If not, why not? That's empirical data, that is real data. That is a decline in a major Chesapeake Bay estuary, in terms of harvesting Atlantic menhaden. That is one question.

The other is, by the way, at 1:15 I sent everybody on the Board not only that question and that data, but I sent you an economic analysis which you referenced, which was the Southwick Associates study, and it talked about a 7.7-billion-dollar striped bass industry back in 2016. Well, it is down 71% in terms of harvest. I am just wondering what you estimate what the GDP would be and define. Could somebody just answer my first question? Has anybody contacted the Potomac River Fisheries Commission, because that is real data not model, thank you.

CHAIR CIMINO: Thank you, Phil, appreciate the comment. I see one other hand online, Ross Kushner. Ross, you have one minute, and again all these public comments are on the motion to the motion, so whether or not this draft is ready to go out to the public. Go ahead, Ross.

MR. KUSHNER: I know folks are worried about the economics and the economic impact, but what I saw is that the employment and income analysis that you did is totally focused on the value of harvested menhaden. It doesn't seem like anyone is considering what the value of an unharvested menhaden is.

I mean at least here in New Jersey, you know these things drive whale watchers, sport fishing, marinas, charter boats, tackle shops. I'm sure the income from that dwarfs any income locally in Virginia for these direct fishery results. I urge you to think about that when you are deciding whether to vote or not vote on this Addendum.

CHAIR CIMINO: Those are the hands I see online, so I am going to go in the room. I'm going to try and go closest up, so we'll start with Kate, and then Kate, we'll go to the right of you and then Shawn we'll get to you, and please introduce yourself when you come up to the mic, thank you.

MS. KATE WILKE: Thank you, Mr. Chair, for taking public comment. My name is Kate Wilke; I am with the Nature Conservancy. I urge the Board to approve this motion and send the Draft Addendum out to public comment. As many Board members have said around the room, it's been a multi-year effort to scope this issue, to provide information to the public. We would really like an opportunity to speak on the record and submit public comment, so the Board can consider that and then making a decision. Thank you.

CHAIR CIMINO: We had another hand here, come up and please introduce yourself, thank you.

MS. JOANIE MILLWARD: Good afternoon, my name is Joanie Millward, I am president of the Virgina Osprey Foundation. I do support Draft Addendum II moving forward. Just a couple of things. Chesapeake Bay, we cannot continue to wait for perfect information while marine science continues to mount and osprey chicks die of starvation.

I respectively ask that you choose precaution to stewardship, reduce the Chesapeake Bay TAC and seriously consider a temporary pause in reduction fishing during this critical time for our young osprey. As someone who has watched these birds' day after day, I can tell you let's not wait for another generation of studies saying that it's not.

CHAIR CIMINO: Sorry, we had another public comment, please come, yes thank you. When you're done if you wouldn't mind introducing yourself.

MS. LINDA NORDSTROM: I'm Linda Nordstrum, I'm also with the Virginia Osprey Foundation, I do observations of nests in Colonial Beach every single day. We started with 37 nests; we're down to 10 as of yesterday. In the last three years we went from 55 chicks three years ago to 5 to 8, and this year is looking very dismal. Every chick or fledgling that we, pretty much every chick that are fledgling now we've recovered has starved, has been very thin. It's very, very depressing.

I absolutely approve the Draft Amendment II to go forward. I want to point out that the Potomac River Fisheries Commission has a nest in the front of that building and I watch that nest every day, and that nest failed about a month, maybe 5 weeks ago. That chick had hatched, that mom was up there, the dad was up there and they stopped bringing fish to that baby and it died. Just pointing that out, thank you.

CHAIR CIMINO: We do have one other hand, please introduce yourself.

MR. SHAUN GEHAN: Shaun Gehan, I represent Omega Protein and Ocean Harvesters. I don't think this document is ready to go out to the public yet. One of our concerns we've raised is the outcome-oriented nature of the analyses and the discussion in the document that omits what was just presented today here by a member of the CESS about the potential tipping point when the Bay cap gets too low.

It omits from an earlier draft of the addendum document Rick Loman's research that showed dividing the sub season length could reduce Bay harvest by 9 to 34%. It talks about the percentage of the Bay cap, the total TAC, not that that means anything in the introductory section, but in the analysis, it starts talking about number of successes. I'm just going to take my extra second, because I've heard a lot. The important thing to keep in mind is that current Bay harvest is the lowest since we've had records because of management action. There is no science. You've got science coming, you should wait for science.

CHAIR CIMINO: Appreciate your comment, thank you. We did have a couple extra hands online, and I do want to allow everyone a chance to speak. Again, we're speaking to the motion, and so we have a couple hands that we'll give each a minute to speak, starting with Jim O'Connell. Go ahead, Jim.

MR. JIM O'CONNELL: Yes, I'll be quick. I believe that the lobster industry should have priority over the pogies. They came up to Maine this year. I've seen them myself out in the Bay, they are thrashing around in Elsworth and Frenchman's Bay like I've never seen them for 15 years like that. But it saved the lobster industry. It's increasing, the value of the fish increases incredibly when you turn it into lobster and not dogfood. That's all I've got to say for that. Thank you.

CHAIR CIMINO: Thank you for your comments, next up is Tom Lilly, go ahead, Tom.

MR. TOM LILLY: Please seize this opportunity for a 50% cap on reduction. Please add a 0 cap for the months of May and June to protect the few schools of forage migrating into the Bay at that time, when they are needed the most, as recommended by your Protective Options group. Even if you reduce the cap by 90% it won't help our striped bass during the critical striped bass or ospreys during their critical spawning and nesting season. Osprey babies' survival would not be improved by that, because the reduction industry would still have all the quota it needs and capacity it needs to catch every one of the few schools coming into the Bay to feed our wildlife in May and June, just as they are now.

With an approved motion you can add that 0 cap for May and June to this Addendum. I'm afraid that without it you will fail to protect our striped bass

spawning stock and osprey reproduction in the Bay. Remember that this is the option your Work Group on Protective Options recommends and that you didn't act on.

Without restricting the fishing in May and June, I don't think you're going to accomplish anything here. The only thing it will help, of course, is reducing the amount of pre-spawned fish that the industry catches. As you know, they now catch 70% of their catch is age 1 year or younger fish that have never spawned, reducing the cap substantially and preventing some of the fishing for those schools in the fall could have a very great impact on the failed recruitment in the Bay.

CHAIR CIMINO: If you could please wrap it up to hear the other comments.

MR. LILLY: That is the crux of the problem here and I think you in the industry and us on the conservation side would agree. It's really the failure of recruitment and catching all those young menhaden in the Bay that is the root of the problem I think we're seeing dramatically all up and down the east coast right now.

Remember that there are thousands of American jobs that have been lost as a result of the decline of the striped bass fishery in the coast. It's American jobs and all these profits that Omega is making are just going up to Canada. That's where they are going, folks. That's it, thank you so much. Thank you, Joe.

CHAIR CIMINO: I'll also take this opportunity to say, thank you very much for the beautiful Christmas Card that you sent me. I appreciate it. We had one other hand online before we take it back to the Board for a decision, so Matt Joyce, you have one minute to speak to the motion. Go ahead, Matt.

MR. JOYCE: I'll just speak on the sentiments of my colleagues in the conservation sector. I say the Connecticut Audubon Society approves the Draft Addendum to be used for public comment and that is all. Thank you.

CHAIR CIMINO: Thank you, Matt, I appreciate that. We had one other hand in the room, and then I am going to turn it back to the Board. But go ahead, Ben, and if you could introduce yourself when you get to the mic, you have one minute.

MR. BEN LANDRY: Yes, my name is Ben Landry, I represent Ocean Harvesters and the menhaden industry in Virginia. Thank you for this opportunity. I would like to commend Delegate McClure and Mr. Minor for kind of pointing out this idea that the economics of this is incredibly important. You know there was a discussion about the linear effects of cuts and a couple of Commissioners questioned that. But I would argue that we harvested with 10 vessels in 2010 and now we're down to 6. That is a 40% reduction in vessel employees. The shore side is also seeing some cuts. There are dramatic steps to everything you guys do here, in terms of employees, and I would say those employees have not been hired back, given, can I get the Lilly allocation.

They have not been hired back, because this company feels we're constantly under the gun every opportunity this Board looks to cut again. Those jobs have been lost. I appreciate the Delegate for pointing that out. As it relates to this Addendum, you have science coming to you. It may not be on a timeline that you prefer or that you would want, but science is coming to you to determine the abundance of menhaden in the Chesapeake Bay.

To ignore that and to say we have to ignore not only 2025 assessment that indicates a healthy population, but also this forthcoming science specifically to the Bay is unfortunate, and I think is a slippery slope for this Commission. I would urge you to allow that science to be conducted, and you can then make a better-informed decision, thank you.

CHAIR CIMINO: Thank you, Ben, appreciate that. If you can get that mic so Loren doesn't have to get up, appreciate that. We do have one more hand online, so I want to get that and then we're going to

bring it back to the Board, but before I do that one more comment. John Turner, go ahead.

MR. TURNER: Yes, good afternoon, again. John Turner from the Seatuck Environmental Association as the Senior Conservation Policy Advocate. Your friends on Long Island strongly support you moving forward with the Draft Addendum II for public consideration. Thanks for your time.

CHAIR CIMINO: Thank you, much appreciate it. It's back before the Board now. We have a motion to approve the Draft Addendum, we've had discussion. I will take prerogative to speak to the motion, not necessarily to the motion as a Board member, but I think one of the things, as I mentioned, a lot of us were hearing during the CESS report, we feel the needs for some updates.

You know one of the things that I was thinking about that I think we also need to consider moving forward is where all of the other bait species are, so those stocks that we either manage or don't manage that also play into what is bait, are very different than they were 10 years ago, for sure.

The pressures of, you know that was something that we talked about in the precautionary stuff too is there is that kind of balloon effect as you squeeze a balloon, it kind of pops out in other places, so where are the pressures going to be as we make decisions on what can and can't be harvested for this stock, which may be healthier than a lot of the other stocks that we see as bait.

That may be something that this Board wants to have a further analysis of as we move forward, not necessarily particular to this point, but just something that we probably need to think about as well. I'll look around the table. Do we need any time to caucus on this? Yes, okay, I'm going to give two minutes for caucus, and then we'll come back for a decision. Okay, that was it. We will take the vote as a roll call, so please raise your hand for **those in favor of the motion.**

MS. KERNS: New Hampshire, Maine, Delaware, Maryland, South Carolina, Georgia, Florida, Pennsylvania, NOAA Fisheries, Fish and Wildlife Service, New Jersey, New York, Connecticut, Massachusetts, Rhode Island, North Carolina.

CHAIR CIMINO: Okay, those opposed to the motion, please raise your hand.

MS. KERNS: Virginia and Potomac River Fisheries Commission.

CHAIR CIMINO: Any abstentions? Any null votes? Okay, we have 16 in favor, 2 opposed, no abstentions, no nulls, so the motion passes. This document will be going out to the public. I have a hand from Toni.

MS. KERNS: Unless you wanted to say something, I just wanted to talk about a piece of how we'll bring this to the public once you're done.

CHAIR CIMINO: No, please, go ahead.

MS. KERNS: James will reach out to the states about hearings and our normal process. But I just wanted to make a note that this document, like we did with striped bass, we will utilize the survey option that we did the last time that I thought was very helpful. It helped us be very efficient with staff time.

I'm making a request to the entities that tend to utilize form letters with the Commission to push for you all to, instead of sending and getting your constituents to send us form letters, to use that survey aspect. If you want to work with James and I in how to track your members to that survey, we would be very happy to work with you to do so, and to reach out to James and I.

We will be utilizing that survey, and of course we still will have the ability for people to send open-ended comments, but the survey helps us get direct responses from the public on the specific options that they are looking for. It doesn't make for guess work for us to try to interpret when folks don't tell us the specific options that they are seeking.

CHAIR CIMINO: Yes, just to add on to that. Typically, the request to Board members, usually in particular to the state agencies. Is your state interested in having a public hearing in person? There will be virtual option or possibly plural, multiple virtual hearings on this. That information will be shared as we get closer to establishing those dates.

Any other questions on where we go from here? That was it for the big action item, we'll move on to the next agenda item, and I believe that is you, Dr. Drew, so I'll turn it over to Katie for Guidance on the Total Allowable Catch.

CONSIDER GUIDANCE TO THE TECHNICAL COMMITTEE ON 2027-2029 SPECIFICATIONS

DR. KATIE DREW: This is about the other major agenda item that we will have in November, which is the projections and setting the TAC for future years. As a reminder of what has already occurred, in the annual meeting last year the Board received the ERP Benchmark Assessment and the single species update. The Board accepted that ERP Assessment for management use, and set specs for 2026, a single year. That means that this year at our annual meeting, you will be receiving some updated projections and you will need to set specs for 2027 through potentially 2029.

In terms of these projections, the stock assessment will not be updated, but the projections will have a little new information. We'll be able to include the final 2025 landings, and we will add an extra year to project through 2029. There is sort of the potential now coming to you for, are there other things that you would like to see out of these projections, relative to what we presented to you last time.

As a reminder, last time we gave you sort of two major sets of options. The first was the cap associated with a 40 to 60% probability of exceeding the F target for 2026 to 2028, both combined and as individual year TAC. Essentially, this is the table. Obviously, the numbers are going to look a little different next time.

But the key is looking at sort of that probability going 40, 45, 50, 55, 60 for all three years combined. This time it would be '27 to '29, and then as individual years. Last time we looked at some different assumptions about landings in '24 versus '25. We could consider that again this time, but I doubt it will be a major source of uncertainty here.

The other sort of set of options or set of numbers we gave you was basically the percent risk of exceeding the ERP target and the ERP threshold for different levels of total allowable catch ranging from a 20% cut to a 20% increase to the current TAC. Again, we went 20, 15, 10, 5, 0, status quo, increase 5, increase 10, increase 15, increase 20%, and then show the probability of exceeding the ERP target and exceeding the ERP threshold.

We presented for both fishing mortality and for the fecundity target threshold. Again, last time we had a few different assumptions about landings in '24 and '25, but they did not make a significant impact on the results. Just to sum up, these two bullets are what you got last time. Is there anything that you would like to see different or in addition for our annual meeting in 2026? I'm willing to take direction.

CHAIR CIMINO: Thank you, Katie, appreciate that. This agenda item is tasking, so I am going to keep this to the Board just for the public's information. This is going to stay amongst us. I will do both questions and discussion, so either or from Board members. Go ahead.

MS. MESERVE: I think I would just ask to alter the second bullet; that instead of looking. I don't think the effect of TACs, well the projections that we saw at the last time that we did this, we need to be looking at any percent increases in the TAC. But I would like to expand the range to a 30% decrease.

I think that would better bridge the gap between the results that you get from the first analysis and the second analysis. There is kind of a wide gap between the TACs that came out in those. I would be looking for the second bullet to be analyzed in

the current TAC down to a 30% decrease and 5% increments. Thank you.

CHAIR CIMINO: Other hands, Megan.

MS. WARE: I would ask for a sensitivity, and it doesn't have to be for all of these, just one is a prime example of comparing. I assume we are going to assume 100% utilization in 2026, as well as I would be interested in what the 80% utilization looks like. I know it wasn't a lot last time, but I think every metric ton does matter here.

That would be really helpful for just one of these as a point of reference. Then I would just say, if these projections are ready in early October, I would advocate for dispersal for the Board as soon as they are ready, just for extra time. I think this will be an intense discussion. They don't need to set until meeting materials are ready to go.

CHAIR CIMINO: Other hands, Rob.

MR. LAFRANCE: Yes, I just want to agree with what Megan said. I think to the extent we get all of this data, the earlier the better. I do think we have a lot of analysis and thought to go through on these numbers to be very helpful for us.

CHAIR CIMINO: I'm going to go back to something Nichola said. I think, Katie, you could certainly correct me if I'm wrong. Some of this, an update is kind of a push of the button, so we have that range. Nichola is suggesting that we, I think perhaps don't even show any increases. I guess since it is not necessarily a lot more work. I guess the question to the Board would be, is there any objection to that. I think that is a fair question to say, is there anyone here that would like to see projections with an increase. I'll look to Adele.

MS. McCLURE: I just want to make sure I'm following along right. That means we would be predetermining an outcome without the data specific that would be coming from some studies, correct?

DR. DREW: I think right, it would limit the options that you are presented with going from essentially status quo, that is no change to the TAC to a decrease. There would be no presentation of an increase to the TAC in these results.

MS. McCLURE: My question is, why would we consider removing the increase if we want to tie it to the TAC?

CHAIR CIMINO: Okay, thank you. Nic, do you have a response on your thoughts there?

MS. MESERVE: I'm not opposed to the TC giving the increases to the TAC. I was just trying to cut back on the work load with my understanding of the type of discussions we would be having in November. But if some are left to be done and the TC can do it, by all means, my main interest would be on expanding the range for the 30% decrease.

CHAIR CIMINO: That I certainly have no objection to. I would also like to see that, but if Katie, there is not necessarily any other work then.

DR. DREW: Yes, I think that is a reasonable request.

CHAIR CIMINO: Not necessarily that the increase also needs to go back. Keep the increased status quo, decrease down to that.

DR. DREW: Got it, we'll do at 20% increase down to a 30% decrease in increments of 5%.

CHAIR CIMINO: How does that sound? Megan gets her sensitivity run, all right, very good. Anyone else? Hands online, Toni? Okay, very good. Where ae we? Katie, you have everything?

DR. DREW: Yes.

CHAIR CIMINO: Those are pretty good marching orders, right? In a weird quirk, the hotel said since we scheduled to 5:30 we're going to have to stay…no, just kidding. I'm glad somebody laughed at that. With that, we are onto other business. Any other business to come before the Board? Bob Beal.

EXECUTIVE DIRECTOR BEAL: Definitely not other business. But just as a reminder, I think the last Amendment that this Board went through we got 125,000 public comments. I know there is a request to get the Board as much information as early as possible, but we'll do the best we can summarizing the hearings and summarizing the written comments that we get to make it on the briefing materials.

But I just don't want to over promise. I have no idea how much we're going to get, maybe that is cut in half, maybe that is doubled, who knows? But we'll get a lot, I'm pretty confident of that. We'll do everything we can, and I'm confident James will recruit many other staff members to help him out summarizing this and pulling it all together.

But you know it's going to be that the Menhaden Board meeting at the annual meeting is going to be a lot. Right, we're going to have to work through the Addendum to see the action there, and then also consider the TAC for '27 and potentially later. We can set aside a chunk of time for that meeting, and we'll work on strategies to make that as efficient as possible.

In other words, is there value in receiving presentations and then taking a break and recessing overnight and reconvening the next morning, so people can think about it. We'll talk through that with you as the Chair and leadership, to figure out what is the most efficient way to pull off all those things. It's going to be a lot of menhaden work at the annual meeting, and we'll set aside adequate time to pull it off.

CHAIR CIMINO: How is the pizza in Rhode Island, because it might be a working meeting? Eric, I trust Eric's opinions, it might be a working meeting until roughly 7:00 p.m. Really, I appreciate that. We absolutely need to give a lot of time to public comment. I think we may even need to consider if there is, so many states are seeing concerning nesting issues, you know nesting success with osprey. We may be looking at a report from other states on that. Not that I am a mic hog, I am a mic hog, but we may need a lot of time on the agenda for menhaden for sure.

I don't know if you want to remind us what the like benefits of employee of the quarter are, but I think James is going to be in the running around that time.

ADJOURNMENT

CHAIR CIMINO: Any other business to come before the Board? Not seeing any; any objecting to adjourning? Not seeing any objection, we are adjourned.

(Whereupon the meeting adjourned at 5:30 pm. on Wednesday, August 5, 2026)

Atlantic States Marine Fisheries Commission

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MEMORANDUM

TO: Atlantic Menhaden Management Board

FROM: Atlantic Menhaden Technical Committee and Stock Assessment Subcommittee

DATE: October 21, 2026

SUBJECT: Stock Projections to Inform 2027-2029 Total Allowable Catch Levels

The Atlantic Menhaden Management Board (Board) will discuss the 2027-2029 total allowable catch (TAC) for Atlantic menhaden at the 2026 Annual Meeting. Per Amendment 3, the TAC is set through Board action, either on an annual basis or for multiple years, based on the best available science. If the Board does not set a TAC for 2027 by December 31, 2026, next year's TAC will automatically be set at the level of the 2026 TAC (186,840 metric tons (mt)).

This memo reviews current stock status, the TAC setting process, the methods for the projections, and the results of the analysis that the Board requested to support the specifications process.

Stock Status

Current stock status is based on the results of the 2025 stock assessment update, which had a terminal year of 2023 (ASMFC 2025). The assessment was not updated for these projections. In 2023, the coastwide Atlantic menhaden stock was not overfished and not experiencing overfishing, with both fecundity and fishing mortality *(F)* between the target and threshold Ecological Reference Points (ERPs) (Figure 1). Although fecundity has declined since a peak in 2012, estimates of biomass and recruitment have shown a slight increase in recent years (Figure 1).

The 2025 assessment update used a revised estimate of natural mortality that was lower than the value used in the 2020 benchmark assessment; this change was peer-reviewed through SEDAR 102 as part of the 2025 ERP Benchmark Assessment[1]. This change resulted in lower estimates of biomass and recruitment and higher estimates of fishing mortality over the entire time-series compared to the 2022 assessment update and contributed to the lower estimates

[1] The Technical Committee (TC) is aware of the new publication by Ault and Luo (2026) that provides a lower estimate of natural mortality. The TC and the SEDAR 102 Review Panel reviewed an unpublished draft of that paper as part of 2025 assessment, which contributed to the revised estimate of natural mortality used in the 2025 update. However, the TC had significant concerns about the methods and assumptions that Ault and Luo used to produce their even lower estimate. The TC has not had the opportunity to review the new publication as a committee to see if those concerns have been addressed.

of the TACs associated with a 40%-60% probability of achieving the ERP *F* target for the 2025 and 2026 projections compared to the 2022 projections (ASMFC 2025).

TAC Setting Process

Since the implementation of coastwide quota management the TAC has varied but overall, has increased from 170,800 mt for 2013–2014 to 233,550 mt for 2023-2025 before being reduced 20% to 186,840 mt for 2026 (Table 1). Table 2 provides each jurisdiction's current (Addendum I) and historic (Amendments 2 and 3) allocations.

At the August 2026 meeting, the Board tasked the Atlantic Menhaden Technical Committee (TC) with developing projections using the ecological reference points (ERPs) and the single-species assessment model (Beaufort Assessment Model, or BAM). Specifically, the Board requested the following projections:

- The TACs that have a 40%-60% probability of exceeding the ERP *F* target, in 5% increments, using 2027-2029 combined and as separate years.
- The probability of exceeding the ERP *F* and fecundity targets and thresholds if the current TAC was changed by -30% to +20% in 5% increments, including 0% (the current TAC of 186,840 mt).

The Board also requested that the TC conduct sensitivity runs around the assumption that the TAC will be fully utilized in 2026 by conducting a subset of runs assuming only 80% of the TAC is used, comparable to the utilization in 2024 and 2025.

As in recent years, the TAC has been informed by the results of projection analysis, which explores a range of TAC alternatives to determine the probability of exceeding the ERP reference points adopted in 2020:

- **ERP target**: the maximum fishing mortality rate (*F*) on Atlantic menhaden that sustains Atlantic striped bass at their biomass target when striped bass are fished at their *F* target and the other ERP species in the model (bluefish, spiny dogfish, weakfish, and Atlantic herring) are fished at their current levels
- **ERP threshold**: the maximum *F* on Atlantic menhaden that keeps Atlantic striped bass at their biomass threshold when striped bass are fished at their *F* target and the other ERP species in the model (bluefish, spiny dogfish, weakfish, and Atlantic herring) are fished at their current levels

Monte Carlo Bootstrap (MCB) runs of the base model run from the single-species model (BAM), are used as the basis for the projection analysis. See the stock assessment update report for details on BAM base run and MCB runs (ASMFC 2025).

Sources of Uncertainty

Predicting the future condition of the stock and the fishery is challenging. Some uncertainty about past and future conditions is included in these projections, resulting in confidence

intervals around the population trajectories under different TACs and a probability of exceeding the ERPs instead of a hard status determination. However, there are additional sources of uncertainty that are not captured in these projections. The true risk of exceeding the ERPs is a combination of the uncertainty that is captured in the probabilities presented in Table 3 - Table 7 and the unknown uncertainty that is not captured here from both the single-species model and the ERP model. The different sources of uncertainty are described below to provide context to the probabilities reported here.

Single-Species Model

The projections have the same methods and assumptions as those run for the benchmark assessment. It is important to note that key uncertainties about natural mortality and fecundity are accounted for in the projections through the use of the MCB process, which resamples from distributions around those parameters. Additionally, during the benchmark assessment (SEDAR 2020), the Stock Assessment Subcommittee (SAS) used a new procedure for projecting recruitment. Instead of assuming a static median value for recruitment, as is done for many assessment projection methodologies, recruitment was projected using nonlinear time-series analysis methods (Deyle et al 2018) which projects future recruitment based on how recruitment has changed in the past under similar conditions. This is done for each MCB run to account for uncertainty. Thus, uncertainty is recognized in the recruitment time series and the methods used for projections adequately accounted for that uncertainty using the best scientific methods available. As with all projection approaches, the uncertainty around recruitment and exploitable biomass will increase with every year the projections are extended beyond the terminal year of the stock assessment.

The projections assumed that the allocation of the TAC in 2027-2029 will be the same as the current allocation. If the Board elects to change the allocation, the results may be affected, since the more northern fisheries tend to harvest larger, older fish than the more southern fisheries. This change could be incorporated into future projections at the Board's request, but no proposed alternatives were provided by the Board for these projections. The projections do not include uncertainty around other aspects of the model structure, such as the selectivity patterns of the bait and reduction fleets, potential future changes in the seasonal or spatial patterns of the fishery, or changes in menhaden growth or weight-at-age. In addition, the TC elected not to apply a retrospective adjustment for the projections based on the results of the Commission's Retrospective Pattern Advice flowchart (ASMFC 2024). Therefore, although the overall scale of the retrospective pattern was within the acceptable bounds for a short-lived species, retrospective patterning contributes to the overall uncertainty that is not fully captured in the projections.

Ecological Reference Point Model

The 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. Better quantification of uncertainty around the reference points themselves was a recommendation from the 2025 peer review panel (SEDAR 2025), but some of the uncertainty can be captured through sensitivity runs. Uncertainty in the ERPs includes

both model uncertainty and ecosystem uncertainty. The ecosystem model was sensitive to the relationship between spiny dogfish and striped bass. Changes in the parameters of that relationship or different assumptions about the spatial distribution of the spiny dogfish stock affected striped bass's ability to rebuild to their biomass target under different combinations of striped bass and menhaden *F* rates and therefore resulted in different estimates of the ERP *F* target and threshold.

Uncertainty about future ecosystem conditions also contributes to uncertainty in the ERP target and threshold. For example, in the base run, it was assumed that the low recruitment regime that Atlantic herring were experiencing at the end of the time-series would persist into the future. A sensitivity run was done where it was assumed that Atlantic herring recruitment would return to the long-term average, which resulted in a slightly higher ERP target, indicating Atlantic menhaden could experience a higher *F* rate and striped bass would remain at their biomass target when Atlantic herring were more abundant.

Results

The TACs with a 40%-60% probability of exceeding the *F* target are presented in Table 3. The probabilities of exceeding the *F* target and threshold for a range of TACs representing a 30% decrease to a 20% increase from the current TAC are presented in Table 4, and the probability of falling below the ERP fecundity target and threshold for those TACs is shown in Table 5.

Instead of providing figures for all the scenarios the Board requested, the TC provided figures of the fecundity, recruits, *F*, and landings for scenarios illustrating the bounds of the highest and lowest risk scenarios requested by the Board, in comparison to the status quo scenario. Figure 2 shows projections under the current TAC (186,840 mt). Figure 3 shows projections under a TAC of 110,200 mt (associated with a 40% probability of exceeding the *F* target in 2027). Figure 4 shows projections under a TAC of 224,208 mt (an increase of 20% from the status quo TAC).

The assumption about levels of removals in 2026 had a minimal effect on the results. The estimates of the multi-year TAC that would have a 50% probability of achieving the ERP *F* target for 2027-2029 were approximately 2,000 mt (2%) greater under the lower 2026 removals assumptions (Table 6). The probability of exceeding the ERP *F* target and threshold under the status quo TAC showed no difference (Table 7).

The TC notes that while the Board has the ability to set the TAC for up to three years (i.e., through 2029), the current projections are based on an assessment with a terminal year of 2023, meaning that the majority of the exploitable biomass in 2029 will be comprised of projected rather than observed recruitment. This increases the uncertainty in the projections, particularly for 2029. The TC recommends setting the TAC for 2027-2028 and using the results of the 2028 assessment update to set the TAC for 2029 and subsequent years.

In addition, it is important to note that the values for the ERP target and threshold were based on the definitions currently used in management. The Board can use the ecosystem model developed through the ERP benchmark assessment (SEDAR 2025) to evaluate the trade-offs between predator biomass and menhaden fishing mortality under different ecosystem

assumptions and consider choosing a different ERP target and threshold definition to best meet their management objectives for Atlantic menhaden. If the Board redefined the ERP target and threshold – for example, using different assumptions about the biomass levels of other species in the ecosystem in the future or about striped bass fishing mortality – the values of the reference points and the associated TACs would change.

References

Atlantic States Marine Fisheries Commission (ASMFC). 2025. Atlantic Menhaden Stock Assessment Update. Arlington, VA. 129 pp. Available online: https://asmfc.org/resources/stock-assessment/2025-atlantic-menhaden-stock-assessment-update/

ASMFC. 2024. Retrospective Pattern Advice Document. Arlington, VA. 11p. Available online: https://asmfc.org/wp-content/uploads/2025/01/ASMFC_RetrospectivePatternAdviceDocument_Jan2024.pdf

Deyle, E., A.M. Schueller, H. Ye, G.M Pao, and G. Sugihara. 2018. Ecosystem-based forecasts of recruitment in two menhaden species. Fish and Fisheries 19: 769-781.

Southeast Data, Assessment, and Review (SEDAR). 2020. SEDAR 69 – Atlantic Menhaden Benchmark Stock Assessment Report. SEDAR, North Charleston SC. 691 pp. available online: https://sedarweb.org/assessments/sedar-69/

SEDAR. 2025. SEDAR 102 Stock Assessment Report – ASMFC Atlantic Menhaden and Ecological Reference Points. SEDAR, North Charleston, SC. 424 pp. Available online: https://sedarweb.org/assessments/sedar-102-asmfc-atlantic-menhaden/

Tables

Table 1. History of Atlantic menhaden TAC levels (1 metric ton (mt) is equivalent to 2,204 pounds).

TAC Period	TAC (mt)
2013-2014	170,800
2015-2016	187,880
2017	200,000
2018-2020	216,000
2021-2022	194,400
2023-2025	233,550
2026	186,840

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

State	Addendum I to Amendment 3 (2022) Allocation (%)	Amendment 3 (2017) Allocation (%)	Amendment 2 (2012) Allocation (%)
ME	4.80%	0.52%	0.04%
NH	1.19%	0.50%	0.00%
MA	2.12%	1.27%	0.84%
RI	0.81%	0.52%	0.02%
CT	0.33%	0.52%	0.02%
NY	0.84%	0.69%	0.06%
NJ	11.00%	10.87%	11.19%
PA	0.01%	0.50%	--*
DE	0.27%	0.51%	0.01%
MD	1.17%	1.89%	1.37%
PRFC	1.09%	1.07%	0.62%
VA	75.21%	78.66%	85.32%
NC	0.37%	0.96%	0.49%
SC	0.25%	0.50%	0.00%
GA	0.25%	0.50%	0.00%
FL	0.29%	0.52%	0.02%

* While under Amendment 2, Pennsylvania was not a part of the Board and did not have an allocation

Table 3. The TACs associated with a 40-60% probability of exceeding the ERP fishing mortality rate (*F)* target for 2027-2029 combined and as separate years. For the combined years, the TAC is chosen such that the probability of exceeding the *F* target for 2027-2029 is no greater than the specified percent in any one year. The probabilities are based on the uncertainties specified in the MCB runs.

Probability of exceeding the ERP F Target	TAC for 2027-2029	2027 TAC	2028 TAC	2029 TAC	Percent change from 2026 TAC
40%	110,200	110,200	120,300	120,500	-41%
45%	112,200	112,200	122,900	122,700	-40%
50%	114,200	114,200	124,800	124,800	-39%
55%	116,000	116,000	127,300	127,300	-38%
60%	118,200	118,200	129,800	129,800	-37%

Table 4. Probability of exceeding the ERP fishing mortality rate (*F)* target and ERP *F* threshold for different TAC projections based on the uncertainties specified in the MCB runs.

TAC (Status quo -/+)	Probability of Exceeding the ERP *F* Target			Probability of Exceeding the ERP *F* Threshold		
	2027	2028	2029	2027	2028	2029
130,788 (-30%)	72%	63%	62.5%	0%	0%	0%
140,130 (-25%)	92%	77%	77%	0%	0%	0%
149,472 (-20%)	97%	87.5%	88.0%	0%	0%	0%
158,814 (-15%)	99%	94%	94.5%	0%	0%	0%
168,156 (-10%)	99.5%	98%	98%	0%	0%	0%
177,498 (-5%)	99.5%	99.5%	99.5%	0%	0%	0%
186,840 (0%)	**99.5%**	**99.5%**	**99.5%**	**0%**	**0%**	**0%**
196,182 (+5%)	99.5%	99.5%	99.5%	0%	0%	0%
205,524 (+10%)	99.5%	99.5%	99.5%	0%	0%	0%
214,866 (+15%)	99.5%	99.5%	99.5%	0%	0%	0.5%
224,208 (+20%)	99.5%	99.5%	99.5%	0%	0.5%	1.5%

Table 5. Probability of falling below the ERP fecundity target and ERP fecundity threshold for different TAC projections based on the uncertainties specified in the MCB runs.

TAC (Status quo -/+)	Probability of falling below the ERP Fecundity Target			Probability of falling below the ERP Fecundity Threshold		
	2027	**2028**	**2029**	**2027**	**2028**	**2029**
130,788 (-30%)	41%	31.5%	26.5%	1%	1%	1%
140,130 (-25%)	41%	33%	28%	1%	1%	1%
149,472 (-20%)	41%	34%	29.5%	1%	1%	1%
158,814 (-15%)	41%	35%	31.5%	1%	1.5%	1.5%
168,156 (-10%)	41%	35.5%	33%	1%	1.5%	1.5%
177,498 (-5%)	41%	36.5%	35%	1%	1.5%	2.0%
186,840 (0%)	**41%**	**38%**	**36.5%**	**1%**	**2.0%**	**2.5%**
196,182 (+5%)	41%	39.5%	38.5%	1%	2%	3%
205,524 (+10%)	41%	40.5%	40.5%	1%	2.5%	3.5%
214,866 (+15%)	41%	41.5%	42.5%	1%	2.5%	4%
224,208 (+20%)	41%	42.5%	44.5%	1%	2.5%	4.5%

Table 6. Sensitivity run results showing the TACs in mt associated with a 50% probability of exceeding the ERP fishing mortality rate (*F*) target for 2027-2029 for the base run scenario based on the uncertainties specified in the MCB runs and the scenario assuming 80% TAC utilization in 2026.

Probability of exceeding the ERP F Target	TAC for 2027-2029	2027 TAC	2028 TAC	2029 TAC
50% (Base run)	114,200	114,200	124,800	124,800
50% (80% TAC utilization in 2026)	116,500	116,500	125,600	125,000

Table 7. Sensitivity run results showing the probability of exceeding the ERP fishing mortality rate (*F*) target and ERP *F* threshold for status quo TAC projections for the base run scenario based on the uncertainties specified in the MCB runs and the scenario assuming 80% TAC utilization in 2026.

Scenario	TAC (Status quo -/+)	Probability of Exceeding the ERP F Target			Probability of Exceeding the ERP F Threshold		
		2027	2028	2029	2027	2028	2029
Base run	186,840 (0%)	99.5%	99.5%	99.5%	0.0%	0.0%	0.0%
80% TAC utilization in 2026	186,840 (0%)	99.5%	99.5%	99.5%	0.0%	0.0%	0.0%

Figures

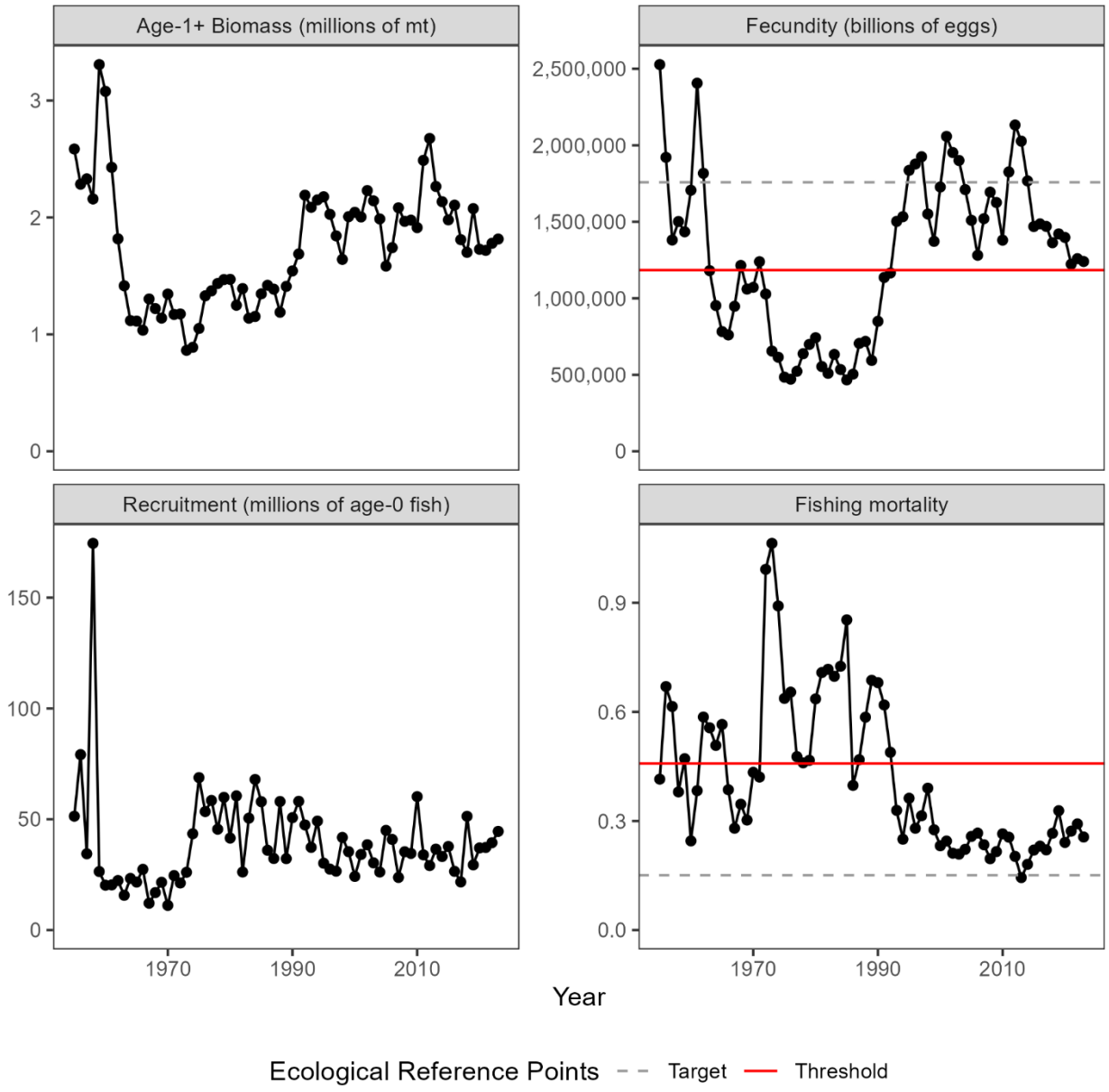


Figure 1. Estimates of biomass, recruitment, fecundity, and fishing mortality from the 2025 stock assessment update for Atlantic menhaden plotted with the ERP targets and thresholds for fishing mortality and fecundity.

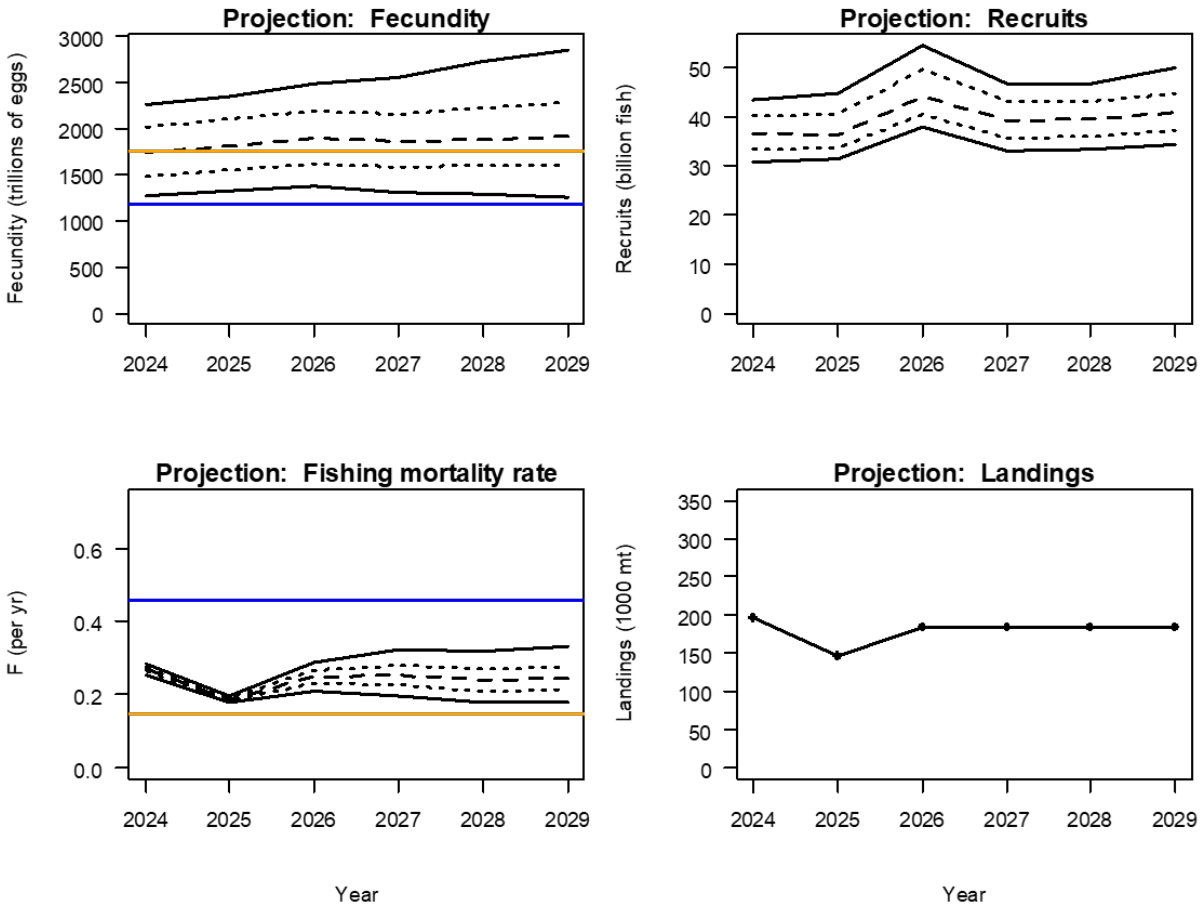


Figure 2. Fecundity, full fishing mortality rate, and recruits projected from 2024 to 2029 for a coastwide total allowable catch of 186,840 mt (status quo). The orange lines represent ERP target fishing mortality rate and fecundity, while the blue lines represent the ERP threshold fishing mortality rate and fecundity. The dashed black line is the 50th percentile (median), the dotted black lines are the 25th and 75th percentiles, and the solid black lines are the 5th and 95th percentiles.

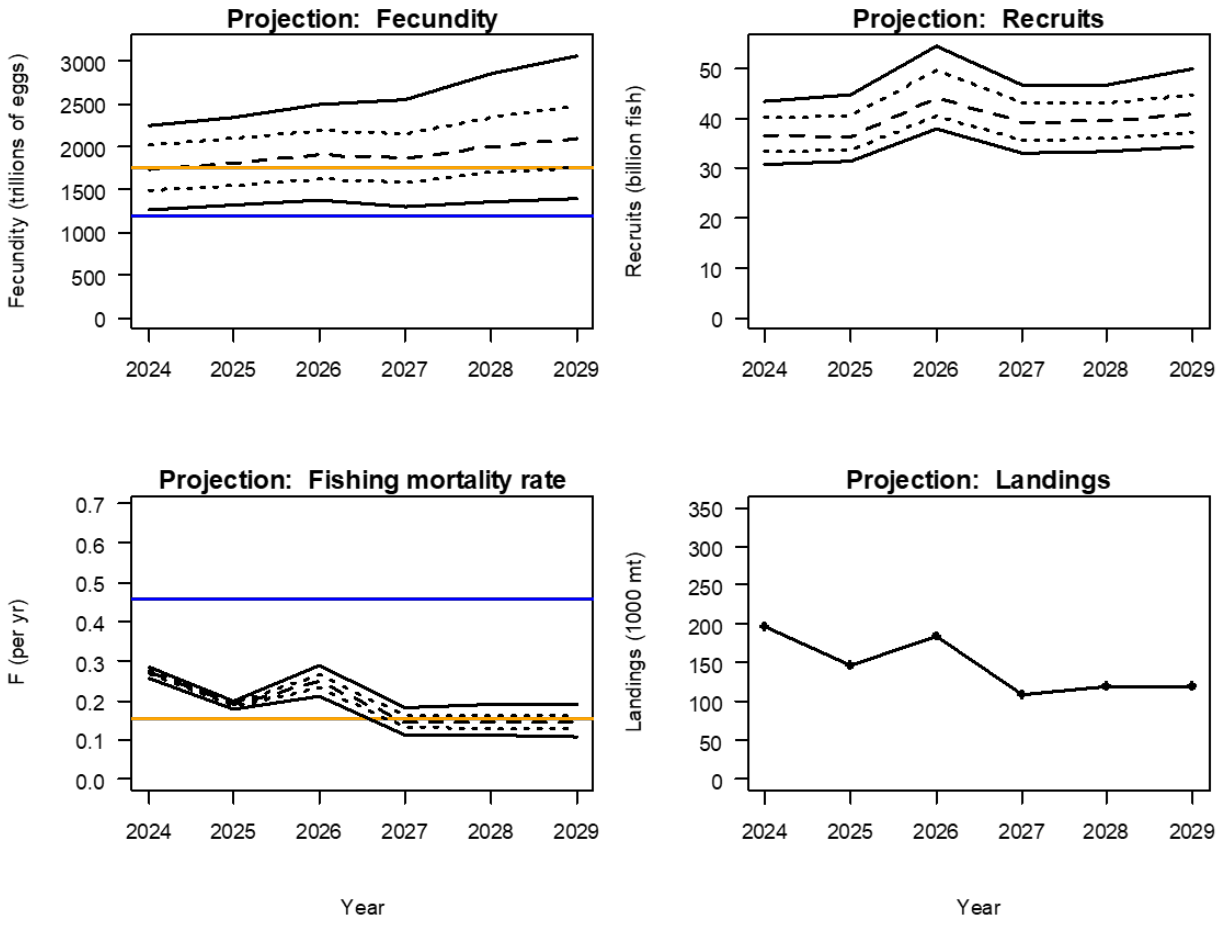


Figure 3. Fecundity, full fishing mortality rate, and recruits projected from 2024 to 2029 for a coastwide total allowable catch with a 40% probability of exceeding the ERP *F* target (110,200 mt). The orange lines represent ERP *F* target and fecundity, while the blue lines represent the ERP *F* threshold and fecundity. The dashed black line is the 50th percentile (median), the dotted black lines are the 25th and 75th percentiles, and the solid black lines are the 5th and 95th percentiles.

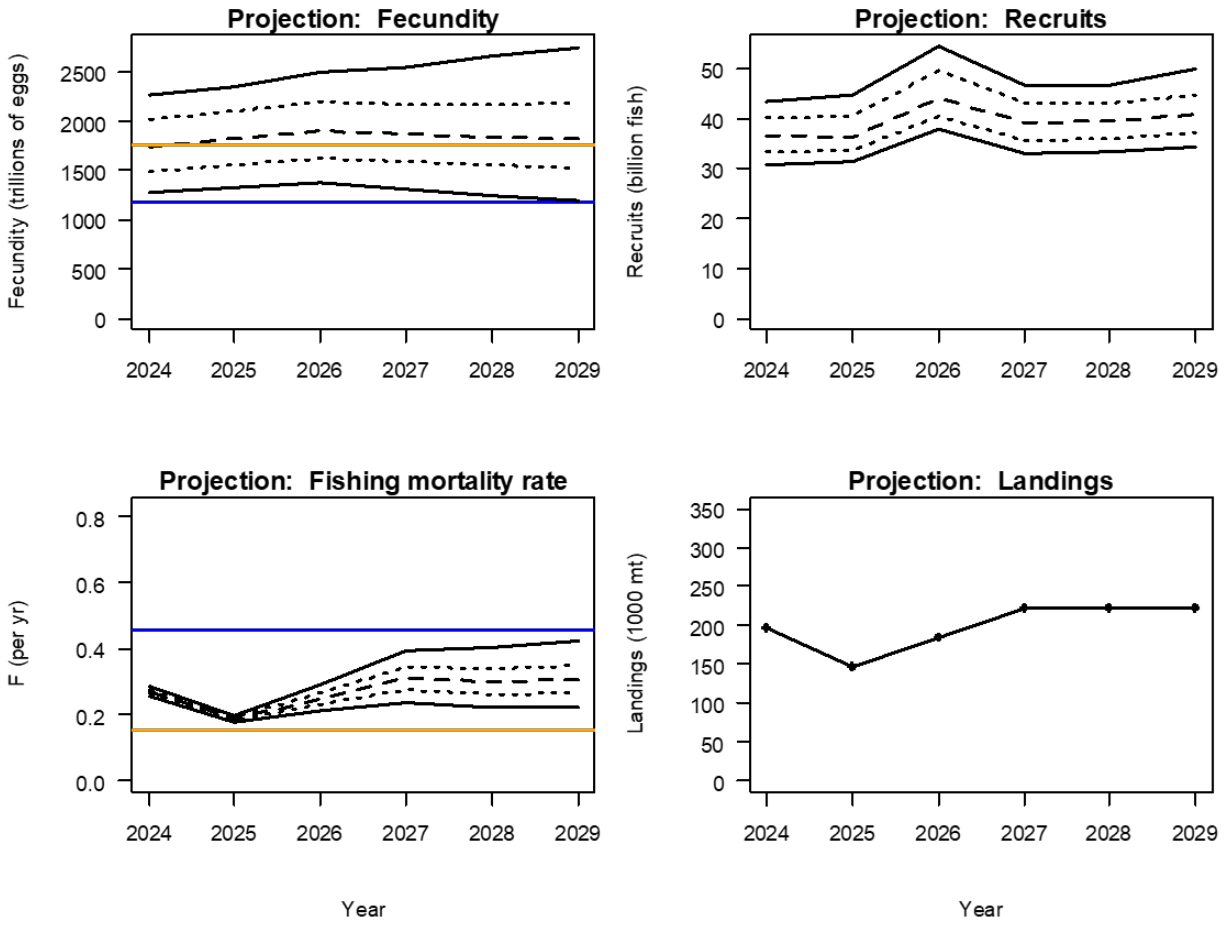


Figure 4. Fecundity, full fishing mortality rate (*F*), and recruits projected from 2024 to 2029 for a 20% increase to the coastwide total allowable catch (224,208 mt). The orange lines represent ERP *F* target and fecundity, while the blue lines represent the ERP *F* threshold and fecundity. The dashed black line is the 50th percentile (median), the dotted black lines are the 25th and 75th percentiles, and the solid black lines are the 5th and 95th percentiles.

Congress of the United States
Washington, DC 20515

October 19, 2026

Joe Cimino
Chair
Atlantic Menhaden Management Board
Atlantic States Marine Fisheries Commission (ASMFC)
1050 N. Highland St., Suite 200 A-N
Arlington, VA 22201

Dear Chair Cimino:

We write to you today to express our support for a strong reduction in the total allowable catch (TAC) for the Atlantic menhaden. Given the decrease in the Atlantic menhaden stock and its critical role in the broader marine ecosystem—including as a vital food source for numerous marine and avian species—a significant reduction in the TAC is necessary to support the health and resilience of the Atlantic Coast.

Menhaden are a keystone species within the Atlantic Coast and Chesapeake Bay marine ecosystems, including in our state of New Jersey. These small forage fish are a crucial component of the diet of osprey as well as predator fish species such as striped bass and bluefish, which are important to our state's marine ecosystems and recreational fishing communities. Maintaining adequate menhaden abundance is essential to protecting these resources for New Jersey residents and future generations.

Excessive menhaden fishing, including harvesting by reduction fisheries, decreases the availability of this forage species for predators throughout the Atlantic ecosystem. The ASMFC's 2025 stock assessment estimated that the average Atlantic menhaden biomass was 37 percent lower than previously estimated. The assessment also showed that a reduction of 50 percent or more in the TAC would be necessary to lower the probability of fishing mortality being at or above the ecological reference point target, which accounts for the forage needs of striped bass. Despite these findings, the Commission adopted a 20 percent reduction in the coastwide TAC for the 2026 fishing season.[1]

[1] Carl Wilson, *Message from DMR Commissioner: ASMFC Menhaden Board Approves 20 Percent Menhaden Quota Reduction*, DEPARTMENT OF MAINE RESOURCES (Oct. 19, 2026, 10:00 AM), https://www.maine.gov/dmr/news/thu-10302025-1200-message-dmr-commissioner-asmfc-menhaden-board-approves-20-percent-menhaden.

This level of reduction is insufficient to address the ecological consequences of declining menhaden abundance. Reduced menhaden availability has been identified as the primary driver of low reproduction in ospreys throughout the Chesapeake Bay.[2] A significant cut to the menhaden TAC is needed to prevent broad ecosystem impacts. We, therefore, urge the Commission to adopt a substantial reduction in the Atlantic menhaden TAC that reflects the best available science and supports the rebuilding of dependent species, and by extension the communities in our state and throughout the Atlantic Coast that rely on them.

We appreciate the Commission's continued work to responsibly manage Atlantic menhaden and urge the Management Board to take strong actions to protect our marine resources. Thank you for your attention to this matter.

Sincerely,

Frank Pallone, Jr.
Member of Congress

Cory A. Booker
United States Senator

cc: ASMFC Atlantic Menhaden Management Board Members

Daniel J. McKiernan, ASMFC Chair

Eugenio Piñeiro Soler, Assistant Administrator for NOAA Fisheries

[2] Bryan D. Watts, ET AL. WIDESPREAD REPRODUCTIVE DEFICITS IN CHESAPEAKE BAY OSPREYS (2026), Frontiers in Marine Science, https://www.frontiersin.org/journals/marine-science/articles/10.3389/fmars.2026.1685158/full#h1.

Public Testimony - Atlantic Menhaden Commercial Quota Reallocation

Atlantic States Marine Fisheries Commission
Atlantic Menhaden Management Board
Annie Sokoloski
Voices of the Fleet
Lubec, Maine
October 19, 2026

I have spent decades working in commercial seafood operations and alongside Maine's fishing industry. Throughout my career, my priority has remained the same: protecting the livelihoods of Maine fishermen and the working waterfront communities that depend upon them.

I support a larger, more predictable commercial menhaden allocation for Maine, provided that any revised allocation remains consistent with responsible coastwide fisheries management.

Maine's fishermen should have a meaningful opportunity to harvest a resource that supports not only the menhaden fleet itself, but also the lobster industry, bait suppliers, shoreside businesses, and the communities that depend upon them.

An allocation system must do more than preserve historical percentages. It must be capable of recognizing how fisheries develop, how fishing opportunities change, and how management decisions affect the people working on the water today.

I believe Maine's current 4.8% allocation deserves serious reconsideration, and I encourage the Board to evaluate an increased share for Maine through a transparent, evidence-based process.

The current allocation structure incorporates historical landings from 2018, 2019, and 2021, along with baseline allocations established under Addendum I to Amendment 3.

Historical landings provide important information, but they are not necessarily a complete measure of present fishing opportunity or future need.

A state's historical harvest may reflect more than resource availability. It can also reflect regulatory restrictions, access to vessels and equipment, processing and handling capacity, markets, weather, and the availability of buyers.

We should be cautious about treating historical landings as a permanent measure of what a state should be entitled to harvest.

An allocation system that relies heavily on past performance may inadvertently limit the ability of a developing fishery to demonstrate its current capacity.

For Maine's fishermen, that distinction matters. A historical allocation should not become a permanent obstacle to future fishing opportunity without a clear justification for maintaining it.

Atlantic menhaden are an important bait resource for Maine's lobster industry.

For Maine's fishing communities, access to menhaden is not simply a question of how many pounds may be landed. It is also a question of whether fishermen can obtain bait reliably, affordably, and when it is needed.

Maine's small-boat menhaden fishermen are an important part of that supply chain. Their ability to harvest and deliver locally caught bait supports other fishing businesses and helps keep economic activity within Maine's coastal communities.

Dependence on quota transfers and episodic set-asides can provide useful flexibility, but those mechanisms should not automatically be treated as substitutes for an appropriate underlying state allocation.

A predictable allocation gives fishermen, buyers, bait dealers, and supporting businesses a stronger foundation for planning.

When fishermen cannot reasonably anticipate whether quota will be available, the uncertainty reaches beyond individual vessels. It affects purchasing decisions, bait availability, business planning, and the ability of Maine's working waterfront to operate efficiently.

I believe the Board should examine whether Maine's current allocation adequately supports these needs and whether an increased baseline share would provide a more dependable foundation for the state's fishery.

I want to make an important distinction.

Supporting a larger allocation for Maine does not necessarily mean supporting an increase in the coastwide Total Allowable Catch.

The amount of menhaden that can responsibly be harvested and the manner in which that harvest is distributed among states are related, but separate management questions.

The coastwide TAC must remain grounded in the best available scientific information, including ecosystem considerations.

Within that conservation framework, however, the Board has a responsibility to evaluate whether the distribution of fishing opportunity remains equitable and appropriate.

A scientifically defensible harvest limit does not, by itself, establish that the allocation among states is fair.

I cannot reasonably ask the Board to justify precautionary restrictions with sound evidence while simultaneously asking it to increase Maine's allocation without demonstrating why that increase is warranted.

The same standards of scientific integrity, transparency, and accountability must apply to both decisions.

Before adopting a new allocation structure, I encourage the Board to examine:

- Current and historical state quota utilization, including the reasons quotas have or have not been fully harvested.
- Changes in menhaden availability and distribution along the Atlantic coast.
- The relationship between historical landings, regulatory access, and actual fishing opportunity.
- Regional bait demand, particularly the dependence of Maine's lobster fishery on reliable bait supplies.
- The role of quota transfers and episodic set-asides in meeting the needs of states with limited baseline allocations.

- The economic and operational consequences of alternative allocation formulas.

I would also encourage the Board to distinguish between demonstrated scientific findings, reported observations from fishermen, and assumptions that require further evaluation.

All three may inform management, but they should not be presented as interchangeable forms of evidence.

Maine's fishermen bring valuable firsthand knowledge of changing fishing conditions, resource availability, and the practical consequences of management decisions. That experience deserves meaningful consideration alongside scientific assessments and administrative data.

I support initiating a formal management process to reconsider commercial quota allocation.

I am not asking the Board to select an arbitrary percentage for Maine without supporting analysis.

I am asking the Board to determine whether the existing allocation structure continues to serve the fishery fairly and, if it does not, to develop a more appropriate approach.

Any revised allocation should be transparent, supported by relevant data, responsive to changing fishery conditions, and consistent with conservation objectives.

I also encourage the Board to establish a regular review schedule, with a three-year interval considered as one option.

Fisheries change. Resource distribution changes. Markets and operating conditions change.

An allocation formula should not remain in place indefinitely without examining whether the assumptions supporting it remain valid.

The Board should be willing to adjust allocations when the evidence supports doing so, just as it should be willing to maintain them when the evidence supports that conclusion.

That is what accountable, adaptive fisheries management should look like.

I am asking the Board to recognize that Maine's fishermen deserve more than temporary solutions to an ongoing allocation problem.

They deserve a fair opportunity to participate in this fishery, a dependable framework for planning their businesses, and a management process that recognizes the importance of locally harvested bait to Maine's lobster industry.

I am not asking the Board to abandon conservation principles or increase harvest beyond scientifically defensible limits.

I am asking the Board to ensure that conservation and fair access are treated as equally important responsibilities within the management process.

> I am not opposed to precaution. I am opposed to presenting precaution as certainty.

That principle remains central to my position, whether discussing harvest restrictions in Chesapeake Bay or the distribution of fishing opportunity among Atlantic states.

Protect the resource. Protect the integrity of the science. And recognize the people whose livelihoods depend upon the decisions made in this room.

For me, those people include the fishermen of Maine, whose ability to continue working on the water must remain at the forefront of this discussion.

Thank you for the opportunity to comment.

AMERICAN SALTWATER GUIDES ASSOCIATION
BETTER BUSINESS THROUGH CONSERVATION
saltwaterguidesassociation.com

October 19, 2026

Atlantic Menhaden Management Board
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200 A-N
Arlington, Virginia 22201
Submitted via email to comments@asmfc.org

Distribution request: Please include this letter in the Atlantic Menhaden Management Board briefing materials for the November 9–12, 2026 Annual Meeting (and, if received later, in supplemental materials or electronic distribution to Board members under ASMFC's written-comment timeline).

Re: Atlantic menhaden specifications for the 2027–2029 fishing years (coastwide TAC)

Dear Members of the Atlantic Menhaden Management Board:

The American Saltwater Guides Association (ASGA) represents conservation-minded fishing guides, private anglers, and fishing businesses who advocate for "Better Business through Conservation." Our members depend on menhaden as forage for striped bass and other predators along the coast.

ASGA asks the Board to set the 2027–2029 coastwide total allowable catch at approximately **112,100 metric tons**, a **40 percent reduction** from the 186,840 mt TAC. That level sits between the Technical Committee's preliminary projection risk levels of about 110,200 mt (40% risk) and 114,200 mt (50% risk), inside the Board's stated 40–60% risk range, and is ten points deeper than the 30 percent option discussed at the Board. A smaller cut does not match what the corrected assessment picture requires.

From 2022 through 2025, coastwide limits rested on a natural mortality estimate the 2025 assessment corrected. Managers spent years setting harvest on a stock picture that was wrong. That error is a reason for caution on coastwide removals, not a reason to treat a modest cut as enough. We estimate that more than 400,000,000 lbs of menhaden were harvested from 2022-2025 due to the error in the natural mortality number. This must be corrected.

A finding of "not overfished" is not the same as healthy. In 2023 fishing mortality ran 1.69 times the ecological target, and spawning output stood at 71 percent of its target. The 2025 assessment also cut natural mortality from 1.17 to 0.92, which lowered the estimates of biomass and fecundity. Anglers and guides along the coast see what that margin means when striped bass and other predators go hungry. Staying above a minimum threshold is a low bar for a forage fish that feeds the whole ecosystem, and it does not justify a modest cut.

ASGA separately submitted comments on Draft Addendum II (Bay Cap). Those comments stand on their own. This letter addresses only the coastwide TAC. Bay Cap reductions are conservation for the Chesapeake nursery. They are not quota to reallocate to other areas, sectors, or seasons. ASGA opposes any path that treats a Bay cut as transferable coastwide tonnage.

We ask the Board to adopt a fixed TAC at the ~112,100 mt level for 2027–2029 through the full specifications process, without linkage formulas, automatic adjustments, or discretionary transfers that reopen the coastwide number outside that process.

If you do not manage to the ERP target, you are failing, which seems commonplace at ASMFC. A phased-in approach is also a failure. After all the time and effort put into ERPs and coastwide support, all eyes are on this decision. Will anything ever be done for conservation or science, or will this be just another half-measure failure because meek board members and powerful influences ignore science and the public?

Thank you for considering ASGA's position.

Sincerely,

Tony Friedrich
President
American Saltwater Guides Association
tony@saltwaterguidesassociation.org

NYSOA

NEW YORK STATE ORNITHOLOGICAL ASSOCIATION, INC.

for the birds and birders of the Empire State since 1948

Date: October 15, 2026

Via Email To: Comments@ASMFC.org

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

Subject: **Atlantic Menhaden 2027-2028 TAC**

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

I am authorized to submit this 4-page official public comment input on the **Atlantic Menhaden 2027-2028 TAC** on behalf of the New York State Ornithological Association.

The New York State Ornithological Association (NYSOA) represents 47 constituent member organizations across New York State (comprised of local bird clubs, Audubon chapters, and nature organizations), plus hundreds of individual members, including ornithologists, scientists, professors, birders and conservationists.

This document details why NYSOA recommends the ASMFC Atlantic Menhaden Technical Committee's maximum 41% reduction option (110,200 mt) as the most supportive choice available on the ballot to ensure baseline protection for the total coastal food web, particularly in light of the latest science available in two new studies, both published in September 2026. One regarding lower natural mortality rates (M = 0.50) of menhaden, and the other, a meta-analysis of coastwide osprey reproductive rates across the Atlantic states.

Thank you for incorporating these comments into your November meeting decisions and for your dedication to the management and conservation of our shared marine resources.

Contact Person:
Russell Comeau
Director, New York State Ornithological Association
Amityville, NY 11701
Russ@Bassdozer.com | (928) 614-9186

1. 2027–2028 Coastwide Total Allowable Catch (TAC) Specifications

Recommendation: The Technical Committee 41% reduction option (110,200 mt) is the recommendation that NYSOA suggests for the 2027–2028 coastwide Total Allowable Catch (TAC) specifications.

Tech Committee Option	Quota Allocation	Precise Risk Profile Target
41% Reduction	110,200 mt	Achieves the lowest risk profile available on the ballot to protect the ecosystem.

Justification: The 41% reduction option (110,200 mt) is mathematically calculated based on a mortality model (M = 0.92), and it is the most supportive choice available on the November ballot. This is a constructive choice to provide baseline protection of the total coastal food web that depends on menhaden availability.

The 2025 Atlantic menhaden stock assessment incorporated an annual natural mortality rate of approximately 0.92 in the Northwest Atlantic Coastal Shelf (NWACS-MICE) ecosystem model. This was revised downward from an earlier estimate of 1.17 incorporated into the menhaden model assessment preceding a major increase in the coastwide menhaden TAC quota in 2022.

A September 2026 science study, co-authored by University of Miami researchers, Dr. Jerald Ault and Jiangang Luo, demonstrates that natural mortality is far lower, at approximately 0.50. This means the population is far less productive and much more vulnerable to overfishing than the current model assumes.

This new, lower mortality rate finding directly impacts the risk profile of the management options. At a lower mortality rate of 0.50, commercial fishing accounts for a much larger percentage of overall population loss than previously assumed.

Consequently, because a full stock assessment revision cannot be executed prior to the November vote, any decision made for less than the maximum available Technical Committee 41% reduction option leaves dependent Atlantic coast wildlife at a high risk of food stress due to menhaden unavailability in the total coastal food web.

- ***Investigation of Atlantic Menhaden Mortality Rates***
  by Dr. Jerald Ault & Jiangang Luo
  https://www.sciencedirect.com/science/article/pii/S0165783626002183

The authors recommend that the ASMFC should model stock assessments around M = 0.50 to protect both the commercial fishing industry and the broader Atlantic marine food web.

NYSOA aligns with this report which reinforces support for the Technical Committee 41% TAC reduction option, as it is the only protective option on the table to help ensure that an as yet unmodeled (using M=0.50) percentage of menhaden stock availability may remain in coastal waters to support the biological requirements of the entire U.S. Northeast Shelf Large Marine Ecosystem.

2. Current Regulatory and Socioeconomic Context

Temporary 2026 Adjustment (20%): For 2026, the coastwide TAC was reduced by 20%, reducing it from 233,550 metric tons down to 186,840 metric tons.

According to the ASMFC's Ecological Reference Points (ERPs), this 20% reduction in 2026 was a compromise intended to serve as a temporary, single-year measure. The model-calculated math at that time indicated that a larger (54% to 55%) reduction was actually required to guarantee that fishing pressure wouldn't outpace what predators like striped bass need to survive. The Board opted for 20% to prevent a sudden economic impact on the commercial bait and reduction fishing industries and because of unstudied socioeconomic impacts.

3. Coastwide Biological Context

The coastwide TAC directly regulates the stock of mature, adult spawners along the open Atlantic coast. Biological data estimates that about 67% to 80% of adult menhaden in the Northeast migratory corridor originate from outside and north of the Chesapeake Bay nursery system.

- **Chesapeake Bay, VA** (~30% to 33%): Approximately one-third of adult menhaden in the Northeast are recruited directly from Chesapeake Bay waters under the jurisdiction of Virginia.
- **Mid-Atlantic and Northern States**: NJ and DE combined with NY, CT, RI, MA produce the overwhelming majority of the coastwide total population.
- **Southern States**: Anchored by NC (plus SC, GA, FL); they contribute minimal recruitment migrating north in spring.

Larva Dispersal: The total Atlantic biomass of menhaden migrates up the coast in spring and back down the coast to North Carolina in the fall, and then offshore for winter where and when spawning primarily occurs in offshore shelf waters anchored by North Carolina with minor spawning extending south into Florida. The buoyant eggs hatch within days, and prevailing winter ocean currents carry the developing larvae westward. This larval drift dispersal enters countless separate estuaries, salt marshes, and coastal rivers from North Carolina to Maine in localized nurseries where the menhaden spend the first part of their young lives before participating in coastal spring and fall migrations for the rest of their lives. Estimates are they can live 10-12 years.

4. Incorporate September 2026 Meta-Analysis Findings

In addition, NYSOA strongly urges the Board to incorporate the September 2026 science study published by Dr. Bryan Watts, Director of The Center for Conservation Biology at William & Mary, into the Board's November ASMFC meeting decisions.

The full September 2026 study by Dr. Bryan Watts, can be downloaded at:

- ***Osprey Starvation Reaches Northern Mid-Atlantic and Southern New England***
  by Dr. Bryan Watts
  https://ccbbirds.org/2026/09/22/osprey-starvation-reaches-northern-mid-atlantic-and-southern-new-england/

This meta-analysis unifies 2026 nest monitoring data from a pool of government agency and NGO scientist-led and citizen-scientist teams monitoring 65 independent coastal districts, tracking 2,886 breeding pairs across 10 Atlantic coastal states. This comprehensive assessment confirms that salt-water nesting ospreys are experiencing unprecedented reproductive failures. The data explicitly links these failures to menhaden scarcity and resulting food stress within the saltier portions of the Chesapeake Bay and of importance to the TAC, along the entire Atlantic coast, demonstrating that current industrial reduction harvest levels are compromising avian apex predators coastwide.

The sweeping multi-state meta-analysis points out that the catastrophic reproductive losses first documented in the saltier areas of the Chesapeake Bay are no longer isolated there. Across our Atlantic states, saltwater breeding pairs that depend on menhaden availability are facing an unprecedented, widespread crisis. In stark contrast, pairs nesting in low-salinity tidal freshwater reaches where menhaden availability is not critical, are surpassing the threshold required for population maintenance.

NYSOA aligns with this report, which reinforces support for the Technical Committee 41% TAC reduction option to protect the menhaden forage requirements of the total U.S. Northeast Shelf Large Marine Ecosystem.

The question now becomes how the management framework will integrate the best available latest science findings to prevent long term fisheries and ecosystem imbalances.

5. What's at Risk

The Role of Menhaden: To continue to serve as the keystone species and primary energetic foundation for an array of marine and avian predators along the Atlantic Flyway and migratory corridor, inshore and offshore waters, including humpback whales, fin whales, and bottlenose dolphins, as well as critical predatory fish like striped bass, bluefish, and tuna. Furthermore, this coastwide abundance dictates seasonal foraging and breeding success for fish-eating seabirds and coastal raptors—such as ospreys, bald eagles, gannets, loons, terns and up to 65 coastal bird species (full list available upon request)—which rely on these high-lipid schooling fish during critical nesting, post-fledging, and migratory periods.

The risk inherent in setting the total allowable coastwide (TAC) harvest specification too high for 2027-2028 is that the Board's decision will directly reduce forage availability and reproductive success for hemispheric migratory and predatory species of wildlife across tidal and coastal water habitats of Atlantic states from Virginia north to Maine. Such an outcome would directly conflict with the established multi-species conservation objectives of the Ecological Reference Point framework.

In conclusion, adopting the Technical Committee 41% reduction option is a necessary action to address these industry and conservation concerns. The Board must act decisively to protect the total U.S. Northeast Shelf Large Marine Ecosystem, menhaden fishery and forage base for the entire Atlantic marine food web, by setting necessary fishing limits for 2027-2028. Thank you.

Sincerely,

Russell Comeau
Director, New York State Ornithological Association
Amityville, NY 11701
Russ@Bassdozer.com | (928) 614-9186

October 16, 2026

Mr. Joseph Cimino, Chair
Members of the Atlantic Menhaden Management Board
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200 A-N
Arlington, VA 22201

Re: Public Comment on the 2027-2028 Coastwide Atlantic Menhaden Total Allowable Catch (TAC)

Dear Chairman Joseph Cimino and Members of the Atlantic Menhaden Management Board:

I appreciate the opportunity to provide a public comment on the coastwide Atlantic menhaden Total Allowable Catch (TAC) for the 2027-2028 seasons. As you know, I have worked closely with the New Jersey Department of Environmental Protection (NJDEP) Fish & Wildlife Endangered and Nongame Species Program (ENSP) to monitor and manage New Jersey's recovering osprey population. During that time, the population has grown to surpass the historic estimate of 500 nesting pairs, and the species' conservation status was upgraded to stable in 2025. Through this work, I have developed a deep appreciation for the role ospreys play in the ecosystem and the insights they provide into the health of the broader food web.

This recovery was made possible by decades of conservation work, including improvements in environmental quality, habitat protection, nest platform installation, and continued monitoring. It also depends on the availability of abundant prey. My experience monitoring ospreys along New Jersey's coast has reinforced a fundamental principle: the recovery of a species does not guarantee the long-term health of the ecosystem that supports it. We must continue to protect the natural resources that make the recovery of an endangered species possible.

New Jersey's Coastal Ospreys Are Sending an Urgent Warning

Ospreys are fish-eating birds of prey that establish nests near water and depend on sufficient prey to successfully raise their young. Because they are highly visible predators with high levels of site fidelity, their reproductive performance can provide valuable insight into changes in local prey availability and the broader marine food web.

Since 2022, we have observed increasingly widespread signs of food stress among coastal nesting ospreys in New Jersey.

In 2022, a May nor'easter brought high waves, strong onshore winds, and heavy precipitation that made it difficult for ospreys to forage. Coastal nest failures rose to 37%, and productivity averaged 1.16 young per active nest (2022 NJ Osprey Project Report).

In 2023, another nor'easter struck in June, when most ospreys were raising young. Viewers of our live-streaming Barnegat Light Osprey Cam witnessed a 17-year-old banded male disappear

for 72 hours. Two of his young died before he returned. Through the cam's citizen-science prey delivery project, viewers also documented a decline in the number of menhaden delivered to the nest. Coastal osprey productivity averaged 1.08 young per active nest (2023 NJ Osprey Project Report).

In 2024, despite more favorable weather, signs of food stress became more apparent. After citizen scientists reported that some females were not laying eggs along the coast, we surveyed 25 occupied nests on Barnegat Bay during the first week of June. Forty percent had no eggs or young. A separate spring survey in the Great Egg Harbor watershed found that only 17 of 50 nests contained eggs or young, despite these sites having been occupied and productive in previous years. Coastal osprey productivity averaged 1.64 young per active nest (2024 NJ Osprey Project Report).

In 2025, we expanded our monitoring to better understand how prey availability and weather might affect breeding outcomes. During a survey in May of 24 occupied nests on Barnegat Bay, we found eggs in only 15 nests. Follow-up surveys in June and July documented just four young at three of those nests. Coastal osprey productivity fell to 0.64 young per active nest, below the level needed to sustain the population and the lowest recorded since 2003 (2025 NJ Osprey Project Report).

The situation remained deeply concerning in 2026. Preliminary results from our statewide surveys identified 850 territorial nesting pairs, including 801 along the coast from the Raritan Bay and Sandy Hook to Cape May and Delaware Bay. Of 579 active nests statewide, 552 were in the coastal region. Ospreys produced 464 young, including 409 at coastal nests and 55 at inland sites. Coastal productivity averaged just 0.74 young per active nest, compared with 2.04 inland. While inland results remained within normal breeding ranges, coastal colonies continued to struggle.

I personally observed food stress at numerous nests on Barnegat Bay. Nineteen nests had territorial pairs but no eggs, more than half of them at Sedge Island, New Jersey's only Marine Conservation Zone, near the southern end of Island Beach State Park. At this colony, 18 pairs laid eggs or produced young. Ten young hatched, but only two survived to fledge.

At one nest, I witnessed a six-week-old nestling so emaciated that it was attempting to feed on its recently deceased sibling. I removed the nestling and brought it to Don Bonica at Toms River Avian Care for critical care. That same day, two other underweight, fledgling-age ospreys from Monmouth County were brought to the facility. All three juveniles later died. From 2014 through 2024, this Sedge Island colony averaged 25 breeding pairs producing 40 young annually. The contrast is alarming.

These findings are not direct evidence that the menhaden harvest alone is responsible for poor osprey breeding performance. Weather, prey distribution, and other ecological factors can influence breeding outcomes. However, the persistence and severity of these reproductive failures along New Jersey's coast warrant urgent attention to the availability of menhaden and other forage fish.

A Historical Warning from New Jersey

Coastal nesting ospreys in New Jersey have faced similar crises before. Following the peak menhaden harvest in 1956, New Jersey's osprey population began to decline. By the mid-1960s, pound nets along coastal beaches had been replaced by large purse-seine vessels. Herbert Mills, founder of The Wetlands Institute in Stone Harbor, New Jersey, observed: "Since 1966, close observation of the fishing of Ospreys from Seven Mile Beach indicated that fish nearby are very scarce and small" (Mills, 1972). He remarked how the loss of the pounds coincided with the decline in ospreys along the southern New Jersey coast.

By the late 1960s, New Jersey's osprey population had crashed to a historic low of just 50 pairs, and the species became one of the first listed as endangered after the passage of the New Jersey Endangered and Nongame Species Conservation Act of 1973.

In July 1997, a New York Times headline again warned, "*Ospreys May Be Starving.*" Biologists documented high nest failure rates along the Atlantic coast, where ospreys were reproducing below the levels needed to sustain their population even as inland colonies thrived. In 2002, New Jersey passed legislation banning the industrial harvest of menhaden from state waters. The goal was to protect a natural resource that provides immense ecological value while also supporting recreational fishing, birding, whale watching, and ecotourism.

Today, our surveys, conducted largely by dedicated volunteers without dedicated government funding, are documenting widespread food stress, brood reduction, and high nest failure rates. These findings are consistent with observations elsewhere in the mid-Atlantic and are especially concerning in coastal saltwater habitats, where ospreys are reproducing at unsustainable levels.

Why the Coastwide TAC Matters

Atlantic menhaden are a critical forage fish and an essential food source for ospreys and many other predators. Their ecological value extends far beyond the reduction fishery. Menhaden help sustain the marine food web, supporting wildlife and recreational fisheries that contribute to the economic and ecological health of coastal communities.

I cannot definitively identify the root cause of the current osprey breeding crisis. What I can report is a pattern of poor reproductive performance consistent with localized shortages of adult menhaden in New Jersey waters and other areas along the East Coast. Osprey breeding performance can serve as an important indicator of localized prey availability. As highly visible predators, ospreys provide valuable insight into changes in the marine food web and can help identify ecological problems that might otherwise go unnoticed.

The coastwide TAC is one of the most important tools available to the Board for managing this resource. Setting a harvest limit that focuses primarily on the amount of menhaden that can be removed, without adequately accounting for the forage needs of predators and the broader ecosystem, risks overlooking the ecological consequences of harvest. A precautionary

approach should recognize that the needs of the reduction fishery must be balanced against the needs of the marine food web.

New Jersey's experience also demonstrates the importance of acting before a population reaches a crisis point. The recovery of ospreys took decades of dedicated work. We should not wait for additional declines in wildlife reproduction, fisheries, or other ecosystem indicators before taking precautionary steps to protect the forage base.

My Recommendations to the Board

I urge the Atlantic Menhaden Management Board to:

1. **Adopt a precautionary coastwide TAC** that prioritizes adequate menhaden availability for the marine food web, including ospreys and other dependent predators, rather than focusing solely on the amount of fish available for harvest.
2. **Account for ecosystem needs and uncertainty** when setting harvest limits. Persistent signs of food stress and poor reproductive performance among coastal ospreys should be treated as a serious warning that warrants investigation and precautionary management.
3. **Strengthen monitoring of menhaden availability and ecological impacts**, including the use of wildlife indicators such as osprey reproductive performance alongside fishery-dependent and fishery-independent data. Monitoring should help determine whether forage fish are sufficiently abundant and accessible to support predators in nearshore waters.
4. **Use an adaptive, precautionary management approach.** As new research and monitoring results become available, management measures should be responsive to emerging evidence of localized depletion, changes in prey availability, and ecosystem stress.
5. **Consider the full ecological and economic value of menhaden.** Management decisions should account for the many predators, recreational fisheries, wildlife-viewing opportunities, and coastal economies that depend on this resource.

Protecting Atlantic menhaden is an investment in healthy fisheries, abundant wildlife, biodiverse coastal ecosystems, and the communities that depend on them. New Jersey's osprey recovery demonstrates what sustained conservation efforts can accomplish. The reproductive failures we are now observing along the coast demonstrate why that work cannot stop at recovering a single species. We must also protect the natural resources that sustain it.

I urge the Board to set a coastwide TAC that reflects the ecological importance of Atlantic menhaden and applies a precautionary approach in the face of troubling evidence from New Jersey and across the mid-Atlantic. The decisions made now will help determine whether future generations inherit a thriving marine ecosystem or one that has lost a critical part of its foundation.

Thank you for your consideration.

Sincerely,



Ben Wurst
Senior Wildlife Biologist
Conserve Wildlife Foundation of New Jersey

James Boyle

From: Joe Aversano <seacilian@verizon.net>
Sent: Tuesday, September 22, 2026 8:05 AM
To: James Boyle
Subject: [External] Menhaden dramatic decrease

Mr. Boyle, I am an 81-year-old Marine combat veteran and world trade center survivor with two cancers, that said i have been fishing on long island since 1970, I noticed the decline in the menhaden starting around the late 80's and early 90's. Bunker were plentiful and the bluefish in particular were many, big and ferocious. The town of Oyster Bay holds a bluefish tournament every year for the past 40 years and this year was a disaster with only three fish enter for weigh in, an 8+ pound for first place a 7+ pound for second place and and a 5+ for third. Usually the winning fish are between 15-19lbs. there are 10 slots to win prizes no other fish were entered, the bunker were nowhere to be seen!!!!!!! Even the Osprey nests I watch on a web cam set up by the electric company was disturbing, two of the three chicks that hatched killed the third chick who was a good size maybe due to lack of the food source Menhaden?? we need to cut back on the ships out of Virginia from taking so much of the food supply. Thank you Joe Aversano 516-297-5133

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.

James Boyle

From: Comments
Sent: Wednesday, October 21, 2026 2:13 PM
To: James Boyle
Subject: FW: [New] [External] New public comment for 2026 Annual Meeting

From: ASMFC <info@asmfc.org>
Sent: Friday, October 16, 2026 6:26 PM
To: Comments <comments@asmfc.org>
Subject: [New] [External] New public comment for 2026 Annual Meeting

2026 Annual Meeting

Action Title

2026 Annual Meeting

Action URL

https://asmfc.org/events/2026-annual-meeting/

Name

Diane Cook

Email

fpc1234@rcn.com

State

New Jersey

Comment

Re: Public Comment on the 2027-2028 Coastwide Atlantic Menhaden Total Allowable Catch (TAC)

I am a volunteer for the New Jersey Department of Environmental Protection's Endangered and Nongame Species Program, monitoring and reporting on nests of Bald Eagles, Osprey, and American Kestrels. I have watched all species thrive thanks to the protection they and their habitats have been awarded. The status of Bald Eagles and Osprey has been upgraded to stable.

Unfortunately in the last few years food stress has taken its toll on the coastal Osprey. Their young are starving to death. Atlantic Menhaden is an important forage fish for them and others in the marine food web. Osprey feed solely on fish. Menhaden was once an abundant food source for them, but there seems to be less being caught and brought back to the nests. This has been an observable trend for the last 4 years up and down the coast as documented by live cams on the Internet and data entered into the Osprey Watch data base by nest monitors.

While a drop in the main forage fish, Menhaden, is not the only factor responsible for the Osprey's decline, ensuring a stable and rich supply of these fish could benefit the Osprey returning to their nesting sites year after year.
In 2002, New Jersey enacted legislation banning the industrial harvest of Menhaden from state waters. The goal was to protect a resource of immense ecological value, one that supports wildlife, recreational fishing, birding, whale watching, and ecotourism. Decisions about how many Menhaden can be harvested should account not only for the needs of the fishery but also for the needs of the predators and ecosystems that depend on them. Fish may be harvested within legal harvest limits, but is that leaving enough for the predators who need them for their very survival?

I urge you to please consider, when making decisions about how many Menhaden can be harvested to not only account not for the needs of the fishery but also for the needs of the predators and ecosystems that depend on them. Food stress and poor Osprey reproduction performance of the past 3 years is a serious warning. New Jersey's Osprey recovery of the past shows the importance of decades of sustained conservation. Leaving more Menhaden in the water will ensure a healthy fishery, abundant wildlife, and healthy coastal ecosystems that support that wildlife.

Please be sure that my comments are distributed to the appropriate Commissioners and Board members. I appreciate your attention to this matter, and your consideration in listening to what the Osprey are telling us.

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.

James Boyle

From: Comments
Sent: Friday, October 23, 2026 12:36 PM
To: James Boyle
Subject: FW: Atlantic Menhaden 2027-2028 TAC

From: Fred Akers <fred.akers13@gmail.com>
Sent: Wednesday, October 21, 2026 4:42 PM
To: Comments <comments@asmfc.org>
Cc: Joe Cimino <joseph.cimino@dep.nj.gov>
Subject: [External] Atlantic Menhaden 2027-2028 TAC

October 17, 2026
(Hardcopy attached)

Joe Cimino, Chair
ASMFC Atlantic Menhaden Board
(Sent via comments@asmfc.org)

RE: Atlantic Menhaden 2027-2028 TAC

Dear Chair Cimino,

The Great Egg Harbor River Council of 12 municipalities in New Jersey and the Great Egg Harbor Watershed Association are very concerned about the impact of the Atlantic menhaden population collapse off the coast and in the bays of New Jersey.

Since Atlantic menhaden are part of the Great Egg Harbor Watershed ecosystem, we urge the ASMFC Atlantic Menhaden Board to **Cut the coastwide TAC by 40% to approximately 112,100 metric tons for 2027 and 2028 now.**

The menhaden industrial fleet failed to reach its quota for 3 consecutive years. Menhaden landings have dropped by more than 80% since 1956. The Atlantic reduction fleet has been scaled down from 25 vessels in the 1990s to roughly 7 to 8 active vessels today.

Adult menhaden schools are shrinking. The local bait harvest has plummeted by 90% in some regions, causing bait costs to double. Charter businesses, tackle shops, and coastal economies are being threatened by menhaden scarcity.

The marine ecosystem is collapsing. Ospreys are starving coastwide. At least 5 states, including New Jersey, have listed Atlantic Menhaden as a Species of Greatest Conservation Need in their State Wildlife Action Plans. Atlantic Mackerel, Atlantic Herring, River Herring, Shad, weakfish, striped bass, and bluefish are all in ecological trouble.

Save the menhaden and the ecosystem, cut the TAC by 40% now.

Sincerely,

Fred Akers, Operations Manager
Great Egg Harbor River

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.

The Great Egg Harbor Watershed Association & River Council

Fred Akers – Operations Mgr.
P.O. Box 109
Newtonville, NJ 08346
609-335-3744
fred.akers13@gmail.com

October 17, 2026

Joe Cimino, Chair
ASMFC Atlantic Menhaden Board
(Sent via comments@asmfc.org)

RE: Atlantic Menhaden 2027-2028 TAC

Dear Chair Cimino,

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The menhaden industrial fleet failed to reach its quota for 3 consecutive years. Menhaden landings have dropped by more than 80% since 1956. The Atlantic reduction fleet has been scaled down from 25 vessels in the 1990s to roughly 7 to 8 active vessels today.

Adult menhaden schools are shrinking. The local bait harvest has plummeted by 90% in some regions, causing bait costs to double. Charter businesses, tackle shops, and coastal economies are being threatened by menhaden scarcity.

The marine ecosystem is collapsing. Ospreys are starving coastwide. At least 5 states, including New Jersey, have listed Atlantic Menhaden as a species of greatest conservation need in their State Wildlife Action Plans. Atlantic Mackerel, Atlantic Herring, River Herring, Shad, weakfish, striped bass, and bluefish are all in ecological trouble.

Save the menhaden and the ecosystem, cut the TAC by 40% now.

Sincerely,

Fred Akers, Operations Manager

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Estell Manor
Greg Conway
Borough of Folsom
David Brown
Egg Harbor Twp.
William Handley
Upper Twp.
Dick Colby
GEHWA

James Boyle

From: Info (ASMFC)
Sent: Monday, August 31, 2026 9:19 AM
To: Comments
Subject: FW: [External] Osprey Decline; menhaden

From: Laura Kreidler <laurakreidler315@gmail.com>
Sent: Friday, August 28, 2026 9:47 AM
To: Info (ASMFC) <info@ASMFC.ORG>
Subject: [External] Osprey Decline

To the Commission Members:

It has come to my attention that this year, due to over fishing by a single company named Omega Protein, the population of menhaden along the east coast has been drastically reduced. This has led to a corresponding drop in the osprey population who depend on this fish to feed their young. Your inadequate response of lowing the amount of fish that could be taken by 20% when your own report said that to improve environmental conditions it should be lowered by 50% is outrageous. We decimated the osprey population before by using DDT and it took significant efforts to rebuild it. You cannot let their population decline like this, all for the sake of corporate profits. Think about the world you are leaving your children, will it be one of bird calls and life or one where the land and sea are barren and silent. Reason demands that you revisit your decision and raise the limits to 50% for the foreseeable future.

Laura Kreidler

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James Boyle

From: Comments
Sent: Wednesday, October 21, 2026 2:13 PM
To: James Boyle
Subject: FW: [New] [External] New public comment for 2026 Annual Meeting

From: ASMFC <info@asmfc.org>
Sent: Saturday, October 17, 2026 11:56 PM
To: Comments <comments@asmfc.org>
Subject: [New] [External] New public comment for 2026 Annual Meeting

2026 Annual Meeting

Action Title

2026 Annual Meeting

Action URL

https://asmfc.org/events/2026-annual-meeting/

Name

mary lenahan

Email

mblenahan01@gmail.com

State

New Jersey

Comment

Subject: Request for a Reduction in the Coastwide Total Allowable Catch of Atlantic Menhaden for 2027–2028

My name is Mary Lenahan, and I have been a resident of Ventnor, New Jersey, for nearly 40 years. Over that time, I have become an avid birder and have found great joy in observing the many bird species that inhabit our coastal community.

Ospreys have always been among my favorite birds to watch, particularly because there is an osprey nesting platform in the

bay near my home. I have also been fortunate to assist Mr. Ben Wurst and other biologists with the monitoring and banding of our local osprey population. These experiences have given me a personal connection to these magnificent birds and a deep appreciation for the importance of protecting them.

Over the past five years, I have witnessed what appears to be a troubling decline in successful osprey nesting in our area. I spend considerable time kayaking through the back bays of both Ventnor and Ocean City, where I have observed numerous nests that appear to have failed. Seeing these changes firsthand has been deeply concerning.

I believe the decline in Atlantic menhaden, an important food source for ospreys, may be a significant contributing factor to the reduced nesting success I have observed. Maintaining an adequate food supply is essential to the health and sustainability of our osprey population, as well as the broader coastal ecosystem.

I respectfully urge the Atlantic States Marine Fisheries Commission (ASMFC) to consider reducing the coastwide Total Allowable Catch (TAC) for Atlantic menhaden for 2027–2028. I hope that my firsthand observations, along with the concerns of other coastal residents and wildlife advocates, will be considered as you make decisions about the future management of this vital resource.

Thank you for your time, your consideration, and your commitment to the conservation of our coastal wildlife and marine ecosystems.

Sincerely,

Mary Lenahan
Ventnor, New Jersey

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James Boyle

From: Hali MacLaren <hali@hkmjewelry.com>
Sent: Monday, October 19, 2026 5:43 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC
Attachments: 20261018_094709.jpg

HI this is Hali MacLaren from Pennsylvania. I visit NJ, MD and DE often and know the menhaden numbers are too low for a sustainable ecosystem to survive. Please reduce the coastwide menhaden catch limit by at least 40% from its 2026 level for 2027 and 2028, and set limits that leave enough food for the fish and wildlife that depend on menhaden. Please include my comment in the Atlantic Menhaden Management Board's meeting materials, and share my image from this weekend of a dead osprey I found on Cape Henlopen this Sunday.

--
Hali MacLaren
Jewelry Artist/Designer, HKM JEWELRY
www.hkmjewelry.com

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

Joseph Cimino, Chair
Atlantic Menhaden Management Board
Atlantic States Marine Fisheries Commission
1050 N. Highland St., Suite 200 A-N
Arlington, VA 22201

October 19, 2026

Dear Chair Cimino and Members of the Atlantic Menhaden Management Board,

The New England Fishermen's Stewardship Association (NEFSA) appreciates the opportunity to comment on Draft Addendum II to Amendment 3 of the Atlantic Menhaden Interstate Fishery Management Plan. NEFSA represents commercial fishermen throughout New England and advocates for the long-term sustainability of our fisheries, the economic viability of working waterfronts, and the fishing families and coastal communities that depend on them.

NEFSA recognizes the ecological importance of Atlantic menhaden as a forage fish and supports responsible management grounded in sound science. However, we are concerned that the proposed management changes risk imposing additional restrictions before sufficient scientific evidence has established the nature, extent, and causes of the problems these measures are intended to address. We urge the Commission to allow ongoing scientific work to progress and carefully evaluate the findings before making management decisions with potentially significant biological, economic, and operational consequences.

NEFSA also strongly opposes further reductions to the coast wide total allowable catch (TAC) without compelling scientific justification. At the same time, we believe the Commission must give greater consideration to the needs of New England's commercial fisheries, particularly the growing demand for menhaden as bait and the importance of maintaining a reliable, affordable domestic bait supply.

Sound Science Must Guide Management Decisions

Responsible fisheries management requires a clear understanding of the problem being addressed, the factors contributing to it, and whether a proposed management measure is likely to produce the intended result. The Commission should not move from observing a change in fish availability or landings to imposing additional restrictions without establishing a defensible scientific basis for doing so.

The draft addendum acknowledges important limitations in the available data regarding menhaden abundance and distribution within Chesapeake Bay. It also recognizes that changes in environmental conditions, habitat, predator populations, and other factors may influence observed trends. These uncertainties matter when evaluating whether the reduction fishery is responsible for observed changes and whether additional harvest restrictions would effectively address them.

Declining pound-net landings or changes in the availability of menhaden in a particular location deserve careful examination. However, those observations alone do not establish causation. Nor do they demonstrate that a reduction in the Chesapeake Bay cap, a new seasonal quota system, or an automatic adjustment to the cap would necessarily produce measurable ecological benefits.

Additional research is expected to improve our understanding of menhaden abundance, distribution, and ecological relationships. Findings anticipated in the coming year could materially inform the management decisions now under consideration. The Commission should not rush to conclusions before this information has been completed, reviewed, and incorporated into a comprehensive assessment of the issue.

NEFSA therefore urges the Management Board to maintain the existing Chesapeake Bay reduction-fishery cap while relevant research is completed and evaluated. We oppose reducing the current cap or adopting an automatic formula that could impose additional restrictions before the scientific justification for such action has been established.

This position does not diminish the importance of precautionary management. Rather, precaution should be proportionate to the evidence, informed by the best available science, and responsive to new information. Management decisions should be based on demonstrated biological needs and a reasonable assessment of likely outcomes, not on assumptions that have yet to be established.

Preserve the Coast wide TAC Unless Science Demonstrates a Need for Change

NEFSA strongly opposes further reductions to the coast wide TAC for Atlantic menhaden without compelling scientific evidence demonstrating that such reductions are necessary.

Menhaden are a coast wide resource with a broad geographic distribution extending from the southeastern United States through New England and into Atlantic Canada. Their abundance and seasonal distribution vary across regions and years. Management must account for this broad distribution rather than allowing concerns in one localized area to drive restrictions that affect commercial fishermen throughout the Atlantic coast.

Localized changes in menhaden availability do not automatically establish that the coast wide stock requires a lower harvest limit. Likewise, reducing the total allowable catch without understanding the causes of a localized concern may impose economic costs on fisheries throughout the coast without resolving the underlying issue.

The coast wide TAC should be determined through the established stock assessment process, with appropriate consideration of population status, fishing mortality, menhaden’s ecological

role, and the best available scientific information. Any further reduction should be supported by clear findings demonstrating why it is necessary and evaluating its likely benefits and consequences.

The Commission must also recognize that menhaden support other commercial fisheries, particularly those that depend on them as bait. A reduction in available harvest affects not only the businesses that directly harvest menhaden, but also the fishermen, bait dealers, and coastal communities that rely on this resource.

NEFSA urges the Commission to preserve the existing coast wide TAC unless and until the scientific record demonstrates that a change is warranted. A management approach that protects the resource while maintaining reasonable fishing opportunities is preferable to imposing additional restrictions without a demonstrated need.

Menhaden Are Essential to New England's Lobster Industry and Domestic Bait Supply

Atlantic menhaden have become an increasingly important component of the bait supply supporting commercial lobstermen throughout New England. Maine, New Hampshire, and Massachusetts are particularly important to this discussion, but the issue extends throughout the region and affects the broader network of fishermen, bait dealers, and working waterfronts that support New England's commercial fisheries.

Bait is an essential operating expense for lobstermen. Its availability, price, and reliability directly affect the ability of fishermen to operate efficiently and remain economically viable. When bait supplies are constrained or unpredictable, fishermen face increased costs, greater uncertainty, and additional pressure on already challenging business margins.

New England fishermen are increasingly confronted with bait shortages and an unreliable supply of suitable products. Dependence on imported bait exposes our fisheries to additional supply-chain uncertainty, transportation costs, international market conditions, and disruptions beyond the control of local fishermen. Maintaining and expanding access to domestically harvested menhaden would help strengthen regional supply, reduce vulnerability to foreign sourcing, and support the businesses and communities that depend on a dependable bait market.

Menhaden harvested in the same regional marine environment in which New England lobstermen operate also provide a valuable, locally available bait source. Expanding access to this resource would help fishermen obtain bait closer to home while supporting domestic harvesting and distribution businesses.

The Commission should fully account for these practical realities when considering management changes. Menhaden are not simply a commodity harvested for one market. They are an important input for other fisheries, and their availability has consequences throughout the seafood economy.

Further restrictions on menhaden harvest should not be considered in isolation from their effects on bait supply. The Commission must evaluate whether proposed restrictions could make bait

more expensive, less accessible, or more dependent on imported alternatives, and what those consequences would mean for commercial fishing families and coastal communities.

NEFSA urges the Commission to recognize the importance of maintaining a strong domestic menhaden fishery that can serve both its existing markets and the growing bait needs of New England's commercial fisheries.

New England Needs a Meaningfully Greater Share of the Coast wide Allocation

NEFSA believes the state-by-state allocation system should be revisited to better reflect the geographic distribution of menhaden, actual fishing opportunities, regional demand, and the economic importance of this resource to the fisheries it supports.

Under the current allocation system, Maine receives 4.80% of the coast wide TAC, New Hampshire receives 1.19%, and Massachusetts receives 2.12%. Together, these three states receive just 8.11% of the coast wide TAC. This combined allocation does not adequately reflect the importance of menhaden to the regional bait supply or the growing need for access throughout Northern New England.

Menhaden are abundant in Northern New England waters, and the demand for them as bait continues to grow. Based on the needs and capacity of the regional bait fishery, NEFSA believes New England could readily utilize twice its current allocation. Additional access is not merely an opportunity for economic growth; it is increasingly necessary to address bait shortages, improve supply reliability, and reduce dependence on imported products.

The allocation system should better recognize where menhaden are available, where harvest can occur efficiently, and where there is demonstrated demand for the resource. A greater share of the coast wide allocation should be directed toward New England to reflect these realities and ensure that fishermen have a reasonable opportunity to access a resource that is increasingly important to their operations.

NEFSA recognizes that the existing allocations support established fisheries, businesses, jobs, and communities in Virginia and other states. Our objective is not to diminish the importance of those fisheries or to suggest that the success of one region must come at the expense of another. Rather, the Commission should consider how the allocation system can better reflect current conditions and evolving needs across the entire coast.

A review of state allocations should examine several complementary approaches. These could include revisiting the allocation formula to better reflect current menhaden distribution and regional demand, improving opportunities for states and fisheries to make use of available quota, and considering whether persistently unused allocations can be made available to regions with demonstrated demand and the capacity to harvest and utilize them.

Where states consistently harvest only a small portion of their available allocations, the Commission should examine whether more flexible arrangements or targeted reallocations could improve the overall utilization of the coast wide TAC. This is one potential avenue, but it should not be the only approach considered. A meaningful northward shift in allocation may also require

adjustments to the broader formula so that it better accounts for the resource's distribution, the needs of bait-dependent fisheries, and changing economic conditions.

The goal should be to improve access and utilization across the coast while respecting established fisheries and the communities they support. The Commission should work collaboratively with affected states and industry participants to identify practical, equitable solutions that increase opportunities in Northern New England without unnecessarily undermining existing operations elsewhere.

NEFSA recommends that the Commission initiate a comprehensive review of state allocations, with the explicit objective of increasing the share available to New England. That review should consider current and historical landings, quota utilization, menhaden abundance and distribution, regional bait demand, and the ability of each region to make productive use of its allocation.

The growing need for menhaden as bait throughout New England warrants a serious and substantive response. The region should not remain constrained by an allocation system that fails to adequately account for its present needs and the availability of the resource in its waters.

Evaluate Proposed Restrictions in the Context of Their Full Economic and Biological Consequences

NEFSA is concerned that combining a reduced Chesapeake Bay cap, automatic adjustments linked to the coast wide TAC, and seasonal quota restrictions could impose substantial additional constraints without sufficient evidence that the measures would achieve their intended objectives.

The current Chesapeake Bay cap is 51,000 metric tons. A change to that cap should be supported by evidence demonstrating that the existing limit is inadequate and that the proposed alternative would provide a meaningful biological benefit. Linking the Bay cap to the coast wide TAC would also create a mechanism through which changes in coast wide management could automatically affect the Bay fishery, even when the specific circumstances within the Bay may not have changed correspondingly.

Similarly, seasonal quota periods should not be adopted simply because harvest has been concentrated during particular portions of recent fishing seasons. The Commission should first evaluate whether that pattern has caused a demonstrable biological impact, whether seasonal restrictions would address that impact, and what operational and economic consequences would follow.

NEFSA urges the Management Board to maintain the existing Bay cap while the relevant scientific work is completed, avoid additional coast wide TAC reductions without compelling scientific justification, and thoroughly evaluate the economic consequences of any proposed restrictions for commercial fisheries throughout the coast.

We also support a transparent and adaptive management process that allows future decisions to incorporate new scientific findings and changing conditions. Periodic review can be valuable, provided it is used to assess whether management measures remain justified rather than creating an automatic presumption that additional restrictions are necessary.

The Commission should also pursue a meaningful review of state allocations so that the coast wide resource is made available in a manner that better reflects current distribution, demonstrated demand, and the economic needs of the fisheries that depend on menhaden.

Conclusion

Atlantic menhaden are an important ecological resource and an essential economic resource for commercial fisheries throughout the Atlantic coast. For New England, their importance extends beyond the menhaden fishery itself. They help sustain the bait supply that allows lobstermen to operate, support regional businesses, and contribute to the economic vitality of working waterfronts.

NEFSA supports responsible, science-based management that protects the long-term health of the resource while maintaining reasonable opportunities for commercial fishermen. However, additional restrictions should not be imposed before the relevant scientific questions have been adequately examined. The Commission should preserve the existing Chesapeake Bay cap while research progresses and should not reduce the coast wide TAC without compelling scientific evidence demonstrating a need for change.

At the same time, the Commission should recognize that the current allocation system does not adequately reflect the growing demand for menhaden as bait throughout New England. Fishermen are facing shortages, unreliable supply, and increasing dependence on imported products at a time when locally available menhaden could help meet these needs. NEFSA believes the New England bait fishery could readily utilize twice its current allocation and urges the Commission to pursue a meaningful northward shift in quota through a comprehensive, collaborative review of the allocation system.

This approach need not come at the expense of the established fisheries and communities in Virginia or elsewhere. The Commission should seek practical ways to improve allocation, utilization, and access across the coast while recognizing the distinct needs of each region.

We respectfully urge the Atlantic Menhaden Management Board to prioritize sound science, preserve reasonable fishing opportunities, and advance a more responsive and equitable allocation system. These steps would better serve the long-term interests of the resource, the commercial fishermen who depend on it, and the coastal communities that sustain New England's fishing heritage.

Sincerely,



Dustin W. Delano
Chairman & Chief Strategist
New England Fishermen's Stewardship Association

MAINE
Lobstermen's Association, Inc.
2 Storer Street, Suite 203, Kennebunk, ME 04043
207-967-4555 * www.mainelobstermen.org

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

October 13, 2026

RE: Atlantic Menhaden Commercial Quota Reallocation

Dear Chair Cimino and Members of the Atlantic Menhaden Management Board:

As the Atlantic Menhaden Management Board prepares to consider commercial quota reallocation, I am writing on behalf of the Maine Lobstermen's Association (MLA) to strongly urge the Board to increase the proportion of menhaden available to bait fisheries, increase Maine's allocation, and give greater consideration to the needs of small-scale, owner-operated bait fisheries in determining how the coastwide commercial quota is distributed.

MLA is Maine's oldest and largest fishing industry organization and has represented the interests of lobstermen and their communities for more than 70 years. Maine's lobster fishery is the economic backbone of Maine's coastal communities, accounting for roughly 75 percent of the value of Maine's commercial fisheries and supporting an estimated 17,500 jobs and $2 billion in economic activity throughout the fleet and shoreside supply chain. Its importance extends well beyond Maine, supporting seafood businesses, restaurants, tourism, and communities throughout the region and across the country.

As Atlantic herring landings have declined, Maine's menhaden landings have increased, and menhaden have become a critically important source of fresh bait for Maine's lobster fleet. The menhaden fishery not only helps keep Maine's lobster fleet fishing, but has also provided an important opportunity for small-scale fishermen to diversify their businesses through participation in the commercial menhaden fishery.

ASMFC's Addendum I updated the allocation formula to place greater weight on recent landings, yet Maine's fishery continues to outgrow its existing allocation. In 2025, Maine fishermen landed more than 31 million pounds of Atlantic menhaden worth nearly $19 million, making it Maine's third-most-valuable commercial fishery. Yet following the 20 percent coastwide quota reduction, Maine entered 2026 with an allocation of only 19.6 million pounds. Maine currently receives just 4.8 percent of the state-allocated coastwide quota.

Recent landings demonstrate that Maine can responsibly utilize a significantly larger allocation. A base allocation that more closely reflects Maine's demonstrated landings and capacity to harvest available fish would allow for more predictable and efficient management while supporting both the small-boat menhaden fleet and meeting a greater share of the lobster industry's bait needs.

The gap between Maine's baseline allocation and its demonstrated recent landings is significant and recurring. Maine has been able to supplement its allocation through the Episodic Event Set Aside and interstate quota transfers. While those tools are valuable and should remain available, they are not a substitute for an adequate base allocation that provides greater predictability for fishermen and Maine's lobster bait supply.

Menhaden have become fundamental to Maine's fishing economy. Maine's small-scale fleet should not have to depend year after year on the availability of episodic quota or whether another state has quota available and is willing to transfer it in order to access this important fishery. The resulting cycle of fishery openings and closures creates uncertainty for the fishermen who catch menhaden, the dealers who handle it, and the lobstermen who depend on a predictable supply of bait.

ASMFC's commercial quota reallocation should give greater weight to the benefits of a predictable fishery and the economic value generated by small-scale bait fisheries. In Maine, the benefits of menhaden harvest extend well beyond the value of the fish landed. Locally caught menhaden support two interconnected fleets of small businesses: the fishermen who harvest the bait and the lobstermen who use it.

MLA therefore urges the Board to use the upcoming reallocation process to:

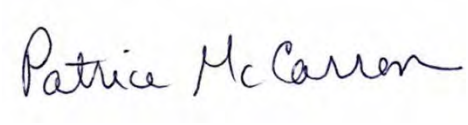
- increase Maine's share of the coastwide commercial menhaden quota to better reflect the current distribution of menhaden and the demonstrated capacity of Maine's small-scale fishery;
- give greater consideration to states supporting small-scale bait fisheries that sustain owner-operated fishing businesses; and
- reduce reliance on annual quota transfers and temporary management mechanisms to meet a predictable and recurring need for locally harvested bait.

The fishery has changed, and allocation should evolve accordingly.

Maine's menhaden fishermen have demonstrated that they can responsibly harvest this resource while supplying a critical need for Maine's lobster industry. The allocation system should provide them a fair and predictable opportunity to do so.

Thank you for your consideration.

Sincerely,



Patrice McCarron
Executive Director

James Boyle

From: mr.stevendunn@gmail.com
Sent: Monday, October 19, 2026 11:41 PM
To: James Boyle
Subject: [New] [External] Slash the reduction boats menhaden quota

Dear Sir,

The entire marine life food chain has been drastically affected by the absence of menhaden all around Long Island. Many businesses and jobs are at risk and some have been lost due to the current regulations. The management of our fisheries by well paid and so-called scientists has clearly been a failure. Maybe something has to change there like listen to the fishermen and get the hands on input to make decisions. Obviously, we can't just rely on the science for making critical decisions related to the regulations guiding our fishery. Please reduce the reduction boats quota in half at least until the fishery recovers. We have never seen fishing as poor as it is now.

Sincerely,

Steven Dunn
USCG Licensed Captain
US Navy Veteran
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James Boyle

From: Janice Dunham <jncdunham@gmail.com>
Sent: Monday, October 19, 2026 5:59 PM
To: Comments; James Boyle
Subject: [New] [External] Atlantic Menhaden Draft Addendum

I am strongly in favor of instituting now the recommendations of the Atlantic Menhaden Draft Addendum. I know the scientific results of decline and unsustainability of this species are incomplete, but the evidence of we who are often on the waters of Chesapeake Bay and areas around Cape May is irrefutable.
Menhaden, and especially adult Menhaden, are simply not there. What we are seeing and catching is preponderantly juvenile fish. The species who depend on Menhaden to make a living, like Ospreys, do not have enough to eat. Osprey numbers have seriously declined -- that is fact -- and juvenile Osprey are increasingly rare --also factual. Menhaden have usually been the largest part of the Osprey diet.

Please institute the recommendations of the Addendum, even if it has to be on a temporary basis.

Thank you for your attention,
Prof. Janice Dunham

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James Boyle

From: Marc Lamothe <marcolamothe.keeper@gmail.com>
Sent: Monday, October 19, 2026 5:47 PM
To: James Boyle
Subject: [New] [External] Menhaden Concerns

I just wrapped up my charter season. My striped bass have headed south.

This summer (2026) (over 100 days targeting striped bass on my charter boat) I viewed two schools of menhaden. Each was the size of one side of a volleyball court.

I think we overdid it again. In the early 2000s Maine banned large scale harvesting of menhaden. Big suction boats are not allowed in our state waters. You know this.

Our menhaden numbers recovered, but not to early 2000 levels.

Menhaden are so important to our Maine fisheries. Lobstermen harvest them, coastal fishing guides use them as bait for tuna and striped bass, and seals and whales and porpoise and dolphin and eagles and ..... You know all this.

The problem is the menhaden are just about gone from southern Maine waters where I fish daily.

In Maine we don't fish striped bass commercially, we limit menhaden harvesting to sustainable levels, and it is my hope that all states will develop similar, sustainable plans.

Please take action to prevent Virginia from continuing down this overharvesting path.

Capt. Marco Lamothe
Keeper Charters
4 Jordan St.
Saco, Maine 04072
www.keeper-charters.com
207-286-5565

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James Boyle

From: Nancy Archer <nancyrchr@gmail.com>
Sent: Monday, October 19, 2026 5:30 PM
To: James Boyle
Subject: [New] [External] Menhaden

Hi Mr. Boyle! I'm writing because I'm very concerned about the Menhaden fishing In the Bay. It is too concentrated in Virginia and causing severe problems to Osprey's and other marine species! Please work to reduce VA's coastline allocation down from 75% of the total catch to at the very most 50%! Than you for your consideration, Nancy
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James Boyle

From: Patrick Cassidy <patrick@capecodonthefly.com>
Sent: Monday, October 19, 2026 4:23 PM
To: Comments
Cc: James Boyle
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

I am writing in support of more protection for menhaden in the Commission's upcoming decision on the coastwide total allowable catch (TAC). In light of the importance of these forage fish to other fish species like striped bass, birds like osprey, marine mammals like whales, and the wide range of connected recreational and economic activities, the Commission should - at the least - implement a 40% reduction in the TAC, as supported by your own work. Feel free to do more but doing less, kicking the can down the road, or simply matching reduction to the latest harvest, as you did last year, would be a clear abdication of your responsibility. Do not give in to a single special interest with little benefit to the overall health and economy. The consequences of failing to do the right thing in this case are significant. This is more so the case given the recent and well documented effects on osprey and the latest striped bass young-of-the-year data, which although still not ideal, provides some hope for future striped bass stock. All of these species need the same thing: food. Menhaden is one of the most important foods to protect in order to protect everything that depends on them, including small businesses like my own. I am a fishing guide on Cape Cod and, like many here, have become increasingly concerned with the effect of fewer fish on my clients' experience, the future of my business, and the broader economy. It all goes back to menhaden. Protect menhaden. Protect us. Protect the future.
Tight lines,

Patrick Cassidy
508-246-3757
patrick@capecodonthefly.com
capecodonthefly.com

Buy tickets to NFFO 2026 here!

Have you taken a lesson lately? It's probably time.
Ask me about the Cape Cod School of Saltwater Fly Fishing.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Tuesday, September 15, 2026 1:29 PM
To: Comments
Subject: [External] New public comment for 2026 Annual Meeting

2026 Annual Meeting

Action Title

2026 Annual Meeting

Action URL

https://asmfc.org/events/2026-annual-meeting/

Name

Dale Neal

Email

dalewilliamneal@gmail.com

State

Virginia

Comment

Public Comment to: ASMFC Menhaden Board Members

From: Dale William Neal, Richmond, VA

I would like to share four points and a simple formula for a path forward on the upcoming TAC vote and Reallocation.

1. “Wildlife eat Menhaden, people don’t.”
Industrial reduction fishing is not about catching seafood, it’s an outlier to what ASMFC shepherds. Menhaden should be prioritized as a bait fish. It is a truly sustainable and economically sound choice. As was stated by a board member in your last meeting, “they are much more valuable when turned into Lobster rather than dog food”.

2. “Menhaden pack the most powerful nutrient punch available for wildlife.”
They are called a “keystone species” for that reason. In the Atlantic, Menhaden provide >50% more essential nutrition per gram than Atlantic Herring. In the Chesapeake Bay that number is >50% more than Mullet and River Herring, and 200-300% more per gram than Bay Anchovy or Silverside. Menhaden mature to upwards of 3/4 pound (300 grams) or larger. Bay Anchovies never reach over 7 grams, vastly smaller than even juvenile menhaden. No other biomass of fish can replace Menhaden in the critical role of supplying wildlife needs for growth, reproduction, or migration.

3. “There are many factors causing issues.”
I agree with Reduction Industry spokespeople—warmer waters, migration changes, invasive species, coastal development, runoff, pollution, and fishing pressure—are all factors in the critical ecosystem changes we are witnessing. That on its’ own should give you more impetus to conserve what’s left. And let me state the obvious, fishing pressure is the only factor you control. Everyone else is depending on you to get your piece right.

4. “Jobs: The Coastwide Bait Industry vs. The Reedville Reduction Industry.”
According to NOAA Fisheries there are an estimated 1-2,000 independent bait and tackle shops still left in business along the Atlantic Coast. Include non-exclusive retailers—such as marinas, gas stations, coastal hardware stores, convenience shops, and fishing piers—the total number of physical locations selling bait along the coast reaches well over 4,000. That’s a lot of indirect jobs depending at least partially on a sustainable menhaden supply. Now add on the 10,000-15,000 lobstermen, crabbers, and commercial hook-and-line fishermen who depend on a consistent and affordable supply provided by the many watermen who catch those menhaden. Those are all real jobs and businesses.

The reduction industry in Reedville routinely employs far less than 400 workers. Fewer than 100 work year round.
More than 10% are foreign guests on H-2B visas, 15-20% live outside of Northumberland County. The county of 12,000 residents currently reports over 4,000 total jobs and an annual GDP of nearly $500 million. The reduction industry reports $29m in annual Virginia payroll and benefits. Reedville is located within 100 miles of the DC metro area (population 6 million) and is growing as a prime coastal destination for retirement and tourism. The median age in the town is 65.5. Half of the residents are retired. Real estate values are above state averages. One third of the homes are second or vacation homes.

Industry profits from reduction fishing go to a multi-billion dollar global corporate conglomerate based in Canada.

An Equitable and Sustainable Solution
(1) Reduce TAC 30%
(2) Reduce the Virginia share to 60%
(3) Increase the other states share to 40% (increasing their metric tonnage >12%)

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James Boyle

From: Jeff Payne <jeff.payne@ignitist.net>
Sent: Thursday, October 15, 2026 4:39 PM
To: Joe Cimino; James Boyle
Subject: [New] [External] Atlantic Menhaden Conservation — November 2026 Management Decisions

Dear Commissioner Cimino and Mr. Boyle:

I am a recreational offshore fisherman who fishes the waters off southern New Jersey, including the Cape May and Avalon areas.

I am deeply concerned about the impact of industrial menhaden reduction fishing on the Atlantic marine ecosystem, particularly the availability of forage for striped bass, bluefish, tuna, marine mammals, and seabirds.

I've been in and around these waters my whole life and the decrease in menhaden over the last few years is alarming. The lack of fish off shore was noticeable especially this year. Also, multiple osprey nests around us that had always thrived where abandoned early with no young. I walk the beach every morning and usually saw osprey returning without any catch. On occasion, the catch they had was either small, or not menhaden.

I urge the Atlantic Menhaden Management Board to:

1. Adopt meaningful coastwide harvest reductions consistent with the latest ecosystem reference point assessment.
2. Implement the strongest scientifically supportable restrictions on industrial reduction fishing within Chesapeake Bay.
3. Support measures that keep industrial reduction vessels away from sensitive coastal feeding areas.
4. Prioritize the ecological and economic benefits of maintaining abundant menhaden populations throughout the Atlantic ecosystem.

I recognize the importance of the commercial bait fishery and believe that reduction fishing should be evaluated and regulated separately.

Please consider these concerns when making the November 2026 management decisions. I would also appreciate knowing what additional steps recreational fishermen can take to support stronger menhaden conservation.

Sincerely,

Jeff Payne

Thanks

Jeff Payne
CFO
Mobile: 215.300.4829

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Harleysville, PA 19438

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Chair Joseph Cimino 10/19/2026
Vice Chair Nicole Lengyel Costa
Members of the Atlantic Menhaden Management Board
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200 A-N
Arlington, VA 22201

Re: Public Comment on Draft Addendum II and Recommendations for 2027–2029 Atlantic Menhaden Specifications

Dear Chair Cimino, Vice Chair Lengyel Costa, and Members of the Atlantic Menhaden Management Board:

The undersigned fishing, bird and wildlife, conservation, scientific, business, and coastal organizations urge the Atlantic Menhaden Management Board to take two major and complementary actions at its November 2026 meeting.

First, under Draft Addendum II, we urge the Board to strengthen protections for Chesapeake Bay by reducing the Bay's reduction-fishery cap by at least 50%, distributing the allowable catch more evenly throughout the season, and reviewing the cap at least once every three years. We also urge the Board to maintain a separate Chesapeake Bay limit rather than automatically linking it to the coastwide quota. Second, when setting the 2027-2029 coastwide specifications, we urge the Board to manage toward the Ecological Reference Point fishing-mortality target adopted for management use.

These decisions address different risks and should work together. Draft Addendum II addresses concentrated reduction harvest within Chesapeake Bay, while the coastwide TAC determines overall fishing pressure on the stock.

1. **Adopt strong precautionary protections for Chesapeake Bay under Draft Addendum II**

    - **Section 3.1 - Select Option B and Sub-option B4:** reduce the Chesapeake Bay Reduction Fishery Cap by 50%, from 51,000 metric tons to 25,500 metric tons. Maintain the Bay Cap as an independent Chesapeake Bay conservation measure rather than automatically linking it to changes in the coastwide TAC.
    - **Section 3.2.1 - Select Option B and Sub-option B1:** establish three roughly equal-length quota periods and distribute the allowable harvest evenly among the three periods.
    - **Section 3.2.2 - Select Option B and Underage Sub-option 1:** require quota-period overage payback and allow within-year underage rollover, with any Period 1 underage divided equally between Periods 2 and 3.
    - **Section 3.3 - Select Option B:** require the Board to reassess these management measures at least every three years.

2. **Set the 2027–2029 coastwide TAC at a level projected to achieve the ERP F target**

Given the current scientific record and the limited one-year 2026 reduction to the TAC, we demand a substantial reduction from the current 186,840-metric-ton TAC.[1] We urge the Board to use the Technical Committee's best available projections to establish a Total Allowable Catch (TAC) that is projected to achieve, or remain at or below, the most recent ERP target with less than a 50% probability of exceeding the ERP F target, with consideration of more precautionary alternatives.

The Addendum II actions and the coastwide TAC decision must work together. Stronger protections inside Chesapeake Bay could be undermined if increased or concentrated reduction harvest simply shifts elsewhere, while a coastwide TAC that continues to manage above the ecological target would not fully use the ecosystem-based framework the Commission developed specifically for menhaden.

Likewise, conservation gains from a lower TAC or stronger Bay Cap should not be offset by allocation or management changes that substantially increase realized removals elsewhere along the coast.

These recommendations represent the minimum actions the Board should take in November and do not preclude the Board, or individual signatory organizations, from supporting additional spatial, seasonal, or reduction-fishery protections.

Rationale and Evidence Supporting These Recommendations

1. Why Chesapeake Bay warrants stronger protection

Chesapeake Bay is a critical nursery and forage area for menhaden, striped bass, osprey and other species, and ASMFC created the Bay Cap in response to concerns about localized depletion.[2]

The coastwide stock assessment cannot determine how many menhaden are available within Chesapeake Bay, a particular tributary, or during a particular season. ASMFC itself states that coastwide stock status cannot be used to make regional inferences about menhaden abundance. That is precisely why a Bay-specific precautionary measure remains important.

Recent information gives the Board reason to choose the recommended conservation options for Chesapeake Bay. In 2023 and 2024, more than half of annual Chesapeake Bay reduction landings occurred within a six-week mid-summer period. This concentration of removals during a biologically important period raises concerns about effects on other fisheries and predators, the same types of concerns Draft Addendum II was initiated to address. Maryland pound-net menhaden harvest fell 60% in 2024 compared with the 2018–2022 average, while ASMFC also documented declines in pound-net catch rates and low adult abundance in the Choptank River survey.[3]

A fixed 50% reduction in the Bay Cap, combined with evenly distributed quota periods, is a precautionary response to the specific risks ASMFC has identified: uncertainty about local abundance, highly concentrated removals, declining Bay fishery indicators, and potential effects on predators and other fisheries.

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[1] Atlantic States Marine Fisheries Commission. *Atlantic Menhaden FAQs.* November 2025.

[2] Atlantic States Marine Fisheries Commission, *Draft Addendum II to Amendment 3, Chesapeake Bay Reduction Fishery*, Aug. 2026

[3] Atlantic States Marine Fisheries Commission. *Draft Addendum II to Amendment 3 to the Interstate Fishery Management Plan for Atlantic Menhaden for Public Comment: Chesapeake Bay Reduction Fishery.* August 2026

Because the Bay Cap exists to address localized risk that the coastwide assessment cannot resolve, we support maintaining a Bay-specific limit rather than automatically scaling local Chesapeake harvest with coastwide TAC changes. A fixed 25,500-metric-ton cap provides a clear reduction in local fishing pressure regardless of future fluctuations in the coastwide quota.

Similarly, dividing allowable harvest evenly across three roughly equal periods directly advances the Addendum's objective of reducing temporal concentration. Rather than reserving half of the Bay harvest for a single later period, an even distribution limits the amount available in any one period and more consistently spreads fishing pressure across the season. Although we would prefer stronger protections, we support these measures because they are the most protective options ASMFC presented for consideration.

2. Why the Commission should manage to the Ecological Target

ASMFC developed Ecological Reference Points because single-species management does not adequately account for menhaden's role as forage. The ERP target is designed to sustain striped bass at its biomass target, while the ERP threshold corresponds to sustaining striped bass at its biomass threshold.[4] Atlantic striped bass currently remain overfished and below their biomass target. Although menhaden availability is only one factor affecting striped bass rebuilding, these circumstances reinforce the logic of managing menhaden toward the ERP target rather than treating the threshold as an acceptable long-term objective.

The distinction is important: the ERP threshold is used to determine whether overfishing is occurring. The lower ERP target provides a conservation buffer and is the management level the Commission is intended to pursue.

Menhaden management affects not only the menhaden fishery, and the striped bass fishery, but also the many fisheries and wildlife resources that depend on menhaden as forage.

The Board developed, peer reviewed, and accepted the ERP framework for management use. A management target should guide management.

Additionally, the latest assessment also materially changed the Commission's understanding of stock size in 2025. Average age-1+ biomass across the assessment time series was estimated to be an average 37% lower than in the 2022 assessment.[5] The Commission's current estimate of the scale of the stock is materially lower than the estimate that informed earlier management decisions. The Board should account for that changed understanding through a substantially reduced TAC and use of the ERP target.

The current 2026 TAC of 186,840 metric tons was adopted as a one-year measure. ASMFC's projections showed a 100% probability that fishing mortality would remain above the ERP F target, even though it would remain below the overfishing threshold. The Board deferred the longer-term 2027-2029 decision in part to allow additional stakeholder consideration.

The 20% reduction also needs to be considered in the context of actual harvest. Commercial landings in 2024 were approximately 186,155 metric tons, nearly identical to the 2026 TAC of 186,840 metric tons. Because the prior quota was not fully harvested, the one-year 20% reduction may produce little reduction from recent realized removals.

The November decision therefore should not be judged simply by the percentage reduction from the previous paper TAC. It should be judged by whether it produces a *meaningful reduction* in actual fishing pressure and gives managers a reasonable probability of achieving the ecological target.

[4] ASMFC, 2025 Ecological Reference Point Benchmark Stock Assessment and Peer Review Report 5 ASMFC, Atlantic Menhaden FAQs, Nov. 2025; ASMFC, 2025 Atlantic Menhaden Stock Assessment Update

That decision is before you now.

For the reasons above, we urge the Board to use the Technical Committee's best available projections to establish a Total Allowable Catch (TAC) that is projected to achieve, or remain at or below, the most recent ERP F target with less than a 50% probability of exceeding the ERP F target, with consideration of more precautionary alternatives.

3. Ecological and Regional Indicators Warrant Proper Management

In addition to peer-reviewed studies, our organizations are receiving reports from state biologists and researchers about coastwide warning signs.

Peer-reviewed research from Chesapeake Bay provides strong evidence that reduced menhaden availability is limiting osprey reproductive performance in menhaden-dependent coastal systems.[6] Osprey reproductive performance was strongly associated with the menhaden abundance index used by researchers ($R^2 = 0.91$).[7] Most significantly, researchers experimentally tested whether food was limiting reproduction. Providing menhaden to osprey nests increased nest success from 33% in control nests to 81% in supplemented nests and more than doubled average productivity from 0.47 to 1.13 young per active nest.[8] In addition to the well-documented reproductive failures reported in Chesapeake Bay, osprey monitors elsewhere along the coast, including New Jersey, Delaware Bay, and Jamaica Bay, New York are also reporting concerning reproductive performance.

In New Jersey, 2025 statewide osprey productivity fell to 0.69 young per active nest, and 57% of active nests failed to produce young, which is the state's lowest reproductive success in decades.[9] In Jamaica Bay, 2026 was the worst osprey breeding season in 36 years: 20 of 25 monitored nests produced no surviving chicks, and the remaining five fledged only one chick each.[10] Taken together, these studies show more than a simple correlation: reproductive performance declined as menhaden provisioning declined, nests receiving more food performed better, and experimentally restoring menhaden to food-limited nests substantially improved reproductive success.

Our organizations are also receiving repeated reports from anglers, bait fishermen, bait and tackle businesses, wildlife monitors, and coastal observers of fewer, smaller, or less reliably available menhaden schools in portions of New Jersey, New York, and elsewhere along the coast. We are working to compile these observations and research findings. Though data and fishery-independent abundance data are necessary, these observations warrant attention when considered alongside documented predator and fishery indicators, the updated stock assessment, and coastwide fishing mortality that remains above the ERP F target.

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[6] Watts et al. 2026, "Widespread reproductive deficits in Chesapeake Bay ospreys," *Frontiers in Marine Science* 7
Watts et al. 2024, "Demographic response of osprey within the lower Chesapeake Bay to fluctuations in menhaden stock," *Frontiers in Marine Science*

[8] Academia & Watts 2023, "Food supplementation increases reproductive performance of ospreys in the lower Chesapeake Bay," *Frontiers in Marine Science*

[9] Conserve Wildlife Foundation of New Jersey, 2025 New Jersey Osprey Project Report / "2025: A Year of Challenges for Coastal Nesting Ospreys," May 2026.

[10] The Wave. "Osprey Population Crash in Jamaica Bay." 2026.

4. Menhaden Support Fisheries, Wildlife, and Coastal Economies

Menhaden have economic value when harvested. They also have economic value when left in the water.

Menhaden left in the ecosystem support striped bass, bluefish, and other predator fisheries; charter and guide businesses; wildlife viewing; and broader ecosystem productivity. Menhaden harvested for bait support crabbers, lobstermen, recreational anglers, commercial fisheries, and local bait businesses. Both values should be considered alongside reduction harvest.

A 2026 Southwick Associates analysis further demonstrates the economic reach of menhaden beyond the reduction fishery.[11] Recreational anglers spent an estimated 13.9 million fishing days using menhaden bait, chum, or scent in 2025, including 6.3 million days in the Mid-Atlantic. Those trips were associated with approximately $804 million in direct angler spending, $1.56 billion in total economic output, and 7,270 jobs nationwide. The Mid-Atlantic alone accounted for approximately $383 million in angler spending and 3,110 jobs. The report also illustrates the importance of the commercial bait supply: 77% of anglers using live or dead menhaden purchased at least some of that bait from a bait shop, marina, or individual. These findings document the broad network of bait fishermen, dealers, marinas, tackle businesses, charter and recreational fisheries throughout the Atlantic Coast and the scale and geographic reach of recreational fishing activity and businesses associated with the use of menhaden.

A healthy bait fishery and a healthy forage base are not competing objectives. Menhaden support fishing directly when used as bait and indirectly when left in the water to support striped bass, bluefish, tuna and other predator fisheries. Management decisions should therefore account not only for the economic effects on the reduction fishery, but also for the geographically distributed fishing businesses and recreational economy supported by menhaden. They reinforce the need to consider the distributed recreational and bait economy.

If coastwide reductions are necessary to achieve the ecological target, the conservation burden should not fall disproportionately on geographically dispersed bait fisheries and the fishing businesses that depend on them while preserving the majority of high-volume reduction harvest. The scale, concentration, and economic reach of the different sectors should be considered when the Board implements the necessary coastwide reduction.

ASMFC's own management framework recognizes that fisheries management must balance economic interests with the long-term productivity and sustainability of marine ecosystems.

5. History Shows the Risks of Waiting for Decline

The history of the menhaden fishery demonstrates the consequences of allowing high fishing pressure to persist until scarcity becomes unmistakable.

Atlantic menhaden have experienced major historical declines and geographic contraction under heavy fishing pressure. Reduction landings peaked at **712,100 metric tons in 1956**, when more than 20 reduction plants operated from Maine to Florida. During the 1960s, the stock's range contracted, northern plants closed because of fish scarcity, and reduction landings fell to approximately **161,000 metric tons by 1969 - a decline of more than 75%**.
Federal fisheries scientists reviewing that period concluded that the decline occurred as **harvest exceeded population growth**.

[11] Southwick Associates, Economic Contribution of Atlantic Menhaden Recreational Fishing, June 2026

Today, the reduction fishery remains the dominant source of menhaden removals. Reduction landings accounted for approximately 73% of coastwide landings in 2023, and approximately 134,400 metric tons were landed for reduction purposes in 2024. The entire Atlantic reduction industry is now supplied by a single processing plant in Reedville, Virginia.

The lesson from this history is clear: managers should not wait for declining landings and disappearing fisheries to confirm that fishing pressure has become excessive. The two decisions before the Board provide tools to act sooner: a Bay-specific cap to address concentrated local removals and a coastwide TAC that keeps overall fishing mortality at the ecological target. Continuing high-volume reduction harvest without ensuring that overall fishing mortality remains at the ecological target and that local forage availability is protected in this critical nursery habitat risks repeating a pattern already documented in the fishery's history.

Considered alongside declining Chesapeake bait-fishery indicators, concentrated summer harvest, the corrected biomass estimate, and fishing mortality above the ERP target, this history supports reducing overall fishing pressure and imposing strong precautionary limits on concentrated reduction harvest.

The historical record shows that menhaden fisheries can continue removing large volumes even as the stock contracts, with declining landings and fishery closures becoming evident only after scarcity is severe. Management should act before that history repeats itself.

For Draft Addendum II, we urge the Board to adopt:

- **Section 3.1 - Select Option B, Sub-option B4:** reduce the Bay Cap by 50%, to 25,500 metric tons.
- **Section 3.2.1 - Select Option B, Sub-option B1:** establish three roughly equal-length quota periods with harvest distributed evenly among them.
- **Section 3.2.2 - Select Option B, with Underage Sub-option 1:** require quota-period overage accountability and divide any Period 1 underage evenly between Periods 2 and 3.
- **Section 3.3 - Select Option B:** require the Bay Cap provisions to be revisited at least every three years.

For the 2027- 2029 coastwide specifications, we urge the Board to set the 2027-2029 TAC at a level projected to achieve the ERP F target.

The Addendum II protections and coastwide TAC must work together. The Bay measures address concentrated harvest in a critical estuary; the TAC determines overall fishing pressure on the coastwide resource.

The science has been updated. The ecological target has been established. The November decisions provide an opportunity to put that framework into practice and maintain more menhaden in the water for fisheries, bait, predators, and coastal communities.

Respectfully,

Danielle McCulloch
Executive Director
American Littoral Society

Wayne Thomas
President
Strathmere Fishing and Environmental Club

Paul Eidman
Founder and President
Menhaden Defenders

Don Torino
President
Bergen County Audubon Society

Dr Kenneth Green
President
Operation Osprey

Madeline Dennis Raleigh
Administrator
Osprey Stewards East Coast Alliance

Paul Spitzer, PhD
Ecology and Evolutionary Biology
Cornell University

Joseph Albanese
President
Hudson River Fishermen's Assoc.

Jessica Yorke
Executive Director
Bayshore Center at Bivalve

Melanie Schroer
Instructor of Biology
Stockton University

Nick Lund
Acting Advocacy Director
Maine Audubon

Amy Hansen
Policy Manager
New Jersey Conservation Foundation

Russell Comeau
Chief Executive Officer
Bassdozer Worldwide Fishing LLC

Carl Safina, PhD
Endowed Professor in Marine Science
The Safina Center and Stony Brook University

Roberta Kellam President
Birding Eastern Shore, Inc.
Matt Gove
Mid-Atlantic Policy Manager
Surfrider Foundation

Peter Davenport President
Linnaean Society of New York

Karla Rossini
Executive Director
Citizens United to Protect the Maurice River

Chris Allieri
Greg Remaud
Executive Director
NY/NJ Baykeeper

Executive Director and Founder
NYC Plover Project

Dr. Adam Aguiar
Professor of Biology Fisheries Research

Fred Akers
Operations Manager
Great Egg Harbor Watershed Association

September 22, 2026

Joseph Cimino
Chair, Atlantic Menhaden Management Board
Atlantic States Marine Fisheries Commission

Caitlin Craig
Chair, Atlantic Menhaden Technical Committee
Atlantic States Marine Fisheries Commission

Re: Action Item: Set Specifications for 2027-2029 Fishing Years – Request to Assess Impacts of the Newly Estimated Atlantic Menhaden Natural Mortality Rate from Ault and Luo 2026

Dear Chair Cimino and Chair Craig:

On behalf of the undersigned recreational fishing and conservation organizations, we respectfully request that ASMFC immediately evaluate the implications of newly published peer-reviewed research on natural mortality in Atlantic menhaden.

The newly published paper "Investigation of Atlantic menhaden mortality rates" by Drs. Ault and Lou of the University of Miami estimates natural mortality (*M*) at **0.50 yr^{-1}**, substantially below the **0.92 yr^{-1}** used in the 2025 stock assessment following the publication of the Liljestrand et al. (2025) corrigendum. Because natural mortality is a fundamental assessment input, a difference of this magnitude could materially affect estimates of biomass, stock status, biological and ecological reference points, and appropriate harvest levels.

In 2025, when M was reduced 20% from 1.17 yr^{-1} to .92 yr^{-1} due to data errors in the Liljestrand et al. (2019a) publication, "Multi-state dead recovery mark recovery model performance for estimate movement and mortality rates," the result was a 37% drop in stock biomass. Given a natural mortality rate of 0.92 yr^{-1} remains biologically implausible based on Atlantic menhaden life-history characteristics, it is more critical than ever to be precautionary and consider the implications of the new study's findings as they are the most up-to-date best available peer-reviewed science.

Ault and Luo report that estimates published before 2019 ranged from M=0.37 yr^{-1} to 0.53 yr^{-1}, with a mean of 0.46 yr^{-1}, and, in fact, even estimates of M=0.45 yr^{-1} have been historically argued in the scientific literature as being high compared to other pelagic forage species. The new study suggests that even M=0.92 yr^{-1} is well outside the range of more than a dozen previous peer reviewed papers and simply does not sensibly align with published survivorship and maximum age estimates. The new peer-reviewed estimate of M=0.50 yr^{-1} falls squarely within the historical range and is a more biologically realistic natural mortality rate based on the best available science, historic estimates, and what is known about Atlantic menhaden life

history. Pursuant to Executive Order "Restoring American Saltwater Angling and Recreation," ensuring that the best scientific information available is integrated in a timely manner into fisheries management for a species that is fundamental to recreational fishing and coastal communities along the Atlantic coast, is of the utmost importance. With the Atlantic Menhaden Management Board preparing to establish harvest specifications for **2027–2029**, the Commission should understand the implications of this new information before making those decisions.

We therefore respectfully request that ASMFC immediately direct the Technical Committee and Stock Assessment Subcommittee to:

1. Review the new mortality study and its implications for the natural mortality assumptions used in the 2025 assessment;
2. **Re-evaluate 2025 assessment models using $M = 0.50\ yr^{-1}$ to determine impacts on estimated menhaden biomass, status, reference points, and harvest; and make the results publicly available;**
3. Incorporate these newly developed mortality assumptions into upcoming harvest projections.

Given the importance of menhaden to the Atlantic marine food web, recreational fisheries, and tourism, we respectfully request that this evaluation begin immediately. To the extent possible, preliminary results of the evaluation should be discussed at the upcoming November meeting.

Thank you for your consideration.

Sincerely,

American Sportfishing Association
Angler Action Foundation
Bonefish & Tarpon Trust
International Game Fish Association
Theodore Roosevelt Conservation Partnership

cc:
Robert Beal, Executive Director, ASMFC
Toni Kerns, Fisheries Policy Director, ASMFC
James Boyle IV, Atlantic Menhaden FMP Coordinator
Dr. Katie Drew, Atlantic Menhaden Stock Assessment Subcommittee

James Boyle

From: John Riggio <riggiojg@gmail.com>
Sent: Friday, October 16, 2026 12:04 PM
To: James Boyle
Subject: [New] [External] Decimation of Menhaden

Dear James:

I am writing on behalf of nature-lovers as well as recreational fishermen on the east coast about an issue quite close to you. It is an abomination that a handful of commercial fishing boats, owned by one Canadian company, are creating a crisis of alarming magnitude: the decimation of menhaden (bunker). As you know, bunker is integral to the entire Atlantic coast aquatic food chain and its decimation will yield costly consequences.

I live on an island—Brigantine, New Jersey. On my home turf alone, not to mention other locations I travel to, I surf fish 7 miles of beach with high regularity. I have personally noticed the dwindling of the bunker population. The evidence is hard to avoid. I've witnessed the consequences of bunker deprivation on Ospreys, striped bass, and whales. In one particular example, a neighbor of mine reports observing the gradual decline of a resident Osprey who would perch on his dock. Due to the scarcity of bunker, this magnificent bird decayed into feathers and bone, finally passing from starvation. Furthermore, he/she abandoned their nest, resulting in a similar fate for their hatchlings. I hold this example up as representative of many similar stories--involving a variety of species-- occurring right now on our coast.

I understand that there is a commercial interest in scouring for bunker. Menhaden is over-fished to support the animal food, vitamin supplement, and cosmetic industries. I get it: at the end of the day it's the usual Almighty Dollar vs. Mother Nature. All told, and this is just my understanding of the figures, revenues derived from but one Canadian company amount to a relative paltry (given the consequences) $400 million. There has to be a better alternative. The benefits to a few are dwarfed by the consequences of many—both human and animal.

Again, I speak for a host of recreational fisherman and concerned citizens. A 20% reduction of the bunker catch, which was recently passed by your organization, is simply not enough. We need to change the entire calculus of this fishery and its abusive operations in order to avoid potential extinction of several crucial species. Look what happened to the cod fishery up north which suffered greatly because of over fishing by reduction fleets similar to the bunker boats operating out of Virginia today.

I thank you for your service on our behalf. I offer this letter up as my proxy for not being able to attend your November annual meeting.

I am interested in your thoughts on any actions you may be taking on this dire issue. We all need to be on the right side of this issue and be bigger than commercial concerns in order to preserve our precious marine life. Hopefully, the results of the meeting will bring the catch reductions closer to and exceeding the 50% mark which was previously presented. I trust you will do your part and am grateful for your facilitating this objective.

With sincere gratitude~

John Riggio
riggiojg@gmail.com

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SAVE BARNEGAT BAY
GIVING THE BAY A VOICE

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Joseph Rizzo
Stafford
Dr. Amy Williams
Ship Bottom

PRESIDENT EMERITUS
William deCamp Jr.
Mantoloking

October 9, 2026

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

Re: 2027–2029 Atlantic Menhaden Coast-wide Total Allowable Catch

Dear Chair Cimino and Members of the Atlantic Menhaden Management Board:

On behalf of Save Barnegat Bay, we urge the Atlantic States Marine Fisheries Commission (ASMFC) to **reduce the 2027–2029 coast-wide Atlantic menhaden Total Allowable Catch (TAC) by at least 40% from the current 186,840 metric tons and to adopt a greater reduction if necessary to provide a meaningful probability of achieving the Ecological Reference Point (ERP) fishing mortality target.**

Save Barnegat Bay is an independent nonprofit organization dedicated to protecting and restoring Barnegat Bay and its watershed in New Jersey. Our concern regarding menhaden management is not theoretical. We are witnessing troubling ecological conditions within Barnegat Bay itself, including extraordinary declines in osprey reproductive success coinciding with documented concerns regarding the availability of Atlantic menhaden, a primary prey species for nesting ospreys.

ASMFC's Own Analysis Demonstrates the Need for a Substantial Reduction

ASMFC adopted ecological reference points because Atlantic menhaden cannot appropriately be managed solely as an isolated single-species fishery. Menhaden transfer energy through the coastal food web and provide forage for striped bass, bluefish,

weakfish, marine mammals, seabirds, ospreys and numerous other predators.

Their ecological function depends not merely upon coast-wide biomass, but upon sufficient abundance and availability to predators in the places and seasons where those predators depend upon them.

When ASMFC established the 2026 TAC at 186,840 metric tons — a 20% reduction from the 2023–2025 TAC of 233,550 metric tons — the Commission reported that fishing mortality was above the ERP fishing mortality target and fecundity was below the ERP fecundity target.

ASMFC's projections indicated that the selected 2026 TAC would result in a 100% probability of fishing mortality remaining above the ERP fishing mortality target. The Commission further reported that a reduction of 50% or more would have been required to lower the probability of exceeding that target.

The preliminary projections presented by ASMFC's Atlantic Menhaden Technical Committee and Stock Assessment Subcommittee on September 28 further reinforce the need for substantial action. As publicly reported following that meeting, maintaining the current 186,840-metric-ton TAC would carry approximately a **99.5% probability of exceeding the ERP fishing mortality target in each year from 2027 through 2029**.

A TAC of approximately **114,200 metric tons — roughly a 39% reduction — would provide only about a 50% probability of remaining at or below the ERP target.**

Those numbers should drive the management decision.

A management system built around ecological reference points should not knowingly select a TAC overwhelmingly likely to exceed its ecological target. Nor should a 50/50 probability of achieving that target necessarily represent the endpoint of precautionary management.

Save Barnegat Bay therefore supports **at least a 40% reduction in the coast-wide TAC**, while urging the Board to adopt a greater reduction if necessary to provide reasonable confidence that the ERP fishing mortality target will actually be achieved.

Barnegat Bay Is Showing Serious Signs of Forage Stress

The consequences of forage availability are visible in Barnegat Bay.

Long-term monitoring conducted by the Conserve Wildlife Foundation of New Jersey (CWF) and Senior Wildlife Biologist Ben Wurst documents an alarming deterioration in osprey reproductive success in New Jersey's coastal ecosystems.

In 2025, CWF reported that:

- **121 Barnegat Bay osprey pairs produced only 36 young;**

- at **Sedge Islands Wildlife Management Area, 37 nests produced only five young;**
- statewide osprey productivity declined to **0.69 young per active nest**, below the approximately 0.80 young per active nest identified by CWF as necessary to sustain the population;
- **57% of monitored active nests statewide failed to produce any young;** and
- statewide production was **56% below the preceding five-year average.**

CWF identified prey availability — particularly the apparent scarcity of Atlantic menhaden — as a key factor in the reproductive failures observed along New Jersey's coast. While storms, turbidity and other environmental factors also affected foraging conditions, CWF reported widespread evidence of food stress, brood reduction and nest abandonment.

Those troubling observations continued in 2026.

During spring surveys at Sedge Island WMA — a long-monitored osprey colony within Barnegat Bay — CWF found that **11 of 22 occupied nests surveyed, or 50%, contained no eggs or young.** CWF characterized this pattern as a strong indicator of food stress occurring early in the breeding season and affecting the ability of females to reach breeding condition and successfully lay eggs.

Later in the 2026 nesting season, Wurst documented brood reduction and the eventual loss of all three young at a Stafford Township nest involving a male osprey banded at Sedge Island in 2017. CWF reported that signs of food stress became increasingly evident as the nestlings grew.

Atlantic menhaden are a primary prey species for nesting ospreys along New Jersey's coast.

Save Barnegat Bay does not suggest that fisheries harvest is the sole cause of every osprey nest failure. Weather, water clarity, prey distribution and other environmental conditions can affect osprey foraging success.

But the persistence, geographic extent and magnitude of these reproductive failures — combined with documented concerns regarding menhaden availability — cannot responsibly be ignored simply because the coast-wide menhaden stock is not classified as overfished.

A coast-wide stock can satisfy a biomass threshold while failing to provide sufficient forage at the spatial and temporal scales at which predators actually encounter it.

For an estuary such as Barnegat Bay, that distinction is critical.

Ecological Reference Points Must Mean Something

Barnegat Bay is a shallow, highly productive estuarine ecosystem connected directly to the Atlantic Ocean. Menhaden moving through New Jersey's nearshore waters and estuaries perform an ecological function far greater than their value as harvested biomass.

The decline in osprey reproductive success therefore should be understood as more than an osprey-management problem. Ospreys are highly visible upper-trophic-level predators whose reproductive performance can provide important information about conditions farther down the coastal food web.

The observations from Sedge Island and elsewhere in Barnegat Bay are an ecological warning signal.

ASMFC's ecological reference points represent an important advance because they recognize that leaving enough menhaden in the water to support predators is itself a management objective.

But ecological reference points only work if they meaningfully constrain harvest.

If management repeatedly selects harvest levels carrying an extremely high probability of exceeding the ERP fishing mortality target, the reference point ceases to function as a meaningful management target.

A menhaden consumed by an osprey, striped bass, bluefish, weakfish, marine mammal or other predator is not an “unused” fish. It is performing the ecological function that supports the productivity, biodiversity and recreational value of the Atlantic coastal ecosystem.

Requested Action

For these reasons, Save Barnegat Bay respectfully urges the Atlantic Menhaden Management Board to:

Reduce the 2027–2029 coast-wide Atlantic menhaden TAC by at least 40% from the current 186,840 metric tons and adopt a greater reduction if necessary to provide a meaningful probability of achieving the ERP fishing mortality target.

ASMFC's own projections demonstrate the need for action. The extraordinary reproductive failures documented among Barnegat Bay's ospreys provide an additional warning that forage availability within our estuary and nearshore waters deserves immediate attention.

We urge the Commission to follow its science, give meaningful effect to its ecological reference points, apply precautionary management, and leave substantially more menhaden in the water.

Thank you for your consideration.

Respectfully submitted,

Britta Forsberg
Executive Director
Save Barnegat Bay

References

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James Boyle

From: Robert Severi <robert.severi@gmail.com>
Sent: Thursday, September 24, 2026 1:31 PM
To: James Boyle
Subject: [External] Public Comment for November Meeting

Dear Mr. Boyle,

I'm 75 years old and have been fishing around Long Beach Island since the 1960s. I'm very concerned about several faltering fisheries, especially bunker, which is an essential food source for many species, e.g., osprey, whales, striped bass, bluefish, etc.

Since I fish primarily for fluke, when they migrate to the ocean I fish at Little Egg Reef. This year is the first time that I didn't encountered a school of bunker while traveling to and from the reef.

Fishermen my age like to talk about abundant fish decades ago. More recently I have experienced a significant decline in catching several species, i.e., weakfish, croakers, bluefish, fluke, etc. Most of the fish caught, if any, are juveniles. Surely, many fisheries are collapsing. The science used to estimate fish stocks is a "black box" to me. My anecdotal experience, while not scientific, strongly indicates declining fish stocks. Consequently, I believe that fish, birds and whales would benefit from allowing bunker to rebuild.

Kind regards,
Bob Severi

Robert M. Severi

10 St. James Place

Paoli, PA 19301

Mobile 484-947-4736

robert.severi@gmail.com

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Monday, October 19, 2026 9:50 PM
To: Comments
Subject: [New] [External] New public comment for 2026 Annual Meeting

2026 Annual Meeting

Action Title

2026 Annual Meeting

Action URL

https://asmfc.org/events/2026-annual-meeting/

Name

Phaedra Singelis

Email

singelisp@yahoo.com

State

New Jersey

Comment

To:
Mr. Joseph Cimino, Chair
Members of the Atlantic Menhaden Management Board
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200 A-N
Arlington, VA 22201

Re: Public Comment on the 2027-2028 Coastwide Atlantic Menhaden Total Allowable Catch (TAC)

Please distribute this email to the appropriate Commissioners and Board members.

I urge you to follow the recommendations of scientists and ecologists at The Conserve Wildlife Foundation of New Jersey. Due to an alarming drop in successful Osprey breeding, they are advising taking quick, precautionary action in the following manner:

Adopt a precautionary coastwide TAC that prioritizes adequate menhaden availability for the marine food web, including ospreys and other dependent predators.

Account for ecosystem needs and uncertainty when setting harvest limits, treating persistent food stress and poor osprey reproductive performance as serious warning signs.
Strengthen monitoring of menhaden availability and ecological impacts, including the use of wildlife indicators such as osprey breeding performance alongside fisheries data.
Apply adaptive management that responds to emerging evidence of localized prey shortages, changes in prey availability, and ecosystem stress.
Recognize the full ecological and economic value of menhaden, including their importance to wildlife, recreational fisheries, wildlife viewing, and coastal communities.

Let us not return to the 1950s when Rachel Carson wrote 'Silent Spring.' We need to respond when indicators, such as Osprey breeding success, tell us something is not right. Overfishing our already stressed oceans is not going to reduce hunger or improve the economy. It will most certainly lead to greater problems. Ecosystems rely on all the players and are delicate systems. They are nearly impossible to fix once broken.

Please follow the science and take steps now before more drastic action is required. The next generation is counting on us. And so are next year's Osprey chicks.

Thank you,
Phaedra Singelis
West Orange, NJ

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Analysis: ASMFC Shows Double Standard on Jobs and Economic Impacts in Striped Bass and Menhaden Management

Tuesday, 05 May 2026 12:10 AM

Topic: Environmental, Social and Governance

The Board Discussions at the ASMFC 2025 Annual Meeting

Show the Commission Gave Greater Practical Weight to Charter, Recreational and Service-Economy Impacts in Their Striped Bass Debate Than to Union Workers and Working Families in the Menhaden Industry

WASHINGTON, D.C. / ACCESS Newswire / May 5, 2026 / An MFC analysis of two board meetings held as part of the **2025 Annual Meeting of the Atlantic States Marine Fisheries Commission** last Fall finds that the Commission treated socio-economic impacts as central to striped bass management decisions, while giving less practical weight to comparable concerns raised by the menhaden reduction industry, including vessel crews, plant workers, union families, and local communities dependent on the fishery.

The analysis, titled **"When Jobs Count, and When They Don't,"** compares the **Atlantic Striped Bass Management Board meeting** and the **Atlantic Menhaden Management Board meeting**, both held as part of the ASMFC's 2025 Annual Meeting. The analysis examines how much attention each Board gave to jobs, business impacts, working waterfronts, associated industries, and the livelihoods of people directly affected by regulation.



In the Atlantic Striped Bass Management Board meeting, speakers and commissioners repeatedly discussed the economic consequences of further restrictions for charter boats, for-hire operators, commercial fishermen, recreational fishing businesses, tackle manufacturers, bait suppliers, hotels, restaurants, fuel businesses, and coastal communities. Those concerns helped shape the outcome: The Board decided not to move forward with the proposed 12 percent reduction in fishery removals, despite consensus that the striped bass population is below its Target population. Instead, the Board chose status quo rather than an additional reduction and created a work group to examine the future of striped bass management with representation from "all sectors."

In the Atlantic Menhaden Management Board meeting, representatives of the menhaden reduction fishery described local jobs, generational labor, family livelihoods, harassment of fishermen, bait-market impacts, and the economic dependence of workers in and around Reedville, Virginia. Ocean Harvesters' CEO Monty Deihl stated that "100 percent" of Ocean Harvesters and Omega Protein employees are U.S. residents and that "94 percent live within 15 miles of that plant." Retired UFCW Local 400 representative Kenny Pinkard told the Board, "I speak for all working people in Virginia," and reminded commissioners that their decision affected "the livelihood of these gentlemen behind me."

Yet despite that testimony, the Atlantic Menhaden Management Board moved forward with an immediate 20 percent reduction for 2026, even with the menhaden stock having been recently announced to be healthy, not overfished and not experiencing overfishing. The analysis argues that, while the Board acknowledged menhaden-related economic concerns, it did not treat them with the same depth, breadth or procedural seriousness shown in the striped bass debate.

"The Atlantic Striped Bass Management Board meeting and the Atlantic Menhaden Management Board meeting at the ASMFC's 2025 Annual Meeting show that the ASMFC knows how to consider human consequences when it chooses to," the analysis concludes. "The question is why charter trips, tackle sales, hotels, restaurants, and recreational access receive more visible concern than union jobs, plant workers, vessel crews, and working families in the menhaden industry."

The analysis does not argue that the ASMFC ignored socio-economic concerns in the menhaden meeting. Rather, it argues that those concerns were treated differently. In the striped bass

meeting, economic harm helped justify status quo, a broader work group, and a management posture focused on preserving access and industry viability. In the menhaden meeting, socio-economic harm helped moderate the severity of the reduction but did not prevent an immediate cut or produce a comparable worker-centered process.

The result, according to the analysis, is a revealing double standard: Socio-economic impacts appear to become management-relevant when they affect the striped bass recreational, charter, and associated service economy, but receive less forceful treatment when they affect the menhaden reduction industry and its workforce.

Read the full analysis below: "When Jobs Count, and When They Don't."

ANALYSIS

When Jobs Count, and When They Don't

What two ASMFC Annual Meeting board discussions reveal about striped bass, menhaden, and selective concern for working people

The Atlantic States Marine Fisheries Commission knows how to talk about jobs.

It knows how to talk about small businesses, charter captains, tackle shops, bait suppliers, hotels, restaurants, fuel docks, working waterfronts, access, community identity, and the human cost of fishery restrictions. It knows how to pause before imposing cuts. It knows how to ask whether another reduction will push fishermen, captains or dependent businesses past the breaking point.

The Atlantic Striped Bass Management Board meeting and the Atlantic Menhaden Management Board meeting, both held as part of the ASMFC's 2025 Annual Meeting, show all of that clearly.

But they also show something else: The Commission does not apply that concern evenly.

When striped bass regulation was on the table, socio-economic impacts were treated as a central management concern. Speakers and commissioners returned again and again to the economic consequences for charter boats, for-hire operators, commercial fishermen, recreational fishing businesses, tackle manufacturers, hotels, restaurants, fuel suppliers, and the broader coastal economy built around striped bass. The Atlantic Striped Bass Management Board ultimately rejected a proposed quota cut of 12%, and instead chose status quo on the key reduction question and created a work group to think more broadly about the future of striped bass management.

When menhaden regulation was on the table, the treatment was different. The menhaden reduction industry's workers were present. Their representatives spoke. Union labor spoke. Vessel captains spoke. People described local jobs, generational work, family impacts, and the economic life of Virginia communities. Yet those concerns were treated less like a reason to pause and more like a factor to manage around while still imposing reductions.

That difference is the story.

The Commission does not ignore socio-economics. It appears to discount them selectively.

How the analysis was done

The analysis compared two board meetings held as part of the **2025 Annual Meeting of the Atlantic States Marine Fisheries Commission**: the **Atlantic Striped Bass Management Board meeting** and the **Atlantic Menhaden Management Board meeting**. The comparison did not simply look for the word "economic." That would miss the real issue.

Instead, the meetings were reviewed around three questions.

First, how much attention was given to socio-economic consequences? This included direct references to jobs, businesses, income, cost of inputs, bait supply, charter trips, commercial viability, hotels, restaurants, fuel, tackle, and local economies.

Second, whose socio-economic consequences were treated as legitimate? The relevant comparison is not "economics versus conservation." It is whether one group's economic concerns were treated as management-relevant while another group's were treated as secondary.

Third, what did the Board do after hearing those concerns? The most important evidence is not merely that someone spoke at the microphone. It is whether socio-economic concerns influenced the motion, the compromise, the vote, the creation of a work group or the timing of future management.

On those three questions, the meetings show a striking contrast.

In the Atlantic Striped Bass Management Board meeting, economic harm was treated as a reason to stop and rethink

The Atlantic Striped Bass Management Board meeting was saturated with socio-economic concern.

At the beginning of public comment, Brian Hardman, president of the Maryland Charter Boat Association, described steep business losses. He told the Board that Maryland charter boats had gone from catching 92,816 fish in 2023 to 34,000 in 2024 and 26,000 year-to-date in 2025. "You've reduced our businesses by well over 50% in every single category," he said. "We can't survive with these continued reductions and closures and try to stay in business." He also said 54 charter boats had been listed for sale during that period.

Commercial watermen made a similar argument. Captain Robert Newberry of the Delmarva Fisheries Association asked commissioners to look at the fishermen in the room and said, "This is who you're affecting here today." He warned that additional cuts would put working watermen "out of business" and distinguished commercial and charter fishing from purely recreational use: "The recreational side, that's a hobby. We have a living. We pay our bills. We buy vehicles. That is what we do for a living."

The meeting repeatedly framed striped bass cuts as a direct threat to the survival of fishing businesses and working waterfronts. A commercial fisherman, Nick Manzion, argued that cutting the commercial quota would not "promote American seafood" but "destroy it," adding: "Every pound taken from the commercial side is one less pound of wild, sustainable, American-caught fish for our people. One less job, one more blow to those who feed the nation."

Then the Board itself absorbed that frame. Staff summarized public comments as warning of "severe negative economic impacts" and harm to "fishing-related businesses and local economies," with damage to already struggling for-hire and commercial sectors.

The Advisory Panel summary was even more explicit. The AP report summarized status quo supporters as saying that "the for-hire commercial industries are already disappearing," that "any season closure would devastate the for-hire industry," and that "the commercial fishery may no longer be profitable with more cuts."

The Board heard economic hardship, repeated it, and built it into the decision frame.

Striped bass economics were not limited to fishermen

One reason the striped bass discussion received such weight is that its economic footprint was repeatedly described as broad and multi-layered.

The meeting included discussion of charter boats, private anglers, commercial fishermen, tackle manufacturers, hotels, restaurants, fuel, and other associated businesses. ASMFC Commissioner Ray Kane of Massachusetts asked for a broader white paper, saying he kept hearing about socio-economic impacts and wanted to see how those impacts worked beyond the dockside price of striped bass: "hotels, restaurants, fuel."

Tom Fote of the Jersey Coast Anglers Association similarly emphasized the recreational economy, saying recreational fishing is "important to my state as far as the business of my state" and pointing to "hundreds of thousands of jobs making tackle and everything else through the country."

The Advisory Panel also described striped bass as an economic linchpin, describing reduction supporters as saying that "striped bass are the linchpin of the economy" and that they wanted to "ensure a fishery for the future."

That framing matters. In the Atlantic Striped Bass Management

Board meeting, the economic ecosystem around the fish was treated as expansive. The Board did not limit its attention to direct harvesters. It was invited to consider the entire service economy around striped bass: charter trips, equipment, bait, tackle, fuel, travel, hospitality, and coastal community identity.

That is exactly the kind of socio-economic analysis the menhaden reduction industry is asking for - but did not receive in the same way.

The Atlantic Striped Bass Management Board converted economic anxiety into process

The most important evidence is the Board's response.

A motion for status quo was offered on the striped bass reduction issue, and the motion-maker, Commissioner Adam Nowalsky of New Jersey, described the decision as "an extremely important decision in the name of conservation" and "an extremely important decision in the name of socioeconomics." He argued that "right now, status quo is the way forward" and that the Board should wait for the next benchmark before responding further.

Commissioner John Clark of Delaware, the seconder of the status quo motion, put the economic concern even more plainly: "If we keep reducing the removals, we're going to end up in a situation where there are no for-hire commercial fisheries when striped bass do recover." He warned that the Board could end up saying "the operation was a success, but the patient died."

That argument carried institutional weight. The Board adopted a status quo approach combined with a work group. The work group was designed to include "representation from all sectors

in addition to scientists and managers" and to consider future striped bass management beyond 2029.

The Board then rejected a motion to add a 12 percent reduction and moved forward with status quo plus the work group.

The Board did not merely hear economic concerns. It changed the outcome.

In the Atlantic Menhaden Management Board meeting, the workers were visible - but less protected

The Atlantic Menhaden Management Board meeting also included powerful socio-economic evidence.

Ocean Harvesters' CEO, Monty Deihl, described the Reedville operation as American-owned and local. "100% of our employees at Ocean Harvesters and Omega Protein, who we sell our fish to, are U.S. residents," he said. "Ninety-four percent live within 15 miles of that plant." He also said the debate had made fishermen into targets, describing harassment on the water and threats on social media.

Thomas Moore, a fifth-generation menhaden boat captain for Ocean Harvesters, described a 15-man crew, "most" of whom were present. "They are also generational workers," he said. "Their ages range from 22 to 66." Moore added: "We love our jobs and are very passionate about them," and warned, "Any cuts we face today will hurt us, our families, and our community."

Most importantly for the labor argument, retired UFCW Local 400 representative Kenny Pinkard spoke directly for working people in Virginia. He identified himself as a third-generation fisherman and said, "I speak for all working people in Virginia." He asked the captains and crews to stand, telling the Board:

"You all do have something to do with the livelihood of these gentlemen behind me." The message the Board sent, he said, was the message those workers would have to take home "to their wives" and "their children."

That is exactly the type of human evidence that, in the striped bass context, helped justify caution, status quo, and a future work group.

But in the menhaden context, it did not receive the same treatment.

The Atlantic Menhaden Management Board acknowledged socio-economics, then moved past them

To be fair, the Atlantic Menhaden Management Board did not ignore economics altogether.

Several commissioners raised socio-economic concerns. Commissioner Joe Grist of Virginia, where Ocean Harvesters is located, warned that reductions beyond 20 percent would put at risk "directly or indirectly, hundreds, if not thousands of American jobs across several states." He also warned that cuts would reduce supply and increase prices for menhaden used by both commercial and recreational fishing industries.

Commissioner Eric Reid of Rhode Island then said the disparity of concern between the fisheries out loud: "When we talk about striped bass, we talk a lot about socioeconomics, and we're not talking about it here."

The Commission itself, through the words of a board member, recognized the asymmetry. Socio-economic concern was not absent from the menhaden meeting, but it was thinner, more defensive, and less powerful than in the striped bass meeting.

The Menhaden Board did ultimately reject the deepest immediate cut. But the final path still imposed a 20 percent reduction for 2026, with the Board planning to revisit 2027 and 2028 later. That motion carried 16-2.

So yes, there was some accommodation. But the comparison remains: striped bass socio-economics helped produce status quo and a work group; menhaden socio-economics helped reduce the severity of the cut, but still resulted in an immediate 20 percent reduction.

The menhaden workforce was treated as a cost, not a constituency

In the Atlantic Striped Bass Management Board meeting, affected stakeholders were treated as constituencies whose future needed to be built into management. The Board created a process for them.

In the Atlantic Menhaden Management Board meeting, workers were treated more like costs to be balanced against ecological targets. Their testimony mattered, but it did not reorganize the Board's response in the same way.

The menhaden workforce is not faceless. The meeting was attended by local, generational, unionized labor. Vessel crews attended the meeting. They showed workers tied to a particular place in Virginia. It showed families whose economic stability depends on the reduction fishery.

The menhaden workforce includes a significant minority labor force. The public record shows this with workforce demographics. Although information presented in the meeting demonstrated the importance of the union, local, and generational labor, it does not appear, from the reviewed

material, to show the Board developing or centering a serious labor-equity record before making a decision affecting those workers.

A commission that can discuss hotels, restaurants, fuel, tackle, charter trips, and recreational access for striped bass can also discuss union jobs, plant labor, vessel crews, minority employment, wage security, and community and customer dependence in the menhaden reduction fishery.

The Atlantic Menhaden Management Board meeting at the ASMFC's 2025 Annual Meeting shows that it largely did not.

The double standard becomes clearer when "associated industries" are compared

The striped bass discussion treated associated industries expansively. The Board heard about charter vessels, tackle manufacturers, hotels, restaurants, fuel, and the broader business ecosystem around recreational fishing.

The menhaden discussion also contained associated-industry impacts. Ross Kellum, who identified himself as owning and operating a vessel in the purse seine bait fishery, warned that any change in the TAC would induce volatility in the bait marketplace. He said higher prices would mean "the lobstermen in New England will no longer be able to afford to work," "the crabbers of Maryland and Virginia won't be able to afford to work," and "chum prices will skyrocket" and depress recreational activity along the Atlantic Coast.

Patrice McCarron of the Maine Lobstermen's Association said excessive quota cuts would cause "significant harm to Maine's lobster industry," describing a fleet of 4,300 lobstermen and 800 students who sustain local families and coastal economies.

So the economic web around menhaden was real and documented. But it was treated differently.

For striped bass, the surrounding economy helped justify restraint.

For menhaden, the surrounding economy was acknowledged, then placed behind the ecological reference point framework and the desire to support striped bass and other predators.

Striped bass was allowed complexity; menhaden was compressed into a forage function

In the Atlantic Striped Bass Management Board meeting, the fishery was viewed as complicated. The Board discussed recruitment failure, environmental change, fishing mortality, MRIP uncertainty, the 2027 benchmark, Maryland's baseline, charter impacts, commercial impacts, and stakeholder distrust. The solution was not simply "cut more." It was "pause, study, involve people, and build a better process."

In the Atlantic Menhaden Management Board meeting, the species was discussed less as a fishery with its own human community and more as an input into ecosystem management, especially striped bass recovery. The ERP presentation described menhaden reference points in relation to striped bass biomass, explaining that the ERP target is defined to allow striped bass to stay at their biomass target when striped bass are fished at their target fishing mortality.

That is not necessarily wrong biologically. Menhaden is a forage species. But it is incomplete as social policy. A fishery can be ecologically important and still be economically important. A reduction industry can be industrial and still be made of workers. A quota cut can be scientifically defensible and still

require serious labor analysis.

The problem is not that the Commission considered ecosystem needs. The problem is that, compared with striped bass, it gave less institutional dignity to the human economy attached to menhaden.

Jobs Matter Sometimes

The strongest case is not that the ASMFC never mentioned menhaden jobs. It did. But menhaden jobs were not treated with the same depth, breadth or procedural seriousness as striped bass jobs.

For striped bass, socio-economic harm helped reject a 12% reduction, and led to the formation of a broad work group, a future white-paper-style analysis, and a management posture focused on preserving access and industry viability.

For menhaden, socio-economic harm helped moderate the size and timing of reductions, but it did not prevent an immediate 20 percent cut. Nor did it produce the same worker-centered process focused on union labor, vessel crews, plant labor, minority employment, and community dependence.

That is unequal treatment.

The Commission treated socio-economic concerns as central when the affected economy is the striped bass recreational and charter complex. But when the affected economy is the menhaden reduction industry - its crews, plant workers, union families, and local Virginia communities - those concerns become secondary, something to acknowledge before moving back to ecological targets.

Selective Caring

The Atlantic Striped Bass Management Board meeting and the Atlantic Menhaden Management Board meeting, both held as part of the ASMFC's 2025 Annual Meeting, show that the ASMFC knows how to care about people. It knows how to discuss jobs, businesses, local economies, and the survival of fishing-dependent communities. The Atlantic Striped Bass Management Board meeting proves that.

However, their concern decreases when the people in question work in the menhaden reduction industry.

Those workers are not abstractions. They are captains, crews, plant employees, union members, families, and local residents. They are part of the American seafood economy. Their customers are those who use the products to feed those fish and animals that then feed humans, or feed their pets, or directly used by humans to improve their health. They should not have to prove, again and again, that their jobs count as real jobs.

Taken together, the Atlantic Striped Bass Management Board meeting and the Atlantic Menhaden Management Board meeting at the ASMFC's 2025 Annual Meeting reveal a double standard: Socio-economic impacts are treated as management-relevant when they affect the striped bass recreational, charter, and associated service economy, but not given comparable weight when they affect the menhaden reduction industry and its workforce.

That is not balanced fishery management. It is selective empathy. And if empathy can be shown for those dependent on a stock deemed Overfished, then why not for a stock that has seen neither overfishing, or being overfished, for over 30 years?

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
Menhaden Fisheries Coalition
(202) 595-1212
www.menhaden.org

SOURCE: Menhaden Fisheries Coalition

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Chesapeake Bay Foundation Continues Spreading False Claims in Latest Attack on Atlantic Menhaden Fishery

Tuesday, 05 May 2026 08:40 PM

Topic: Environmental, Social and Governance

WASHINGTON, DC / ACCESS Newswire / May 5, 2026 / Just

over a month ago, Will Poston of the Chesapeake Bay Foundation once again published false and misleading claims about Virginia's menhaden fishery. Just as CBF did in a March email falsely connecting natural fish die-offs to the menhaden fishery, Poston presents advocacy as science, speculation as fact, and political talking points as settled biology.

Poston's piece is built around a series of assertions that cannot stand up to the actual record.



Start with his effort to portray Virginia's 2026 legislative session as proof that industry influence defeated "meaningful conservation measures." What lawmakers rejected were proposals that would have imposed sweeping new restrictions without first establishing any biological basis for them. Atlantic menhaden are not unmanaged, and they are not being harvested in some regulatory vacuum. The Atlantic States

Marine Fisheries Commission (ASMFC) manages this stock under ecological reference points specifically designed to account for the species' forage role, and the Commission continues to report the stock is not overfished and that overfishing is not occurring. The fishery is also certified as sustainable by the Marine Stewardship Council, the international gold standard for seafood sustainability.

Then there is Poston's claim that "new coastwide science found the population of menhaden is nearly 40 percent smaller than previously estimated." This is one of the most misleading lines in the entire article. It invites readers to think scientists discovered a dramatic new collapse in the stock. This is not the case. The ASMFC responded directly to this talking point and explained that the difference between the earlier and later estimates is "primarily due to a change in the estimate of natural mortality." Importantly, the ASMFC stated, "the 2025 update indicates total biomass has actually slightly increased since 2021. The lower estimate of biomass from the current assessment compared to the previous assessment is a result of a change in our understanding of the stock rather than a change in the stock itself." Poston is taking a technical model revision and selling it to the public as a conservation crisis.

Poston also points to osprey chick mortality and implies that menhaden harvest is to blame. That claim goes well beyond what the underlying science supports. As the U.S. Geological Survey has stated, many factors affect osprey productivity, including contaminants, disease, predation risk, parental condition, brood size, and weather conditions, as well as prey abundance and access to prey. Current research has not explored all the possible causes of osprey issues in the Bay. It is one thing to say more research is warranted. It is another to

repeatedly tell the public that the case is already closed when it is not.

A similar problem appears in Poston's claim that bait fishermen have seen catches decline and that this somehow proves the Bay is being emptied of menhaden by the reduction fleet. That is an anecdote dressed up as population science. Catch levels in local bait fisheries can reflect a range of factors, including effort, participation, market conditions, gear, weather, and location. Poston presents this as if it were hard evidence, when science continues to point to a healthy stock.

Poston's charge that scientific research "has repeatedly been delayed by Omega Protein and their Richmond lobbying firm" is also false. There is a legitimate policy debate over what kind of Chesapeake-specific research should be done, how quickly, by whom, and for what management purpose. But that is very different from claiming the industry has simply blocked science. In fact, the industry has supported a Science Center for Marine Fisheries (SCEMFIS) project to produce a research roadmap for menhaden in the Bay as a long-overdue opportunity to ground Bay management in sound science. SCEMFIS, a member of the National Science Foundation's Industry-University Cooperative Research Program, brings scientists and industry together to fund and conduct applied marine fisheries research.

Last Fall, SCEMFIS funded a team of Atlantic menhaden researchers from the Batten School of Coastal and Marine Sciences & VIMS at William & Mary, the Chesapeake Biological Laboratory at UMCES, and NOAA to identify the research needed to support a scientifically defensible Chesapeake Bay harvest cap. Since then, the team has worked collaboratively online, met in person in February in Solomons Island, Maryland,

and presented its progress at the SCEMFIS spring meeting in Nashville. The current focus is on advancing a PIT-tagging pilot study, including controlled holding studies at VIMS and field-planning work starting May 12 with Ocean Harvesters to determine how tagged fish could be detected and recovered during commercial fishing and processing operations.

Poston wants readers to believe that one side supports research and the other side fears it, but that caricature is not an accurate description of the actual debate. One side is helping science progress, while the other side is raising money via fear-mongering.

A broader look at the data only further undermines Poston's narrative. The ASMFC's 2025 Atlantic menhaden assessment update shows that recent coastwide age-1+ biomass remains roughly twice the depressed levels seen in the early 1970s, even after the revised natural-mortality assumption in the 2025 model. At the same time, the ASMFC says coastwide reduction landings today are only about one-third to one-half of what they were in the 1970s and 1980s, and the Chesapeake Bay reduction fishery is already tightly constrained by a 51,000-metric-ton Bay cap that is far below historic Bay harvest levels.

And Maryland's own survey work continues to show strong juvenile menhaden presence in the Bay: Maryland DNR reported that menhaden abundance in 2024 was nearly equal to the previous year, "which was the highest measured since 1990," and in October 2025 stated that "Atlantic menhaden and bay anchovies were widespread in the Bay for the third consecutive year."

The truth is much simpler than Poston would like readers to

believe. Atlantic menhaden are managed under one of the most ecosystem-conscious fisheries frameworks on the Atlantic coast. The ASMFC says the stock is not overfished and overfishing is not occurring. The ASMFC says the latest update shows total biomass has actually slightly increased since 2021. And the ASMFC says the lower biomass estimate relative to the earlier model reflects "a change in our understanding of the stock rather than a change in the stock itself." Poston's effort to turn that into proof of collapse is not honest science communication. It is advocacy masquerading as analysis.

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.

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SOURCE: Menhaden Fisheries Coalition

Chesapeake Bay Foundation Peddles a False Menhaden Crisis-Not Science

Wednesday, 13 May 2026 08:25 PM

Topic: Environmental, Social and Governance

ASMFC decision to return Draft Addendum II for further development is responsible due diligence

WASHINGTON, DC / ACCESS Newswire / May 13, 2026 / A May 5 statement by David Sherfinski of the Chesapeake Bay

Foundation (CBF) misleadingly portrays the Atlantic States Marine Fisheries Commission (ASMFC) as ignoring "dire warning signs" in the Chesapeake Bay by delaying action on Draft Addendum II for menhaden. But the Commission's decision is basic due diligence: the draft addendum is technically complex, and the Board acted responsibly by choosing to refine the proposal before launching public comment.

CBF's statement, however, leans on alarmist language, including "dire warning signs," "starving osprey chicks," and "plummeting bait catches," and implies those outcomes are caused by the commercial menhaden fishery. But the available evidence does not support this, and presenting these issues as settled cause-and-effect is exactly how public confidence in fisheries governance gets undermined.



1) CBF is spinning a responsible pause as a crisis
CBF suggests the Board "delayed protections" for menhaden. But the Board's decision to pause and form a work group reflects the reality that Draft Addendum II involves complicated design choices and real-world implementation questions that should be addressed *before* a public process begins.

CBF Forage Campaign Manager Will Poston called the Board's action a "frustrating delay," but that's exactly backwards. Sending a complicated draft back for further development is what responsible management looks like-especially when the addendum's mechanics and underlying assumptions are still being debated. Treating due diligence as a failure castigates the Board for doing the careful work the public expects.

2) "Dire warning signs" is hyperbole, especially when CBF

treats uncertainty as a verdict

Osprey reproduction and local bait availability deserve careful attention. But referring to "dire warning signs" while implying the menhaden fishery is operating irresponsibly is not supported by the record.

On ospreys: The **U.S. Geological Survey** and other agencies have emphasized that multiple stressors can affect osprey productivity, and that food availability is only one factor among others such as disease, climate conditions, and water quality.

On bait: Declines in local catch cannot, by themselves, be used to diagnose a stock. Catch trends can reflect many different factors, including participation and fishing effort, costs and labor constraints, weather, shifting fish distribution, and conditions that affect where fish can live and how catchable they are.

3) Maryland Commissioner H. Russell Dize rejected scapegoating

During the May 5 Board discussion, Maryland ASMFC Commissioner **H. Russell Dize** warned the Board against exactly the kind of one-cause narrative CBF is pushing.

He said the Board had "taken the reduction fishery and set them out like a white elephant," and made clear: "You can't tell me that that's the only problem we got with menhaden not coming into Maryland, coming up the Bay."

Commissioner Dize continued: "You're still not going to find the problem until we look further into what's causing it... It's our responsibility to find that and not just... blame this one group."

Reflecting on his own personal history in the menhaden industry, he concluded: "I just don't think they're the culprit...

We got other problems."

4) CBF's "mismanagement" insinuation clashes with the oversight record and the fishery's MSC sustainability recertification

CBF's statement insinuates that the fishery is being managed recklessly and must be curbed immediately. But the ASMFC's management framework for menhaden is already precautionary and incorporates the species' forage role through ecosystem-based reference points and oversight.

In March, the Atlantic menhaden fishery was **recertified as sustainable** under the **Marine Stewardship Council (MSC)** program. MSC is an international nonprofit that operates the widely recognized **blue MSC ecolabel** for wild-capture fisheries. MSC certification is based on an assessment against the MSC Fisheries Standard and carried out by independent third-party auditors. Certified fisheries have demonstrated that their fish stocks are sustainable, that they have minimized their environmental impact, and that they are managed effectively.

5) A serious policy debate requires a testable problem statement, not slogans

If the ASMFC is going to consider seasonal quota periods, rollovers, closures, or cap changes, the public deserves more than CBF's headlines. At minimum, the proposal should clearly state:

1. **What exact problem is being measured** (where, when, with what data)
2. **What evidence links that problem to fishery activity**, as opposed to Bay-wide environmental conditions
3. **What mechanism the rule is intended to change**, and how success will be measured
4. **How monitoring and enforcement will work** in practice

That is what the work group should do, and what CBF's statement does not do.

6) Advocacy shouldn't substitute for evidence
Like too many CBF alarmist releases on this issue, the May 5 statement uses hyperbolic language to rile up its readers.

Chesapeake Bay challenges are real. But regulation-by-campaign, especially when it treats correlation as causation and elevates rhetoric over evidence, does not protect the Bay. It distorts public understanding and pressures regulators toward decisions that may be politically satisfying, but scientifically unmoored.

About the Menhaden Fisheries Coalition
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SOURCE: Menhaden Fisheries Coalition

Menhaden Fisheries Coalition Condemns Chesapeake Bay Foundation for Misusing Natural Fish Wash-Up to Push False Anti-Fishing Narrative

Friday, 06 March 2026 11:25 PM

Topic: **Environmental, Social and Governance**

WASHINGTON, D.C. / ACCESS Newswire / March 6, 2026 / The Menhaden Fisheries Coalition strongly criticizes the Chesapeake Bay Foundation's Will Poston for exploiting the recent fish wash-up from Cape Henry, Virginia to Nags Head, North Carolina to promote yet another misleading attack on Virginia's menhaden fishery.

The Chesapeake Bay Foundation (CBF) is using this natural event to make false accusations and continue the campaign of anti-menhaden misinformation it has employed in numerous fundraising appeals, both online and in direct mail. It is another shameless attempt by CBF to make villains of the menhaden fishery, while failing to put the same focus on current environmental disasters, such as the vast amounts of raw sewage flowing into the Bay from the Potomac River. CBF's effort to use this beach wash-up to smear the menhaden fishery fits a broader pattern: blame menhaden harvest first, oversimplify the science second, and ignore every other environmental stressor that is harder to politicize.

Mr. Poston falsely stated that efforts to fund research to better understand the Chesapeake Bay menhaden population have "been needlessly delayed by Omega Protein and their McGuireWoods lobbyists in Richmond." There is no truth to that statement. Neither Omega Protein, nor Ocean Harvesters, nor McGuireWoods are standing in the way of any funding of a Bay survey.



The industry supports science. Over the past two decades, Ocean Harvesters and Omega Protein have supported at least 15 scientific studies and have regularly provided detailed landings and operational data to NOAA and ASMFC scientists. The industry is currently working collaboratively with researchers day in and day out on menhaden tagging and other studies.

Through the Science Center for Marine Fisheries (SCEMFIS), a National Science Foundation (NSF) Industry-University Cooperative Research Center (IUCRC) that includes the Virginia Institute of Marine Science, the Marine Stewardship Council, and researchers from NASA, the industry has funded a project designed to identify the research needed to finally develop a scientifically defensible and ecologically meaningful Chesapeake Bay harvest cap for Atlantic menhaden. Led by scientists from the Chesapeake Biological Laboratory, the

Virginia Institute of Marine Science, and NOAA, it will review existing menhaden science, identify key data gaps, and recommend specific study designs, analytical methods, timelines, and costs for future Bay-focused research, including tools such as tagging, hydroacoustics, spatial modeling, and analysis of existing datasets like landings and spotter pilot reports.

When CBF says research has been "needlessly delayed" by the industry, it is distorting the record. The real issue has been making sure research is done with credible methods and defensible study design, not blocking research.

The fish die-offs are unfortunate. But as reported by WTKR News 3, Virginia Marine Resources Commission public information officer Zach Widgeon stated this was "not a result of a fishing spill or a net bust." It was a natural cold-weather occurrence tied to a sudden temperature drop offshore.

The current die-off is not evidence of a collapsing forage base. It is evidence that menhaden remain abundant in Bay waters. As Mr. Widgeon noted, "There are so many menhaden out on the East Coast that you're going to see them affected and washing up more than any other species." CBF's statements continually ignore this most basic scientific reality: Atlantic menhaden are not overfished and overfishing is not occurring, according to the Atlantic States Marine Fisheries Commission's current benchmark assessment. ASMFC's management framework explicitly uses ecological reference points designed to account for menhaden's role as forage for predator species.

CBF also ignores recent state survey data. In October 2025, the Maryland Department of Natural Resources reported that Atlantic menhaden were widespread in the Chesapeake Bay for the third consecutive year.

These attacks are aimed at real people in a real working community. The Reedville-centered menhaden industry provides the kinds of jobs that rural Virginia cannot easily replace. A Virginia Marine Resources Commission economic assessment found that the direct effects of the operation are heavily concentrated in Northumberland County, with 217 of 299 employees residing there, including 55 in Reedville. The report also describes the jobs as stable employment with benefits and union representation, and notes that most direct impacts occur in Northumberland County.

CBF is not just criticizing a fishery. It is attacking one of the most economically important sources of unionized working-class employment in Virginia's Northern Neck, while presenting itself as the sole voice of the public interest. It is easy to issue inflammatory press releases, it's much harder to create well-paying jobs with full benefits.

Anyone who wants to understand what is really at stake should hear directly from the union fishermen themselves. Readers should visit the UFCW Local 400 website and watch this video featuring the union fishermen describing their jobs in their own words.

About the Menhaden Fisheries Coalition

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Press Contact

Menhaden Fishermen Are TRCP's Favorite Villains, But the Facts Don't Fit

Tuesday, 26 May 2026 07:55 PM

Topic: Environmental, Social and Governance

Economic Compassion for Anglers, A Cold Shoulder for Union Watermen

WASHINGTON, D.C. / ACCESS Newswire / May 26, 2026 / In a May 6 post by Jaclyn Lunaas, ("Fisheries Board Defers Advancing Plan to Address Chesapeake Bay Menhaden Management"), the Theodore Roosevelt Conservation Partnership (TRCP) calls the Atlantic States Marine Fisheries Commission (ASMFC) Menhaden Board's decision to form a work group on Draft Addendum II "another delay for Chesapeake Bay menhaden conservation," then argues that cutting Chesapeake Bay menhaden harvest (and spreading it across the season) is needed to improve outcomes for predators like striped bass.

That framing misses the most important fact: striped bass are overfished because striped bass have been overfished for years, not because managers failed to squeeze menhaden hard enough. But when the ASMFC is asked to make unpopular decisions that directly affect striped bass anglers, TRCP's rhetoric is very different.



1) ASMFC explicitly chose status quo for striped bass in 2026 because of socio-economic consequences

The ASMFC's striped bass management history is clear: striped bass were declared overfished in 2019 and are under a rebuilding plan that requires rebuilding to the spawning stock

biomass target by 2029. The ASMFC also notes that while the stock is no longer experiencing overfishing, it remains overfished.

At an October 2025 meeting, the ASMFC's Striped Bass Management Board considered-and ultimately rejected-moving forward with a proposed 12% reduction in fishery removals for 2026. The ASMFC's own summary explicitly cited "severe economic consequences" as a key reason the Board maintained current measures and quotas.

TRCP's response to this decision? Deafening silence. Other than its repeated attacks on the menhaden fishery, Ms. Lunaas and TRCP have not published a comment directly addressing striped bass management since November 2023.

Sticking with the status quo for striped bass will make rebuilding harder and decreases the likelihood that the 2029 rebuilding target will be met, but the ASMFC weighed that against socio-economic harm to the recreational and commercial striped bass fisheries and the communities and businesses they support. That's a legitimate policy tradeoff. But it's exactly the tradeoff TRCP refuses to acknowledge when it comes to menhaden.

2) Silence on protecting striped bass access, no mercy for menhaden workers

TRCP's post pushes menhaden cuts as if predator recovery depends on it, while staying quiet on the striped bass decision that delays rebuilding trajectories and was justified, in part, by economic impacts.

When the affected stakeholders are recreational striped bass anglers (and the coastal economies tied to that fishery), TRCP is aligned with a process that treats economic consequences as central. When the affected stakeholders are the menhaden fishery's working families-a union workforce in a rural community, and one of the largest minority workforces in its area-TRCP's tone shifts to "just do it," even when many of their claims about menhaden fishing remain unproven.

3) TRCP overstates the evidence on seasonal quota periods and Maryland pound nets

TRCP implies that re-timing the Virginia reduction harvest via seasonal quota periods will improve availability for predators and other fisheries, including Maryland's pound-net bait fishery.

But the ASMFC's Plan Development Team (PDT) memo does *not* support the re-timing story as settled:

- The PDT calls its work a preliminary analysis and recommends the Technical Committee as the proper avenue for a detailed test of the hypothesis.
- Maryland pound-net landings fell sharply in 2023-2024, but the PDT found the data suggest the decline was "primarily driven by reduced effort" because catch per unit effort (CPUE) fell less dramatically than effort and catch.
- For early-season weeks (13-26), the PDT says it is unlikely low pound-net CPUE in 2023-2024 was due to the reduction fishery because reduction harvest usually begins later-and in those years was delayed even further.
- For 2024, the PDT says an effect is possible, but the data were inconclusive at the resolution evaluated, and a meaningful conclusion would require finer-scale analysis of movement and fishery dynamics.

So when TRCP pushes seasonal menhaden quota periods as a practical fix to protect other fisheries, it's taking a hypothesis

and selling it as if it were established.

Bottom line

Striped bass recovery won't be achieved by blaming menhaden whenever recommended striped bass management proposals become unpopular. The ASMFC's Striped Bass Board chose status quo for 2026, citing economic consequence, while striped bass remain overfished and the 2029 rebuilding requirement still exists but seems unlikely.

If TRCP wants any credibility, it should stop implying that menhaden cuts are a substitute for confronting the real driver of striped bass decline-a long period of excessive striped bass fishing mortality-and face up to the hard tradeoffs between rebuilding timelines and economic realities the ASMFC has repeatedly had to make to protect both the striped bass population and the striped bass fishery itself.

About the Menhaden Fisheries Coalition

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Ocean Harvesters Statement on Center for Conservation Biology 2026 Osprey Findings

Tuesday, 15 September 2026 09:20 PM

Topic: Environmental, Social and Governance

REEDVILLE, VA / ACCESS Newswire / September 15, 2026 / The Center for Conservation Biology at William & Mary has released the results of its 2026 Chesapeake Bay osprey breeding performance monitoring, reporting historically low reproductive rates in higher salinity portions of the Bay and attributing widespread nesting failures to food stress.

As these findings receive attention, it is important to distinguish between evidence of food stress and evidence of what caused food stress.

The Center itself states that "the underlying causes of reduced availability of menhaden to osprey are not clear." It identifies climate change, commercial harvest, changes in menhaden distribution and delayed entry into Bay waters as possible contributing factors.

Dr. Bryan Watts has made the same distinction even more directly, writing earlier this year: "Our paper [does not] attempt to link poor osprey reproduction to menhaden harvest."

Both CCB and the U.S. Geological Survey have also identified numerous other factors that can affect osprey reproductive performance, including storms and other adverse weather, heat stress, predation, human disturbance, contaminants, disease, parental condition, brood size, competition for prey and access to prey.

Timing also deserves consideration. Chesapeake osprey return to breeding territories in late February and March and begin laying eggs in early April, while Virginia's commercial purse seine season does not open until the first Monday in May and did not begin fishing in 2026 until early June.

There is also a broader geographic context. U.S. Geological Survey scientists have noted recent leveling or declining osprey population trends in other parts of the country, including Florida, South Carolina, North Carolina, New Jersey and Delaware, as well as on the Pacific Coast in California and Washington. The presence of similar trends in areas far removed from the Chesapeake Bay-and, in the case of the Pacific Coast, where there is no Atlantic menhaden fishery-underscores the need for caution before attributing the Chesapeake observations to a single fishery.

We are not disputing the reproductive conditions reported by the Center. The point is simply that neither CCB nor USGS has established that commercial menhaden fishing caused them.

At the same time, a number of conservation and recreational fishing advocacy organizations have mounted a concerted campaign to portray these osprey findings as evidence against the commercial menhaden fishery, even though that is not what the Center itself has concluded. Some conservation organizations have also used alarmist characterizations of osprey conditions in advocacy and fundraising messages, including appeals for donations that link osprey concerns to industrial menhaden fishing.

Those organizations are entitled to advocate for their preferred policies and to raise funds for their work. But their advocacy and fundraising appeals should not be confused with or reported as scientific findings.

We urge journalists, policymakers and the public to look closely at the actual words of the Center for Conservation Biology, Dr. Watts and the U.S. Geological Survey, and to distinguish those scientific statements from claims and fundraising appeals by special interest organizations that go beyond what the research

has established.

To learn more about the people and jobs supported by Virginia's commercial menhaden fishery, visit the YouTube page of the United Food and Commercial Workers Union Local 400.



About Ocean Harvesters

Ocean Harvesters owns and operates a fleet of more than 30 fishing vessels in the Atlantic Ocean and Gulf of America. 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

Ocean Harvesters Urges ASMFC to Test 'Gauntlet' Claim Before Advancing New Chesapeake Bay Restrictions

Thursday, 29 January 2026 05:35 PM

Topic: Environmental, Social and Governance

REEDVILLE, VA / ACCESS Newswire / January 29, 2026 / In a letter to the Atlantic States Marine Fisheries Commission's (ASMFC) Atlantic Menhaden Management Board released this week, Ocean Harvesters explained that the ASMFC should examine the premise of a proposed addendum to the Atlantic Menhaden Fishery Management Plan. The addendum is based on the premise that a recent decline in Maryland menhaden pound net catches can be attributed to Ocean Harvesters' purse seine fishery in the lower Chesapeake Bay, creating a "gauntlet" that has prevented fish from reaching pound nets in the mid and upper Bay. Ocean Harvesters maintains that neither the Board nor its Plan Development Team (PDT) have thoroughly examined this premise, and that available data suggests that other factors may be the cause.

"Before the Commission advances restrictions premised on a single, untested narrative, the PDT should be tasked with a rigorous examination of what is actually happening in the Bay - including other plausible environmental and economic drivers," said Ben Landry, Vice President of Public Affairs for Ocean Fleet Services.

Statistical Review Questions Inverse Relationship Between Purse Seine Effort and Maryland Pound Net Harvest

Ocean Harvesters cites a preliminary statistical memorandum prepared by economic consulting firm Georgetown Economic Services indicating that, in the months during 2022-2024 when the number of reduction purse seine net sets was above

average, the Maryland pound net harvest size also tended to be above average. The opposite was also true, and the direct relationship was found to be statistically significant. If the "gauntlet" theory were true, the relationship between purse seine effort and pound net landings would be expected to be negative (inverse), not positive.

The letter also identifies a graph of weekly pound net and reduction catch rates presented in PDT discussions last week. If the gauntlet theory were correct, Maryland pound net catch rates should show a steep drop during the weeks in which the purse seine fleet was purportedly intercepting fish. Instead, weekly catch-rate curves show pound net catch rates remained stable through the season, further contradicting the "blockage" theory.

Data Show Maryland Pound Net Capacity Has Collapsed - Independent of the "Gauntlet" Narrative

The letter also highlights a fundamental trend that can directly explain reduced landings: Maryland's pound net fishery has sharply contracted in both effort and capacity over the past decade. Data from the Atlantic Coastal Cooperative Statistics Program (ACCSP) Data Warehouse shows that Maryland pound net trips fell from 1,835 (2013) to 284 (2024), with the maximum number of vessels operating in any month declining from 25 to 6, alongside comparable declines in the number of pound net fishermen. Pound net landings over these years did not proportionally increase in response to substantial reductions made to the purse seine Bay quota during the same period.

Call for Further Examination and Analysis by the PDT

Ocean Harvesters urged the PDT to conduct its own examination using the purse seine data from the April Work

Group Report and the ACCSP data on Maryland pound net landings. The letter calls on the Board to direct the PDT to examine a range of considerations, including environmental and economic conditions, that may be a more direct cause of declining pound net catches than the "gauntlet" theory.

This is especially important because the Board's push for an addendum originated with the narrow "gauntlet" narrative presented to the Board by Maryland ASMFC delegate Lynn Fegley. This claim has been accepted as fact without examination, and the PDT has not meaningfully evaluated alternative explanations for weak pound net landings in 2023 and 2024.

Similarly, the January 28, 2026 Menhaden PDT memo, "Progress Report on Draft Addendum II to Amendment 3," does not define the problem it is trying to solve, and instead quickly pivots to structuring "options" for three, four, or five time intervals of allowable Ocean Harvesters landings without a clear rationale rooted in tested causation.

Additionally, the memo's characterization of a 50% reduction in the Bay cap as providing "the most conservative buffer … for ecological and socioeconomic benefit" is an unsupported conclusion presented as analysis, rather than a finding tied to defined objectives, quantified tradeoffs, or tested assumptions.



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Osprey Paper Fails to Prove Menhaden Fishery Caused Chesapeake Bay Nesting Problems

Thursday, 11 June 2026 08:40 PM

Topic: Environmental, Social and Governance

Study catalogs legitimate osprey concerns but does not establish fishery causation

REEDVILLE, VA / ACCESS Newswire / June 11, 2026 / A new paper by Dr. Bryan Watts and coauthors reports poor osprey reproduction in high-salinity areas of the Chesapeake Bay and suggests reduced availability of Atlantic menhaden may be a primary driver. While osprey nesting success deserves serious attention, the paper does not prove that Virginia's commercial menhaden fishery caused the problem. The paper, "Widespread Reproductive Deficits in Chesapeake Bay Ospreys," was published in *Frontiers in Marine Science* this week.

"The study documents osprey concerns, but it does not prove that our fishery caused it," said Monty Deihl, CEO of Ocean Harvesters. "Many of the study areas discussed are not places where our vessels fish, and the paper appears to accuse commercial harvest without showing a clear connection between actual fishing activity and the nesting problems it describes. Before this paper is used to call for new restrictions, the public deserves a careful look at timing, geography, local environmental conditions, and what the data actually prove."

The paper's central inference rests on a chain of assumptions: poor osprey reproduction may indicate food stress; food stress may reflect reduced menhaden availability; reduced availability may indicate broader menhaden scarcity; and that scarcity may be related to commercial fishing. Each step requires evidence. The paper does not carry the argument all the way to fishery causation.

"This paper is likely to draw attention because it reads, at least up front, like an indictment of menhaden availability in the

Chesapeake Bay," said Peter Himchak, Senior Fisheries Scientist at Omega Protein. "But the paper also details numerous other possible mechanisms that may affect osprey productivity, and those caveats are critical considerations in evaluating this issue."

Several issues require closer scrutiny:

Timing: Ospreys return to the Chesapeake Bay and begin nesting before the menhaden reduction fishery begins (there is some pound-net fishing at this time). Egg laying occurs in early April, and the earliest and heaviest brood-reduction period occurs in May, before the reduction fleet is on the water. Data presented to the Atlantic Menhaden Plan Development Team show only a handful of Bay sets between the weeks of May 12 and June 9, 2024, with roughly ten percent of annual Bay landings occurring by June 30. If the key osprey reproductive failures occurred before meaningful menhaden harvest, the explanation points to the ospreys returning to the region in poor condition over winter, menhaden migration timing, environmental conditions, or other local factors - not fishery removals.

"Egg laying and the earliest chick losses occur before our vessels start to fish in the Bay," Deihl said. "A fishery that has taken little or nothing from the Bay during the key early nesting window cannot be blamed for reproductive failures."

Geography and fishery operations: Several study areas discussed in the paper are not areas where the reduction fleet fishes or fishes meaningfully. Poor osprey productivity in areas with little or no nearby fishing cannot be attributed to the fishery without evidence connecting actual fishing activity to those local outcomes. The geography problem is especially clear at the Maryland sites, including the Choptank and Patuxent, where the reduction fishery does not operate. Poor

performance at sites where the fleet cannot and does not fish undercuts any simple claim that reduction harvest explains the pattern.

Availability versus abundance: The paper does not provide a direct adult menhaden abundance index for the Chesapeake Bay. In fact, the paper acknowledges that there is no fisheries-independent monitoring of adult menhaden in the Chesapeake Bay that would allow a direct assessment of the relationship between osprey reproduction and local menhaden abundance. Menhaden availability to ospreys can be affected by salinity, temperature, dissolved oxygen, freshwater flow, plankton, fish movement, water clarity, and seasonal timing. A fish can be present in the larger system but unavailable to a predator at a particular time, place, depth, or water condition.

Food stress and dietary flexibility: Food stress is not menhaden-specific. Osprey reproductive problems may reflect changes in the broader prey field, including striped bass, spotted seatrout, bay anchovy, gizzard shad, catfish, or other forage species. Ospreys are opportunistic fish-eaters, and their diet varies by location, salinity, and prey availability. The paper's emphasis on menhaden as especially energy-rich prey also requires seasonal context: menhaden caught or available in May are not the larger, higher-oil fish present later in the year. That weakens any claim that early nestling success depends uniquely on May menhaden because of oil content.

Striped bass: The paper's discussion of other prey species should not treat striped bass availability as simply a menhaden issue. Striped bass have their own well-documented stock-status and recruitment challenges and are managed separately. Overfishing occurred for more than a decade, and the stock remains overfished and depleted. If striped bass availability

affects osprey productivity, it must be evaluated on its own terms.

Low-salinity comparisons: The paper compares high-salinity osprey sites with low-salinity sites in the James and Rappahannock systems, but those areas have different prey communities. Low-salinity areas with abundant catfish and gizzard shad may not be direct comparisons for high-salinity areas where prey conditions differ.

Environmental and local stressors: The Chesapeake Bay is not a controlled laboratory. Shoreline development, runoff, pollution, water quality changes, hypoxia, weather, predators, nest competition, disease, and broader changes in the fish community can all affect osprey productivity and prey availability. The paper discusses some alternative mechanisms, but discussion is not the same as ruling them out.

Mobjack Bay extrapolation: The paper builds on earlier Mobjack Bay work, but broader observations do not automatically prove that the same cause is operating across the Chesapeake Bay. Any Bay-wide conclusion requires evidence that accounts for local conditions, prey communities, and actual fishery activity.

Landings and effort: Landings are not abundance. The Potomac landing figure cited in the paper is a bait-fishery number from one tributary, not a Bay-wide adult abundance index and not the reduction fishery. Harvest data cannot be treated as a clean measure of how many fish were present unless evaluated alongside fishing effort, weather, regulations, market conditions, gear, participation, location, and catchability.

Stock status and management: The Watts paper should not be mistaken for a menhaden stock assessment. Atlantic

menhaden are managed by the Atlantic States Marine Fisheries Commission. The coastwide stock is not overfished, overfishing is not occurring, and the fishery is managed with ecological reference points that account for predator needs. The Chesapeake Bay fishery is also subject to a Bay cap. Available juvenile recruitment data also caution against portraying the paper as evidence of a Bay-wide menhaden collapse. Maryland's 2025 survey found high juvenile Atlantic menhaden abundance in the Bay for the third consecutive year, with the 2025 menhaden result the third highest since 1991, although juvenile indices do not measure adult menhaden availability in the areas used by ospreys.

The more accurate conclusion is this: Dr. Watts' paper documents poor osprey productivity in some high-salinity Chesapeake Bay areas and advances a menhaden-availability hypothesis. It does not prove that commercial menhaden fishing caused the problem.

"Ospreys matter, and so does scientific accuracy. Any fair assessment has to account for where the fleet actually fishes, and whether other prey and local environmental conditions are being considered," Deihl said. "The Bay needs good science, not an oversimplified and irresponsible blame campaign. The people who work in this fishery deserve a fair assessment of what the paper actually proves."



About Ocean Harvesters

Ocean Harvesters owns and operates a fleet of more than 30 fishing vessels in the Atlantic Ocean and Gulf of America. 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.

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Response to Dr. Bryan Watts: Repeating Misinformation Should Not Happen - Including in the Menhaden Debate

Monday, 20 July 2026 07:00 PM

Topic: Environmental, Social and Governance

REEDVILLE, VA / ACCESS Newswire / July 20, 2026 / We thank *The Virginian-Pilot* and *Daily Press* for respectfully providing the opportunity for both sides of an Atlantic menhaden debate to appear in their pages. In a June 30 guest column, Ocean Harvesters CEO Monty Deihl questioned whether an academic paper recently published with Dr. Bryan Watts as the lead author is appropriate to use in arguments against menhaden fishing in the Chesapeake Bay. On July 6, Dr.Watts responded.

We wholeheartedly agree, as Dr. Watts said in his response, that repeating misinformation should not happen. But repeating misinformation is precisely what Dr. Watts and others have done. In the interest of producing the fairest and most open response, we are including a bibliography of all scientific, regulatory, and other sources referenced.

1. Dr. Watts has now publicly confirmed the central point: his paper does not link poor osprey reproduction to menhaden harvest.

Dr. Watts writes: "Deihl is incorrect in suggesting that our paper attempts to link poor osprey reproduction to menhaden harvest. We do not."

But Mr. Deihl did not say the paper itself makes that link. What he said was that the paper "will almost certainly be used to argue for harsh restrictions on this well-regulated fishery."

The Chesapeake Bay Foundation has already issued a press release explicitly using Dr. Watts' study under the headline "New Study Links Starving Chesapeake Bay Osprey to Menhaden Woes." In that release, CBF stated that the report "adds urgency for pausing menhaden reduction fishery in the Bay" and quoted Forage Campaign Manager Will Poston as saying: "Ultimately, decision makers must pause reduction fishing inside the Bay until menhaden research is completed."

That is exactly what Mr. Deihl warned would happen. The paper is being used to argue for harsh restrictions on the well-regulated Chesapeake Bay menhaden fishery. And given Dr. Watts' own public statement that his paper does not link poor osprey reproduction to menhaden harvest, CBF and Mr. Poston are wrong to use his paper as the basis for pausing reduction fishing in the Bay.

An academic paper may raise important ecological questions. It may identify food stress in osprey nests and support further research into prey availability, environmental conditions, and other factors. But unless it demonstrates a causal connection to menhaden harvest, it cannot be presented to the public or regulators as though that causal connection has been established.

When a paper that expressly does not link osprey reproduction to harvest is nevertheless used to demand fishery-specific restrictions, the public is no longer being given science. It is being given advocacy dressed in scientific language.

2. The "intercept fishery" or "gauntlet" theory is not supported by the available evidence.

Dr. Watts repeats the claim that Ocean Harvesters is operating an "intercept fishery," catching menhaden at the mouth of the Bay and preventing fish from reaching the rest of the Chesapeake. That theory is contradicted by the analyses now before managers.

The theory ignores basic menhaden life history. Menhaden are not a static Bay-resident population. NOAA Fisheries explains that mature menhaden spawn in coastal waters, and juveniles remain in estuaries such as the Chesapeake Bay for about a year before joining adult schools. Many menhaden are migratory, and others remain resident in their area. NOAA also notes that menhaden are common in all Chesapeake Bay salinities and swim in large surface schools during spring, summer, and fall. That life history is hard to square with a simple "intercept" story that assumes one lower-Bay fishery is blocking a single, predictable flow of fish to the rest of the Bay. Equally important, Virginia law does not allow the menhaden reduction fishery to begin before the first Monday in May, and actual fishing activity often starts later.

A January 2026 analysis conducted by Georgetown Economic Services of Washington, D.C. and submitted to the Atlantic States Marine Fisheries Commission directly addressed the so-called "gauntlet" theory. It explained that if the purse seine fleet were preventing menhaden from traveling into the upper Bay, pound-net catch rates should show a corresponding steep decline during the relevant weeks. Instead, the submitted analysis found that pound-net catch rates remained on a relatively steady increase through the season. The same submission reported that, in months when Virginia reduction purse-seine net sets exceeded their 10-year average, Maryland pound-net harvest also tended to be above its 10-year average;

the converse was also true. The submission concluded that the relationship did not support the "gauntlet" claim.

A second analysis by estuarine scientist Dr. Arnoldo Valle-Levinson focused on Chesapeake Bay physics and environmental conditions. Rather than assuming an "intercept" mechanism, it examined how summer Bay conditions can compress livable habitat and affect where fish concentrate and how catchable they are. The same public summary reports that Maryland catches and trips both declined together, while catch per unit effort did not show the steady collapse one would expect if the upper Bay were being systematically starved of fish.

Dr. Watts compares the issue to water withdrawals on the Rio Grande affecting downstream farmers, but fish are not water. Water flows downstream in one direction; menhaden are migratory schooling fish whose movement and availability depend on season, age, salinity, temperature, dissolved oxygen, plankton, predator pressure, and other Bay conditions. The analogy assumes a simple one-way flow that does not exist in a dynamic fishery. That is why the "intercept" or "gauntlet" theory must be tested against actual fishery data, timing, catch rates, effort, and Bay conditions.

3. Food stress in osprey nests is not proof that one fishery caused reduced prey availability.

We do not dismiss osprey observations. We do not dismiss food stress. We do not dismiss the ecological importance of menhaden. Menhaden are an important forage fish, and ospreys are important indicators of aquatic ecosystem conditions.

But an indicator is not a cause.

Earlier Chesapeake Bay osprey diet studies show why food stress cannot be evaluated through menhaden alone. Glass & Watts reported that Atlantic menhaden and seatrouts/weakfish were dominant prey in lower-estuarine nests - meaning nests in the saltier lower Bay, closer to where the Chesapeake meets the Atlantic Ocean and freshwater mixes with seawater - while gizzard shad and catfish dominated upper-estuarine diets (Glass & Watts 2009). Their Table 1 shows that spotted seatrout were more frequent than menhaden by number in lower-estuarine nests, 28.8% versus 24.2% (Glass & Watts 2009, Table 1). Lazarus et al. later reported that Poplar Island ospreys fed predominantly on striped bass, 47.8% of diet, and Atlantic menhaden, 44.3% of diet, while ospreys on the Susquehanna, Anacostia/middle Potomac, and James Rivers fed predominantly on catfish and gizzard shad (Lazarus et al. 2016).

That broader prey-base context matters because one of those prey species, striped bass, remains overfished. ASMFC says Atlantic striped bass was declared overfished in 2019 and remains overfished under the 2024 stock assessment update (ASMFC 2024 Atlantic Striped Bass Stock Assessment Update; ASMFC Atlantic Striped Bass Species Page). ASMFC also reports that in 2024 the recreational sector accounted for about 85% of total striped bass removals by number of fish, and that from 2022-2023 recreational harvest and recreational release mortality together accounted for roughly 89% of total removals (ASMFC Atlantic Striped Bass Species Page; ASMFC 2024 Atlantic Striped Bass Stock Assessment Update). Watts' own research shows that deliveries of other prey species declined at a steeper rate than menhaden between 2006-07 and 2021

(Watts et al. 2024, Table 2). If osprey food delivery is now insufficient, the more relevant question is whether availability of the full prey base - including striped bass, seatrout/weakfish, gizzard shad, catfish, and menhaden - has changed, and why.

In his response, Watts states that "[w]hile it is true that ospreys have a varied diet, all fish are not the same," claiming that menhaden are more nutritious because they are "rich in oils." Dr. Watts is correct that menhaden are generally an oily forage fish, but "oily" is not a fixed condition throughout the year. A NOAA/NMFS study of Atlantic menhaden from the Chesapeake Bay area found strong seasonal variation in oil content, with early-season fish averaging roughly 8-10% lipid content, compared with about 20% at the October peak (Dubrow et al. 1976). Resident forage species also matter: Maryland DNR describes gizzard shad as present across Maryland's Chesapeake river systems and spawning during the same spring period when osprey nesting begins, which reinforces the need to evaluate the full prey base rather than assume menhaden alone explain spring food stress. Because osprey breeding begins in spring, before menhaden reach peak oil content, the question is not whether menhaden are nutritious in general. The question is whether spring menhaden are uniquely more valuable than other prey actually available to nesting ospreys at that time, including resident forage species such as gizzard shad.

Timing is important. The Watts et al. paper states that Chesapeake Bay osprey pairs return to breeding territories from late February through late March and lay clutches in early April. Virginia law identifies the relevant menhaden purse-net season in certain waters as running from the first Monday in May through the third Friday in November. If nest initiation, egg-

laying, or non-laying behavior is already being set before the reduction fishery is active, those early reproductive outcomes cannot be attributed to harvest later in the season.

USGS describes the Chesapeake osprey question as one involving menhaden and other fish prey, while stating that ongoing work is intended to help determine whether prey delivery or other environmental factors are affecting reproductive success.

The 2026 Watts et al. paper itself lists multiple factors that may influence menhaden abundance in the Chesapeake Bay, including commercial harvest, predation, competition, recruitment, plankton availability, larval transport, temperature, salinity, water quality, and other environmental conditions.

The 1980s comparison also needs context. Dr. Watts points to a period when menhaden made up a higher percentage of osprey deliveries, but Chesapeake striped bass were then at historic lows. The University of Maryland Center for Environmental Science reports that by the mid-1980s striped bass had fallen to the lowest numbers in decades. A peer-reviewed study of Chesapeake Bay striped bass management likewise reported that commercial landings reached a record high in 1973 and then declined by almost 90 percent during the following decade, with depressed juvenile production during the 1970s. A period when a major menhaden predator was severely depleted is not a neutral baseline for judging today's osprey diet composition. Furthermore, there were only 3,500 osprey breeding pairs in the mid-1990s (fewer in the 1980s). There are10,000 breeding pairs today (Watts et al. 2026).

The timeline also undercuts the blame-the-fishery narrative.

Chesapeake ospreys rebounded during decades when Bay menhaden harvests were much higher than they are today. The Bay reduction fishery is now capped at 51,000 metric tons - roughly one-third of levels seen during portions of the osprey rebound from the 1970s through the early 2000s. Ospreys recovered while the Bay menhaden fishery was far larger.

It is also important to understand why this debate exists in the first place. While Dr. Watts now says his 2026 paper does not link poor osprey reproduction to menhaden harvest, prior work by Dr. Watts and colleagues went much further. In their 2023 Mobjack Bay osprey food-supplementation study, Academia & Watts acknowledged that "local levels of menhaden abundance were not available," but nevertheless concluded that "the menhaden population within Mobjack Bay is not currently adequate to sustain the osprey breeding population" and recommended that "industrial purse seine fishing occur outside Chesapeake Bay" (Academia & Watts 2023). A later Watts et al. paper likewise acknowledged that "no menhaden stock index has been developed that is specific to the Mobjack Bay study area," yet argued that osprey viability required menhaden to be restored to 1980s levels (Watts et al. 2024). That is the leap at the heart of the dispute: food limitation may be real, and menhaden may be important prey, but those facts do not prove that the menhaden fishery caused the condition observed in Mobjack Bay.

A *Frontiers in Marine Science* commentary on the Mobjack Bay osprey paper raised related scientific concerns. The commentary noted that Watts et al. relied on coastwide juvenile menhaden abundance indices as a proxy for menhaden availability to ospreys in Mobjack Bay. Those indices are model-based estimates drawn from surveys spanning a large portion

of the Atlantic coast, from Rhode Island to South Carolina. The concern is straightforward: a coastwide juvenile index is not the same thing as measuring the local abundance, size, timing, and availability of menhaden to nesting ospreys in one Chesapeake Bay sub-estuary. As the commentary explained, the analysis assumed that those broad indices represented the menhaden actually available to ospreys in Mobjack Bay - an assumption that had not been directly tested (Latour, Gartland, and Ralph, 2024). That distinction matters because a study may show that ospreys benefit from more menhaden without proving that the menhaden fishery caused the local prey conditions observed at those nests.

That is why Latour et al. concluded that Watts et al.'s analyses "do not establish a clear relationship with menhaden abundance and availability" and encouraged concurrent osprey nest and menhaden sampling to directly assess the ecological linkage (Latour et al. 2024). That is also why Ocean Harvesters has supported new Bay-specific menhaden research rather than policy decisions based on inference, proxy indices, or advocacy claims that go beyond the available data.

The relevant question is not simply whether some osprey nests show food stress. The relevant question is what caused the food stress, whether it is connected to adult menhaden abundance, whether adult menhaden abundance is connected to harvest, and whether any proposed fishery restriction would actually address the cause.

Those links have not been demonstrated.

4. Coastwide stock science is not a distraction; it is the official management foundation.

Dr. Watts argues that Ocean Harvesters has used the Atlantic States Marine Fisheries Commission's coastwide stock assessment to suggest, "without evidence," that Chesapeake Bay menhaden conditions remain healthy. That framing is misleading.

No one should pretend that coastwide stock status answers every Bay-specific question. Bay-specific abundance, movement, predator availability, and localized ecological conditions are legitimate research questions. But it is equally wrong to dismiss the official coastwide assessment as irrelevant. Atlantic menhaden are a migratory species managed through a coastwide interstate process because the stock moves across state boundaries and in and out of estuarine systems.

The ASMFC's 2025 stock assessment update states that, using the current ecological reference point benchmarks, "the Atlantic menhaden population is not overfished and overfishing is not occurring."

Coastwide science does not prove every Bay-specific claim, but it does provide the official management baseline. Meanwhile, Bay-specific claims require Bay-specific evidence.

The absence of a validated Bay-specific adult abundance index does not license advocates to substitute osprey diet observations, bait landings, or anecdotes for proof of fishery-caused depletion. It means the Bay-specific science needs to be done.

And that is exactly the work the industry has supported. Through the Science Center for Marine Fisheries, industry

members have supported a Chesapeake Bay menhaden research roadmap to identify the data and methods needed to develop a scientifically defensible and ecologically meaningful Bay harvest cap. That project brings together researchers from the Chesapeake Biological Laboratory, the Virginia Institute of Marine Science, and NOAA to evaluate the research needed to answer Bay-specific management questions.

More recently, with support from Ocean Harvesters and Omega Protein, Virginia approved $2 million for menhaden research in the Chesapeake Bay. The funding will go to William & Mary's Virginia Institute of Marine Science for research over the next two years, in collaboration with the Virginia Marine Resources Commission. That is the proper path forward: identify the data gaps, fund the science, and let the results guide management - rather than using a paper that does not link osprey reproduction to harvest as a justification for fishery-specific restrictions.

5. Certification and independent review also matter.

The U.S. Atlantic menhaden purse-seine fishery has been certified by the Marine Stewardship Council since 2019.

MSC certification is an independent third-party assessment process that represents a global gold standard for sustainability. Reasonable people can debate management choices, but the public should know that this fishery has passed rigorous sustainability review beyond being managed by the ASMFC.

6. Bait landings are not adult menhaden abundance indices.

Dr. Watts points to bait fishermen and homeowners watching

osprey nests as evidence that menhaden abundance has changed. These observations may be worth investigating, but they are not substitutes for a validated adult abundance index.

Bait landings can change because fish are less abundant. They can also change because effort changes, markets change, labor availability changes, gear use changes, weather changes, fish distribution changes, or environmental conditions affect catchability. That is why the "gauntlet" analyses matter: they look at catch rates, effort, timing, and environmental conditions rather than assuming that lower landings equal fishery-caused depletion.

The right path is Bay-specific science, not Bay-specific blame.

Ocean Harvesters and the broader menhaden industry support better Chesapeake Bay science. We support research that can answer the questions regulators actually need answered: adult menhaden abundance in the Bay, movement between coastal and Bay waters, local availability to predators, fishery interactions, environmental drivers, and the real effects of any proposed management measure.

The wrong approach is to begin with blame and then look for facts to support it.

Dr. Watts' column asks the public to view Ocean Harvesters as the source of misinformation. But the public record shows a different story.

- The "gauntlet" theory he cites is contradicted by analyses submitted to ASMFC.
- USGS frames the osprey question as a multi-factor

ecological investigation.

- ASMFC says menhaden are not overfished and overfishing is not occurring.
- ASMFC manages menhaden with ecological reference points specifically designed to account for predator needs.
- Earlier Chesapeake Bay osprey diet studies, including Watts' own (Glass & Watts 2009), found that ospreys relied on a broader prey base than menhaden alone, including seatrouts/weakfish, striped bass, gizzard shad, and catfish, during periods when Bay osprey populations were growing.
- Chesapeake Bay ospreys rebounded when menhaden harvests were much higher than they are today. The Bay reduction fishery is now capped at roughly one-third of levels seen during portions of that rebound period.

That is the scientific and regulatory record.

We invite readers to review it for themselves.

Source Links

- Access Newswire - "Statement by Monty Deihl, Ocean Harvesters CEO, on Governor Spanberger's Amendments Restoring Funding for Virginia Chesapeake Bay Menhaden Study": https://www.accessnewswire.com/newsroom/en/industrial-and-manufacturing/statement-by-monty-deihl-ocean-harvesters-ceo-on-governor-spanbergers-1183322
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- Atlantic States Marine Fisheries Commission - Atlantic Menhaden Stock-Status Page: https://asmfc.org/stock-assessment/atlantic-menhaden/

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- Maryland Department of Natural Resources - American Gizzard Shad Fish Facts: https://dnr.maryland.gov/fisheries/Pages/Fish-Facts.aspx?fishname=American+Gizzard+Shad

- Menhaden Fisheries Coalition - SCEMFIS-Funded Chesapeake Bay Menhaden Research Roadmap Announcement: https://www.menhaden.org/scemfis-funds-chesapeake-bay-menhaden-research-roadmap-to-inform-a-scientifically-defensible-bay-cap

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SOURCE: Ocean Harvesters

Back to the Newsroom

Steve Atkinson Overlooks the Science, and the Workers, Behind Virginia's Menhaden Fishery

Thursday, 08 October 2026 04:15 PM

Topic: Company Update

WASHINGTON, D.C. / ACCESS Newswire / October 8, 2026 / Steve Atkinson, chairman of the Virginia Saltwater Sportfishing Association, argues in his September 15 *Virginian-Pilot* column ("Reduced menhaden fishing will help protect the bay") for additional menhaden fishing restrictions. But his interpretation of the stock science is contradicted by the Atlantic States Marine Fisheries Commission (ASMFC), and his proposal gives inadequate attention to the people whose livelihoods depend on the fishery.

Atkinson says scientists recently "admitted" the coastwide menhaden stock had been "overstated by a whopping 37%." In its FAQ, under "Has the menhaden population re

says total menhaden biomass has actually increased since 2021. In fact, adult Atlantic menhaden biomass is nearly twice the size it was in the early 1970s, while landings are now precautionarily regulated at less than half their historical levels.

Atkinson is wrong to claim that the coastwide menhaden assessment has "nothing to do with the Chesapeake Bay."

Atlantic menhaden are migratory, and the ASMFC has been clear and consistent: its 2010 assessment, 2017 stock assessment update, and 2019 benchmark stock assessment all concluded that Atlantic menhaden are a single stock or population. They move through coastal and estuarine waters, including the Chesapeake Bay, and are assessed and managed as a coastwide stock. The absence of a Bay-specific abundance estimate does not transform that migratory stock into an isolated Chesapeake population. In short, there is no such species as a Chesapeake Bay menhaden.

Maryland's October 2025 young-of-year survey reported that Atlantic menhaden and bay anchovies were widespread in the Bay for the third consecutive year. Those observations concern juvenile fish, not a Bay-wide estimate of adult menhaden abundance.

Atkinson also says "leaving more menhaden in the water would help the recovery of striped bass." Yet the best available Bay-wide condition-factor analysis does not show starving striped bass. An April 2025 ASMFC Work Group report evaluated Fulton's Condition Factor-a length-to-weight measure of body condition-for 298,232 Chesapeake Bay striped bass across eight datasets from Maryland DNR, the Potomac River Fisheries Commission and the Virginia Marine Resources Commission. Annual values remained above the 0.8 stress threshold. The Work Group concluded that the sampled fish "are not starving and would be considered healthy." Body condition does not independently measure prey availability at every location or season.

The ASMFC's November 2025 Atlantic Menhaden FAQ is equally clear: even if all menhaden fishing suddenly stopped, that alone would not rebuild striped bass to their biomass target. The Commission identifies sustainable recreational and commercial striped bass fishing as the important management factor.

Recreational fishing accounted for the overwhelming majority of striped bass removals in the 2022-2023 assessment period: 49% from recreational harvest and another 40%

The ASMFC has also expressly weighed economic consequences when deciding whether to restrict striped bass fishing. In October 2025, its Striped Bass Management Board declined a proposed 12% reduction in fishery removals and retained existing recreational measures and commercial quotas. It cited the severe economic consequences of the reduction, low 2024 fishing mortality and preliminary evidence of lower 2025 catches. The economic effects on menhaden workers warrant equally serious consideration.

The Reedville fishery supports a blue-collar, unionized workforce in rural Northumberland County, including African American workers and multigenerational fishing families. Vessel crews, plant employees, mechanics, electricians and other skilled workers depend on the fishery.

The Southern Christian Leadership Conference raised those concerns, urging policymakers to consider African American workers, union families and rural communities that could be disproportionately affected by additional restrictions. SCLC called for policy guided by "balance, sound science, environmental stewardship, economic justice, and a recognition of the workers and families whose lives may be directly affected."

The Chesapeake Bay is a shared resource. Recreational advocates can argue for their preferred policies, but commercial fishermen and their families also deserve serious consideration of what restrictions would mean for jobs, wages, benefits and rural communities.

Recreational fishing matters and supports businesses, but there is a difference. Recreation is discretionary. For commercial fishermen, the Bay and surrounding waters are where they earn their living and support their families.

As one former union leader put it, ***"It's their playground, but it's our workplace."***

The Chesapeake Bay has long supported both recreational and commercial users. Reedville families should not have their livelihoods treated as expendable so another constituency can claim a greater share of the resource. One group's desire for greater recreational access should not outweigh blue-collar working families. Our goal has always been to "Share the Bay"-it shouldn't only be for one user group.

To learn more about the people and jobs supported by Virginia's commercial menhaden fishery, visit the **YouTube page of United Food and Commercial Workers Union Local 400.**



About the American Small Pelagics Network

The American Small Pelagics Network represents fishermen, processors, suppliers, and coastal communities connected to fisheries such as menhaden, mackerel, herring, squid, and butterfish. ASPN supports sustainable fisheries management that supports critical fish species, while maintaining economic opportunities for fishermen and fishing communities.

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SOURCE: American Small Pelagics Network

What The Washington Post and Mark Robichaux Got Wrong About Menhaden

Thursday, 20 August 2026 06:40 PM

Topic: Environmental, Social and Governance

WASHINGTON, D.C. / ACCESS Newswire / August 20, 2026 / The *Washington Post* today published an opinion column by Mark Robichaux which misleadingly portrayed Atlantic and Gulf menhaden fisheries as ecologically destructive, weakly regulated and headed toward crisis. Readers unfamiliar with these fisheries may likely come away believing that menhaden stocks are collapsing, predators are being starved by commercial fishing, and regulators have largely failed to act. Which was Mr. Robichaux's point.

That is not what the record shows. But just as troubling is that Mr. Robichaux and *Washington Post* opinion editors were provided with substantial information prior tc

publication addressing the menhaden stock, menhaden management, and the latest menhaden science. Nevertheless, the final column still contains factual errors, misleading source use and conclusions that go beyond what the cited science establishes.

This is not the first time Mr. Robichaux has used the *Washington Post's* opinion pages to advance a crisis narrative about menhaden. In a November 20, 2025 column, he wrote that menhaden were "disappearing," warned that striped bass could be "next to vanish," and said the ecosystem was being pushed toward collapse. Today's column repeats much of that same argument and adds new claims about osprey, Maine bait supply, Chesapeake Bay harvest and Gulf management. Both columns repeatedly blur the line between advocacy and what the underlying science actually establishes. Despite the *Post* prominently noting Mr. Robichaux's tenure at the *Wall Street Journal* from twenty-five years ago, this most recent piece has the tone of a special interest group press release rather than the work of a journalist.

1. Atlantic menhaden are not a stock on the verge of disappearing.

According to the Atlantic States Marine Fisheries Commission (ASMFC) Atlantic menhaden are not overfished and overfishing is not occurring, based on the Commission's 2025 stock assessment update. Even with this finding, managers still reduced the 2026 coastwide allowable catch by 20 percent to ensure a 0 percent chance of overfishing. While some argue that management should be even more precautionary, that is very different from suggesting the coastwide stock is in crisis.

2. The column misstates what the ecosystem target means.

Mr. Robichaux emphasizes that a harvest cut of roughly 50 percent or more would be needed to move fishing mortality toward the ecosystem-based target. That is true, and it sounds terrible, but only because he leaves out half the story. As is explained on the ASMFC FAQs, fisheries managers receive both an ecological target and an ecological threshold from their scientists. The target is a more conservative management objective; the threshold is the ecological overfishing line. Fishing between the two does not constitute overfishing, and the adopted 2026 catch level was projected to have a zero percent probability of exceeding the ecological overfishing threshold. The lower target may be a policy preference for some observers, but it is not accurate to describe it as the minimum level predators simply "need." Had the ASMFC done nothing at its October 2025 meeting, the stock would still continue to be healthy, and overfishing would not be occurring. Mr. Robichaux either didn't understand this or ignored this to drive home his flawed personal opinion.

3. Osprey science doesn't show commercial harvest caused the problem.

The peer-reviewed osprey study documents serious reproductive deficits and food stress in parts of the Chesapeake Bay and suggests reduced menhaden availability as a primary driver of this stress in high-salinity areas. But the study also says that the data needed to determine the effect of commercial harvest on adult menhaden abundance in the Bay do not exist. The ASMFC likewise says its coastwide assessment cannot determine the status of the menhaden stock at the Bay level. Mr. Robichaux acknowledges that the study does not establish harvest causation and then argues that the pattern is "hard to read any other way." That is his inference, not the study's conclusion.

That research gap is precisely why Bay-specific work is so important and why the industry has supported new research initiatives. Virginia has now funded a dedicated Bay menhaden study, and there is ongoing work involving the Virginia Institute of Marine Science, NOAA and the University of Maryland Center for Environmental Science aimed at identifying the data needed for a science-based Bay harvest cap. Treating the unanswered local abundance question as already settled undermines the purpose of the research now underway.

4. The Maine bait story points in the opposite direction.

Mr. Robichaux cites tightening bait supplies for Maine lobstermen as part of a broader menhaden scarcity narrative. Yet the article he links is primarily about reduced Atlantic herring quotas. It says menhaden helped replace lost herring supply, describes a strong return of pogies (another term for menhaden) and quotes a bait dealer saying there was "no lack of bait" and "there's too many pogies!" A source about herring scarcity in which menhaden helped fill the gap should not be used to leave readers with the impression that Maine is experiencing a menhaden shortage. In fact, Maine has fully harvested their menhaden quota for 2026, which would be impossible if you believe Mr. Robichaux's claims of a scarcity.

5. "Rudderless" ignores the management and regulatory record.

Atlantic menhaden are managed through a coastwide quota, state allocations, ecological reference points, accountability provisions and a separate Chesapeake Bay cap. The ASMFC recently cut the coastwide quota and is currently considering further Bay measures. Even the much-cited 2019 Chesapeake compliance dispute was more complicated than presented: the ASMFC had lowered the Bay cap to 51,000 metric tons while Virginia law still contained the older, higher statutory limit. The ASMFC found Virginia out of compliance with the interstate plan, but the episode reflected a conflict between state law and interstate requirements, not the absence of rules.

Louisiana has likewise adopted buffers, spill reporting rules, retrieval requirements, tracking measures and penalties. The industry has gone above and beyond the regulations on paper. KPLC reported the move toward stronger purse seine nets after the 2023 spills, while The Advocate later reported stronger nets and standardized improved excluder devices designed to keep larger fish, including redfish, out of the pumping system.

A Louisiana state-funded study adds important context to the bycatch issue: for 2015-2024 removals by weight, the menhaden fishery's red drum bycatch accounted for 9.9 percent of total fishery removals, compared with 90.1 percent from recreational harvest and dead discards. For spotted seatrout, the menhaden share was 2.7 percent. Those numbers show that the column presents an incomplete picture when it treats spills and commercial bycatch as if they define the entire fishery.

6. Commercial use is not evidence of biological unsustainability.

NOAA's Atlantic menhaden page explains that the menhaden reduction fishery produces fishmeal, fish oil and solubles used in aquaculture, animal feeds and human nutritional supplements. Those are important products, and the fishery supports vessels, processing and waterfront jobs. The ASMFC has also evaluated the economic and employment effects of quota reductions; management decisions affect not only vessels and plants, but also shoreside suppliers, transportation, maintenance and communities built around commercial fishing. Whether a fish becomes meal or oil does not determine whether the harvest is sustainable; stock assessments and management reference points do.

The *Post* had the opportunity to get these distinctions right.

Before publication, Mr. Robichaux was provided detailed information explaining that Atlantic menhaden are not overfished; that the ecological target and threshold mean different things; that the osprey research does not show commercial harvest causation; that Bay-specific science remains incomplete; and that substantial management, compliance and mitigation measures are already in place. *Washington Post* opinion editors were separately provided those concerns before the column appeared.

The final piece nevertheless leaves readers with several of the same misleading impressions. These disputed points were not obscure details discovered only after publication but were among the central factual distinctions raised in advance.

Menhaden should be managed carefully. Bay-specific research should continue. Gulf operators should keep reducing bycatch and preventing spills. But precautionary management does not require overstating what the evidence shows. This issue is too important to treat advocacy and science as one and the same.



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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.

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SOURCE: Menhaden Fisheries Coalition

Advocacy Disguised as Journalism: Sierra's One-Sided Attack on Virginia's Menhaden Fishery

Thursday, 12 March 2026 05:00 PM

Topic: Environmental, Social and Governance

WASHINGTON, DC / ACCESS Newswire / March 12, 2026 / The *Sierra* magazine March 8 article "Will Osprey Chick Deaths Inspire Conservation Action on Menhaden?" by Amy Brecount

White is not a work of balanced journalism, but an advocacy piece masquerading as reporting.

At the most basic level, the story fails the simplest test of fairness. It quotes five individuals aligned with the narrative that menhaden fishing is responsible for osprey reproductive problems, yet it does not quote a single scientist or expert with a dissenting view, nor a single fisherman, union fishermen, or member of the menhaden industry whose livelihood is at stake. That is not balance. It is message amplification.

A more truthful story would have told readers that there is no scientific consensus that menhaden fishing is even related to osprey nesting failure in the lower Chesapeake. External reporting and official USGS material show that scientists have identified multiple environmental stressors affecting osprey reproduction and that even researchers involved in the work have cautioned against claiming conclusive proof from the existing evidence.

The article's central premise is that industrial menhaden fishing is starving ospreys. But that claim is presented as if it were settled fact when it is anything but. Publicly available rebuttal material quoting VIMS scientist Dr. Robert Latour states that localized depletion has not been demonstrated and that claims to that effect are speculative based on existing data. A peer-reviewed *Frontiers* commentary by Dr. Latour and coauthors also challenged the statistical basis for drawing such strong conclusions from the osprey-menhaden linkage.

The article also leans heavily on the familiar activist refrain that the fishery is overharvesting a foundational forage species. But the Atlantic menhaden fishery has repeatedly been found by the Atlantic States Marine Fisheries Commission to be neither overfished nor experiencing overfishing, and the fishery is

managed with ecological reference points specifically designed to account for predator needs. It is also certified as sustainable by the Marine Stewardship Council, the global gold standard for fisheries sustainability.

The piece further suggests that current science is so deficient that sweeping new restrictions or even an end to the fishery are justified until more is known. That framing is misleading. The Atlantic menhaden fishery is perhaps the most studied on the East Coast. There is active scientific work underway to develop a more Bay-specific management foundation, including ongoing ASMFC and related scientific work on ecological reference points and the Chesapeake Bay cap.

The article recycles the idea that Virginia's fishery is uniquely out of step with the rest of the coast. But the fishery is already constrained by an unscientific and precautionary Chesapeake Bay cap and coastwide quota management, and recent ASMFC action cut the 2026 coastwide TAC by 20 percent while also initiating a process to review the Bay cap.

The story also indulges the familiar insinuation that Omega Protein is somehow a foreign operator exploiting Bay resources. That too is misleading. Even reporting sympathetic to the fishery's critics acknowledges that Omega Protein is based in Reedville, Virginia, and that harvesting is performed by Ocean Harvesters, an American company based in Reedville.

Just as important, the article ignores the people who would bear the cost of the policies it encourages. Rural Virginia cannot easily replace these jobs. A Virginia Marine Resources Commission economic assessment found that the direct effects of the menhaden reduction operation are heavily concentrated in Northumberland County: 217 of 299 employees resided there, including 55 in Reedville. The report also described the

operation as providing health care, paid holidays, retirement programs, paid life insurance, vacation days, and union representation, and it noted that most direct impacts occur in Northumberland County.

We urge readers to visit the UFCW Local 400 website and watch this video featuring the union fishermen describing their jobs in their own words.

That point matters. This is not an abstract policy debate to the people who live in the Northern Neck. The same VMRC/VIMS assessment found that employees interviewed said they would have difficulty finding other work at or near the same pay level and with similar benefits if the fishery were closed.

A properly reported story following legitimate journalistic principles would have told readers all of this. It would have noted that there are credible scientific disputes over causation. It would have acknowledged that the fishery is already heavily regulated and managed under ecosystem-based reference points. It would have included the voices of watermen, union workers, and local communities whose futures are tied to Reedville and Northumberland County. Instead, *Sierra* delivered a one-sided narrative built to advance a policy outcome.

Sierra is the national magazine of the Sierra Club. It describes itself as "an independent journalistic enterprise."

This article is advocacy. It is not journalism.



About the Menhaden Fisheries Coalition

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SOURCE: Menhaden Fisheries Coalition

The Fisherman's Jim Hutchinson Misrepresents Key Evidence and Attacks Respected New Jersey Scientist's Objectivity

Tuesday, 29 September 2026 05:25 PM

Topic: Company Update

WASHINGTON, D.C. / ACCESS Newswire / September 29, 2026

/ In *The Fisherman's* September 24, 2026 NJ/DE Bay Region Fishing Forecast, New Jersey/Delaware Bay Edition Editor Jim Hutchinson, Jr. pressed for deeper Chesapeake Bay menhaden restrictions while repeating a broader narrative about the fishery that leaves out or conflicts with key parts of the scientific and management record. His report encourages viewers to see the reduction fishery as the cause of Maryland's bait fishery problems and as a central answer to striped bass concerns, while giving little weight to the current menhaden stock assessment, the Atlantic States Marine Fisheries Commission's (ASMFC) ecological reference points, the history of the Bay Cap, the Commission's own scientific uncertainty, or analyses that challenge the so-called "gauntlet" theory.



He questioned fisheries scientist Peter Himchak's objectivity without noting that his own publication had honored Himchak in 1987 with *The Fisherman* magazine's Sportsman of the Year award for his work on striped bass restoration and conservation.

The video was published on YouTube and promoted on Facebook, in addition to appearing on TheFisherman.com as part of the magazine's September 24 report.

We spoke directly with Himchak for his response. He rejected the suggestion that leaving New Jersey's Division of Fish and Wildlife for industry work changed his scientific standards.

Himchak's response

"I am first and foremost a scientist," Himchak said. He described examining data sets, graphs, trends, statistics, correlations, confidence and error bars-the same approach he used in state service. "Science must be objective."

Himchak also questioned the selective use of affiliation as a credibility test, noting that individuals affiliated with recreational fishing and environmental organizations serve on ASMFC Management Boards and its committees. His objection is that an employer's identity cannot substitute for examining the evidence.

Asked about the 50 percent hypothetical, Himchak said his position would change if the data justified it. If an assessment showed fishing mortality well above the overfishing threshold, he said, he would give Omega Protein and Ocean Harvesters that news and explain that restrictive measures were needed.

A record of delivering unpopular management news

Himchak noted that he has never feared delivering unpopular recommendations. During the striped bass rebuilding effort, he recalled explaining progressively higher minimum size requirements at New Jersey public information meetings in the 1980s and receiving criticism from fishermen for doing so.

Those measures were part of the broader effort to protect and rebuild the stock. ASMFC identified protection of the 1992 year class as central to the restoration program. As that rebuilding effort progressed, *The Fisherman* recognized Himchak in 1987 with its Sportsman of the Year award for his "outstanding contributions in helping to restore the striped bass fishery in New Jersey, the conservation of game fish, and the protection of our natural resources." ASMFC records that the restoration effort ultimately succeeded, declaring Atlantic coastal striped bass stocks fully recovered in 1995.

He said he earned that recognition while remaining objective and facing criticism from fishermen. "My mindset as a scientist has not changed from those years to current times," he said. "It remains objective, as it should."

What the Bay Cap record establishes

Draft Addendum II presents alternatives, including the status quo and a 50 percent reduction, alongside coastwide quota linkage, seasonal limits and periodic review. These are management choices under consideration, not an assessment finding that a 50 percent cut to the Chesapeake Bay Cap cut is required.

The Bay Cap was reduced by 20 percent for 2013 and then to 51,000 metric tons for 2018, roughly another 41 percent reduction. The current draft acknowledges insufficient data to comprehensively characterize Bay-wide menhaden abundance,

distribution and fishing effects. It contains data, but does not establish a quantified biological requirement for the proposed 50 percent cut.

When the Cap was first imposed in 2006, it was a political compromise between Virginia, Maryland, and environmental groups, not a conservation measure grounded in a scientific justification. As ASMFC's Executive Director at the time, Vince O'Shea, testified before Congress in 2008, the Bay Cap was established "in response to a political problem" and "there was not a science basis for the Cap."

That view was echoed by ASMFC's scientific staff. In 2012, the Menhaden Plan Development Team concluded, "The annual Chesapeake Bay harvest cap is not based on a scientifically quantified harvest threshold, fishery health index, or fishery population level study."

In a follow-up report that same year, the ASMFC Technical Committee stated: "The TC stands by its previous recommendation that, given the current fishery and history of landings, there has not appeared to be any biological benefit to the Chesapeake Bay Reduction Cap since it was implemented."

The Technical Committee reinforced this position during the Commission's December 2012 meeting, with the then-chairperson noting that, "Given the current structure of the industry right now, and the fish that they harvest, and the biological information that we're collecting, there doesn't seem to be any benefit" from the Bay Cap.

ASMFC leadership previously said the evidence was not there

This is not a new scientific question. In a July 30, 2026 letter to

the Atlantic Menhaden Management Board, Ocean Harvesters reproduced language from then-ASMFC Chairman James J. Gilmore Jr. addressing Virginia's appeal of the reduction of the Chesapeake Bay Cap from 87,216 metric tons to 51,000 metric tons.

Gilmore wrote: "There is no evidence in Amendment 3 to support the view that lowering the Bay Cap was necessary to protect the Bay as a nursery area for menhaden and there is no evidence to suggest the Bay Cap is necessary to protect the Bay as a nursery for other species. Leadership agrees the Amendment does not provide sufficient evidence to support such claims."

That statement addressed the specific nursery protection rationale in Amendment 3. It matters now because the current 51,000 metric ton cap already reflects substantial prior reductions, while Draft Addendum II again considers cuts of up to 50 percent and acknowledges that sufficient scientific information is still not available to comprehensively characterize menhaden abundance, distribution and fishing effects throughout Chesapeake Bay. Hutchinson does not grapple with that history when attacking Himchak for saying the scientific case for another 50 percent reduction has not been demonstrated.

Independent analyses undercut the "gauntlet" claim

Hutchinson relayed the claim that Virginia's reduction fishery is preventing menhaden from reaching fishermen farther up Chesapeake Bay. But the available analyses do not support that simple cause-and-effect story. ASMFC's own review indicated little reduction fishery influence on Maryland pound net catch rates in 2023; for 2024, it identified only a possible effect and said finer-scale information on fishery dynamics and menhaden

movement would be needed.

A January 2026 Georgetown Economic Services analysis (Exhibit B, p. 16) tested the interception theory directly. If Virginia purse seine activity were blocking menhaden from reaching Maryland, Maryland pound net catch rates should fall sharply during the relevant period. Instead, the analysis found that pound net catch rates continued on a relatively steady seasonal increase. It also found that months with Virginia reduction purse seine sets above the 10-year average tended to coincide with Maryland pound net harvest above its 10-year average, while below-average Virginia activity tended to coincide with below-average Maryland harvest.

A separate analysis in Dr. Arnoldo Valle-Levinson's actual report, Menhaden Catches in Mid-Chesapeake Bay, examined the physical and environmental conditions in the Chesapeake Bay alongside the Maryland fishery data. His analysis found a consistent relationship between Maryland catches and catch rates and changes in hypoxia depth over annual cycles. When low-oxygen water rises and compresses usable habitat, fish can become concentrated in a smaller oxygenated layer, changing their availability and catchability.

A summary of Valle-Levinson's analysis explains that Maryland catches and fishing trips declined together, while catch per unit effort did not show the sustained collapse that would be expected if the upper Bay were being systematically deprived of menhaden. His analysis points to fishing effort and Bay conditions, including dissolved oxygen, salinity, temperature, habitat compression, plankton and other environmental factors, as important influences on where menhaden occur and how catchable they are. Those findings directly challenge the "gauntlet" narrative Hutchinson repeats.

The data behind Himchak's position

Himchak cites stable-isotope chemistry research by Kristen Anstead and colleagues, published in *Transactions of the American Fisheries Society,* which challenges older assumptions about the Chesapeake Bay's contribution to the coastwide menhaden population. Their 2016 four-region analysis estimated that an average of about 31 percent of age-1 recruits from the 2009-2011 cohorts originated from Chesapeake Bay nurseries, far below the historical, unvalidated estimate of 69 percent. Their 2017 study produced a similar result, estimating that about 30 percent of sampled age-2 to age-4 fish from the 2008-2010 cohorts originated from Chesapeake nurseries. These studies do not measure current Bay abundance, but they do show that the long-used assumption that Chesapeake Bay supplies nearly 70 percent of the coastwide menhaden population was not supported by the sampled cohorts.

Maryland's long-term juvenile seine survey provides a measure of the relative abundance of young-of-year menhaden in Chesapeake Bay. The Maryland Department of Natural Resources' 2023 survey reported that menhaden abundance was the highest measured in more than 30 years. The 2025 survey found a third consecutive year of the highest Atlantic menhaden recruitment in the Bay since 1990. These results document several recent years of strong juvenile occurrence, indicating that the Chesapeake Bay continues to serve its function as an important nursery for menhaden.

Stock status, predator needs and striped bass

The 2025 menhaden assessment classified the coastwide stock as not overfished and not experiencing overfishing. Estimated fishing mortality was below the overfishing threshold, although

above the lower management target. Ecological reference points already account for predator needs; the American Sportfishing Association and Theodore Roosevelt Conservation Partnership praised their adoption in 2020.

ASMFC's April 2025 review evaluated 298,232 striped bass across eight data sets. Its body condition analysis indicated the fish "are not starving and would be considered healthy." Body condition does not, however, measure population recovery or establish a direct relationship with menhaden availability.

The 2024 striped-bass assessment attributed 49 percent of coastwide fishing removals in 2022-2023 to recreational harvest and another 40 percent to recreational release mortality. ASMFC's menhaden FAQ states that ending menhaden fishing alone would not rebuild striped bass to their biomass target. Local feeding observations and coastwide rebuilding are different questions.

New Jersey bait fishermen are part of the same working coast

New Jersey's bait fisheries connect commercial harvesters with commercial and recreational customers. New Jersey's fisheries agency documents menhaden's bait and chum uses, while the National Oceanic and Atmospheric Administration (NOAA) identifies its role in crab and lobster fisheries. The reduction sector supplies fishmeal, fish oil and other marine ingredients.

Cape May-based Lund's Fisheries and Omega Protein participate in the U.S. Atlantic menhaden purse-seine fishery, which holds Marine Stewardship Council certification. These sectors serve different markets - bait and marine ingredients - within a shared coastwide management system. Their economic contributions do not depend on casting one group of

fishermen against another.

Hutchinson's account of supportive webinar comments describes the opinion of the recreational fishermen who made them. It does not resolve biological questions.

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Atlantic Menhaden Amendment 2 - Plan Development Team discussion, p. 63 - States that the annual Chesapeake Bay harvest cap was not based on a scientifically quantified harvest threshold, fishery health index, or fishery population-level study.

Atlantic Menhaden Management Board Proceedings - December 2012, p. 21 - Technical Committee statement that there had not appeared to be a biological benefit to the Chesapeake Bay Reduction Cap under the fishery conditions then in place.

Atlantic Menhaden Management Board Proceedings - December 2012, p. 22 - Jeffrey Brust's response that, given the industry structure, harvested fish and biological information being collected, there did not seem to be a benefit from the Bay Cap.

Atlantic Menhaden Draft Addendum II - 2026 - Bay Cap history, proposed management alternatives including a 50% reduction, Maryland pound-net analyses, and acknowledged

Chesapeake Bay data limitations.

Atlantic Menhaden Management Board Supplemental Materials - Exhibit B, p. 16 - Georgetown Economic Services, "Analysis of Maryland Harvest Sizes and the Number of Virginian Nets Set."

Atlantic Menhaden Management Board materials - 2018 Gilmore statement - Contains the statement attributed to then-ASMFC Chairman James J. Gilmore Jr. that Amendment 3 did not provide evidence supporting the specified nursery-protection rationale for lowering the Bay Cap.

2025 Atlantic Menhaden Single-Species Stock Assessment Update - Current coastwide stock status and fishing mortality.

ASMFC adoption of ecological reference points for Atlantic menhaden - 2020 - Commission announcement establishing ecosystem-based reference points that account for predator needs.

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ASMFC - Atlantic Menhaden FAQs - Explains that ending menhaden fishing alone would not rebuild striped bass to the biomass target.

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class.

Chesapeake Bay and Maryland analyses

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Public summary of the Georgetown and Valle-Levinson analyses - Summary discussing both analyses and their implications for the interception or "gauntlet" theory.

Maryland DNR - 2024 Young-of-Year Survey results - Reports 2024 juvenile menhaden abundance nearly equal to 2023, when the index was the highest measured since 1990.

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Anstead et al. - 2017, Transactions of the American Fisheries Society - Follow-up analysis of nursery contributions to older menhaden cohorts.

New Jersey, fishery uses and sustainability

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NOAA Fisheries - Atlantic Menhaden - Background on Atlantic menhaden and its use as bait in commercial fisheries including crab and lobster fisheries.

Marine Stewardship Council - U.S. Atlantic Menhaden Purse Seine Fishery: client listing - Identifies client-group participants including Lund's Fisheries and Omega Protein.

Marine Stewardship Council - U.S. Atlantic Menhaden Purse Seine Fishery - Current certification record for the fishery.

Theodore Roosevelt Conservation Partnership - 2020 statement on ecological reference points - Recreational/conservation response praising ASMFC's adoption of ecological reference points.

About the American Small Pelagics Network

The American Small Pelagics Network represents fishermen, processors, suppliers, and coastal communities connected to fisheries such as menhaden, mackerel, herring, squid, and butterfish. ASPN advocates for sustainable fisheries management that supports critical fish species, while maintaining economic opportunities for fishermen and fishing communities.

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SOURCE: American Small Pelagics Network

Washington Post Osprey Story Blurs the Line Between Science and Special Interests

Wednesday, 30 September 2026 10:00 PM

Topic: Environmental, Social and Governance

Article Repeats Unproven Claims Without Explaining Where They Exceed the Scientific and Regulatory Record

WASHINGTON, D.C. / ACCESS Newswire / September 30, 2026 / *The Washington Post* on September 27 published a story by Mark Robichaux under the headline "Ospreys are disappearing along the East Coast. Scientists think they know why."

The osprey breeding failures reported in the story are serious and warrant further study. The reporting, however, repeatedly places the commercial menhaden fishery at the center of a causal question that the scientists themselves say remains unresolved, while omitting key details on menhaden management and the fishery's economic impact.

The article does acknowledge that Dr. Bryan Watts of William & Mary's Center for Conservation Biology describes the evidence as an association rather than proof that commercial menhaden harvest caused osprey nesting failures. That critical limitation should have guided the rest of the account.

The headline blurs what scientists know and what remains uncertain

Researchers have identified food stress as the immediate cause of many Chesapeake Bay osprey nesting failures. They have also associated that food stress with reduced delivery of menhaden to some nests. But the Center for Conservation Biology says the underlying causes of reduced menhaden availability are not clear. It lists commercial harvest as one possible factor, alongside climate change, changing distribution and delayed entry of forage species into the Bay. The headline attempts to draw in readers on a false premise.

The distinction is even more important beyond the Chesapeake. In its 2026 compilation of monitoring from 65 study areas, the center says the underlying cause of low reproductive performance at other Atlantic Coast sites is less clear. It says,

"we should view ospreys as sentinels for the marine ecosystem rather than a species imperiled." It also states, "ospreys appear to be secure throughout much of their range but are struggling within some coastal sites." The *Post's* coastwide headline is broader than those findings.

The article treats an unmeasured Bay-wide condition as a premise

The story states, without attribution, that menhaden are not present when birds and fishermen need them. Researchers have documented reduced menhaden deliveries at some osprey nests, and fishermen describe difficulty finding dependable concentrations in some locations, while abundant concentrations are observed elsewhere and mass fish kills involving mostly juvenile menhaden have occurred in North Carolina. Those contrasting observations do not measure adult menhaden abundance throughout the Chesapeake Bay or establish a uniform coastwide shortage.

The article also calls menhaden the principal prey of Chesapeake ospreys. Menhaden are an important prey species, particularly in saltier parts of the Bay, but the peer-reviewed study cited in the story says osprey diet composition shifts with salinity: pairs in higher-salinity waters appear to rely on menhaden, while pairs in low-salinity waters depend primarily on catfish and gizzard shad. A USGS study of osprey diets across Chesapeake Bay sites and a USGS presentation to the Atlantic States Marine Fisheries Commission (ASMFC) summarizing the site-specific results provide the underlying geographic detail. Catfish and gizzard shad accounted for 77 percent and 20 percent of the diet reported for the Susquehanna, respectively, and 52 percent and 28 percent in upper-Bay estuarine areas. At Poplar Island, striped bass accounted for 48 percent and

menhaden 44 percent; in lower-Bay estuarine areas, spotted seatrout accounted for 29 percent and menhaden 24 percent. Those data do not support a single Bay-wide description of menhaden as the principal prey.

The 2026 peer-reviewed osprey study says there is no fishery-independent monitoring of adult menhaden in the Bay. According to the authors, that information gap prevents a direct assessment of the relationship between local menhaden abundance and osprey reproduction. They also say the effect of harvest on adult menhaden abundance in the Bay remains unresolved.

The Louisiana passage leaves out regulatory and scientific context

The article also turns to Louisiana's separate Gulf menhaden fishery. It reports the 2023 net failures and later enforcement improvements, but omits existing rules governing coastal buffers, release reporting, gear retrieval, vessel tracking and penalties. Following those incidents, the fishery also moved toward stronger purse seine nets and standardized improved bycatch excluder devices intended to keep larger fish out of the pumping system.

Robichaux also omits the Louisiana wildlife agency's summary of a state-commissioned, season-long study of the 2024 fishery, which estimated total bycatch at approximately 3.6 percent of catch by weight. In its 2015-2024 comparison, the agency reported that dead menhaden fishery bycatch accounted for 9.9 percent of red drum removals by weight and 2.7 percent of spotted seatrout removals; directed recreational anglers accounted for the remainder, 90.1% and 97.3%, respectively. The aggregate rate does not resolve every species-specific concern, but the results are material context for evaluating the fishery.

Claims from advocates and fishermen are observations and policy positions

Robichaux quotes Virginia Saltwater Sportfishing Association chairman Steve Atkinson asserting that the Bay no longer contains enough menhaden to support the current reduction fishery and a healthy ecosystem. While there is little doubt that Atkinson made that statement, the scientific record cited in the story does not establish it, and it is presented without challenge.

The ASMFC's Chesapeake work group expressly did not determine whether the supply of menhaden is sufficient to meet predator demand in the Bay. Nor has the commission determined that a 50 percent reduction in the Bay cap - the policy Atkinson supports - would improve osprey reproduction. The range from no reduction through 50 percent consists of management options under consideration, not measured biological remedies. At no point has the ASMFC provided any scientific rationale for a reduction in the Bay harvest.

Anecdotal accounts like charter captain Chris Newsome's about difficult fishing deserve to be heard, but Robichaux takes that one named Chesapeake captain's experience and turns it into an unsubstantiated coastwide conclusion. The story cites no coastwide survey, abundance index, standardized fishing data, additional named fishermen or geographic examples to support its assertion that anglers and fishermen throughout the Atlantic Coast are seeing the same pattern. An unspecified collection of anecdotes is not evidence of a coastwide biological trend. By presenting it that way, Robichaux seeks to create the appearance of broad corroboration while giving readers no way to assess how many people were consulted, where they fish or whether their experiences are representative.

The article omits important evidence of sustainable

management

Robichaux reports that the Atlantic States Marine Fisheries Commission finds Atlantic menhaden not overfished, with overfishing not occurring, but he does not tell readers that the ASMFC already uses ecological reference points designed to account for menhaden's role as prey or that it reduced the coastwide catch limit by 20 percent for 2026. It also omits that the U.S. Atlantic menhaden purse seine fishery is certified by the Marine Stewardship Council, following independent assessment against the MSC Fisheries Standard.

The economic figures are not comparable measures

The article compares an estimated **$804 million** spent on Atlantic recreational fishing trips involving menhaden with roughly **$300 million** in reported annual sales from Omega Protein's combined Atlantic and Gulf operations and approximately **260 direct Virginia jobs** reported by the companies in the Atlantic menhaden fishery. But it does not explain that the ASMFC's 2026 Committee on Economics and Social Sciences review expressly describes historical modeling showing that direct harvesting and processing jobs sustain additional non-fishing employment in mechanics, logistics and local services including fuel and lubricants, repairs and maintenance, shipping, vehicle operations, supplies and food, utilities and telephone service, insurance and security, real estate rent, county property taxes and healthcare benefits.

But when it came to the recreational fishing contribution, the story cited a Southwick Associates study commissioned by the Theodore Roosevelt Conservation Partnership that casts a very wide net in its economic assumptions, counting all tangential spending on entire fishing trips on which an angler used menhaden as bait, chum or scent. This means they counted

anything including transportation, fuel, food, hotels and other purchases as an economic contribution of recreational fishing.

In short, the story's comparison of the industries' economics is apples and oranges.

Robichaux mentions the direct Virginia jobs but says nothing about the workers who hold them. UFCW Local 400 says Ocean Harvesters' crews are overwhelmingly local and unionized and that the operation employs one of the largest minority workforces in Northumberland County. The union has documented collectively bargained increases in base pay, incentive rates and bonuses, as well as health-and-welfare benefits. These are family-supporting union jobs that provide strong wages and full benefits to workers, including many without college degrees - opportunities that no other employer in the Northern Neck provides on a comparable basis. The bigger issue remains that the article never illustrates how a reduction in the Bay Cap would benefit recreational anglers, but reductions would almost certainly result in economic harm to menhaden fishermen and their families.

The ASMFC's Committee on Economics and Social Sciences identifies the reduction industry as an important part of the Reedville-area economy. It also warns that high fixed costs mean a small reduction in fishing quota could cause larger unemployment effects. That analysis is relevant to any discussion of workers and communities affected by additional restrictions.

The ASMFC's economic advisers warn that job losses in the reduction sector could be lasting because comparable work may be hard to find locally.

The Southern Christian Leadership Conference raised that

concern directly with Maryland Governor Wes Moore. SCLC urged Maryland to consider how additional restrictions could disproportionately affect African American workers, union families and rural communities, and to weigh environmental stewardship together with economic justice and the consequences for workers and their families. Robichaux does not mention the union workforce or the civil rights organization's intervention.

The February 18 letter does not show opposition to research

Robichaux introduces a February 18, 2025 letter from an industry government relations professional to Virginia Del. Betsy Carr and then immediately quotes Chesapeake Bay Foundation executive Chris Moore alleging that the industry is using scientific uncertainty to stall restrictions. CBF has repeatedly used this letter out of context to allege that the industry opposed research funding.

The companies explained to Robichaux that by February 18, the General Assembly was no longer considering the roughly $2 million needed for the full study; discussion had shifted to whether a reduced amount of funding could support useful interim work. The letter responded by proposing a two-year pilot to test aerial and hydroacoustic survey methods that had not yet been validated for estimating Chesapeake Bay menhaden abundance. It also called for a plan and budget for a peer reviewed research program and, as an alternative, recommended returning to the General Assembly in 2026. Read in full and in context, it proposed research under constrained funding and raised concerns about methodology.

What followed after February 2025 undercuts CBF's characterization. When the 2025 Virginia session ended without funding the proposed comprehensive study, industry

participants helped fund a Science Center for Marine Fisheries research roadmap involving VIMS, the University of Maryland Center for Environmental Science and NOAA; supported a tagging feasibility study; and opened commercial vessels and processing operations to researchers. That record is inconsistent with Moore's false claim about the industry's motive.

The research effort gained substantial public funding in 2026: Virginia committed $2 million over two years, and Congress appropriated $2.5 million for Bay-specific research.

Commercial menhaden fishermen and processing workers support coastal communities and supply fishmeal, fish oil, nutritional products and bait to recreational and commercial fishermen from Maine to Louisiana. They deserve coverage that distinguishes observed osprey food stress from an unproven allegation of fishery causation, and that compares harvest and economic figures on an accurate basis.



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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.

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SOURCE: Menhaden Fisheries Coalition

Whit Fosburgh Misstates Menhaden Science on Qualified Captain Podcast and Overlooks American Fishing Families

Tuesday, 06 October 2026 04:50 PM

Topic: Company Update

WASHINGTON, D.C. / ACCESS Newswire / October 6, 2026 /

The Qualified Captain is a North Carolina-based boating and maritime interview podcast hosted by Aaron Stasiak. On the podcast, Stasiak interviews captains, marine industry participants and people who have survived incidents at sea, discussing their experiences and lessons for others on the water.



In episode 55, published on Oct 1, 2026, Stasiak interviewed Whit Fosburgh, executive director of the Forage Fish Campaign and former president and CEO of the Theodore Roosevelt Conservation Partnership. Their conversation addressed menhaden and other forage fish, industrial reduction fishing and proposals to restrict or end that fishing. Fosburgh made statements about menhaden science, fisheries management and the American businesses and workers the fishery supports that conflict with the documented record. The following twelve factual corrections present the corrected facts and supporting evidence.

1. Striped bass recovery

Fosburgh said the Atlantic States Marine Fisheries Commission (the ASMFC) concluded that reducing the menhaden quota from about 233,000 to 108,000 tons, a cut of almost 60%, would give striped bass only a 50-50 chance of recovery.

Facts: The assessment does not say that. The probabilities in the stock projections concern exceeding a menhaden ecological fishing mortality target. They are not probabilities of rebuilding striped bass. The ASMFC has explained that eliminating all menhaden fishing would not, by itself, rebuild striped bass to their biomass target. Sustainable striped bass management is also necessary.

2. Menhaden age assumptions

Fosburgh said scientists know menhaden can live to 11 years but assumed they would never live beyond about 4½ years and therefore concluded that "they will die anyway," so the fishery could "catch just as much."

Facts: There is no evidence that Atlantic States Marine Fisheries Commission scientists made that assumption or used that rationale. The assessment does not impose a maximum lifespan of 4½ years. It applies age-specific natural mortality rates, a measure of deaths from causes other than fishing, and separately models menhaden at ages zero through five and in an age-six-and-older group. NOAA Fisheries has collected menhaden age data for decades, and NOAA-published research has documented fish older than 4½ years.

Fosburgh's statement inaccurately portrays both the assessment and the work of the ASMFC scientists. Natural mortality estimates can affect modeled biomass, fishing

mortality and reference points, but that does not mean scientists assumed that older fish do not exist or concluded that catching them does not matter because they would "die anyway." By attributing that rationale to scientists without evidence, Fosburgh makes an inaccurate disparagement of the scientific work underlying the assessment.

3. Products and American economic benefits

Fosburgh said menhaden are processed and shipped to Canada, North Africa or Southeast Asia for aquaculture, and that almost all the material goes abroad.

Facts: The product sales claim conflicts with Omega Protein's reported figures. According to the company, 70% of its 2025 sales were to U.S. customers, 83% were within the United States, Canada and Mexico, and only 17% were overseas. Omega Protein also reports that none of its Atlantic menhaden products supply Cooke Seafood operations in Canada. The fishery's American benefits include wages and healthcare for the workers, as documented by UFCW Local 400.

4. Osprey nest outcomes

Fosburgh said 90% of osprey nests fail in the Chesapeake Bay and along the New Jersey and Connecticut coasts because the birds have nothing to eat.

Facts: Local findings do not establish that approximately 90% of nests throughout the Chesapeake Bay fail because industrial fishermen have removed their food. The 2026 Chesapeake study found successful reproduction at 33.1% of high-salinity nests and 65.5% of low-salinity nests. Results at individual locations varied substantially. The study does not demonstrate that industrial harvest caused the observed reproductive deficits, and its

Chesapeake findings cannot substantiate the same blanket claim for New Jersey and Connecticut given that no reduction menhaden fishing occurs in those estuarine waters.

5. Official stock status and ecosystem management

Fosburgh described the official finding of no overfishing as a defense advanced by paid industry representatives, then said the issue is protecting the ecosystem and that managers acknowledge they are not doing that.

Facts: NOAA's finding that Atlantic menhaden are not overfished and are not undergoing overfishing is an official scientific conclusion. Menhaden management uses ecological reference points accounting for predator needs. Characterizing the finding as merely an industry defense, or suggesting that the management framework omits the ecosystem, misrepresents the assessment and is disrespectful of the expertise of the ASMFC scientists who conduct the scientific assessments. It is a well-known fact that menhaden stocks in both the Atlantic and Gulf are not overfished, overfishing is not occurring, and the species are certified sustainable by the Marine Stewardship Council. Given Mr. Fosburgh's long-time work in this subject matter he certainly must be aware that menhaden stocks on both coasts are healthy and sustainable harvested.

6. Natural mortality and assessment revisions

Fosburgh said managers increased the quota after changing scientific assumptions, refused to reconsider the research when warned, and later admitted a mistake. He said the natural mortality assumption was shifted so harvest could increase.

Facts: The assessment record documents a correction and

scientific review. The ASMFC's FAQ describes a tagging data correction and peer-reviewed reanalysis that lowered estimated natural mortality. The resulting revision lowered biomass estimates across the historical series; it did not demonstrate a sudden equivalent population decline. The ASMFC states that the 2025 update indicates total biomass actually increased slightly since 2021. The documented correction does not establish that the assumptions were changed to benefit industry.

7. Predator losses attributed to menhaden harvest

Fosburgh said science shows current coastwide menhaden harvest reduces striped bass by about 30%. He also attributes reductions of about 15% for Gulf king and Spanish mackerel and about 10% for red drum to the removal of their bait.

Facts: Fosburgh is restating a 30% allegation that the sportfishing lobby has repeatedly advanced through use of an altered graph from a 2017 study. This is not what the study shows. The allegation is a gross oversimplification of one forward-looking simulation, and the study's lead author criticized that use. Since 2017, regulators have switched to ecosystem-based management of the menhaden fishery, reduced the Chesapeake Bay quota by 41% and reduced the coastwide quota by 10%. The study compared long-term simulated striped bass biomass and fishery yield under hypothetical menhaden fishing mortality rates with a zero-menhaden-fishing baseline; it did not measure a 30% decline in the striped bass population caused by the reduction fishery. The paper also said strong broad-scale evidence tightly coupling menhaden and striped bass population dynamics was lacking. The ASMFC now says that even ending all menhaden fishing would not, by itself, rebuild striped bass to its biomass target;

sustainable recreational and commercial fishing on striped bass remains necessary.

Fosburgh's 15% figures for Gulf king and Spanish mackerel and 10% figure for red drum do not follow from the available feeding evidence, which does not show that these predators depend on menhaden alone. NOAA reports that king mackerel eat fish, squid and shrimp, while Spanish mackerel feed on herring, menhaden, sardines, mullet, needlefish, anchovies, shrimp, crabs and squid. A 2024 peer-reviewed University of Southern Mississippi analysis integrating stomach content and stable isotope data for 41 predators and 173 prey categories found that northern Gulf predators are generalists and identified no single menhaden-dependent predator. Red drum had 46 observed prey types; the study estimated Gulf menhaden at 2.2% of its diet and the broader Brevoortia category at 2.1%.

Nor are Fosburgh's Gulf percentages measured population losses. They are conditional outputs from a Gulf ecosystem model, not observations that current menhaden harvest reduced those predator populations by the stated amounts. Independent technical reviews by Emeritus Professor Doug Butterworth, director of the Marine Resource Assessment and Management Group at the University of Cape Town; Professor Ray Hilborn of the University of Washington's School of Aquatic and Fishery Sciences; and Professor Steven Cadrin of the Department of Fisheries Oceanography at the University of Massachusetts Dartmouth's School for Marine Science & Technology found too many technical problems to justify the model's management conclusion, including uncertain diet inputs, inadequate fits to observed data and performance below conventional stock-assessment standards. The evidence may support examining possible food web tradeoffs, but it does not establish that menhaden harvest caused the 15% and 10%

population reductions Fosburgh stated.

8. Claims that menhaden are absent

Fosburgh said menhaden are no longer seen along the entire coast. Later, he described people asking him about there being no striped bass and no menhaden in the Chesapeake Bay.

Facts: The claim that menhaden are no longer seen along the entire East Coast is contradicted by official fishery data and observations from several regions. The ASMFC reports that 2024 commercial landings, including reduction, bait, bycatch and episodic-event landings, totaled 186,155 metric tons, while bait and recreational landings alone totaled 52,200 metric tons. It also states that adult and juvenile menhaden form large, near-surface schools from Nova Scotia to northern Florida. Maryland DNR found juvenile menhaden widespread in the Chesapeake Bay for the third consecutive year in 2025. Recent reporting likewise documented nearshore menhaden aggregations off New York feeding humpback whales. Large die-offs further confirm the species' presence in areas Fosburgh described as empty. Maryland's official 2025 fish-kill report recorded three Baltimore Harbor events totaling about 206,000 fish; two were almost exclusively Atlantic menhaden and about 99% of the third were menhaden. In March 2026, hundreds to thousands of menhaden washed ashore from Cape Henry to Nags Head following a cold-stun event; a Virginia fisheries spokesman said menhaden have a "huge population" offshore and that there are "so many menhaden out on the East Coast" that they were the most visibly affected species. In September 2026, Public Radio East reported a massive Neuse River kill consisting mostly of juvenile menhaden. Catch data, observed schools and repeated die-offs directly contradict an assertion that menhaden are absent from the coast or Chesapeake Bay.

9. Ownership and regulatory review

Fosburgh said Cooke bought Omega Protein and then established Ocean Harvesters to break rules prohibiting foreign companies from fishing in American waters.

Facts: Fosburgh is repeating accusations that were at the core of the failed False Claims Act lawsuit brought by W. Benson Chiles and Chris Manthey against Ocean Harvesters, Cooke Inc., Omega Protein and related defendants. The U.S. District Court for the Southern District of New York dismissed the amended complaint in its entirety, and the U.S. Court of Appeals for the Second Circuit affirmed that dismissal in August 2026. Reporting on MARAD's separate review states that the agency found the company's documentation satisfactory and compliant with fishery-endorsement requirements.

10. The effect of the quota reduction

Fosburgh said the reduced quota of about 186,000 tons was the same as the industry's previous catch, so not a single fish was saved. He later calls it a paper reduction.

Facts: That conclusion confuses a harvest ceiling with realized landings. The ASMFC reduced the allowable catch from 233,550 to 186,840 metric tons. The reduction limits subsequent permitted harvest. Comparing the new ceiling with an earlier year's actual landings does not establish that the reduction saves no fish.

11. Gulf bycatch numbers

Fosburgh said Louisiana's research found about 150 million non-target fish are caught and killed every year. He said the percentage is small but the practical number is significant.

Facts: Fosburgh turned one season's sample-expanded estimate into a recurring annual death count. The LGL study observed 3.2% of Louisiana menhaden-fishery effort in 2024 and expanded those samples to estimate total bycatch for that season; it did not establish that the same number is killed every year. The study estimated total bycatch at about 3.6% by weight, and its accounting distinguishes retained bycatch, released bycatch and estimated post-release mortality. LDWF's official comparison shows where red drum and spotted seatrout fishery removals actually came from over 2015-2024, measured by weight. For red drum, recreational harvest accounted for 78.9% of total removals and recreational dead discards another 11.2%-90.1% combined-while dead menhaden fishery bycatch accounted for 9.9%. For spotted seatrout, recreational harvest accounted for 93.3%, recreational dead discards 3.9%, and commercial harvest 0.1%-97.3% from directed fisheries-while dead menhaden fishery bycatch accounted for 2.7%. A raw count of small individuals, detached from weight, species composition, disposition and comparison with directed fisheries, does not support Fosburgh's characterization.

12. Employment and economic losses

Fosburgh said the Virginia plant employs 260 people in good jobs, but thousands of jobs are being lost in the bait, recreational fishing, small commercial fishing and whale-watching sectors because of the fishery.

Facts: Fosburgh offered no economic analysis establishing that the menhaden fishery is responsible for job loss in the thousands. He compared the direct headcount at one processing plant with an undefined claim spanning bait, recreational fishing, small commercial fishing and whale watching, expressed no concern for the minority and union jobs

sustained by the menhaden fishery, and relied on measures that are not comparable and do not support attributing thousands of job losses to it.

The menhaden fishery itself has a substantial, documented economic footprint. The ASMFC's Committee on Economics and Social Sciences reviewed the fishery's broader footprint and cited historical modeling of approximately 519 full- and part-time reduction-sector jobs in Maryland and Virginia, including 347 in Northumberland County. The committee also warned that high fixed costs and minimum operating volume can make job losses nonlinear: crossing the break-even threshold could cause structural unemployment and potentially a complete plant shutdown, not a proportional reduction in a 260-worker headcount.

UFCW Local 400's account and accompanying workforce video describe hundreds of union jobs, an overwhelmingly local workforce, one of Northumberland County's largest minority workforces, and benefits that support healthcare, college and local businesses. The Southern Christian Leadership Conference separately warned that additional restrictions could disproportionately affect African American workers, union families and rural communities, and urged full recognition of affected workers and families. Together, this record documents substantial employment tied to the fishery and its economic importance to Northumberland County and surrounding rural communities.

About the American Small Pelagics Network

The American Small Pelagics Network represents fishermen, processors, suppliers, and coastal communities connected to fisheries such as menhaden, mackerel, herring, squid, and butterfish. ASPN supports sustainable fisheries management

that supports critical fish species, while maintaining economic opportunities for fishermen and fishing communities.

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SOURCE: American Small Pelagics Network

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Richmond Times-Dispatch

https://richmond.com/opinion/column/article_662666ff-d2c8-4ca7-9426-a54aea5b8524.html

Matt Strickler's menhaden argument leaves working Virginians out of the picture | Guest column

Guest column by DARAWN KENNER - Oct 17, 2026

I am an African American union worker in Virginia's menhaden fishery. When former Natural Resources Secretary Matt Strickler reduced this debate in the pages of this newspaper to the interests of "one foreign corporation," he left people like me out of the picture.

The menhaden fishery is a workplace. UFCW Local 400 represents fishermen in the Reedville fleet, and the fishery supports hundreds of family-supporting union jobs in Virginia's Northern Neck. Our union members are second-, third- and fourth-generation fishermen whose livelihoods depend on this work. My fellow workers are not an "industry," as Strickler labels us. They are Virginians supporting families and communities.



Ocean Harvesters fishermen Lionel Waddy and Adam Crockett work aboard a purse seine vessel. Virginia's menhaden debate must account for the union workers and Northern Neck communities whose livelihoods depend on the fishery, Darawn Kenner writes.

Strickler's column gives those workers almost no attention. Instead, he writes that the company "doesn't give a lick about Virginia" and describes the fishery as an operation that "vacuum[s]

up" the base of the bay's food chain. That rhetoric makes it easier to overlook the people who would live with the economic consequences of additional restrictions.

The Southern Christian Leadership Conference has raised that concern directly. In a letter to Maryland Gov. Wes Moore, SCLC said the issue involves environmental responsibility, rural economic life, labor, wages, race and the dignity of work and warned that African American workers, union families and rural communities could be disproportionately affected. Those workers should not simply disappear from the discussion.

It is difficult to comprehend a former senior official of a Democratic administration showing so little regard for blue-collar workers. Our workforce is comprised of predominantly minority, unionized working people whose livelihoods would be affected by the restrictions he advocates.

The scientific record also contains important facts missing from Strickler's account. ASMFC's 2025 assessment states that Atlantic menhaden is not overfished and that overfishing is not occurring. ASMFC also says its coastwide model cannot determine menhaden abundance solely within Chesapeake Bay or define a "sufficient" bay-specific level.

That is why Virginia has funded more research. VIMS reports that the 2026-2028 state budget provides $2 million over two years for research needed to inform a scientifically defensible Chesapeake Bay harvest cap. VIMS also states plainly that scientists do not currently have the data necessary to determine menhaden survival or abundance in the bay.



Ocean Harvesters fishermen Irvin Ball, Carroll Diggs and Lionel Waddy aboard the Cockrells Creek. Darawn Kenner writes that Virginia's menhaden debate overlooks union workers whose families and communities depend on the fishery.

Strickler points to low striped bass stocks as another warning sign. ASMFC's own ecosystem model says that even if all menhaden fishing suddenly ended, that action alone would not rebuild

striped bass to their biomass target. The commission identifies sustainable recreational and commercial striped bass fishing as the important management factor in rebuilding that stock.

The osprey research deserves the same precision. A 2026 peer-reviewed study documented serious food stress and reproductive problems in high-salinity portions of Chesapeake Bay and suggested reduced menhaden availability as a primary driver. But the study also states that the impact of commercial harvest on adult menhaden abundance in the bay remains unresolved because the abundance data needed to evaluate that relationship is lacking.

The economic stakes are documented too. ASMFC's Committee on Economics and Social Sciences reviewed historical modeling that estimated about 519 reduction-sector jobs in Maryland and Virginia, including 347 in Northumberland County. It warned that high fixed costs can make employment losses nonlinear if harvest falls below an economically viable threshold.

Workers deserve to be visible in this debate. Behind his bloodless word "industry" are fishermen, plant workers, mechanics, families and communities. They are directly affected stakeholders whose jobs and communities are part of the economic record regulators themselves have examined. Any account of Chesapeake Bay menhaden policy that omits them omits a material part of the story.



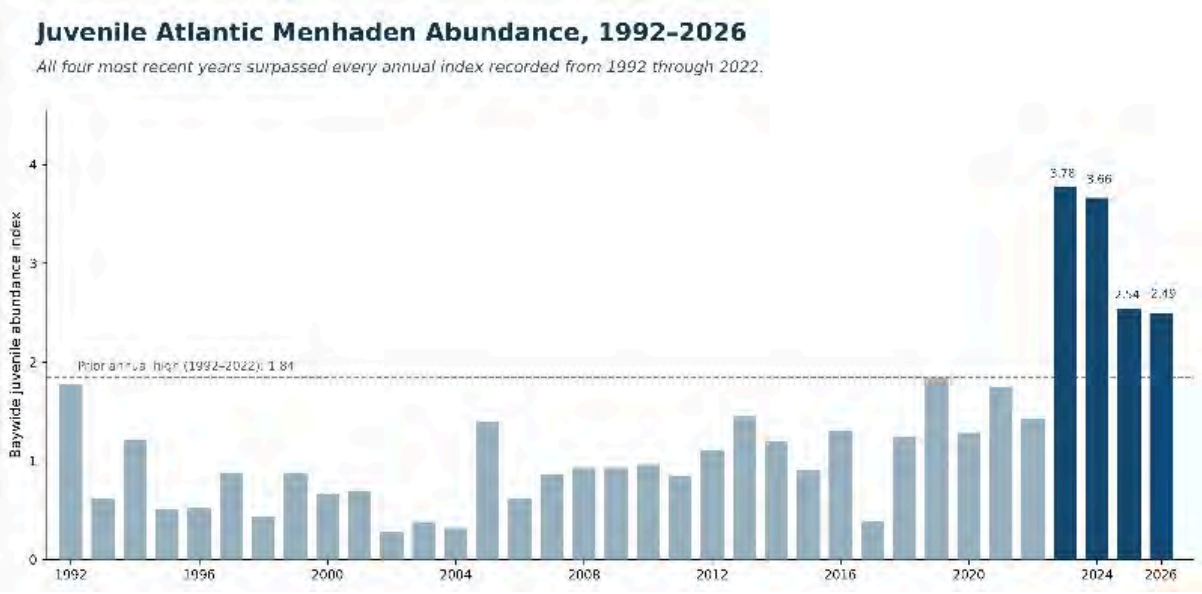
Darawn Kenner is the chief shop steward for United Food & Commercial Workers Local 400 at Ocean Harvesters in Reedville. He is also the cook on the F/V Reedville. He can be reached at dkenner2015.dk@gmail.com.

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Maryland Survey Finds Strongest Four-Year Run of Juvenile Menhaden Abundance in Over 30 Years

For Fourth Consecutive Year, Menhaden Abundance Exceeds Every Annual Survey Reading From 1992 Through 2022



Juvenile Atlantic Menhaden Abundance, 1992-2006. All four most recent years exceeded every annual index recorded from 1992 through 2022. Source: Durell,

E.Q., and Weedon, C. 2025. Striped Bass Seine Survey Juvenile Index Web Page. Maryland Department of Natural Resources, Fishing and Boating Services.

WASHINGTON – October 19, 2026 – The Maryland Department of Natural Resources' (DNR) 2026 juvenile striped bass survey, which tracks the reproductive success of Maryland's state fish in Chesapeake Bay, has documented another year of abundant juvenile Atlantic menhaden, completing the strongest four-year average of juvenile menhaden abundance since 1988–1991, according to the full survey series dating back to 1959.

In today's announcement, Maryland DNR reported that young Atlantic menhaden were again found in abundance during its 2026 juvenile striped bass survey. There was also good news on two other important forage species. Atlantic silversides were recorded in the highest numbers in more than a decade, and the Bay anchovy has shown better than average relative abundance over the past four years.

The underlying menhaden data reveal an especially striking trend. For four consecutive years, from 2023 through 2026, the Bay-wide juvenile menhaden abundance index has exceeded every annual reading recorded during the preceding 31 years, from 1992 through 2022.

The menhaden index reached 3.78 in 2023, followed by 3.66 in 2024, 2.54 in 2025 and 2.49 in 2026. The four-year average of 3.12 is the highest for any consecutive four-year period since 1988–1991.

The results provide substantial evidence of sustained strong juvenile menhaden abundance in Maryland's Chesapeake Bay survey waters, where menhaden serve as an important food source for predatory fish and birds.

The news for striped bass itself was less encouraging. Maryland reported an eighth consecutive year of below-average striped bass spawning success. However, the 2026 young-of-year index of 5.5 was the highest since 2018, improving from 4.0 in 2025 and 2.0 in 2024. The long-term average is 10.8.

Maryland DNR identified several environmental factors that can affect striped bass spawning success, including winter temperatures, spring rainfall and river flows. The agency noted that prolonged regional drought and resulting low river flows may have contributed to unfavorable spawning conditions in 2026

flows may have contributed to unfavorable spawning conditions in 2020.

Maryland's latest survey adds four more years of strong juvenile menhaden observations to the scientific record as fisheries managers consider the future of menhaden management in the Chesapeake Bay. While the juvenile survey does not directly measure adult menhaden biomass or availability in particular areas, its findings provide important evidence about the Bay's forage fish population.

The Atlantic States Marine Fisheries Commission (ASMFC) has also explained that ending all menhaden fishing would not, by itself, rebuild the striped bass population to its biomass target. The ASMFC manages Atlantic menhaden using ecological reference points designed to account for the forage needs of striped bass and other predators.

Sources: Maryland DNR announcement | Maryland DNR juvenile striped bass survey | the ASMFC Atlantic Menhaden FAQs

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.

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Menhaden Fisheries Coalition | menhadencoalition.org

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Suite 601
Washington, D.C. 20006

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Lawmakers Demand Menhaden Cuts Before Chesapeake Bay Science Is Complete, Ignoring Already Struggling Workers

Friday, 16 October 2026 02:20 AM

Topic: Environmental, Social and Governance

Menhaden Fisheries Coalition warns proposed restrictions

could threaten hundreds of jobs held by rural Virginia's largely minority, unionized menhaden workforce

WASHINGTON, D.C. / ACCESS Newswire / October 16, 2026 / The Menhaden Fisheries Coalition is challenging an October 9 congressional letter, led by Senator Chris Van Hollen (D-Md.) and Representative Sarah Elfreth (D-Md.), urging the Atlantic States Marine Fisheries Commission (ASMFC) to impose additional restrictions on Atlantic menhaden fishing before critical Chesapeake Bay research has been completed.

The proposed restrictions threaten a predominantly minority, unionized workforce whose families have depended on the Reedville, Virginia fishery for generations. For more than a century, the industry has helped sustain Virginia's Northern Neck communities, providing jobs that support families and send children to school and college. United Food and Commercial Workers (UFCW) Local 400 has documented the importance of these jobs, including in a video featuring the fishermen themselves.

The Southern Christian Leadership Conference (SCLC) has raised concerns about the disproportionate consequences of further restrictions for African American workers, union families and rural communities, calling for environmental stewardship and sound science alongside economic justice.

Ocean Harvesters and Omega Protein's Reedville operations provide approximately 250 to 300 well-paying jobs with benefits. A review by the ASMFC's own Committee on Economics and Social Sciences cites estimates of more than 500 full- and part-time reduction fishery jobs in Maryland and Virginia, including hundreds in Northumberland County. It also warns that further restrictions could threaten the viability of the entire Reedville operation.

The future of the menhaden fishery, and the families who depend on it, requires a healthy Chesapeake Bay. Nobody has a greater stake in protecting the Bay than the fishermen and processing workers whose livelihoods depend on it. The fishery has worked with regulators and scientists, adjusted its fishing practices, complied with regulatory harvest limits and supported new research to improve management.

The Virginia Institute of Marine Science confirms that scientists lack sufficient data to determine adult menhaden abundance or survival in the Chesapeake Bay. And there is no scientifically established Bay-specific harvest threshold or validated adult abundance index demonstrating that commercial fishing has depleted menhaden to an unsustainable level. Virginia has committed $2 million over two years to new Chesapeake Bay menhaden research. Senator Van Hollen helped secure another $2.5 million in federal funding for a Bay-specific menhaden survey. Yet he is now leading an effort to impose additional restrictions before the research he helped fund produces results.

Participants in the fishery are members of the Science Center for Marine Fisheries (SCEMFIS), a member of the National Science Foundation's Industry-University Cooperative Research Centers program, and contributed financially to its Chesapeake Bay menhaden research roadmap. The roadmap identifies research needed to establish a scientifically defensible Bay harvest cap. The fishery is actively cooperating with researchers from the University of Maryland Center for Environmental Science, the Virginia Institute of Marine Science and the National Oceanic and Atmospheric Administration (NOAA) as they develop that roadmap.

The congressional letter points to osprey breeding problems

and declining Maryland bait landings as evidence of menhaden scarcity. Researchers have documented serious osprey reproductive problems, but have not established that commercial menhaden harvest caused them or that restricting the fishery would improve reproduction. Declining bait landings likewise do not establish declining Bay-wide abundance. Maryland fisheries scientists reported that explaining a recent decline in a local menhaden index through increased harvest would require an implausibly large increase in landings, suggesting other explanations, including migration, should be considered.

Maryland's own Department of Natural Resources reported in October 2025 that juvenile Atlantic menhaden and bay anchovies were widespread in the Chesapeake Bay for the third consecutive year. The agency's annual juvenile fish survey documented more than 36,000 fish representing 55 species. The survey does not measure adult abundance, but its findings challenge sweeping claims of Bay-wide scarcity.

The lawmakers call for ecosystem-based management, but the ASMFC already adopted ecological reference points (ERPs) in 2020, following years of work among the commercial fishery, recreational fishing interests, conservation organizations and scientists. Since 2021, those reference points have guided catch limits by accounting for the menhaden needed as prey. Striped bass was selected as the focal predator because the model found it most sensitive to menhaden harvest. The ASMFC's 2025 ecosystem review also included osprey in the supporting full ecosystem model. The lawmakers have not explained why further restrictions would achieve benefits beyond this existing ecosystem-based system, or why it is inadequate.

Major recreational and conservation organizations helped

advocate for the adoption of this system and publicly praised it when the ASMFC approved it. In an August 5, 2020 announcement, Theodore Roosevelt Conservation Partnership President Whit Fosburgh called it a "landmark decision" and "a new era in fisheries management." The American Sportfishing Association welcomed predator-sensitive quotas as "the science-based management we look for." Coastal Conservation Association Maryland applauded "a more holistic approach," and the Congressional Sportsmen's Foundation called the decision a "significant step" in science-based fisheries management. The Marine Retailers Association of the Americas also endorsed the new approach. Their support explicitly extended to birds: a July 2020 coalition letter urging the ASMFC to adopt the reference points identified ospreys, bald eagles, common loons and brown pelicans among the species the new approach was intended to protect.

The ASMFC's own ecological reference point analysis found that even ending all menhaden fishing would not, by itself, rebuild striped bass to its biomass target; sustainable recreational and commercial striped-bass fishing remains essential. And the ASMFC's April 2025 Chesapeake Bay review analyzed eight datasets covering 298,232 striped bass and found, using Fulton's Condition Factor, that the sampled fish "are not starving and would be considered healthy." Their body condition does not directly measure menhaden abundance, but it provides strong evidence against widespread striped-bass starvation.

The signers of the congressional letter were misled into believing that Atlantic menhaden are overfished. The facts are clear: according to the ASMFC's latest assessment, Atlantic menhaden are not overfished, and overfishing is not occurring. The Commission already reduced the coastwide catch limit by 20% for 2026. The Atlantic menhaden purse seine fishery is

certified sustainable by the Marine Stewardship Council (MSC). Whole Foods Market, an MSC partner since 1999, describes it as the world's leading certification program for sustainable wild-caught seafood, involving independent review of fish populations, ecosystem impacts and responsible fishery management.

The existing Chesapeake Bay harvest cap was never based on a scientifically quantified biological threshold. During a May 2008 congressional hearing, then-ASMFC Executive Director Captain John "Vince" O'Shea reportedly described the cap as established "in response to a political problem" and said "there was not a science basis for the Cap," as documented in published accounts of his testimony. His written testimony describes the cap as a precautionary response to public concern. In 2018, then-ASMFC Chairman James "Jim" Gilmore Jr., responding to Virginia's appeal of the reduction to 51,000 metric tons, stated that "Leadership agrees the Amendment does not provide sufficient evidence to support such claims" - referring specifically to the argument that lowering the cap was necessary to protect the Bay as a nursery area. His statement is also reflected in the ASMFC's published proceedings.

The lawmakers have not established that further restricting this fishery would produce those environmental benefits. The ASMFC should reject further Chesapeake Bay cap cuts and mandatory seasonal allocations until the research can establish their necessity and likely benefits. Hundreds of working families should not pay the price for restrictions unsupported by completed Bay-specific science.

Congressional signatories: The published letter bears the signatures of Senators Chris Van Hollen (D-Md.), Angela Alsobrooks (D-Md.), Cory Booker (D-N.J.), Lisa Blunt Rochester

(D-Del.), Chris Coons (D-Del.) and Martin Heinrich (D-N.M.), and Representatives Sarah Elfreth (D-Md.-3), Frank Pallone Jr. (D-N.J.-6), Eleanor Holmes Norton (D-D.C., at-large delegate) and Bobby Scott (D-Va.-3). The accompanying press release also identifies Representative April McClain Delaney (D-Md.-6), although her signature is absent from the published letter.



About the Menhaden Fisheries Coalition

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TRCP Video Series Is Latest Campaign to Spread Falsehoods About Atlantic Menhaden Fishery

Tuesday, 05 May 2026 03:00 PM

Topic: Environmental, Social and Governance

WASHINGTON, D.C. / ACCESS Newswire / May 5, 2026 / A recent video series from the Teddy Roosevelt Conservation Partnership continues the organization's near decade-long

practice of spreading misinformation about the Atlantic menhaden fishery. From substituting anecdotes for real science to misidentifying the companies involved in the fishery to mischaracterizing the state of the stock, the videos paint a misleading picture of a sustainable and economically vital fishery.

Menhaden Are Important - But the "Most Important Fish in the Sea" Claim Is Misleading

The videos repeatedly refer to menhaden as "the most important fish in the sea," which also serves as the title for the series. This phrase comes from the title of a 2007 book by H. Bruce Franklin, a former Rutgers University English professor. While menhaden are an ecologically and economically important species, the moniker of "most important fish in the sea" has historically been misused by industry opponents to suggest that menhaden play an outsized role in the ecosystem compared to other forage species. This is not borne out by the science.

A 2015 analysis of the diets of five major predator species in the Chesapeake Bay found that Atlantic menhaden was not one of the top four most important prey species. Menhaden was found to be significant for just one predator, striped bass, while bay anchovy was significant for four of the species and was even more important for striped bass than menhaden. Similarly, a 2025 study of Gulf menhaden using cutting-edge stable isotope analysis found that they do not play an outsized role in predator diets and that there is no "most important" prey species in the Gulf.



Anecdotes Are Not a Substitute for Science

Besides misleading monikers, the videos frequently use anecdotes as stand-ins for real science. In one video, a drone operator states that she saw menhaden on 76 days in 2023, and just 24 days in 2025. In another, a filmmaker states that she is seeing fewer menhaden inshore, while a few years ago there were "acres and acres of menhaden all summer long" and "you could almost walk on [them]." She also falsely states that the "biggest threat facing menhaden is overfishing."

While the observations of those on the water can in some cases guide sound science, individual anecdotes are not a substitute for the work of numerous scientists and fisheries managers who have found the menhaden population is healthy and sustainable. The Atlantic States Marine Fisheries Commission

(ASMFC) has repeatedly found that menhaden are not overfished and overfishing is not occurring. Moreover, the fishery is certified sustainable by the Marine Stewardship Council (MSC), the international gold standard for seafood sustainability.

The Videos Misidentify the Companies Involved in the Fishery

Another video featuring a charter captain is replete with falsehoods. In it, the captain accuses an "industrial company, Omega [Protein]" of "taking more than the Bay can handle - it's not sustainable." This is not only incorrect on the merits - again, the fishery is managed for sustainability by the ASMFC and has been certified sustainable by MSC - but also misidentifies the company that harvests fish. Fishing is conducted by Ocean Harvesters, an American company based in Reedville, Virginia; Omega Protein is a processing company that does no fishing.

Sustainability Is Measured by Science, Not Visual Impressions

The charter captain further states, "you can sit out here and watch them pull up a gigantic net full of [menhaden] and you look at it and it's like 'how is that sustainable?'" The size of the net has nothing to do with the sustainability of a species that is measured in millions of metric tons. The menhaden fishery adheres to quotas set by federal managers and states based on the best available science. That is how sustainability is measured - not by the size of individuals nets.

The Osprey Narrative Ignores Scientific Complexity

The video series also features frequent fishery detractor Chris Moore of the Chesapeake Bay Foundation continuing to drive the narrative that menhaden fishing is responsible for problems with osprey productivity in the Bay. This claim is echoed by

Remy Moncrieffe of the National Audubon Society, who states that a "lack of science in regards to the menhaden population, especially in the Bay, is one of the biggest deterrents we have towards effectively managing menhaden."

Menhaden is one of the most studied fish species on the Atlantic coast. Menhaden fishery members have partnered with the Science Center for Marine Fisheries for the past decade, leading to numerous scientific publications and graduate-level theses. Landings data from the industry is used by NOAA scientists and the ASMFC in their menhaden stock assessments. And the industry is supportive of a new effort to produce a research roadmap for menhaden in the Chesapeake Bay.

There is no scientific consensus that menhaden fishing is related to osprey issues in the Bay. U.S. Geological Survey (USGS) scientists have pointed out that osprey populations have leveled off in numerous areas around the country, including places like California and Washington where there are no menhaden, and that there are numerous environmental factors that impact osprey productivity. Fisheries scientists have also questioned the statistical basis that some avian researchers used to draw a link between menhaden fishing and osprey.

Menhaden Is Already Managed With Extraordinary Precaution

The videos call for "more precautionary management" of menhaden "while we get more science," ignoring the fact that menhaden are already managed with extraordinary precaution, including the use of ecological reference points specifically designed to account for predator needs. This call echoes a TRCP petition to remove the fishery from the Chesapeake Bay, which would effectively lead to its shutdown. The idea of shuttering a

fishery that has operated continuously for nearly 150 years, is not overfished nor experiencing overfishing, and is certified sustainable by the world's preeminent seafood certifier flies in the face of all traditional fisheries management. Advocacy videos from TRCP using anecdotes, mischaracterizations, and straight up falsehoods do not change the truth about this fishery.

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Press Contact

Menhaden Fisheries Coalition
(202) 595-1212
www.menhaden.org

SOURCE: Menhaden Fisheries Coalition

Two Independent Reviews Find No Evidence that Virginia's Menhaden Season Is 'Blocking' Fish from Reaching Maryland Pound Nets

Monday, 04 May 2026 11:30 PM

Topic: Environmental, Social and Governance

WASHINGTON, DC / ACCESS Newswire / May 4, 2026 / A

proposed Atlantic menhaden management addendum aimed at Virginia's Chesapeake purse seine fishery is being driven by a simple claim: that a shift in the timing of the reduction fishery has reduced menhaden availability farther north, contributing to lower Maryland pound net harvests.

Two separate analyses, one statistical and one oceanographic, reach the same conclusion: the available evidence does not support the "gauntlet" theory. Instead, both studies suggest Maryland pound net results are better explained by (1) changes in fishing effort and (2) Bay conditions that affect where fish can live and how catchable they are.



The analyses were submitted to the Atlantic States Marine Fisheries Commission's Atlantic Menhaden Management Board in a comment letter from Ocean Harvesters.

The ASMFC Atlantic Menhaden Management Board's Plan Development Team (PDT), the staff group tasked with drafting the proposed addendum, has already signaled that the addendum's core premise warrants deeper scientific review. In a memo to the Board, the PDT recommended referring the proposal to the menhaden Technical Committee (TC) as "a more appropriate avenue to conduct a detailed analysis" of the central claim driving the addendum: that a recent shift in timing of the Chesapeake Bay reduction fishery has reduced fish availability in the upper Bay and, in turn, reduced Maryland pound net harvests.

These two studies support that recommendation by challenging the "blocking" narrative and highlighting alternative explanations rooted in measurable environmental conditions.

1) What the numbers say: when Virginia sets are high, Maryland catch-per-trip tends to be high too

The first study was conducted by Georgetown Economic Services (GES) using commonly referenced data sources: Virginia purse-seine "net sets" and Maryland pound net landings and trips.

If the Virginia reduction fishery is preventing menhaden from reaching Maryland, then Maryland's catch-per-trip should fall when Virginia activity rises.

That's not what the data show.

GES calculated Maryland "harvest per trip" (a common way to express catch rate) and compared it month by month against the number of Virginia purse-seine sets, while accounting for normal seasonal patterns.

Result: the relationship was positive and statistically meaningful. The "net sets" coefficient was 2.4063 with a p-value of 0.0289, meaning the relationship is unlikely to be random noise.

Put plainly:

- When Virginia set activity is higher, Maryland's menhaden catch per trip tends to be higher.
- When Virginia set activity is lower, Maryland's menhaden catch per trip tends to be lower.

GES notes it's "highly unlikely" that one fishery is impacting the other; the more reasonable interpretation is that both fisheries are responding to the same underlying condition: how many fish are present and available in the Bay at a given time.

This is the opposite of what you'd expect if a lower-Bay "gauntlet" were systematically starving the upper Bay of fish.

2) What the Bay's physics say: water conditions can change where menhaden concentrate, without any "interception"

The second study was prepared by Dr. Arnoldo Valle-Levinson, a University of Florida professor who specializes in how water moves through estuaries and how that movement shapes conditions in places like the Chesapeake.

Rather than starting with fishing narratives, this analysis starts with a basic reality of the Chesapeake Bay: summer conditions can squeeze fish into smaller "livable" layers of water, and those shifts can make fish easier or harder to catch depending on location and gear.

A simple but critical point: catches fell, but effort fell too; catch rate did not steadily collapse

Dr. Valle-Levinson first looked at Maryland pound net time-series patterns:

- Maryland menhaden catches show a decreasing trend over the last 12 years.
- Maryland trips (effort) also show a decreasing trend.
- The two "go hand in hand."
- Importantly, catch per unit of effort (catch/trip) "has not changed over time," despite a marked dip in 2024.

That matters for public understanding: lower landings do not automatically mean fewer fish are available. Sometimes, it means fewer trips are being made.

The "hypoxia" effect: when oxygen drops, fish habitat compresses, and catches can rise

The report then evaluates how hypoxia (low oxygen levels in the water) relates to catch patterns. It tracks hypoxic depth, essentially, how far down you have to go before oxygen becomes too low for many fish.

Dr. Valle-Levinson finds that Maryland catches and catch rates show a consistent linkage with hypoxia depth over annual cycles. In practical terms, the analysis indicates that catches increase when the low-oxygen zone rises (when hypoxic depth becomes shallower), a pattern consistent with fish being pushed into a smaller oxygenated layer, making them more concentrated and more catchable.

Stratification and river flow: the upstream "push" that can set the stage

The report also finds that:

- River discharge in the upper Bay relates to water-column

stratification in the mid-Bay (how strongly the Bay separates into layers).

- River discharge relates to hypoxic depth.
- Stratification is linked to Maryland catches and catch rates, especially at deeper mid-Bay stations.
- There is also evidence that increased discharge is linked to increased Maryland catch with a time lag (months).

The submission summarizes this chain in a way that's easy to visualize: **more freshwater flow → stronger layering → stronger hypoxia/habitat compression → fish concentrate → catches can rise.**

The report even includes a plain-language schematic ("The estuary cascade") illustrating how high-flow seasons can contribute to stratification, expand low-oxygen conditions, compress fish habitat, and increase pound net catches, again, without invoking any "interception" mechanism.

About Dr. Arnoldo Valle-Levinson
Dr. Valle-Levinson is a Professor in the University of Florida's Department of Civil and Coastal Engineering and currently serves as a Program Officer for Physical Oceanography at the National Science Foundation.

He is the author of the textbook, *Introduction to Estuarine Hydrodynamics*(Cambridge University Press, 2022); and the Editor of *Contemporary Issues in Estuarine Physics* (Cambridge University Press, 2010).

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Press Contact
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SOURCE: Menhaden Fisheries Coalition

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James Boyle

From: elizabeth thompson <theleesburg4@gmail.com>
Sent: Thursday, October 15, 2026 5:46 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

From: Elizabeth Thompson, Leesburg, New Jersey.

I ask that my message be formally included in the Atlantic Menhaden Management Board's meeting materials.

I support a 40% reduction to approximately 114,200 MT menhaden Total Allowable Catch (TAC), which provides a 50% probability of not exceeding the Ecological Reference Point (ERP) target, and I urge ASMFC to reaffirm its commitment to science-based Ecological Reference Point (ERP) management.

PLEASE GET MENHADEN MANAGEMENT BACK ON TRACK!

Thank you very much!

Elizabeth A. Thompson
189 High Street, PO Box 53
Leesburg, NJ 08327

Email: theleesburg4@gmail.com
Cell/Text: 856.491.8539
Phone/Voicemail: 856-785-2350

"If you want to see birds, you must have birds in your heart." -- John Burroughs

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James Boyle

From: Barbara S <bgslatcher@gmail.com>
Sent: Thursday, October 15, 2026 10:23 AM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

Please reduce the coastwide menhaden quota by at least 40% for 2027–2028

Thank you,
Barbara Slatcher

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James Boyle

From: Tyler Wilkins <tylewilk@gmail.com>
Sent: Friday, October 16, 2026 7:15 PM
To: Comments
Subject: [New] [External] Atlantic menhaden 2027-2028 TAC

To whom it may concern,
I speak for many with grave concern for the future of our Atlantic fisheries. Many species are in danger of complete population collapse due to the over harvesting of menhaden, a food source needed for the sustainability of whole ecosystems. This is certainly not a natural, environmental, or climate change phenomenon that has led the drastic reduction in numbers. It is of utmost importance that at least a 40% reduction in TAC for Atlantic menhaden be administered to commercial fleets. I hope you consider the objective facts and do the right thing.

Sincerely,
Tyler Wilkins

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James Boyle

From: Annie Kowalski <dskowalski93@gmail.com>
Sent: Friday, October 16, 2026 11:07 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

Please god the ospreys need a moratorium to help their numbers rebound

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James Boyle

From: Ryan Alberts <rjalberts777@gmail.com>
Sent: Saturday, October 17, 2026 12:55 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

To whom it may concern,

I am writing to urge for a TAC reduction of 50%. I understand that fishing is a part of many people's lives. I enjoy fishing and partake in the hobby. I do not catch fish on some of my outings, but I still have a great time. I will not starve to death if I don't catch fish. I also am an avid birder and care about birds and ornithology. Ospreys on the other hand are directly starving to death due to the current TAC in the Atlantic Menhaden. Please consider reducing the TAC to protect not only ospreys, but other birds and wildlife that rely on the local fishing reserves. People like me can then still enjoy fishing and bird watching.

Thank you,
Ryan A

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James Boyle

From: Germain Cloutier <stripedbassking@yahoo.com>
Sent: Saturday, October 17, 2026 12:57 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

Hello,
I Fully support Maximum reduction needed in the Menhaden fishery to turn around the decline of this very important baitfish species. Please do the right thing and get Menhaden Management back on track!

Thank you,
Germain Cloutier

Sent from Yahoo Mail for iPhone

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James Boyle

From: Lyell Gallagher <lyellgallagher@gmail.com>
Sent: Saturday, October 17, 2026 1:34 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

I support the menhaden TAC. The Chesapeake Bay and its rivers are spawning grounds for many species of fish that depend on menhaden to survive as well as Osprey and Mendahen themselves. It is essentially a nursery for all species of fish and wildlife and should be treated as such. Taking entire schools of Menhaden or any other fish without a means of safely returning the ones that are too small to spawn will bring anything to the brink of extinction in time. I have purchased crab bait (menhaden) that were way too small to spawn. The blues that I have caught were feeding on shiners when they have always in the past fed on menhaden. That is just one proof of the overfishing and low numbers of menhaden that is occurring in the Chesapeake Bay area. I believe the industrial Menhaden reduction fleet that uses planes and purse nets to surround schools of menhaden and whatever is feeding on them should only fish in the ocean past the 3 mile line as all of the other Atlantic states require.Thank you, Sincerely, Lyell Gallagher

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James Boyle

From: Laura Tillman <lauramiles.tillman@gmail.com>
Sent: Saturday, October 17, 2026 5:53 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

I support a 114,200 MT menhaden TAC, which provides a 50% probability of not exceeding the Ecological Reference Point (ERP) target, and urge ASMFC to reaffirm its commitment to science-based Ecological Reference Point (ERP) management.

Course correct the overfishing that has been happening without research and study because Omega has previously opposed scientific inquiry. A shared biological resource should be shared!

Sincerely,
Laura Tillman

Sent from my iPhone
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James Boyle

From: Sarah Hansel <magmakgran1@gmail.com>
Sent: Sunday, October 18, 2026 5:15 AM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

I am unhappy that osprey have had to compete with factory fishing boats for food. I support a 114,200 MT menhaden TAC, and urge ASMFC to reaffirm its commitment to science based Ecological Reference Point management

Sarah Hansel
Onancock. VA

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James Boyle

From: David Johnson <johnsd01@yahoo.com>
Sent: Sunday, October 18, 2026 8:36 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

I live in Cape Charles and watch the fishing boats and tracking planes all the time. It's horrible to me that we are being so irresponsible concerning the menhaden population. I have lived here for years and have observed the decline first hand. Please stop the commercial fishing for the menhaden all together to allow them to recover. Why is this even a debate?
Dave Johnson
757-813-7723
2459 Townfield Dr
Cape Charles VA

Sent from Yahoo Mail for iPhone

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James Boyle

From: Lee D <lee.droste@gmail.com>
Sent: Sunday, October 18, 2026 10:43 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

To Whom it May Concern,
As a angler, citizen and lover of the natural world I urge you to please consider the following amendments to the upcoming Menhaden quotas...

- Cut the coastwide TAC by 40% to approximately 112,100 metric tons for 2027 and 2028, which the ASMFC's own science projects would still result in a 40% and 50% chance of overharvest during those years.
    - Effective management action is needed now. Delays would allow the current TAC (186,840 mt) to be used for the 2027 harvest season, enabling continued unsustainable Atlantic Menhaden harvests by the commercial fishery.
    - Set the TAC as a fixed tonnage for 2027 and 2028, not a formula that adjusts automatically. Do not defer it pending further analysis.

Thank you for your attention to this matter.
Sincerely,
Lee X. Droste
Sent from my iPhone

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James Boyle

From: Maxwell Bruch <maxwell.bruch@gmail.com>
Sent: Monday, October 19, 2026 9:56 AM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

Hi Atlantic States Marine Fisheries Commission,

I'm reaching out regarding the plight of the Ospreys. The menhaden are being overfished due to a large overestimation of their population and thus their cap was too high.
Fishermen benefit from healthy ecosystems. Ospreys contribute to those healthy marine ecosystems that the fishermen earn their livelihoods in.
When osprey are starving and not able to feed their young, it is a sign that the ecosystem needs help. Sadly, right now it seems that we are the culprit tipping it towards imbalance.

Please consider a 50% reduction in TAC to allow the menhaden population to recover. I am personally in favor of a moratorium, as while it is difficult for everyone who relies on this fish, that period will be shorter than if there is a cap reduction and some people are still fishing but competing with others for a smaller pool, etc. it may also encourage some entrepreneurial activity for others to possibly find other ways of making an income that may be more lucrative or sustainable during that time if they are forced to stop fishing menhaden.

As a real estate agent, when listing a home that the owner insists on a high price or other factors result in it not gaining traction the way they want, I generally try to follow the advice of "cut once, cut deep". They want to sell the house so they are no longer burdened with that financial responsibility and can move on to their priorities (finding a new home, moving in, relocating, etc). Yes that cut might be painful, but it solves a problem and saves time to get back to 'normal' instead of a small slice one week, another in a month if it's not working, and a medium dip when desperation starts to set in to ultimately end up around the same ballpark but with much more time and headache involved.

I encourage you all to consider the same philosophy for the menhaden, the ospreys, and the fishermen. A moratorium on TAC, or a 50% reduction at minimum to help solve this problem and allow all involved parties to return to 'normal' as soon as possible.

I sincerely hope you consider this approach to the situation at hand.

Best,
-Max Cooper-Bruch

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James Boyle

From: Tyler Borer <tylerborer8@gmail.com>
Sent: Monday, October 19, 2026 12:59 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

Please reduce the coastwide menhaden catch limit by at least 40% from its 2026 level for 2027 and 2028, and set limits that leave enough for all wildlife that depend on them.

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James Boyle

From: Brad V <brad.vogel@gmail.com>
Sent: Monday, October 19, 2026 1:05 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

Dear AMMB,

I'm sick of Omega Protein destroying the Atlantic menhaden population! You need to act!

Please reduce the coastwide menhaden catch limit by at least 40% from its 2026 level for 2027 and 2028, and set limits that leave enough food for the fish and wildlife that depend on menhaden (whales, fish, seabird, etc.). The long-term health of the bunker population in the waters I live near, interact with, paddle across, and boat on depends on you acting with clarity now.

Please include my comment in the Atlantic Menhaden Management Board's meeting materials.

Along Gowanus Bay,

Brad Vogel
Gowanus, Brooklyn, NY

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James Boyle

From: Jen Forsythe <jennanj1996@gmail.com>
Sent: Monday, October 19, 2026 2:42 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

Good afternoon,

Please reduce the coastwide menhaden catch limit by at least 40% from its 2026 level for 2027 and 2028, and set limits that leave enough food for the fish and wildlife that depend on menhaden. Please include my comment in the Atlantic Menhaden Management Board's meeting materials.

Please reduce the catch limit to AT LEAST 40% as striped bass numbers are on the decline in the Atlantic Ocean. Osprey chicks have also faced a mortality rate of 50% in New Jersey due to lack of food resources available. Other species such as bluefish, dogfish, bluefin tuna, fluke and sharks rely on menhaden populations as a food resource. One loss of a species inevitably leads to the destruction of another, unless we as human beings take care of what was given to us.

Only the righteous care for the needs of our animals.

Regards,

Jenna Paterno

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James Boyle

From: Warren Stern <wrstern@me.com>
Sent: Monday, October 19, 2026 2:52 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

I have fished the waters of the LI Sound for more than 40 years. I am very concerned about the declining quality of this very important fishery. I am aware that the ASMFC is considering the 2027-2028 coastwide Atlantic menhaden TAC. I urge the Board to cut the coastwide TAC by 40%, to approximately 112,100 metric tons, as a fixed tonnage for 2027 and 2028, and to do so without delay.

Thank you for considering this comment. I am sure that many anglers will agree.

Warren R. Stern
Greenwich CT

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James Boyle

From: Renee DeMicco <reneedemicco@gmail.com>
Sent: Monday, October 19, 2026 3:59 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

Hello and thank you for allowing public comment on such an important topic. As you probably already know, ospreys had their worst year on record up and down the Atlantic coast. Ospreys play an important role in our ecosystem and are an indicator species. They came back from near extinction after the widespread use of DDT in the 50s-70s and were taken off of NJ's endangered list only very recently in January 2025 thanks to the DDT ban, the ESCA, and so many volunteers and biologists over several decades working hard to bring their numbers back. They were finally thriving, until they weren't. Their success is rapidly reversing. Evidence shows that Atlantic Menhaden, the osprey's primary food source, is no longer as abundant as it once was and has caused the collapse of their success. I believe that the overfishing of this important forage fish has caused a significant decline in the population of ospreys and is continuing to cause a major negative butterfly effect in our region for many other species such as striped bass and bluefin tuna, among many others.

Please reduce the coastwide menhaden catch limit by *at least* 40% from its 2026 level for 2027 and 2028, and set limits that leave enough food for the fish and wildlife that depend on menhaden. Please include my comment in the Atlantic Menhaden Management Board's meeting. Thank you for your time and this opportunity.

Sincerely,
Renee DeMicco
Waretown, NJ

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James Boyle

From: Patrick Cassidy <patrick@capecodonthefly.com>
Sent: Monday, October 19, 2026 4:23 PM
To: Comments
Cc: James Boyle
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

I am writing in support of more protection for menhaden in the Commission's upcoming decision on the coastwide total allowable catch (TAC). In light of the importance of these forage fish to other fish species like striped bass, birds like osprey, marine mammals like whales, and the wide range of connected recreational and economic activities, the Commission should - at the least - implement a 40% reduction in the TAC, as supported by your own work. Feel free to do more but doing less, kicking the can down the road, or simply matching reduction to the latest harvest, as you did last year, would be a clear abdication of your responsibility. Do not give in to a single special interest with little benefit to the overall health and economy. The consequences of failing to do the right thing in this case are significant. This is more so the case given the recent and well documented effects on osprey and the latest striped bass young-of-the-year data, which although still not ideal, provides some hope for future striped bass stock. All of these species need the same thing: food. Menhaden is one of the most important foods to protect in order to protect everything that depends on them, including small businesses like my own. I am a fishing guide on Cape Cod and, like many here, have become increasingly concerned with the effect of fewer fish on my clients' experience, the future of my business, and the broader economy. It all goes back to menhaden. Protect menhaden. Protect us. Protect the future.
Tight lines,

Patrick Cassidy
508-246-3757
patrick@capecodonthefly.com
capecodonthefly.com

Buy tickets to NFFO 2026 here!

Have you taken a lesson lately? It's probably time.
Ask me about the Cape Cod School of Saltwater Fly Fishing.

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James Boyle

From: Tim Regan <tkregan12@gmail.com>
Sent: Monday, October 19, 2026 11:37 PM
To: Comments
Subject: [New] [External] [Atlantic Menhaden 2027-2028 TAC]

I am a surf fishing guide and marine wildlife photographer in Suffolk County, New York. I witnessed the resurgence of Atlantic Menhaden firsthand. I saw whales return to our shoreline, osprey and eagle populations bolster, and fisheries improve as a direct result of the improved menhaden population. 2025 and 2026 have been lackluster on the menhaden front though. It is very clear to anyone who spends ample time on the water that this fishery is being abused at an unsustainable level, and the mismanagement of this specific species is causing devastation to the coastal ecosystem.

The coastline TAC needs to be reduced by at least 40%. Set the TAC as a fixed tonnage for 2027 and 2028, not a formula that adjusts automatically. Do not defer it pending further analysis.

Fix the Chesapeake Bay Reduction Fishery Cap at 25,500 metric tons. At a coastwide quota near 112,000 metric tons, keeping the current 51,000-ton Bay Cap would allow roughly 45% of the coast's harvest to come from inside the Bay. A 25,500-ton cap is about 23%, in line with the 24% average since 2018.

Reject every option linking the Bay Cap to the coastwide TAC. Reductions to the Bay Cap are conservation for the Bay, and should be approached as such. Linking the Bay Cap to the coastwide TAC opens the door for geographic reallocations of unused quota and for increased harvest in the future.

My first son is about to be born. I'd like him to be able to watch whales, tuna, dolphins, bluefish and striped bass breach from the ocean in pursuit of this great American fish, the Atlantic Menhaden. I'd like for him to see bald eagles and ospreys battling for their catch over the surf. If the ASMFC doesn't act in a conservation-minded way right now, I fear he won't be able to experience these incredible events.

Sincerely,
Tim Regan
South Fork Salt

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James Boyle

From: Kyle Schaefer <kyle@soulflyco.com>
Sent: Monday, October 19, 2026 2:34 PM
To: Comments
Subject: [New] [External] [Atlantic Menhaden 2027-2028 TAC]

Good Afternoon,

I am a long time fishing guide and entrepreneur in the fishing industry. My comments come with years of experience on the Atlantic coast in the fishery and the management process.

I strong urge the board to cut the coastwide TAC by 40%, from 186,840 metric tons to 112,100 metric tons, as a fixed tonnage for 2027 and 2028, with no delay.

ASMFC has severely lost trust with the public that you can properly manage any fishery let alone a keystone species like menhaden. It's incredibly disappointing to continually see the resource(menhaden) loose and the special interest commercial groups "win" while predators, rec anglers, and coastal communities bear the burden.

I've seen the gulf of maine for years without pogues and I've seen the gulf with plentiful with pogies. It's incredible what our oceans can do if they are given the opportunity to thrive. Our communities will thrive along side our waters. Do what is right for the resource. Stop operating just to please just the lobster industry and omega. You work for the public, start acting like it.

Best,

CEO & CO-FOUNDER

(603) 969-3050 | Kyle@soulflyco.com

Lodge: Web | IG

Events: Web | IG

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James Boyle

From: Kyle Hublitz <kylehublitz@yahoo.com>
Sent: Monday, October 19, 2026 2:21 PM
To: Comments
Subject: [New] [External] [Atlantic Menhaden 2027-2028 TAC]

This is Kyle Hublitz, fisherman out of Riverside CT and Shinnecock, NY.
We desperately need to cut down on the menhaden overfishing happening right in plain sight! So many other fisheries and bird populations rely on the food chain basic building block of a large and healthy menhaden population, we can't allow so much widespread destruction by overfishing this species .

I am commenting on the 2027-2028 coastwide Atlantic menhaden TAC. I urge the Board to cut the coastwide TAC by 40%, to approximately 112,100 metric tons, as a fixed tonnage for 2027 and 2028, without delay.

Kyle Hublitz
Riverside, CT

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James Boyle

From: thatguy844@gmail.com
Sent: Sunday, October 18, 2026 8:05 AM
To: Comments
Subject: [New] [External] [Atlantic Menhaden 2027-2028 TAC]

To the Atlantic Menhaden Management Board:

I am a wildlife biologist in the Northeast, and I write in my personal capacity — not on behalf of any agency or employer — in support of a precautionary coastwide total allowable catch for Atlantic menhaden for 2027–2028.

The science case for caution is straightforward. The recent assessment update found menhaden abundance roughly 37% lower than previously assumed — the same overestimation that forced last year's 20% coastwide harvest cut. Setting the 2027–2028 TAC at the upper end of the range, on the basis of the old inflated abundance estimates, would repeat that mistake.

The ecological signal is visible from shore. The Connecticut Audubon Society's Osprey Nation program just reported its 2026 breeding
results: 0.87 chicks per breeding pair, the worst success in the program's 13-year history, with starvation implicated as a major factor for the first time. Rhode Island's 2026 osprey season was worse still — 38% of 339 monitored nests fledged young, at 0.33 young per pair, far below the stable-population threshold. Menhaden are the prey base behind those numbers.

I urge the Board to set the 2027–2028 coastwide TAC at a level consistent with the corrected abundance estimate — not at a level that assumes the old numbers were right — and to keep the coastwide TAC independent of any Bay Cap decision under Addendum II.

Joseph McEnery III
wildlife biologist, Greenwood Lake, NY
(commenting in a personal capacity)
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James Boyle

From: braddubik@gmail.com
Sent: Friday, October 16, 2026 12:10 PM
To: Comments
Subject: [New] [External] [Atlantic Menhaden 2027-2028 TAC]

Dear Chairman Clark and Members of the Atlantic Menhaden Management Board,

I am writing to comment on the 2027-2028 coastwide Atlantic menhaden total allowable catch. The 2025 benchmark assessment shows that the current TAC trajectory carries a 100% probability of exceeding the ERP fishing mortality target — that is not management within the ecological reference point framework the Board adopted in 2020.

I urge the Board to set the 2027-2028 coastwide TAC at a fixed tonnage that gives at least a 50% probability of meeting the ERP F-target, consistent with the best available science and the Board's own projections. I also ask that the coastwide TAC be decided independently of the Chesapeake Bay cap deliberations under Draft Addendum II — each should stand or fall on its own merits.

Sincerely,
Brad Dubik
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James Boyle

From: Lyn bass <lynbass81@gmail.com>
Sent: Monday, October 19, 2026 11:05 PM
To: Comments
Subject: [New] [External] Menhaden

To whom it may concern,

Please reduce the coastwide menhaden catch limit by at least 40% from its 2026 level for 2027 and 2028, and set limits that leave enough food for the fish and wildlife that depend on menhaden. Please include my comment in the Atlantic Menhaden Management Board's meeting materials.

Lyn Bass,
Long Island, New York

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James Boyle

From: Bryanna Strang <bryannastrang@gmail.com>
Sent: Monday, October 19, 2026 9:44 PM
To: Comments
Subject: [New] [External] Mendenhan Management

Hello

My name is Brie Strang from New Jersey. Please reduce the coastwide menhaden catch limit by at least 40% from its 2026 level for 2027 and 2028, and set limits that leave enough food for the fish and wildlife that depend on menhaden. Please include my comment in the Atlantic Menhaden Management Board's meeting materials.

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James Boyle

From: Stephanie Pileggi <stephanie.pileggi@gmail.com>
Sent: Monday, October 19, 2026 9:42 PM
To: Comments
Subject: [New] [External] Reducing coastwide menhaden catch limit

Hello

My name is Stephanie Pileggi from New Jersey. Please reduce the coastwide menhaden catch limit by at least r40% from its 2026 level for 2027 and 2028, and set limits that leave enough food for the fish and wildlife that depend on menhaden. Please include my comment in the Atlantic Menhaden Management Board's meeting materials.
Stephanie Pileggi

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James Boyle

From: Aaron Stephenson <aaronstephenson22@gmail.com>
Sent: Monday, October 19, 2026 9:28 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028

Hello
Please reduce the coastwide menhaden catch limit by at least 40% from its 2026 level for 2027 and 2028, and set limits that leave enough food for the fish and wildlife that depend on menhaden. Please include my comment in the Atlantic Menhaden Management Board's meeting materials.

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James Boyle

From: HILLARY LEONARD <hillaryleonard@comcast.net>
Sent: Monday, October 19, 2026 8:22 PM
To: Comments
Subject: [New] [External] Public Comment on the 2027-2028 Coastwide Atlantic Menhaden Total Allowable Catch (TAC)

Hello,
I am writing to voice my support to reduce the TAC for 2027 & 2028 drastically. I support the American Saltwater Guides Association recommendation, namely:

- **Cut the coastwide TAC by 40%** to approximately 112,100 metric tons for 2027 and 2028, which the ASMFC's own science projects would still result in a 40% and 50% chance of overharvest during those years.
    - Effective management action is needed now. Delays would allow the current TAC (186,840 mt) to be used for the 2027 harvest season, enabling continued unsustainable Atlantic Menhaden harvests by the commercial fishery.
    - Set the TAC as a fixed tonnage for 2027 and 2028, not a formula that adjusts automatically. Do not defer it pending further analysis.

The reality is that the TAC should be cut by much more than 40%. I support a complete ban of reduction fishing of menhaden for 3 to 5 years, to allow the population to rebound and with it the fate of the most noble of birds, the Osprey.

I have lived in NJ most of my life. I attended Stockton College where I was introduced to birdwatching and coastal ecosystem issues. I started watching Osprey from my home town of Avalon in the mid-90s and still watch them extensively now on the North Jersey shore & Hackensack River area. It is incredibly difficult to watch the starvation of Osprey chicks and nest abandonment by adults. And menhaden support so much more than Osprey. The entire food web, up to humans is dependent on these fish. The health of our coastal waters depend on their ingestion of phytoplankton. The benefits of abundant menhaden go on and on. If menhaden come back in large numbers, we will all benefit from the abundance.

Thanks,
Hillary Leonard
Montclair, NJ

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James Boyle

From: Rachel Wyman <rw.wyman7@gmail.com>
Sent: Monday, October 19, 2026 8:15 PM
To: Comments
Subject: [New] [External] Public Comment: Chicks are Trying to Eat Their Dead Siblings - Atlantic Menhaden TAC

To whom it may concern;

This comment should be distributed to the appropriate Commissioners and Board members, including Mr. Joseph Cimino.

As a born-and-raised New Jerseyan, I am heartbroken at the state of the osprey population - a direct result of the lack of menhaden. **Did you know this past nesting season, there was footage captured of osprey chicks attempting to eat their dead siblings (who died of starvation) after their parents abandoned the area due to a lack of food?**

Nests are failing, and our waterway eco-systems are collapsing. We must limit our consumption and do all that we can to slow, if not reverse, these effects. The ocean is resilient; it is NOT too late.

Please help. When you look back, will you be able to say you did all you could to leave the planet better than you found it? I urge the board to:

1. **Adopt a precautionary coastwide TAC** that prioritizes adequate menhaden availability for the marine food web, including ospreys and other dependent predators.
2. **Account for ecosystem needs and uncertainty** when setting harvest limits, treating persistent food stress and poor osprey reproductive performance as serious warning signs.
3. **Strengthen monitoring of menhaden availability and ecological impacts**, including the use of wildlife indicators such as osprey breeding performance alongside fisheries data.
4. **Apply adaptive management** that responds to emerging evidence of localized prey shortages, changes in prey availability, and ecosystem stress.
5. **Recognize the full ecological and economic value of menhaden**, including their importance to wildlife, recreational fisheries, wildlife viewing, and coastal communities.

- Via (Conserve Wildlife NJ.org, 2026)

Thank you.

Best,
Rachel Wyman

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James Boyle

From: erpayne@verizon.net
Sent: Monday, October 19, 2026 8:07 PM
To: Comments
Subject: [External] Atlantic Menhaden 2027-2028 Tac

To whom it may concern

I am deeply concerned about the lack of menhaden and the impact of reduction and other commercial fishing on these stocks. We have boated and lived on the Chesapeake Bay for more than 50 years.

The decrease is menhaden every year is becoming more and more noticeable. Rock fish aka striped bass rely on these fish. Rock fish stocks have been decreasing for years.

We used to have osprey nests around our property. Those nests are now abandoned and empty.

I am asking to reduce the menhaden harvest by the largest levels possible, moving harvesting boats 12 miles off shore and all the other measures suggested by Chesapeake Bay Foundation.

Tom and Elise Payne
Erpayne@verizon.net
Chesapeake City, MD

Sent from the all new AOL app for iOS

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James Boyle

From: Dennis Lysenko <dennis.s.lysenko@gmail.com>
Sent: Monday, October 19, 2026 5:49 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2029 TAC - public comment

Dear Commissioners,

My name is Dennis Lysenko. I live in Dunn Loring, Virginia. I'm writing to ask the Board to set the 2027-2029 Atlantic menhaden TAC well below the current 186,840 metric tons, low enough to give the ecological reference point target a real chance of being met.

I care about this because of ospreys. Menhaden are their main prey in the Chesapeake, and the birds are failing. In 2023, William & Mary's Center for Conservation Biology found that only 17 of the 167 lower Bay nests it monitored produced any young, about 0.13 young per pair, when roughly 1.15 are needed to keep the population stable. In Mobjack Bay, the rate at which male ospreys bring menhaden to the nest has fallen by more than 80 percent since 1985. Last month, a survey led by the Center of 2,886 pairs across ten Atlantic states was reported to show that only 28 percent of saltwater study areas produced enough young to sustain themselves, compared with 93 percent of freshwater areas.

The researchers are careful to call this a strong association, not proof. But the Board adopted ecological reference points so that menhaden would be managed with their role as food for other species in mind. Last year the Technical Committee's projections showed that a 20 percent cut would still leave fishing above the ERP target, and that a cut of 50 percent or more would be needed to improve those odds. I'd ask the Board to follow that advice this time rather than repeat a moderate cut.

Please include this comment in the briefing materials for the Atlantic Menhaden Management Board.

Thank you,
Dennis Lysenko

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James Boyle

From: Janice Dunham <jncdunham@gmail.com>
Sent: Monday, October 19, 2026 5:59 PM
To: Comments; James Boyle
Subject: [New] [External] Atlantic Menhaden Draft Addendum

I am strongly in favor of instituting now the recommendations of the Atlantic Menhaden Draft Addendum. I know the scientific results of decline and unsustainability of this species are incomplete, but the evidence of we who are often on the waters of Chesapeake Bay and areas around Cape May is irrefutable.
Menhaden, and especially adult Menhaden, are simply not there. What we are seeing and catching is preponderantly juvenile fish. The species who depend on Menhaden to make a living, like Ospreys, do not have enough to eat. Osprey numbers have seriously declined -- that is fact -- and juvenile Osprey are increasingly rare --also factual. Menhaden have usually been the largest part of the Osprey diet.

Please institute the recommendations of the Addendum, even if it has to be on a temporary basis.

Thank you for your attention,
Prof. Janice Dunham

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James Boyle

From: Kathy Michaelian <kmichaelian91@gmail.com>
Sent: Monday, October 19, 2026 7:13 PM
To: Comments
Subject: [New] [External] Atlantic menhaden 2027–2028 TAC

I support a 114,200 MT medhaden TAC, which provides a 50% probability of not exceeding the Ecological Reference Point target, and urge ASMFC to reaffirm its commitment to science based Ecological Reference Point management.

Katherine Michaelian
5475 Warren Street
Chincoteague, VA 23336

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James Boyle

From: patti jackson <jacksonpatti6@gmail.com>
Sent: Monday, October 19, 2026 3:49 PM
To: Comments
Subject: [New] [External]

“Please reduce the coastwide menhaden catch limit by at least 40% from its 2026 level for 2027 and 2028, and set limits that leave enough food for the fish and wildlife that depend on menhaden. Please include my comment in the Atlantic Menhaden Management Board’s decision..
Patricia Jackson
Del Haven
New Jersey
Wildlife needs you!!

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James Boyle

From: Donne <dwitt612@gmail.com>
Sent: Monday, October 19, 2026 3:21 PM
To: Comments
Subject: [New] [External] Menhaden Ocean TAC

I support a 114,200 MT menhaden TAC, which provides a 50% probability of not exceeding the Ecological Reference Point (ERP) target, and urge ASMFC to reaffirm its commitment to science-based Ecological Reference Point (ERP) management.

Thank you for your time with this.

Donne D Witt

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James Boyle

From: bob stabinski <bs19440@yahoo.com>
Sent: Monday, October 19, 2026 3:00 PM
To: Comments
Subject: [New] [External] Menhaden state

“Please reduce the coastwide menhaden catch limit by at least 40% from its 2026 level for 2027 and 2028, and set limits that leave enough food for the fish and wildlife that depend on menhaden. Please include my comment in the Atlantic Menhaden Management Board’s meeting materials.”
Here in southern new jersey the lack of bunker is scary. No bait around and osprey chics starving. Please do something ASAP.

Bob Stabinski

Sent from Yahoo Mail for iPhone

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James Boyle

From: STEPHEN ATKINSON <steveatkinson52@verizon.net>
Sent: Sunday, October 18, 2026 1:11 PM
To: Comments
Subject: [External] 2027 Atlantic menhaden TAC

AN OPPORTUNITY TO GET MENHADEN MANAGEMENT BACK ON TRACK!

The science was wrong, and has been corrected, providing the ASMFC Menhaden Board with the opportunity to use the best available science to make a positive difference for menhaden and the Atlantic ecosystem.

Advocates, including myself, are encouraging the Board to adopt a Total Allowable Catch (TAC) of 114,200 metric tons, which provides a 50% probability of not exceeding the Ecological Reference Point (ERP)

Please do not abandon your very important ERP science in favor of industrial reduction fishing.

Steve Atkinson

Sent from my iPhone
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James Boyle

From: Bill Campbell <jiminyxmas@gmail.com>
Sent: Sunday, October 18, 2026 5:17 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2026-2028 TAC

I support the 114,000 MT menhaden TAC, and would like the adjustment/review period to be “at least every 3 years.
Bill Campbell
Maryland & Virginia

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James Boyle

From: Sharon (Affishionado) <sharon@affishionado.com>
Sent: Monday, October 19, 2026 11:31 AM
To: Comments
Subject: [New] [External] Please save the Ospreys

To the Commission,

When it's clear that we are impacting the lives of the wild animals that we are responsible for living compatibly with and protecting, we must act. There are too many examples of the opposite happening with the Trump Administration. But since you have the authority to stop the decimation of menhaden and save the Osprey and other wildlife that depend on this fish, please do the right thing.

Consider the investment in recovery as a win for both animals and human beings. I live in the Seattle area and we struggle with preserving our Chinook salmon populations which have so many challenges. Restrictions to commercial and private fishing, fish hatcheries as well as restoring a healthy habitat to our waterways continue in a constant battle to save them and the resident Orca populations that rely on this species. It's not always easy to see progress but the point is, trying is our responsibility as stewards of this planet.

The Chesapeake is one of the country's greatest estuaries. Please use your power for good. Be an example to the country. Show the people of your region that Ospreys and our natural habitats are essential to quality of life on this earth.

Thank you for listening,
Sharon Wada

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James Boyle

From: Susan Allen <susanallenn@icloud.com>
Sent: Monday, October 19, 2026 12:47 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

Hello,

I'm from New Jersey and observed the worst osprey nesting season of my lifetime.

Please reduce the coastwide menhaden catch limit by at least 40% from its 2026 level for 2027 and 2028, and set limits that leave enough food for the fish and wildlife that depend on menhaden. Please include my comment in the Atlantic Menhaden Management Board's meeting materials.

Thank you,
Susan

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James Boyle

From: Hans Gabler <gablerhans96@gmail.com>
Sent: Monday, October 19, 2026 1:34 PM
To: Comments
Subject: [New] [External] Menhaden

Sirs:

This “reduction fishing" has to be slowed down OR stopped. A finite resource such as the fish that basically feeds the whole Chesapeake Bay cannot handle INDUSTRIAL FISHING.

A 40% decrease is maybe and I mean maybe, a start.

HG
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James Boyle

From: BRUCE KINDSETH <bkindseth@cox.net>
Sent: Monday, October 19, 2026 1:52 PM
To: Comments
Subject: [External] Atlantic Menhaden TAC for 2027

Dear Mr. Cimino and Members of the Atlantic Menhaden Management Board.

Thank you for allowing me to comment on behalf of Narragansett Surfcasters on a very important issue with Atlantic Menhaden and the future of the Atlantic Fishery.

Almost a year ago now, the ASMFC Menhaden staff recommended a cut in the menhaden TAC of 54%. There was a lot of opposition from states that depended on the bait fishery and were already suffering from the collapse of the Atlantic herring and the high cost of bait. The Menhaden board finally settled on a compromise of a 20% cut.

There were a lot of comments submitted by the public. (LINK) (LINK) One was by Paul Eidman, charter boat operator and founder of Menhaden Defenders. His suggestion is to set the 2026-2028 TAC at 75,616 mt, the current TAC for the bait fishery, and reallocate all quota to the bait fishery to protect the bait, lobster and crab fisheries, and prohibit menhaden fishing for reduction purposes. His comment is on p.9 of the first link above.

To me, that seemed like the best solution and in nearly a year since, I have found a lot of information that supports this solution, which I will highlight in the following text.

There were also many letters from fishermen and lobstermen in the Gulf of Maine area telling about the abundance of menhaden there. Another fisherman mentioned that there used to be a lot of menhaden in the GOM, but they disappeared in the 1990's.

The abundance of menhaden in the GOM was news to me. A friend investigated using AI an found, "While there is no single scientific consensus that the 2012 catch limit *caused* a northward expansion, experts agree it significantly contributed to a population rebound that allowed Atlantic menhaden to return to their historic northern range." **This is very exciting because that would mean that the Paul Eidman solution, which is an even bigger cut, would cause an even larger expansion of the menhaden population.**

!00% of the cut in TAC will go into growing the fishery. The menhaden that are eaten will allow an equal amount of fish to stay in the fishery and grow the fishery. Those that don't get eaten will grow the menhaden population.

So, based on this example, I started using AI. NASA, in the Apollo program, had a slogan, "In God we trust, all others bring data." I don't even trust myself. That's why I am putting everything that I get from AI in a library on my website. (LINK). I want to be completely transparent in what I do and I welcome feedback.

From my first involvement with the herring Amendment 10, I became aware that the whole Atlantic fishery was far below historic levels, beginning with the collapse of the Atlantic herring around 1980 and the cod following in the 1990's. I was aware of bioenergetics being used in a couple of models. So, I asked AI if any bioenergetic studies had been done that would link the collapse of herring to the collapse of cod in the northwest Atlantic. The answer was no but I was referred to a study done on herring and cod

in the straights between Sweden and Denmark. (LINK) This study is very interesting. They used a bioenergetics model (LINK) to predict how cod would react using optimal foraging theory (LINK) and then test the predictions by observing the cod's behavior and collecting data. They found that cod would arrive in the area first and feed on benthic prey. When the herring arrived, they would feed exclusively on herring, but they would only fill up to about 2/3 full. This they believed fit the optimal foraging theory, that the risk from predation from seals while foraging outweighed the value of the additional forage. Then, when the cod's energy reserves were built up, they stopped feeding on herring and switched back to benthic prey for protein and also including a shore crab which was a source of arachidonic acid (ARA) which acts as a micronutrient precursor for prostaglandins, which is important for reproduction.

So what does this study in Scandinavia have to do with menhaden and striped bass in America? **One of the findings of the study was that fish need lipids for energy, protein for growth and both lipids and protein for egg production.** So, I asked Grok AI the following:

"Question: In a paper that you found for me, Van Deurs et al 2022, (LINK), it was mentioned that fish need lipids for energy, protein for growth, and both lipids and protein for egg-laying. Now consider the case of an anadromous fish, striped bass. They must burn a lot of energy from stored lipids swimming upstream to spawn.

Response: Striped bass illustrate a clear application of the macronutrient principles from van Deurs et al. (2022). In that paper on Atlantic cod, lipids are the high-density fuel preferentially used for metabolism and activity (with a protein-sparing effect), while proteins supply the amino acids required for somatic growth and gonad tissue because fish cannot synthesize protein from fatty acids. Gonad development (egg production) draws on both, plus micronutrients such as arachidonic acid. (LINK)

Anadromous striped bass (Morone saxatilis) face an especially high lipid demand. Mature adults leave coastal or estuarine feeding grounds and swim upstream into freshwater rivers (major systems include Chesapeake Bay tributaries, the Hudson, Delaware, and Roanoke) to spawn in spring when temperatures reach roughly 14–20 °C. These migrations can cover tens to well over 100 miles against current and can be energetically costly. Fish rely primarily on endogenous stores, especially visceral and muscle lipids accumulated during the previous marine feeding season (often on lipid-rich forage such as menhaden, herring, or anchovy), to power the swimming. (LINK) (LINK)

How this maps onto the paper's framework:

- Lipids for energy: The upstream swim is met largely by oxidizing stored lipids. This matches the paper's emphasis on lipids as the preferred metabolic fuel and the "protein-sparing effect of lipids." Adequate lipid reserves let the fish meet locomotor and maintenance costs without heavily catabolizing muscle protein.

- Protein for growth and for eggs: Protein (from residual muscle stores and any dietary intake) is the irreplaceable building material for ovarian tissue and eggs. Striped bass eggs contain both protein-rich yolk and lipid-rich oil globules, so both macronutrients are allocated to the clutch. Females can produce hundreds of thousands to millions of eggs depending on size.

- Both for reproduction

As in the cod model, an individual preparing for spawning benefits from a higher lipid:protein energy ratio than one focused only on somatic growth. Depleting lipids too far during migration can force greater protein catabolism, potentially reducing the material available for eggs, lowering fecundity or egg quality, or slowing post-spawn recovery. Because striped bass are iteroparous (repeat spawners, though not necessarily every year), residual condition after one migration also affects the next cycle.

Unlike many Pacific salmon, striped bass generally continue to feed during much of the upstream migration (often on co-migrating anadromous prey such as river herring or shad). Stomach-content studies (e.g., on the Roanoke River) show substantial feeding in the lower reaches during the pre-spawning ascent, with fasting largely limited to the brief period immediately before and during the actual spawning act; opportunistic feeding can resume between batches. This dietary intake can partially replenish both energy and protein en route, but the bulk of the migration still depends on pre-stored lipids. (LINK)

Broader implications

Successful migration and spawning therefore require that fish enter the river with sufficient lipid stores (built in the ocean) so that protein can be preferentially directed toward gonads rather than burned for swimming. Poor marine feeding conditions, or excessive energy expenditure, can compromise reproductive output or post-spawn condition. After spawning, adults typically return to marine or estuarine waters to rebuild both lipid and protein stores before the next cycle. Juvenile striped bass also show seasonal lipid accumulation (especially in fall) that supports overwinter survival, consistent with the same prioritization of lipids for energy storage.

In short, the cod study's distinction between lipids as fuel and proteins as structural material for growth and eggs is directly relevant to striped bass: the costly anadromous migration amplifies the value of lipid stores precisely because it allows protein to be conserved for the reproductive investment that is the whole point of the journey."

Striped Bass, along with many other species, have long had a problem with low recruitment. The above paragraph explains how lipids can bd a major factor in the low recruitment, and why an abundance of menhaden is a necessity for striped bass, especially in Chesapeake Bay.

Looking at the big picture, the Atlantic fishery has declined about 90% from historic levels. According to the NEFSC State of the Ecosystem Report, it continues to decline. The current situation, a low population that is continuing to decline, is unacceptable. We don't have much time left to reverse the decline.

Worse yet, our resources are severely limited. The marine ecosystem is an energy system. (LINK) (LINK) The energy comes from the sun, and algae uses that energy to create carbohydrates, lipids and protein. Lipids are a key, because that is what gives fish energy.

Menhaden are the only fish that have very fine gill rakers that enable them to trap single-celled algae. This is significant because in each step in the food web, energy is expended. The net efficiency of each stage varies wildly when the energy spent foraging is included but is generally assumed to be around 10%. So, when the menhaden feed on algae, only 10% of the lipids consumed get stored in the menhaden's body.

Zooplankton, particularly copepods and krill are also able to consume the algae, and other forage fish feed on these zooplankton. This adds a step in the process, also at 10% efficiency, which would mean that the forage fish would store only 1% of the original lipids from the algae. In addition, because of warm waters, this route might not be a reliable source of lipids in the future.

Menhaden, herring, mackerel, capelin and sand eels are all high in lipids. Herring and mackerel have been overfished to the point that there are no longer any dedicated commercial fisheries for them. The Atlantic herring stock is around 50,000 MT, the Mackerel is around 95,000 MT, but fortunately for us, the menhaden stock is 1.7 million MT. And menhaden start spawning in their second year, while mackerel start in their third or fourth year and herring in their fourth or fifth year. Not only that, but older menhaden

will continue to spawn throughout the year. We are so lucky to have menhaden to lead the recovery of our fishery.

USF&W works with the states on wildlife plans. (LINK) Each state identifies Species of Greatest Conservation Need (SGCN). The list for NJ includes blueback herring, alewife, sand lance (sand eels), tomcod, Atlantic herring, American eel, menhaden, butterfish, mackerel and silver hake. The list for CT includes rainbow smelt, darter, shiner, stickleback, killifish, dace, anchovy, shanny, silversides, mummichog and cunner. Striped bass's favorite food is menhaden, but when they are not available, they will eat anything. (LINK) Interestingly, "the primary invertebrate consumed in abundance in the (Chesapeake) bay as stripers age is the blue crab." And "stripers of all sizes frequently feed on young-of-the-year and yearling (1- and 2-year-old) fishes rather than larger individuals, and even big stripers consume prey as small as an inch in length." Sharks, who would normally eat menhaden and herring, are now feasting on striped bass.

What do fish do when there's no menhaden to eat?

They won't starve.

There's plenty of food out there.





It's called "prey switching"

A comparison of the forage fish consumed in the eclectic diet compared with the fish that are in the SGCH finds that many fish are on both lists. **The reduction in menhaden population, combined with very low numbers of herring and mackerel, may have increased predation by stripers on other forage fish, which resulted in their Species of Greatest Conservation Need designation.**

Menhaden, along with herring, mackerel, sand lance and capelin fill a very important and unappreciated niche in the Atlantic marine food web. That is of a very nutritious, high energy content food that, when present in abundance, enables young of other more valuable prey (including lobsters) to

escape being eaten. These high energy content forage fish must be in abundance to have a healthy fishery.

Menhaden are the only high energy species that are present in viable numbers. They can't fill that niche by themselves and supply the reduction industry at the same time.

Not all fish need a high lipid diet. Bottom feeding fish, called benthivores, which include less active and non-migratory fish such as flounder, tautog, black sea bass and drum, are perfectly happy and healthy with a lower lipid diet. However, a low population of forage fish will mean increased predation on the benthic fish young, and the benthic fish also eat a certain amount of small forage fish.

Is there any good reason why the VA reduction should even exist? For over 150 years, they have been getting rich taking the food away from the fish in the Atlantic fishery, and the chickens have finally come home to roost. We don't have to worry about providing fish feed for the aquaculture industry, they are taking care of themselves. In 2019, Veramaris spent $200 million to build a plant in Blair Nebraska that harvests farm-grown algae for Omega 3. Algae is the same source from which menhaden gets Omega 3. In 2024, the plant reached its peak production of Omega 3 with an amount equal to what could be obtained from 1.2 million metric tons of fish. (LINK) (LINK)That would be 8 times what was produced by the VA reduction plant and twice that from the VA plant and the Gulf plants combined. The purchase of Omega Protein and their reduction plants for $1 billion by Cooke Seafood does not look like that great a deal, compared to the Nebraska plant producing twice as much with an investment 20% of what Cooke paid. There is also a biomedical firm (LINK) that has plants in Texas and New Mexico that produce Omega 3 from algae for human consumption, and that is popular among vegetarians. **The aquaculture industry no longer needs fish oil from menhaden as they have developed an alternate source that can be unlimited.**

There have been several studies on the Stellar's Sea Lion in Alaska, starting in 2000. A study was done in 2018 (LINK) using Ecopath with Ecosin and they did back-to-back studies, the first was based on biomass and the second based on energy. They studied an ecosystem which included fish, birds and mammals. One thing that they found was that birds and mammals need more energy, which they get from the high lipid herring, for thermoregulation (keeping warm). This is significant to us because we are having problems in Chesapeake Bay with ospreys. (LINK). Of course, the reduction industry is making a lot of noise about not having proof of a connection with menhaden. So, I thought, with all the problems with osprey, did anyone ever try supplemental feeding? I asked AI and sure enough, there was a paper that addressed that subject. (LINK) **Supplemental feeding of osprey chicks with menhaden proved that shortage of menhaden in Chesapeake Bay was the cause of poor nesting success.** This is more support for eliminating harvesting of menhaden for reduction purposes.

I support Paul Eidman's suggestion is to set the 2027-2028 TAC at 75,616 mt, the 2025 TAC for the bait fishery, and reallocate all quota to the bait fishery to protect the bait, lobster and crab fisheries, and prohibit menhaden fishing for reduction purposes. The big reason the larger cut in TAC failed last year was the broad base of opposition from the bait industry and their customers. I know that the lobstermen are really hurting with this year's 20% cut in TAC, and I have heard of lobstermen giving up because of that high cost. There is not enough bait to support the bait fishery and the VA reduction fishery.

I have been studying this issue for nearly a year, and have not found any downside to the Paul Eidman solution. Striped bass will be the first to see impact of the TAC reduction, as they follow the menhaden migrations and will benefit from increased energy stores for their spawning migration. That will be a huge benefit to the recreational fishery, and the economic impact from the recreational fishery far exceeds the income from the reduction industry. The aquaculture industry is no longer restrained by having to depend on fish-based fish oil for their feed, so their future is unlimited. There is a huge world-wide demand for

feed for aquaculture, and much of the feed produced in the US is exported. Closing the VA reduction plant will just be the equivalent of cutting the exports from the Nebraska plant by 12.5%. The commercial fisheries may be slower to respond. They also depend on mackerel and herring to have a year-long source of forage, and the mackerel and herring are starting at much lower populations which may take longer to rebuild. But the important point is that rebuilding will finally be happening.

On the positive side, there might be a glimmer of hope for the worst-case scenario in the Atlantic Fishery-Cod. (LINK) With the expansion of the menhaden into the GOM and the recovery of alewives (LINK) into Maine rivers, I have been looking for some signs of cod recovery. I got an email from a lobsterman/fisherman who stated that he has been finding small lobsters in cod's stomachs, and he sees cod splashing around in shallow waters. Not a very good sign for the lobsterman. We just have to hope that with an even bigger abundance of menhaden in the GOM, optimal foraging theory will take over, and cod will take a liking to menhaden and follow them south for the winter and leave the lobster alone.

Sincerely,

Bruce Kindseth

Narragansett Surfcasters

Pt. Judith, RI

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James Boyle

From: Tom Alvarado <talvarado1225@gmail.com>
Sent: Sunday, October 18, 2026 8:24 AM
To: Comments
Subject: [New] [External] Control menhaden catch

Hello I am an Atlantic Coast resident and fisherman, port Cape May, NJ
I have witnessed the decline in recreational fishing Particularly with striped bass.
I feel that the commercial menhaden catch needs to be reduced, it is over fished to a concerning level, it is causing adverse effects on recreational fishing.
Please consider making changes to the commercial menhaden quota.
Respectfully
Tom Alvarado

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James Boyle

From: Brian Leuchtenburg <leuchtenburg@gmail.com>
Sent: Saturday, October 17, 2026 7:21 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 Coastwide TAC - please make meaningful changes

Dear ASMFC,

The overharvest of menhaden has clearly gotten out of hand. We are seeing damage up and down the coast line. In my local waters around Block Island and Fishers Island Sound, we have seen an enormous decline in menhaden. We had vasts schools - sometimes stretching for miles - only 5 years ago. I am hardly seeing any schools of menhaden locally and am very fearful about other reports across the eastern seaboard. This is far too important of a resource to take chances on. I would love to see lobster fisherman favored over an international company decimating this species for vitamins and catfood! It is crazy to me that I am even having to write this letter. You know well the importance of this species for our food chains, and it is unfathomable to me that ASMFC has been favoring special interests with limited importance.

Please make drastic cuts to the coastwide TACs (40-50% or more) to ensure we are not overfishing this vital species. Please do not dare wait to assess the situation further. These cuts must be effective for the 2027 and 2028 season.

My entire fishing community is talking about the overfishing of menhaden. They are enraged. Unfortunately, I do not believe they have been effectively organized and have limited awareness of the upcoming ASMFC decisions.

Sincerely,
Brian Leuchtenburg

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James Boyle

From: Debbie Campbell <debbiescampbell@icloud.com>
Sent: Saturday, October 17, 2026 4:01 PM
To: Comments
Subject: [New] [External] Menhaden Ocean TAC

Atlantic Menhaden: A Science-Based Recommendation for the 2027–2029 Coastwide TAC

A personal perspective on ecological targets, Chesapeake Bay forage, and coastal economies

Debbie Campbell | Editor and a Founder, Menhaden – Little Fish, Big Deal! | October 2026

My recommendation

My family has been connected to the Chesapeake Bay for nine generations. As a volunteer conservation advocate and recreational angler, I support a 2027–2029 coastwide Atlantic menhaden Total Allowable Catch (TAC) of no more than 114,200 metric tons, which was projected to have a 50 percent probability of not exceeding the ERP fishing mortality target..

What the assessment actually found

The 2025 Atlantic menhaden stock assessments significantly changed our perception of the population. When natural mortality was lowered (and peer reviewed science still believes that natural mortality should be lowered further), menhaden fishing mortality increased and the overall size of the population across the time-series was 37% lower than the 2022 stock assessment. The Atlantic States Marine Fisheries Commission (ASMFC) reports that Atlantic menhaden are not overfished and that overfishing is not occurring under the current ecological reference point (ERP) threshold, but the ASMFC's half measures Nevertheless, the ASMFC managers failed to adopt a TAC that would meet the ERP F target.

The ERP target explicitly accounts for menhaden as forage for Atlantic striped bass under defined model assumptions. It is not a comprehensive, Bay-specific estimate of food needs for ospreys, other predators, or every part of the estuary.

Why 114,200 metric tons?

The 2023–2025 coastwide TAC was 233,550 metric tons. In response to the 2025 Menhaden Assessments, ASMFC lowered it 20% for 2026 to 186,840 metric tons, ignoring the 54% reduction needed to meet the ERP F target. Its published technical analysis projected that the 2026 limit would remain above the ERP fishing-mortality target with a 100% modeled probability.

In early October, the ASMFC Menhaden technical committee met to review TAC projections for 2027-2029. The group determined that in order to have a 50% probability of not exceeding the ERP F Target, i.e. the standard for management, the TAC would need to be reduced 39% to 114,200 metric tons.

Chesapeake Bay: an unresolved local question

The Chesapeake is a major estuary and nursery habitat for fish and shellfish, and an important nesting region for ospreys. Menhaden link the Bay's productivity to striped bass, bluefish, birds, and other predators. A coastwide stock assessment does not establish whether enough menhaden are present in particular Bay locations and seasons. Osprey studies documenting food stress and poor reproductive performance in parts of the Bay warrant careful investigation, but do not establish that reduction fishing alone caused those outcomes.

The full economic picture

The costs of restricting the industrial reduction fishery deserve assessment. So do the potential costs of insufficient forage to charter captains, fishing guides, tackle shops, bait suppliers, marinas, boatyards, waterfront hospitality, and other local enterprises. Menhaden have value both when landed and when remaining in the water. ASMFC should request independent analysis of both sets of interests, clearly distinguishing documented effects from plausible but unquantified impacts. Predator abundance and business revenue are also influenced by other fisheries and environmental conditions.

Read the sources and draw your own conclusions

I invite readers to consult ASMFC's original material, assess the assumptions and tradeoffs, and submit their own evidence-based views. October 19, 2026 is the deadline identified for written comments to be included in the initial November annual-meeting briefing materials; consult ASMFC for subsequent submission deadlines and procedures.

- ASMFC Atlantic menhaden management and 2025 ERP findings — https://asmfc.org/wp-content/uploads/2025/11/AtlanticMenhadenAssessmentsOverview_October2025.pdf
- Menhaden Technical Memo re 2026 TAC scenarios (a new one for 2027-2029 will be published shortly): https://asmfc.org/wp-content/uploads/2025/11/AtlMenhadenTC-ERP-Report_October2025.pdf
- ASMFC 2026 TAC decision and assessment summary — https://asmfc.org/news/press-releases/asmfc-atlantic-menhaden-board-reduces-2026-tac-by-20-and-initiates-addendum-for-chesapeake-bay-cap/
- ASMFC 2026 Annual Meeting / public comment guidance — https://asmfc.org/events/2026-annual-meeting/
- ASMFC Draft Addendum II (Bay-specific process; October 9 deadline) — https://asmfc.org/actions/atlantic-menhaden-draft-addendum-ii/
- Peer-reviewed Chesapeake osprey research (2026) — https://www.frontiersin.org/journals/marine-science/articles/10.3389/fmars.2026.1685158/full

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James Boyle

From: Vincent Malfitano <vincent.malfitano@gmail.com>
Sent: Friday, October 16, 2026 8:07 AM
To: Comments
Subject: [New] [External] Bunker fishing

Please accept this email as my request to further limit bunker fishing. As a lifelong presence at the Jersey Shore and a longtime resident I have seen the connection between the menhaden and the health of birds of prey, striped bass, water purity, whales and therefore tourism and the economy of the area.

Most all the locals are grateful and dependent for the work ASMFC does.

Vincent Malfitano

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James Boyle

From: Robert Mullen <rkhgroup19@gmail.com>
Sent: Thursday, October 15, 2026 4:29 PM
To: Comments
Subject: [New] [External] Menhaden Tac

"I support a 114,200 MT menhaden TAC, which provides a 50% probability of not exceeding the Ecological Reference Point (ERP) target, and urge ASMFC to reaffirm its commitment to science-based Ecological Reference Point (ERP) management."

Thank you

Robert M

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James Boyle

From: MICHAEL DOBBS <michaelddobbs@aol.com>
Sent: Thursday, October 15, 2026 4:46 PM
To: Comments
Subject: [New] [External] Catch limit

I support a 114,200 MT menhaden TAC, which provides a 50% probability of not exceeding the Ecological Reference Point (ERP) target, and urge ASMFC to reaffirm its commitment to science-based Ecological Reference Point

Michael Dobbs
18132 Ivy Lane
Olney, MD 20832
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James Boyle

From: Jonathan Cogswell <jcogswell483@gmail.com>
Sent: Thursday, October 15, 2026 12:52 PM
To: Comments
Subject: [New] [External] Please reduce harvest by 40%

I am lucky enough to spend time recreationally in Cape Cod bay in Massachusetts and Little Peconic Bay on LINY - over the past few years there has been a drop off in Menhaden of all sizes, especially the larger fish. This was most dramatic this year with no larger Menhaden coming into my favorite estuary on the North Fork of LINY. Needless to say, the drop off in Striped Bass has been commensurate.

Please recognize the importance of this fishery to all the others! It is a keystone species that must be protected.

Best,

Jon

Jonathan B. Cogswell
Chief Bee Whisperer
www.MindingOurOwnBeeswax.com
508-561-3982

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James Boyle

From: Laura Kushner <laurah2oh@gmail.com>
Sent: Friday, October 16, 2026 6:28 AM
To: Comments
Subject: [New] [External] Menhaden Fisheries

To Whom It May Concern:

I am writing to comment on the proposed 40% reduction to the ocean TAC for menhaden. This would reduce the TAC to approximately 112,200 metric tons. I believe even that is not enough, but it is a start.

In New Jersey, as in other Atlantic coast states, the current harvest level has nearly eliminated menhaden, including both adult and juvenile fish. This in turn has devastated marine life - striped bass, tuna, summer flounder, bluefish, ospreys, cormorants, whales and dolphins were all impacted as well as the businesses and recreation that depend on them.

As an avid birder and frequent visitor to the area, I know that the Osprey were severely impacted this year. I am sure Sport fishing, charter boats, boating and boat sales, marinas, tackle shops, whale watches, motels, gas stations and much more feel the effects as the ripple of loss spreads outward. Too much is being sacrificed to support a single industry. Even for that industry this is not sustainable.

For these reasons I urge you to lower the menhaden harvest by as much as possible using all means at your disposal. It is already too late.

Sincerely,

Laura Kushner (former NJ resident)
3254 SE Quay Street
Port St. Lucie, Florida

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James Boyle

From: Karl Stehle <slabside@optonline.net>
Sent: Friday, October 16, 2026 12:36 PM
To: Comments
Subject: [External] Declining Osprey dilemma

Sent from my iPadDear Commission, i recently read an informative article by Jim Wright who writes in The Record , and he recently wrote about the decline of the Osprey due primarily to overfishing of its primary food source, Menhaden from the Atlantic Coast Chesapeake Bay. Removing more than 400 million pounds of Menhaden annually will surely destroy the remaining Osprey to breed their young successfully. Countless Osprey chicks have died from starvation & that is so painful to read about.

Sometimes it takes scientific research to understand what is causing the endangerment of a species & how to solve it. In this case reducing perhaps half of the allowable Menhaden quota would be a good start. Surely there must be other sources for bait fish, animal feed, fertilizer & nutritional supplements (that I take on a regular basis).

Please do the “right thing” & follow the science about allowable catches of Menhaden that will help the Osprey and other marine life to thrive successfully. Ocean marine life is already suffering from manmade climate change but this profit driven overfishing of Menhaden is solvable and needs your attention immediately. More studies are not necessary!

Thank you for reading my concerns and please take tge appropriate actions to help the Osprey survive.

Sincerely,
Karl Stehle
PO Box 431
Hewitt, NJ07421

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James Boyle

From: Green and Blue Eco Care <greenandblueecocare@gmail.com>
Sent: Friday, October 16, 2026 5:15 PM
To: Comments
Subject: [New] [External] Atlantic Manhaden 2027-2028 TAC

Please reduce the coastwide menhaden quota by
at least 40%!

Our marine animals and birds need them.

Simone Marques
GreenBlu Loop

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James Boyle

From: Becky Dilba <rebecca.dilba@gmail.com>
Sent: Friday, October 16, 2026 8:21 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden TAC 2027 to 2029

To the Atlantic Menhaden Management Board:

My name is Becky Dilba. I live in Olympia, Washington. Even though I do not live on the east coast, or fish in Atlantic waters, I am an avid bird watcher and also volunteer at my local wildlife rehabilitation center in Long Beach, WA. I have had the joy of rescuing, rehabilitating, and releasing Brown Pelicans, Common Murres, and, Brandt's Cormorants who came in emaciated and exhausted during the 2026 starvation event that impacted sea birds all up and down the west coast. It is heartbreaking to see how lack of food due to climate change and large weather events has caused so much devastation in the sea bird population. The ASMFC has an opportunity to turn the tide on Atlantic menhaden populations that will help stabilize the population and in turn help out osprey, bass, whales, and the fisherman that rely on these fish for bate.

This comment addresses the coastwide total allowable catch (TAC) for Atlantic menhaden for the 2027 to 2029 fishing years. It is separate from my position on Draft Addendum II.

Request

I ask the Board to set the 2027 to 2029 coastwide TAC as a fixed annual tonnage that gives at least a 50 percent probability of not exceeding the ERP fishing mortality target in each year, based on the Technical Committee's updated projections. If the Board phases reductions to limit economic disruption, I ask that the phased TACs reach that standard no later than 2028.

1. The Board deferred this decision to now.
In October 2025, the Board set the 2026 TAC at 186,840 mt and voted 16 to 2 to revisit the 2027 and 2028 TACs at the 2026 Annual Meeting (Proceedings of the Atlantic Menhaden Management Board, October 2025, p. 44). ASMFC states that the 2026 TAC carries a 100 percent probability of fishing mortality falling between the ERP target and threshold, and that a reduction of 50 percent or more would be needed to lower the probability of exceeding the target (ASMFC Atlantic Menhaden species page). ASMFC described the 2026 reduction as a moderate cut for 2026 only, chosen to allow time for outreach before setting later TACs (ASMFC Atlantic Menhaden FAQs).

2. Ospreys in menhaden dependent waters are not reproducing at replacement levels.
New Jersey Fish and Wildlife reports that 2025 was the state's worst osprey nesting season since the DDT era. Statewide productivity was 0.69 young per active nest, against roughly 1.0 needed for a stable population and a 1.47 average (NJ Osprey Project 2025, p. 2). Coastal nests averaged 0.62 (n=464), while inland nests averaged 1.47 (n=43) (p. 3). The nest failure rate was 57 percent, compared with 17 to 20 percent in prior years (p. 3). The report identifies lack of food as the primary cause and Atlantic menhaden as the primary food source for coastal ospreys (pp. 2 to 3).

In the lower Chesapeake Bay, osprey reproductive rates fell from 1.7 young per nest in 1974 to 1975 to 0.3 in 2021, against 1.15 needed for stability (USGS, Osprey in the Chesapeake, slide 12, citing Watts et al. 2024). Menhaden made up 44 percent of the diet at Poplar Island and 24 percent in the lower Bay (slide 9). The Center for Conservation Biology reports 2026 reproductive deficits from the Chesapeake Bay through Buzzards Bay, Massachusetts, and projects declines of about 10 percent per year if they continue.

3. Fisheries that depend on menhaden are also showing stress.
In 2025, many bait suppliers in southern New Jersey did not have enough menhaden to meet normal customer demand (NJ Osprey Project 2025, p. 4). Atlantic striped bass remain overfished, with less than a 50 percent probability of rebuilding by 2029 (ASMFC, 2024 Atlantic Striped Bass Stock Assessment Update press release). The ERP target is defined as the maximum menhaden fishing mortality that sustains striped bass at their biomass target (ASMFC Atlantic Menhaden species page). Meeting that target supports the recreational and bait fisheries as much as the birds.

4. I recognize the uncertainty and the economic stakes.
ASMFC finds that Atlantic menhaden are not overfished, that overfishing is not occurring, and that the lower biomass estimate reflects a revised natural mortality rate rather than a sudden decline (ASMFC Atlantic Menhaden FAQs). The Technical Committee provided projections and did not recommend a specific TAC. USGS lists several stressors on osprey reproduction, including weather (slide 13), and calls for more fishery independent data on prey abundance (slide 14). Food stress is now documented across multiple states, and the Board's own target has not been met. Under those conditions, a precautionary TAC is the responsible choice while that data is collected.

Thank you for considering this comment.

Becky Dilba
Olympia, Washington

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James Boyle

From: Robert Sachewicz <rsachewicz@gmail.com>
Sent: Saturday, October 17, 2026 12:53 PM
To: Comments
Subject: [New] [External] Fwd: Atlantic Menhaden 2027-2028 TAC

On Sat, Oct 17, 2026 at 12:49 PM Robert Sachewicz <rsachewicz@gmail.com> wrote:

> Please lower menhaden TAC by 40% from 2026 levels
> As a boater and fisherman in NJ I have noticed a steady decline in the fishery.
>
> Thank you
> Robert Sachewicz
> New Jersey

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James Boyle

From: Mike Moore <mightymoore804@gmail.com>
Sent: Thursday, October 15, 2026 8:00 AM
To: Comments
Subject: [New] [External] Menhaden

I support the TAC for the Atlantic Menhadden. As a fisherman and birder, I am concerned about the overfishing of this vital food source in our ecosystem. Please make this happen! Michael Moore

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James Boyle

From: Kurt Bland <KBland@BlandLandscaping.com>
Sent: Thursday, October 15, 2026 12:04 AM
To: Comments
Subject: [New] [External] Atlantic menhaden 2026-27 TAC

I live in Carteret County on North Carolina's Southern Outer Banks. Over the last couple of decades, I have witnessed a material decline in the menhaden fishery.

I am not a commercial fisherman, but I am an avid lifelong recreational fisherman. I am also a hunter and a conservationist. Every season I witness the ospreys on Bogue Sound have to hunt harder and harder to find sufficient food sources. I believe this is in part due to the decline in menhaden stocks. We just don't see the numbers of prolific bait balls that we used to see.

Please reduce the harvest quota by 40 to 50% for the upcoming season. This fishery is collapsing, and all of our fisheries depend on this vital forage fish.

Kurt H. Bland
President/CEO
Bland Landscaping Company and Foster Lake & Pond Management

Sent from my iPhone
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James Boyle

From: John Tamboles <offthegridspplyco@gmail.com>
Sent: Wednesday, October 14, 2026 10:01 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

Please reduce the coast wide menhaden quota by at least 40% for 2027-2028. They are vital to a healthy ecosystem!

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James Boyle

From: Natalie Menage <fmenage@verizon.net>
Sent: Wednesday, October 14, 2026 7:10 PM
To: Comments; Roy Miller; jordon.zimmerman@delaware.gov; Rep. William J Carson; Craig D Pugh
Subject: [External] Atlantic Menhaden 2027-2028 TAC

Gentlemen, I would like to express my opinion for you to consider to vote for a maximum 41% reduction option (110,200) in the commercial fish netting operation in the Atlantic Ocean during the 2027-2028 TAC season.

I would also like to express my thoughts of menhaden netting in the future - BAN the menhaden netting in the Delaware & Chesapeake Bays by the commercial industries fishing boats and allow Mother Nature's filter feeders help to clean up the water quality by straining plankton and converting the sun's energy into fat and protein to fuel predators in both bays and allow the wildlife to prosper and survive. Move the commercial netting operations boats out into the ocean at least 12 nautical miles off of America's coastal shorelines.

Thank you!

Frederick C. Menage, Jr.

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James Boyle

From: Pete Turner <captpete5@gmail.com>
Sent: Wednesday, October 14, 2026 6:24 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

To whom it may concern,

Please reduce the coastwide menhaden quota (TAC) by at least 40% for 2027-2028. At the current rate, we are losing this resource faster than it can replenish itself and we will ultimately lose it altogether, along with everything that requires it to survive, if changes aren't made.

Thanks!

Captain Pete Turner

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James Boyle

From: JD Miller <jdmillerfish@gmail.com>
Sent: Wednesday, October 14, 2026 3:41 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

Dear Atlantic States Marine Fisheries Commission,

I am writing to urge the commission to reduce the coastwide Atlantic menhaden total allowable catch by at least 40% for the 2027-2028 fishing seasons.

Atlantic menhaden are a critical forage species, providing an essential food source for striped bass, bluefish, weakfish and numerous other marine predators, including seabirds and marine mammals. Protecting this forage base is essential to maintaining a healthy, balanced Atlantic ecosystem.

As someone who values fishing, conservation and the protection of our natural resources, I believe fisheries management must prioritize the long-term health of the ecosystem rather than focusing solely on short-term harvest opportunities.

A meaningful reduction in the menhaden quota would demonstrate a commitment to precautionary, ecosystem-based management and help ensure sufficient forage remains available for the species that depend on it.

I urge the commission to take decisive action by reducing the coastwide quota by at least 40% for 2027-2028. Our marine resources deserve responsible management that considers the health of the entire ecosystem and preserves these fisheries for future generations.

Thank you for considering my comments and for your commitment to the responsible management of Atlantic fisheries.

Thank you,

JD Miller

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James Boyle

From: Reinstedler, Christopher <creinstedler@textronsystems.com>
Sent: Wednesday, October 14, 2026 3:16 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

Hello ASMFC team,

I am an active striped bass fisherman who has witnessed firsthand the ripple effects that reduced menhaden abundance is having on the striped bass population and the broader marine ecosystem. I am writing to express my strong **support for the proposed 40% reduction in the Atlantic menhaden quota**.

Menhaden are the primary forage fish for striped bass, accounting for a significant portion of their diet according to publicly available diet studies from NOAA and the Atlantic Menhaden Stock Assessment. In recent years, as industrial reduction harvest has continued at high levels—roughly 70% of the total coastwide quota going to the reduction fishery, concentrated largely in the Chesapeake Bay—recreational anglers like myself have observed notable declines in the availability of healthy striped bass and disruptions in normal migratory and feeding behaviors.

As a fisherman who values healthy, sustainable fisheries—both for recreation and for the coastal economies that depend on them—I believe taking precautionary action now is the responsible path. A 40% reduction in quota is an important step toward restoring ecological balance, supporting striped bass rebuilding, and ensuring that this critical forage base remains stable for future generations.

I urge ASMFC to adopt the proposed quota reduction and continue prioritizing ecosystem-based management that reflects the interconnected realities of our marine fisheries.
Thank you for your attention and for your ongoing work to steward this resource responsibly.

Thanks,

Christopher A. Reinstedler
Sr Sourcing Manager
c: 502.797.8811
TEXTRON Systems
PUSHING PAST POSSIBLE
TextronSystems.com

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James Boyle

From: Eric Bosley <ericbosley@gmail.com>
Sent: Wednesday, October 14, 2026 12:27 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

I am commenting on the 2027-2028 coastwide Atlantic menhaden TAC. I urge the Board to cut the coastwide TAC by 40%, to approximately 112,100 metric tons, as a fixed tonnage for 2027 and 2028, without delay.

Eric Bosley
Nyack New York,
recreational angler.

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James Boyle

From: Mary Byrne <marybyrne2014@icloud.com>
Sent: Wednesday, October 14, 2026 11:21 AM
To: Comments
Subject: [New] [External] ATLANTIC MENHADEN 2027-2028 TAC

Vote to reduce the coastwide commercial allowable catch of the Menhaden by at least 40 percent. The bass, osprey, whales and tuna do not have enough to eat and the research is showing the devastating results.

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James Boyle

From: russ@bassdozer.com
Sent: Wednesday, October 14, 2026 10:32 AM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC
Attachments: ASMFC comments TAC 101926.pdf

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

Please accept the attached 4-page PDF document as my official public comment input on the **Atlantic Menhaden 2027-2028 TAC.**

The document details why the ASMFC Atlantic Menhaden Technical Committee's maximum 41% reduction option (110,200 mt) is the most supportive choice available on the ballot to ensure baseline protection for the total coastal food web, particularly in light of the latest science available in two new studies, both published in September 2026. One regarding lower natural mortality rates (M = 0.50) of menhaden, and the other, a meta-analysis of coastwide osprey reproductive rates across the Atlantic states.

Thank you for incorporating these comments into your November meeting decisions and your dedication to the management and conservation of our shared marine resources.

Sincerely,

Russell Comeau
Breezy Point, NY 11697

Russ@Bassdozer.com
(928) 614-9186

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James Boyle

From: Kathy Wilson <kat.wils@hotmail.com>
Sent: Wednesday, October 14, 2026 7:54 AM
To: Comments
Subject: [New] [External] Save NJ Osprey

The terrible state of Osprey breeding on the NJ Atlantic coast is very sad. Please drastically reduce the allowable menhaden harvest limits.

Regards,
Kathy Wilson

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James Boyle

From: Fletcher, Avery <avf847@g.harvard.edu>
Sent: Wednesday, October 14, 2026 7:45 AM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

Good day,

Thank you for adding the Atlantic Menhaden TAC to your upcoming agenda. This is a critically important topic for the entire Eastern seaboard impacting the livelihoods of thousands and the health of the entire ecosystem.

The food web needs more Atlantic Menhaden. Please cut the the total allowable catch for 2027-2028 by at least 40%

Thank you.

Avery A. Fletcher
New Jersey

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James Boyle

From: Adrienne D <adrienned126@gmail.com>
Sent: Tuesday, October 13, 2026 7:22 PM
To: Comments
Subject: [New] [External] Fwd: Subject: Atlantic Menhaden 2027-2028 TAC

Dear Members of the Atlantic Menhaden Management Board,

I am writing to request changes to the fishing cap. Specifically, please reduce the coast-wide menhaden catch limit by at least 40% from its 2026 level for 2027 and 2028, and set limits that ensure sufficient food remains for the fish and wildlife that depend on menhaden. Please include my comments in the Board's upcoming meeting materials.

As a Connecticut resident, this action is critical to me. Our local osprey population, along with other key species like striped bass, relies heavily on menhaden.

Thank you for your consideration of this important matter.

Sincerely,
Adrienne Dest

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James Boyle

From: Rogers, James D <JROGERS8@travelers.com>
Sent: Tuesday, October 13, 2026 5:05 PM
To: Comments
Subject: [External] Atlantic Menhaden 2027-2028 TAC

Please reduce the coastwide menhaden catch limit by at least 40% from its 2026 level for 2027 and 2028, and set limits that leave enough food for the fish and wildlife that depend on menhaden. Please include my comment in the Atlantic Menhaden Management boards meeting materials.

Best Regards,

James Rogers | Director | Property Major Case Claims
Travelers
Work: 860-277-0379 Fax: 866-381-6247
Mailing Address:
Travelers
P.O. Box 430
Buffalo, NY 14240





If further assistance is required, please contact my manager Mike Gatti at MGATTI@travelers.com

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James Boyle

From: Patrick Huban <patrick@albatrossflyfishing.com>
Sent: Tuesday, October 13, 2026 3:26 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

TO ASMFC:

The coastwide must be reduced by AT LEAST 30% and should be reduced to 50%.

Please see my further comments below:

It is clear Atlantic Menhaden has been grossly mismanaged, the effects of this are clear. As a full time fishing guide in Connecticut, I have visibly seen the amount of Menhaden go from harbors full of these important fish to hardly any at all. For the past three years, my son and I have not gone to our local salt marsh to net a few menhaden, attach them to a circle hook, and virtually guarantee a bite from a striped bass for my enthusiastic son. There are no Menhaden there. Not only does my now 6-year-old son, probably not remember those great moments from when he was 3, but we may never have them again. Not to mention the impact on my professional income as a guide. ASMFC has impacted my ability to make a living through this blunder in Menhaden management, compounded by equally grievous blunders in striped bass management and pretty much any other fish that falls under your purview.

There's no other way to describe this but borderline criminal, you are destroying our fisheries by prioritizing bad actors who have no concern for keeping this fishery sustainable. Do something now, for my son, and so I can continue to do what I love and earn a living SUSTAINABLY as a professional fly fishing guide.

Captain Patrick Huban
860-416-1339
ALBATROSS FLY FISHING

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James Boyle

From: Ella Gatfield <etg9942@nyu.edu>
Sent: Tuesday, October 13, 2026 2:55 PM
To: Comments
Subject: [External] Menhaden Ocean TAC

ASMFC Board,

I support a 40% cut to approximately 112,100 metric tons for 2027 and 2028.

Let's keep fish in the water for recreational, commercial, and ecological considerations alike. Plain and simple.

Please make the right decision for our coast.

Best,
--
Ella Gatfield (she/her)
Interdisciplinary Ecology | Writer | Coastal Educator
M.A. Dean's Scholar, Gallatin School of Individualized Study, NYU
Substack newsletter: *Another Way Home*
ellagatfield.com

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James Boyle

From: Michael Flanagan <mjflanagan2@hotmail.com>
Sent: Tuesday, October 13, 2026 2:52 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

Dear Sir:

The question is who owns the resource. A small group of people using technology to scoop up everything they can or the public writ large. We have ample history of humans, for selfish purposes, knocking down a fishery to the point of no return. Think cod and Atlantic salmon. Its always "the other guys" fault until it's gone for everyone. Then trying to restore what was lost.
Menhaden is a public resource and its best and highest use, for the public, is allowing it to thrive and feed the rest of nature. Not making fish pellets.

I have lived on the Housatonic River for 24 years. Last 3-4 years, there have been no Bunker schools in the river. Before that, you could walk across the river on schools from June. Stripers and Bluefish followed. Something is very wrong.

Mike Flanagan
33 Housatonic Dr. Milford CT.
203 878 7469.

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James Boyle

From: Kevin Travers <kevobt@gmail.com>
Sent: Tuesday, October 13, 2026 1:26 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

Hello
ASMFC Atlantic Menhaden Management Board,
I am writing to urge the Board to reduce the coastwide Atlantic menhaden TAC by 50% for 2027 and 2028. The preliminary projections are concerning. At the current 186,840 metric ton quota, the projections indicate a 99.5% probability of exceeding the ecological reference point fishing mortality target in each year from 2027 through 2029. A roughly 39% reduction only brings the probability of staying under that target to about 50/50. That is not enough of a margin for a forage species this important to the Atlantic ecosystem.
Last year's 20% reduction also appears to have done little to reduce actual harvest because the fishery had already been operating below the available quota. Given that history, I believe a 50% reduction is the appropriate precautionary action. It would represent a meaningful reduction in fishing pressure rather than another adjustment largely to unused quota.
Menhaden are a coastwide resource and an essential forage species. Management should prioritize abundance and account for their ecological role, not simply set harvest at the highest level that might meet a minimum threshold.
Please set the 2027-2028 coastwide TAC at 50% below the current 186,840 metric ton level, approximately 93,420 metric tons, and establish it as a fixed tonnage rather than delaying action or relying on an automatic adjustment formula.
Thank you for considering my comments.

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James Boyle

From: Jennifer West <jjandkevinwedding@gmail.com>
Sent: Tuesday, October 13, 2026 1:09 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

ASMFC Atlantic Menhaden Management Board, I am writing to urge the Board to reduce the coastwide Atlantic menhaden TAC by 50% for 2027 and 2028. The preliminary projections are concerning. At the current 186,840 metric ton quota, the projections indicate a 99.5% probability of exceeding the ecological reference point fishing mortality target in each year from 2027 through 2029. A roughly 39% reduction only brings the probability of staying under that target to about 50/50. That is not enough of a margin for a forage species this important to the Atlantic ecosystem. Last year's 20% reduction also appears to have done little to reduce actual harvest because the fishery had already been operating below the available quota. Given that history, I believe a 50% reduction is the appropriate precautionary action. It would represent a meaningful reduction in fishing pressure rather than another adjustment largely to unused quota. Menhaden are a coastwide resource and an essential forage species. Management should prioritize abundance and account for their ecological role, not simply set harvest at the highest level that might meet a minimum threshold. Please set the 2027-2028 coastwide TAC at 50% below the current 186,840 metric ton level, approximately 93,420 metric tons, and establish it as a fixed tonnage rather than delaying action or relying on an automatic adjustment formula. Thank you for considering my comments.

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James Boyle

From: Jennifer West <westj@udel.edu>
Sent: Tuesday, October 13, 2026 1:08 PM
To: Comments
Subject: [External] Atlantic Menhaden 2027-2028 TAC

ASMFC Atlantic Menhaden Management Board, I am writing to urge the Board to reduce the coastwide Atlantic menhaden TAC by 50% for 2027 and 2028. The preliminary projections are concerning. At the current 186,840 metric ton quota, the projections indicate a 99.5% probability of exceeding the ecological reference point fishing mortality target in each year from 2027 through 2029. A roughly 39% reduction only brings the probability of staying under that target to about 50/50. That is not enough of a margin for a forage species this important to the Atlantic ecosystem. Last year's 20% reduction also appears to have done little to reduce actual harvest because the fishery had already been operating below the available quota. Given that history, I believe a 50% reduction is the appropriate precautionary action. It would represent a meaningful reduction in fishing pressure rather than another adjustment largely to unused quota. Menhaden are a coastwide resource and an essential forage species. Management should prioritize abundance and account for their ecological role, not simply set harvest at the highest level that might meet a minimum threshold. Please set the 2027-2028 coastwide TAC at 50% below the current 186,840 metric ton level, approximately 93,420 metric tons, and establish it as a fixed tonnage rather than delaying action or relying on an automatic adjustment formula. Thank you for considering my comments.

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James Boyle

From: Jennifer West <jennwest@sas.upenn.edu>
Sent: Tuesday, October 13, 2026 1:08 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

ASMFC Atlantic Menhaden Management Board, I am writing to urge the Board to reduce the coastwide Atlantic menhaden TAC by 50% for 2027 and 2028. The preliminary projections are concerning. At the current 186,840 metric ton quota, the projections indicate a 99.5% probability of exceeding the ecological reference point fishing mortality target in each year from 2027 through 2029. A roughly 39% reduction only brings the probability of staying under that target to about 50/50. That is not enough of a margin for a forage species this important to the Atlantic ecosystem. Last year's 20% reduction also appears to have done little to reduce actual harvest because the fishery had already been operating below the available quota. Given that history, I believe a 50% reduction is the appropriate precautionary action. It would represent a meaningful reduction in fishing pressure rather than another adjustment largely to unused quota. Menhaden are a coastwide resource and an essential forage species. Management should prioritize abundance and account for their ecological role, not simply set harvest at the highest level that might meet a minimum threshold. Please set the 2027-2028 coastwide TAC at 50% below the current 186,840 metric ton level, approximately 93,420 metric tons, and establish it as a fixed tonnage rather than delaying action or relying on an automatic adjustment formula. Thank you for considering my comments.

Jennifer (JJ) West
she/her
UPenn Master's Program
Department of Criminology

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James Boyle

From: JW <westjmv@gmail.com>
Sent: Tuesday, October 13, 2026 1:06 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

ASMFC Atlantic Menhaden Management Board, I am writing to urge the Board to reduce the coastwide Atlantic menhaden TAC by 50% for 2027 and 2028. The preliminary projections are concerning. At the current 186,840 metric ton quota, the projections indicate a 99.5% probability of exceeding the ecological reference point fishing mortality target in each year from 2027 through 2029. A roughly 39% reduction only brings the probability of staying under that target to about 50/50. That is not enough of a margin for a forage species this important to the Atlantic ecosystem. Last year's 20% reduction also appears to have done little to reduce actual harvest because the fishery had already been operating below the available quota. Given that history, I believe a 50% reduction is the appropriate precautionary action. It would represent a meaningful reduction in fishing pressure rather than another adjustment largely to unused quota. Menhaden are a coastwide resource and an essential forage species. Management should prioritize abundance and account for their ecological role, not simply set harvest at the highest level that might meet a minimum threshold. Please set the 2027-2028 coastwide TAC at 50% below the current 186,840 metric ton level, approximately 93,420 metric tons, and establish it as a fixed tonnage rather than delaying action or relying on an automatic adjustment formula. Thank you for considering my comments.

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James Boyle

From: JJ West <jennn717@gmail.com>
Sent: Tuesday, October 13, 2026 1:06 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

ASMFC Atlantic Menhaden Management Board, I am writing to urge the Board to reduce the coastwide Atlantic menhaden TAC by 50% for 2027 and 2028. The preliminary projections are concerning. At the current 186,840 metric ton quota, the projections indicate a 99.5% probability of exceeding the ecological reference point fishing mortality target in each year from 2027 through 2029. A roughly 39% reduction only brings the probability of staying under that target to about 50/50. That is not enough of a margin for a forage species this important to the Atlantic ecosystem. Last year's 20% reduction also appears to have done little to reduce actual harvest because the fishery had already been operating below the available quota. Given that history, I believe a 50% reduction is the appropriate precautionary action. It would represent a meaningful reduction in fishing pressure rather than another adjustment largely to unused quota. Menhaden are a coastwide resource and an essential forage species. Management should prioritize abundance and account for their ecological role, not simply set harvest at the highest level that might meet a minimum threshold. Please set the 2027-2028 coastwide TAC at 50% below the current 186,840 metric ton level, approximately 93,420 metric tons, and establish it as a fixed tonnage rather than delaying action or relying on an automatic adjustment formula. Thank you for considering my comments.

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James Boyle

From: Julia Lavelle <juliarae30@gmail.com>
Sent: Tuesday, October 13, 2026 12:52 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

ASMFC Atlantic Menhaden Management Board,
I am writing to urge the Board to reduce the coastwide Atlantic menhaden TAC by 50% for 2027 and 2028. The preliminary projections are concerning. At the current 186,840 metric ton quota, the projections indicate a 99.5% probability of exceeding the ecological reference point fishing mortality target in each year from 2027 through 2029. A roughly 39% reduction only brings the probability of staying under that target to about 50/50. That is not enough of a margin for a forage species this important to the Atlantic ecosystem.
Last year's 20% reduction also appears to have done little to reduce actual harvest because the fishery had already been operating below the available quota. Given that history, I believe a 50% reduction is the appropriate precautionary action. It would represent a meaningful reduction in fishing pressure rather than another adjustment largely to unused quota.
Menhaden are a coastwide resource and an essential forage species. Management should prioritize abundance and account for their ecological role, not simply set harvest at the highest level that might meet a minimum threshold.
Please set the 2027-2028 coastwide TAC at 50% below the current 186,840 metric ton level, approximately 93,420 metric tons, and establish it as a fixed tonnage rather than delaying action or relying on an automatic adjustment formula.
Thank you for considering my comments.

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James Boyle

From: Julia Lavelle <julia.lavelle2@gmail.com>
Sent: Tuesday, October 13, 2026 12:51 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

ASMFC Atlantic Menhaden Management Board,
I am writing to urge the Board to reduce the coastwide Atlantic menhaden TAC by 50% for 2027 and 2028. The preliminary projections are concerning. At the current 186,840 metric ton quota, the projections indicate a 99.5% probability of exceeding the ecological reference point fishing mortality target in each year from 2027 through 2029. A roughly 39% reduction only brings the probability of staying under that target to about 50/50. That is not enough of a margin for a forage species this important to the Atlantic ecosystem.
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Thank you for considering my comments.

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James Boyle

From: Spike Amers <spikeamers@gmail.com>
Sent: Tuesday, October 13, 2026 12:48 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

ASMFC Atlantic Menhaden Management Board,
I am writing to urge the Board to reduce the coastwide Atlantic menhaden TAC by 50% for 2027 and 2028. The preliminary projections are concerning. At the current 186,840 metric ton quota, the projections indicate a 99.5% probability of exceeding the ecological reference point fishing mortality target in each year from 2027 through 2029. A roughly 39% reduction only brings the probability of staying under that target to about 50/50. That is not enough of a margin for a forage species this important to the Atlantic ecosystem.
Last year's 20% reduction also appears to have done little to reduce actual harvest because the fishery had already been operating below the available quota. Given that history, I believe a 50% reduction is the appropriate precautionary action. It would represent a meaningful reduction in fishing pressure rather than another adjustment largely to unused quota.
Menhaden are a coastwide resource and an essential forage species. Management should prioritize abundance and account for their ecological role, not simply set harvest at the highest level that might meet a minimum threshold.
Please set the 2027-2028 coastwide TAC at 50% below the current 186,840 metric ton level, approximately 93,420 metric tons, and establish it as a fixed tonnage rather than delaying action or relying on an automatic adjustment formula.
Thank you for considering my comments.

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James Boyle

From: Peter T. <petermtravers@gmail.com>
Sent: Tuesday, October 13, 2026 12:48 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

ASMFC Atlantic Menhaden Management Board,
I am writing to urge the Board to reduce the coastwide Atlantic menhaden TAC by 50% for 2027 and 2028. The preliminary projections are concerning. At the current 186,840 metric ton quota, the projections indicate a 99.5% probability of exceeding the ecological reference point fishing mortality target in each year from 2027 through 2029. A roughly 39% reduction only brings the probability of staying under that target to about 50/50. That is not enough of a margin for a forage species this important to the Atlantic ecosystem.
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Menhaden are a coastwide resource and an essential forage species. Management should prioritize abundance and account for their ecological role, not simply set harvest at the highest level that might meet a minimum threshold.
Please set the 2027-2028 coastwide TAC at 50% below the current 186,840 metric ton level, approximately 93,420 metric tons, and establish it as a fixed tonnage rather than delaying action or relying on an automatic adjustment formula.
Thank you for considering my comments.

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James Boyle

From: Gregory Travers <grgtravers@gmail.com>
Sent: Tuesday, October 13, 2026 12:26 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

ASMFC Atlantic Menhaden Management Board,

I am writing to urge the Board to reduce the coastwide Atlantic menhaden TAC by 50% for 2027 and 2028.

The preliminary projections are concerning. At the current 186,840 metric ton quota, the projections indicate a 99.5% probability of exceeding the ecological reference point fishing mortality target in each year from 2027 through 2029. A roughly 39% reduction only brings the probability of staying under that target to about 50/50. That is not enough of a margin for a forage species this important to the Atlantic ecosystem.

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Menhaden are a coastwide resource and an essential forage species. Management should prioritize abundance and account for their ecological role, not simply set harvest at the highest level that might meet a minimum threshold.

Please set the 2027-2028 coastwide TAC at 50% below the current 186,840 metric ton level, approximately 93,420 metric tons, and establish it as a fixed tonnage rather than delaying action or relying on an automatic adjustment formula.

Thank you for considering my comments.

Gregory Travers

--
Greg
grgtravers@gmail.com
201-572-3660

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James Boyle

From: Peter Snieckus <docbluefin@verizon.net>
Sent: Tuesday, October 13, 2026 11:30 AM
To: Comments
Cc: pete snieckus
Subject: [External] Atlantic Menhaden 2027-2028 TAC

To Whom at ASMFC...
I am writing to register my opinion on the upcoming meeting concerning lowering Menhaden TAC on the East Coast.

I am a resident and avid recreational fisherman living in Barnegat Light, NJ. I have personally noticed the DRAMATIC reduction in the number and size of Menhaden (Bunker) schools off the coast of NJ in the past few years. This is confirmed by the local commercial fishermen, bait shops, and charter fishermen.

In addition, my wife, Nancy, is an avid "Osprey Observer"... and we have watched the sad starvation death of chicks and lack of eggs laid this year. Our house is situated in an area where we commonly see adult Ospreys fly by with their catch from the ocean to their bayside nests, normally, large fat bunker clutched in their talons. This year, only tiny "peanut bunker", small flounder, a few rodents and a few scrawny snakes.

Please strongly consider a significant decrease in the TAC for bunker, or I would be in favor of a temporary moratorium on commercial harvest till the situation resolves...

Respectfully Submitted
Pete Snieckus
908-963-2369
docbluefin@verizon.net

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James Boyle

From: Gregg Wramage <gwramage@jamesburg.org>
Sent: Tuesday, October 13, 2026 11:05 AM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

Please cut coastwide the total allowable catch by at least 40% so we have enough menhaden for striped bass, oprey, whales and tuna and a healthy food web.

Dr. Gregg Wramage
Music Teacher
Grace M. Breckwedel Middle School
John F. Kennedy Elementary School

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James Boyle

From: Matt Tumasz <tumaszm@comcast.net>
Sent: Tuesday, October 13, 2026 10:00 AM
To: Comments
Subject: [New] [External] Atlantic Menhaden Draft Addendum II

To the Atlantic Menhaden Management Board,

I am writing to support the most conservative options in Draft Addendum II.

Please reduce the Chesapeake bay reduction fishery cap by the full 50%, link the bay cap to the coast wide total allowable catch and divide the bay cap into quota periods so the harvest isn't concentrated in the spring and summer.

I also urge the board to set a coast wide TAC for 2027 and beyond that meets the ecological reference point target. The assessment showed the stock is smaller than previously estimated, and the Boards own projection found a cut of 50% or more was needed to meet that target.

Thank you for considering my comments.

Matthew Tumasz
Audubon, NJ
267-664-9831
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James Boyle

From: Lara D <mybluedogtoby@gmail.com>
Sent: Tuesday, October 13, 2026 6:43 AM
To: Comments
Subject: [New] [External] menhaden crisis

Dear Sirs,
As an avid angler and a resident of NJ, I am extremely concerned about the overfishing of menhaden that is currently happening off the Atlantic coast of the USA. Our fish depend on this vital bait food to survive and thrive. Please reduce the coastwide menhaden catch limit by at least 40% from the current allowed level, as soon as possible.
Please include my comment in the Atlantic Menhaden Management Board's meeting materials.
Thank you for your time and consideration,
Lara Delorenzo-Sims
Milford, NJ

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James Boyle

From: Vito Degennaro <vdeg@aol.com>
Sent: Monday, October 12, 2026 7:37 PM
To: Comments
Subject: [New] [External] Atlantic Menhaden 2027-2028 TAC

I live in Atlantic Highlands NJ and fish twice a day, Dawn and Dusk.
The taking of an enormous amount of forage fish is killing not only the Bass population, Ospreys, whales, Tuna and every other fish that subsists on Bunker.
In addition it is having a devastating effect on Bait and Tackle shops, luncheonettes, motels gas stations, etc...
rustic cuts are needed please!

Thank you,

Vito Degennaro
908 512 6231



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James Boyle

From: Marc Bianchi <hiloproforklift@icloud.com>
Sent: Monday, October 12, 2026 11:05 AM
To: Comments
Subject: [External] Atlantic Menhaden Draft Addendum II

Cutting the Chesapeake Bay Cap by the full 50%

Absolutely linking the Bay Cap to the Coastwide Catch Limit

Spreading Bay Harvest across Quota Periods so the Bay is not stripped in Spring and Summer

Reducing the Coastwise Catch Limit by 40%to meet the Science for 2027

Please do your job before it is too late as Millions will lose theirs. Its plenty easy to see. If Menhaden disappear any further all Recreational Fishing boat manufacturers will lose, all rod & reel manufacturers, fishing string manufacturers, bait shops etc. What makes tis even crazier, it is a Canadian owned company. Hopefully I didn't waist my time here, Thanks,

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James Boyle

From: JoAnn Rozum <jojoroz26@gmail.com>
Sent: Monday, October 12, 2026 9:22 AM
To: Comments
Subject: [External] osprey

My concern for these beautiful birds is front and center.

I am alarmed by the plummeting coastal osprey population!!
I urge you to please drastically reduce the allowable menhaden harvest.
Protecting our earth and habitat is very important and overrides the need for bait fertilizer or supplements

Thank you

JoAnn Rozum

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James Boyle

From: Dix Leeson <dixleeson@gmail.com>
Sent: Sunday, October 11, 2026 8:34 PM
To: Comments
Subject: [External] Atlantic Menhaden 2027-2028 TAC

Dear Decision Makers,

Your own data show that keeping the current quota of 186,840 metric tons carries a near certain chance of exceeding the ecological reference point fishing mortality target in every year from 2027 through 2029. I urge you to implement at least a 40% Reduction to the Coastwide Menhaden Total Allowable Catch ASAP. This action should have been taken last year.

Thank you for considering this,

Dix Leeson Jr.
Cuttyhunk, MA

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James Boyle

From: Gerald Barrack <jerryoradi@gmail.com>
Sent: Saturday, October 10, 2026 8:28 AM
To: Comments
Subject: [External] Ospreys in trouble

To whom it may concern,

As a member of the Fyke Nature Organisation I am writing to express my alarm at the plummeting coastal Osprey population. I would urge you to drastically reduce the allowable menhaden harvest.
Thank you.

Sincerely,

Gerald Barrack

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James Boyle

From: Nathaniel Hersh <natehersh77@gmail.com>
Sent: Friday, October 9, 2026 9:49 AM
To: Comments
Subject: [External] Atlantic Menhaden 2027-2028 TAC

Categories: Menhaden 2 Auto Replied

Greetings,

I am writing in support of lowering the catch limit for menhaden along the Atlantic Coast. This fish is a foundation of the ecosystem, and a strong and healthy population benefits the entire ecosystem including the many people who fish and recreate along our shores.

The current cap has led to overfishing and benefitted one corporation, and a foreign one at that, at the expense of the community.

Thank you,
Nate Hersh
Manahawkin, NJ

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James Boyle

From: Kathy Lambrow <klambrow@comcast.net>
Sent: Friday, October 9, 2026 8:26 AM
To: Comments
Subject: [External] MENHADEN OCEAN TAC

Categories: Menhaden 2 Auto Replied

I support a 40% reduction to approximately 112,100 metric tons for 2027 and 2028.
Our entire Atlantic ocean ecosystem is at stake. Please take action now.
Thank you,

Kathy L Kahler Lambrow

1857 Cape May Rd, Essex, MD 21221

Mobile - 410-733-5837

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James Boyle

From: Debbie Gritt <debbg44@gmail.com>
Sent: Thursday, October 8, 2026 7:05 PM
To: Comments
Subject: [External] Menhaden TAC

Categories: Menhaden 2 Auto Replied

Reduce TAC by 50 per cent. Please.
The health of the Bay is at risk.
Sent from my iPhone
CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

James Boyle

From: Andrew Manus <amanus@verizon.net>
Sent: Thursday, October 8, 2026 4:11 PM
To: Comments
Subject: [External] Atlantic Menhaden COASTWIDE TAC REDUCTION

Categories: Menhaden 2 Auto Replied

RE: Atlantic Menhaden Draft Addendum II: **Coastwide TAC Reduction**

My name is Andrew T. Manus. I am a retired conservation professional. Over my 40 year career, I have participated in the conservation field as the Executive Director of the University of Delaware Sea Grant College Program, the Director of the Delaware Division of Fish and Wildlife (in that capacity I served as an ASMFC Commissioner), the Mid-Atlantic Director of Conservation Programs for Ducks Unlimited and finished out my career as the Director of Conservation Program for The Nature Conservancy in Delaware. During the last eight years while retired I have chaired the Delaware Public Integrity Commission for three years and served as a Commissioner for five years.

I write to support a 40% reduction in the coastwide TAC . This would result in a reduction 74,736 metric tons. This reduction would move management of menhaden to a more reasonable and responsible ecological target. The basis for my support is both ecological and ethically driven. Menhaden are a vital forage fish. They nourish larger predators like striped bass, osprey, whales, dolphins and pelicans. Removing menhaden at the current rates is having a deleterious effect on ocean and estuarine ecosystems and causing decline across multiple species noted above.

Modern industrial menhaden fishing uses massive purse seines and spotter planes to clear enormous volumes of fish from nearshore nurseries like the Chesapeake Bay. I believe that my support for the reduction noted above is a more ethical and responsible approach to the harvesting of menhaden than the current industrial dominated one currently in place. The menhaden fishery is a natural resource that belongs to all the people and future generations, not just the current commercial enterprises.

Viewed in monetary terms think about menhaden as the dollars of the Atlantic. Every whale, dolphin, striped bass, and osprey relies on this currency to survive. Right now, we are letting single industry cash in all the chips, leaving the rest of our marine ecosystem bankrupt. When we conserve menhaden, we are not losing money—we are fueling a massive wildlife tourism

and recreational fishing economy. So let's keep some of the ocean's currency through a 40% reduction where it belongs, in the ocean.

In closing, for menhaden to be a healthy fishery it must move beyond being simply viewed as a commodity that generates corporate earnings or tons of fishmeal produced.

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James Boyle

From: johnholmgren@optonline.net
Sent: Wednesday, October 7, 2026 8:11 AM
To: Comments
Subject: [External] Atlantic Menhaden 2027-2028 TAC

Categories: Menhaden 2 Auto Replied

I am commenting on the 2027-2028 coastwide Atlantic menhaden TAC. I urge the Board to cut the coastwide TAC by 40%, to approximately 112,100 metric tons, as a fixed tonnage for 2027 and 2028, without delay.

John Holmgren

Norwalk, CT

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James Boyle

From: Alex Ford <alex@fordhamilton.com>
Sent: Tuesday, October 6, 2026 9:46 PM
To: Comments
Subject: [External] Atlantic Menhaden 2027-2028 TAC

Categories: Menhaden 2 Auto Replied

Hey ASMFC,

I am writing to say that I strongly support a coastwide reduction of the menhaden TAC to 112,100 metric tons to align with the science for 2027 and beyond.

As an angler and a NJ resident who spends a lot of time on the water - as well as a business owner whose livelihood is affected by healthy fisheries - I strongly urge you to adopt this lower TAC.

Thank you

Alex

--



Alex Ford
oakpool
US: +1.908.642.8930
alex@fordhamilton.com

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James Boyle

From: Joseph Esposito <joseph.esposito511@gmail.com>
Sent: Tuesday, October 6, 2026 8:39 PM
To: Comments
Subject: [External] Atlantic Menhaden 2027-2028 TAC

Categories: Menhaden 2 Auto Replied

Hello -

My name is Joseph Esposito and I am a saltwater angler from Connecticut, where menhaden numbers are down significantly compared to prior years. This not only has negative impacts on our fishery, but our osprey population as well.

Regarding the Atlantic Menhaden 2027-2028 TAC, I support:

- Cutting the coastwide TAC by 40% to approximately 112,100 metric tons for 2027 and 2028, which the ASMFC's own science projects would still result in a 40% and 50% chance of overharvest during those years.
    - Effective management action is needed now. Delays would allow the current TAC (186,840 mt) to be used for the 2027 harvest season, enabling continued unsustainable Atlantic Menhaden harvests by the commercial fishery.
    - Set the TAC as a fixed tonnage for 2027 and 2028, not a formula that adjusts automatically. Do not defer it pending further analysis.

I stand by the opinions of the American Saltwater Guides Association. Thank you for considering my public comment.

Joseph Esposito

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James Boyle

From: Brian Sittlow <blsittlow@msn.com>
Sent: Tuesday, October 6, 2026 7:22 PM
To: Comments
Subject: [External] Menhaden Ocean Total Allowable Catch (TAC)

Categories: Menhaden 2 Auto Replied

AMFC,

Menhaden stocks have been poorly managed, resulting in commercial fishing harvest and quotas that have drastically reduced the viability of the species and the ecosystems that relies on their abundance.

I support a an menhaden ocean total allowable catch (TAC) that reduces commercial quota from 186 mt to 114 mt. This is a 40% reduction.

These cuts are needed to prevent the possibility of continued overfishing, and bring back menhaden to management target levels.

With support for conservative fisheries management measures,
Brian Sittlow
Westerly, RI
Recreational Angler

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James Boyle

From: Katherine Evers <kevers2@student.framingham.edu>
Sent: Monday, October 5, 2026 2:43 PM
To: Comments
Subject: [External] Atlantic Menhaden Draft Addendum II

Hello,

I believe that reducing the menhaden quota by only 20% is absolutely not enough to protect the thousands of other species, including culturally and comercially importnat ones, that depend on them. I support reducing the quota by the full 50%.

Sincerely,

Katherine Evers

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James Boyle

From: Barbara S <snyderbarbara44@gmail.com>
Sent: Monday, October 5, 2026 12:18 PM
To: Comments
Subject: [External] Menhaden Ocean TAC

I am a New Jersey resident and I have previously commented, using this email address, on the Atlantic Menhaden Draft Addendum II, requesting that Menhaden Bay Cap be cut by 50%.

I am now writing to request a 50% cut in the Menhaden Ocean Total Allowable Catch (TAC) as well. This seems even more important to me.

According to the American Saltwater Guides Association:

> "The current 186,840 metric ton TAC carries a 99.5% probability of exceeding the ecological fishing target in each of those years. A TAC of 114,200 metric tons—a 39% reduction—gets that risk down to 50%. At 110,200 metric tons, a 41% reduction, the probability of exceeding the target falls to 40%.
>
> [This] decision matters enormously; cutting the current 51,000 metric-ton Bay Cap in half would leave 25,500 metric tons of additional menhaden in the Bay, while a 40% coastwide TAC reduction would leave roughly 75,000 metric tons more menhaden in the ecosystem—nearly three times as much."

The American Saltwater Guides Association also writes:

> "Atlantic Menhaden face a grossly overestimated assessment, with science suggesting that overall abundance is ~37% lower than recently assumed. Additionally, the commercial fishery has

seen consistently below-average harvests, especially in the reduction fishery within the Bay. Consequently, many other important fisheries are declining, driving significant concern about the need for appropriate management action across the board, with critical action needed for Atlantic Menhaden."

I beg you to consider the future health of our ocean resources and our environment and make this cut to allow Menhaden stocks to rebuild. This is for the sake of:

- Fishermen along the East Coast;
- Citizens who rely on these resources;
- Osprey chicks who are currently starving in their nests;
- Other wildlife we may not even know about, which will be affected by the depletion of "the most important fish in the sea."
- States along the East Coast that rely on a healthy ocean for their economies including tourism.

It is 100% clear that something is terribly wrong on our East Coast, when Osprey chicks are starving in their nests because their parents cannot find fish to feed them. Ospreys are the best fishermen of all birds, and have been doing this for tens of thousands of years. But ospreys have been declining on the coast for a number of years now, and it's only happening in saline waters; osprey nests in freshwater areas are doing fine and in fact thriving.

Ospreys have been canaries in the coal mine before, during the DDT crisis - and it looks like this is happening again. We MUST do whatever it takes to restore the health of the ocean and menhaden, for the sake of all the creatures that share the planet with us, and for our own sake as well.

Thank you for considering my comments.

Barbara Snyder

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James Boyle

From: Elliott Webb <norloel@gmail.com>
Sent: Monday, October 5, 2026 11:52 AM
To: Comments
Subject: [External] Menhaden Ocean TAC

Dear Board,

I support a 40% reduction to approximately 112,100 metric tons for 2027 and 2028. Thenk you.

Elliott Webb
Norfolk, VA

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James Boyle

From: Stu Kindle <stuthemusic@gmail.com>
Sent: Monday, October 5, 2026 7:17 AM
To: Comments
Subject: [External] TAC

Hello,

Please implement the new TAC. For the sake of the world and all of us on it.

Thanks,

-Stu
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James Boyle

From: Ryan Hunter <gunner.rah@gmail.com>
Sent: Sunday, October 4, 2026 10:34 PM
To: Comments
Subject: [External] Atlantic Menhaden 2027-2028 TAC

To the Atlantic Menhaden Management Board,

My name is Ryan Hunter, and I am an avid saltwater angler from Chester, NY who fishes the waters of New Jersey to Rhode Island. I am writing to comment on the coastwide total allowable catch (TAC) for 2027 and 2028.

I urge the Board to reduce the coastwide TAC by 40%, to approximately 112,100 metric tons, for both 2027 and 2028.
The Technical Committee's preliminary projections presented on September 28 show that keeping the current quota of 186,840 metric tons carries a 99.5% chance of exceeding the ecological reference point fishing mortality target in every year from 2027 through 2029. Even a reduction to 114,200 metric tons, about 39%, only brings the chance of staying under the target to 50/50. A 40% cut is the minimum the Board's own science supports.

Last year's 20% reduction did little to reduce actual harvest, because the fishery has not been landing its full quota. Another year of delay would allow the current TAC to be used for the 2027 season. I ask the Board to set the TAC as a fixed tonnage for 2027 and 2028, rather than a formula that adjusts automatically, and not to defer the decision pending further analysis.

This decision matters well beyond the Chesapeake Bay. Menhaden spawn along the coast from the Carolinas to southern New England, and only about one in five adult menhaden in the Northeast come from the Bay nursery. The Bay Cap protects that nursery, but the coastwide TAC protects the coastwide spawners.

My fishing in New Jersey to Rhode Island waters depends on healthy menhaden and the striped bass, bluefish, and other species that feed on them. I ask the Board to act at the November meeting.

Thank you for considering my comments.

Sincerely,

Ryan Hunter
Wilkes U 20'
Mechanical Engineering
(845)-492-7253

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James Boyle

From: adam mccarthy <adamtmccarthy@gmail.com>
Sent: Sunday, October 4, 2026 10:27 PM
To: Comments
Subject: [External] [Atlantic Menhaden 2027-2028 TAC]

Dear ASMFC,

I am writing as a recreational angler to support reducing the coastwide Atlantic menhaden TAC by 40%, to approximately 112,100 metric tons for 2027 and 2028. I support setting this as a fixed tonnage with no deferral.

The ASMFC Technical Committee's September 28, 2026 projections indicate that maintaining the current TAC of 186,840 metric tons carries a 99.5% chance of exceeding the ecological reference point fishing mortality target in every year from 2027 through 2029.

As a recreational angler who fishes CT/RI/NY for striped bass, blue fish and bluefin tuna, I depend on a healthy and abundant forage base. Menhaden are an essential part of the marine food web and support many of the species recreational anglers pursue.

I believe the proposed 40% reduction is an important step toward maintaining a healthy menhaden population and a productive coastal ecosystem.

Thank you for your time and consideration.

Best Regards,

Adam McCarthy
Glastonbury, CT

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James Boyle

From: Ryan Hunter <gunner.rah@gmail.com>
Sent: Sunday, October 4, 2026 10:24 PM
To: Comments
Subject: [External] Menhaden Ocean TAC

Good afternoon,

I strongly advocate and support a 40% cut to
approximately 112,100 metric tons of menhaden harvesting for 2027 and 2028. The coasts and oceans around my home waters of NY/NJ have been subjected to overfishing of Menhaden by out of state entities for too long and its time for our water and environment to recover.

Protect the baitfish!

Ryan Hunter
Wilkes U 20'
Mechanical Engineering
(845)-492-7253

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James Boyle

From: Matthew Robertson <robertson.matt.j@gmail.com>
Sent: Sunday, October 4, 2026 8:16 PM
To: Comments
Subject: [External] Atlantic Menhaden 2027-2028 TAC

Dear ASFMC,

I am a recreational angler from Ellington, Connecticut. I fish Long Island Sound, the Rhode Island coast around Westerly and Block Island, and the waters south of Montauk, primarily for striped bass, bluefish, and tautog. I am writing — separately from my comment on Draft Addendum II — in support of reducing the coastwide Atlantic menhaden total allowable catch by 40%, to approximately 112,100 metric tons, for 2027 and 2028.

The projections presented by the Commission's own Technical Committee on September 28 show that keeping the current TAC of 186,840 metric tons carries a 99.5% chance of exceeding the ecological reference point fishing mortality target in every year from 2027 through 2029. Even a reduction of about 39% only brings that to a coin flip. Menhaden spawn along the coast and support the predator fisheries of Long Island Sound and southern New England, not only those of Chesapeake Bay; a coastwide quota set above what the science supports risks the forage base all of those fisheries depend on.

Please set the 2027–2028 TAC at approximately 112,100 metric tons as a fixed tonnage, and do not defer the reduction. Allowing the current TAC to carry into the 2027 season would lock in a harvest level the Commission's own projections say is almost certain to exceed the ecological target.

Sincerely,

Matthew Robertson
Ellington, CT

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James Boyle

From: RM Lytle <brwntroutangler@gmail.com>
Sent: Sunday, October 4, 2026 7:56 PM
To: Comments
Subject: [External] [Atlantic Menhaden 2027-2028 TAC]

Given what is still a 40-50% chance of overharvest, the coastwide TAC should be cut by 40%, not delayed, and set as a fixed tonnage for 2027 and 2028.
The menhaden population is clearly falling behind along most of the Atlantic Coast. Not only the Chesepeake Bay is important, and measures that have a greater than 50% chance of failure to prevent overharvest are pointless.

Rowan Lytle
Portland, CT
Connecticut Fly Angler

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James Boyle

From: Alex McCrickard <mccrickard90@gmail.com>
Sent: Sunday, October 4, 2026 12:23 PM
To: Comments
Subject: [External] Atlantic Menhaden 2027-2028 TAC

Dear Atlantic Menhaden Management Board,

Hi, my name is Jackson McCrickard, and I am a recreational angler living in Virginia. I've been fishing the Chesapeake my entire life, in both Maryland and Virginia. I'm an avid striped bass and red drum angler who cherishes our resources here in the bay, as well as along the greater Atlantic coast.

Here are my public comments on the record for the coastwide TAC for 2027 and 2028:

Please implement an immediate 40% reduction to the coastwide TAC. We NEED the coastwide quota to drop to at least 114,200 metric tons just to give us a 50% chance of not exceeding the ecological reference point fishing mortality target.

I am also strongly opposed to linking the bay cap to the coastwide TAC. We cannot allow a reduction to the Chesapeake bay cap to be reallocated to the coast. We need real meaningful reductions to the Chesapeake and coastwide TAC in order to conserve Menhaden.

Respectfully,

Jackson McCrickard
410-905-0099
mccrickard90@gmail.com

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James Boyle

From: Charlie Nutting <charnut963@gmail.com>
Sent: Sunday, October 4, 2026 2:06 AM
To: Comments
Subject: [External] Atlantic Menhaden 2027-2028 TAC

Dear ASMFC Commissioners,

As a USCG Master Captain, wildlife cinematographer, and avid freediver in New England, Atlantic menhaden are the foundational forage base that sustains the marine life I document and interact with daily, from striped bass to bluefin tuna.

I am writing to urge you to cut the coastwide Total Allowable Catch
(TAC) by 40% to approximately 112,100 metric tons for 2027 and 2028.
This reduction is critical to ensuring enough menhaden remain in the ocean to support the predators and coastal economies that depend on a healthy ecosystem.

Thank you,
Charlie Nutting
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James Boyle

From: Craig Mclaughlin <cfmorders@gmail.com>
Sent: Saturday, October 3, 2026 7:30 PM
To: Comments
Subject: [External] Mehadan Ocean TAC

My name is Craig McLaughlin, and I am a recreational fishing-related business owner and educator based in Concord, Massachusetts. I am writing today to express my strong support for science-based management and conservation of the Atlantic menhaden fishery.
According to the latest data and scientific insights highlighted by fishery advocates, ASMFC science indicates that a 39% reduction in the Total Allowable Catch (TAC)—bringing the overall harvest down to between 100,000 and 114,200 metric tons—is necessary to provide even a 50% chance of meeting target ecological reference points and safeguarding menhaden stock dynamics.
As a recreational business owner and educator, I see firsthand how vital menhaden are to the health of the broader marine ecosystem. They serve as a foundational forage fish for ecologically and economically critical species, including striped bass, bluefish, weakfish, and marine wildlife across the Atlantic coast. Allowing harvest levels to remain above sustainable scientific

thresholds harms local fishing economies, marine biodiversity, and the future of coastal communities. I strongly urge the Board to follow the science and implement a 39% reduction in the Atlantic menhaden TAC to protect this vital resource for future generations and sustain the broader fishing economy.
Thank you!

Sincerely,
Craig McLaughlin
Recreational & Fishing-Related Business Owner and Educator
Concord, MA

--
Craig

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James Boyle

From: Adam Jannetti <adamj109109@gmail.com>
Sent: Saturday, October 3, 2026 5:43 PM
To: Comments
Subject: [External] Atlantic Menhaden 2027-2028 TAC

Dear Atlantic Menhaden Management Board,

I am writing separately regarding the 2027–2028 coastwide Atlantic menhaden Total Allowable Catch. I strongly urge the Board to reduce the coastwide TAC by at least 40%, to approximately 112,100 metric tons, for 2027 and 2028.

The projections presented by the Atlantic Menhaden Technical Committee and Stock Assessment Subcommittee make a compelling case for immediate action. Maintaining the current 186,840-metric-ton quota is projected to carry a 99.5% probability of exceeding the ecological reference point fishing mortality target in each year from 2027 through 2029.

Those odds are simply unacceptable for one of the most ecologically important forage species on the Atlantic coast.

Last year's 20% quota reduction also did little to reduce the number of fish actually being removed from the ecosystem because coastwide harvest had already been falling well below the previous quota. Cutting unused quota on paper is not the same thing as reducing actual fishing mortality.

Menhaden support an enormous network of predators and fisheries from the Chesapeake Bay through the Northeast. Management should recognize their value as forage and as a foundation of the broader coastal ecosystem, not merely as a source of harvest.

I therefore urge the Board to adopt a fixed coastwide TAC of approximately 112,100 metric tons for both 2027 and 2028. Please do not delay this decision, defer it for additional analysis, or adopt an automatic formula that could increase harvest without another deliberate management decision.

The Commission's own scientific projections demonstrate the risk of maintaining the status quo. I urge the Board to follow that science and make a meaningful reduction now.

Thank you for considering my comments.

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James Boyle

From: Justin Friedman <justin.friedman94@gmail.com>
Sent: Saturday, October 3, 2026 5:19 PM
To: Comments
Subject: [External] Atlantic Menhaden 2027-2028 TAC

Dear Atlantic Menhaden Management Board,

I am writing separately regarding the 2027–2028 coastwide Atlantic menhaden Total Allowable Catch.

I strongly urge the Board to reduce the coastwide TAC by at least 40%, to approximately 112,100 metric tons, for 2027 and 2028.

The projections presented by the Atlantic Menhaden Technical Committee and Stock Assessment Subcommittee make a compelling case for immediate action. Maintaining the current 186,840-metric-ton quota is projected to carry a 99.5% probability of exceeding the ecological reference point fishing mortality target in each year from 2027 through 2029.

Those odds are simply unacceptable for one of the most ecologically important forage species on the Atlantic coast.

Last year's 20% quota reduction also did little to reduce the number of fish actually being removed from the ecosystem because coastwide harvest had already been falling well below the previous quota. Cutting unused quota on paper is not the same thing as reducing actual fishing mortality.

Menhaden support an enormous network of predators and fisheries from the Chesapeake Bay through the Northeast. Management should recognize their value as forage and as a foundation of the broader coastal ecosystem, not merely as a source of harvest.

I therefore urge the Board to adopt a fixed coastwide TAC of approximately 112,100 metric tons for both 2027 and 2028. Please do not delay this decision, defer it for additional analysis, or adopt an automatic formula that could increase harvest without another deliberate management decision.

The Commission's own scientific projections demonstrate the risk of maintaining the status quo. I urge the Board to follow that science and make a meaningful reduction now.

Thank you for considering my comments.

Best,

Justin

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James Boyle

From: Kurt Long <klong1132@gmail.com>
Sent: Saturday, October 3, 2026 11:32 AM
To: Comments
Subject: [External] Atlantic Menhaden 2027-2028 TAC

Dear ASMFC,
Thank you for considering my opinions on the Coastwide TAC of Atlantic Menhaden. As an avid angler, fishing up and down the east coast, I believe that we must **Cut the Coastwide TAC by 40%**. I believe that this needs to occur immediately as even with this cut there is still a 50% chance of overfishing over the next couple of years. This would show a meaningful attempt on your part to regulate and sustain the fishery. Previous attempts have resulted in "paper" cuts only which have allowed many more metric tons to be harvested than is sustainable long term. These findings are based off of your own numbers. The TAC needs to be lowered inline with all currently available information and these new numbers cannot come as a result of shifting quotas up and down the coast. Please take this opportunity to help the population of Menhaden along with every other species you manage that relies on them.

Thank you for your time,
Kurt

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James Boyle

From: Matthew Roach <matt.roach.586@gmail.com>
Sent: Friday, October 2, 2026 6:48 PM
To: Comments
Subject: [External] Atlantic Menhaden 2027-2028 TAC

Dear Fisheries Managers:

As part of the ongoing discussions around the future of Atlantic Menhaden, and as a fisherman and coastal resident of the state of Virginia who has seen first hand the impacts of the current reduction fishery on abundance, including the devastating impact on nesting pairs of osprey in my Virginia waters of the Atlantic and Chesapeake, I ask for you to please do the following:

- **Immediately cut the coastwide TAC by 40%** to approximately 112,100 metric tons for 2027 and 2028
- ASMFC's own scientists note this would still result in a 40% and 50% probability of over harvest during those years.

Menhaden deserve at least a 50% chance of avoiding over-harvest! This action is needed immediately, as if not implemented fisheries managers would be allowing the current TAC (186,840 mt) to be used for the 2027 harvest season. This is completely unsustainable and the results would be devastating.

Additionally, I ask that ASMFC set the TAC as a fixed tonnage for 2027 and 2028, not a formula that adjusts automatically. Do not defer it pending further analysis. We need action now, for these fish, for the animals that depend on them, and for the costal communities that count on their presence for recreational fishing and tourism.

This country is counting on you to make the most informed decision with the best available data, and to make right the acknowledged errors of the past. I pray for you and your team in this moment, and thank you for your service to our country.

Regards,
Matt Roach
Hungars Creek, VA

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James Boyle

From: Mark Gilroy <markngilroy@gmail.com>
Sent: Friday, October 2, 2026 4:29 PM
To: Comments
Subject: [External] Atlantic Menhaden 2027-2028 TAC

To whom it may concern,

I am writing to express my strong endorsement of the Atlantic Menhaden Management Board's recommendations to decrease the total coastwide TAC to 40%, fix the Chesapeake Bay fishery cap at 25,500 metric tons and reject linking the Bay Cap to the total coastwide cap. I am a passionate saltwater fly fisherman in CT, and I spend my time and dollars fishing and chasing game fish up and down the east coast. We are seeing a marked decrease in game fish, and we need to protect their food source. We have been taking far too many menhaden out of the system, and we need to address that. Please consider making these changes. Thank you for your time.

Mark Gilroy

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James Boyle

From: Eric Shannon <eshannon12@mac.com>
Sent: Friday, October 2, 2026 3:48 PM
To: Comments
Subject: [External] Atlantic Menhaden 2027-2028 TAC

Dear Atlantic Menhaden Management Board Members,

My name is Eric Shannon. I live in Narberth, Pennsylvania, and I'm a recreational angler and former small-business owner. I urge you to reduce the coastwide Atlantic menhaden total allowable catch by at least 40% from the current 186,840 metric tons, to approximately 112,100 metric tons for 2027 and 2028, without postponing action.

My fishing interests include fall striped bass in New Jersey's back bays and spring stripers in the Delaware River. I fish from kayaks and small boats, and I invest considerable time and money in the equipment and planning that make those outings possible. Having accessible, productive fisheries within driving distance of home matters to me.

If we fail to protect the forage supporting those fisheries, the consequences reach well beyond fewer fish on the end of my line. Less dependable fishing means fewer reasons to make a trip, buy tackle, launch a boat, book a guide, or bring the family to a waterfront town. That affects bait shops, charter captains, marinas, boat dealers, restaurants, and lodging businesses. For an individual angler, it may mean a disappointing season. For someone whose livelihood depends on anglers returning, it can mean losing customers year after year.

As a former business owner, I understand that harvest reductions have real costs for commercial fishing businesses and their employees. Those costs deserve consideration. So do the costs of inaction borne by the many other businesses that depend on abundant fish. Leaving menhaden in the water has economic value that should carry substantial weight in this decision.

I understand that ASMFC's ecological fishing mortality target is different from its overfishing threshold. Avoiding the threshold should not be the extent of our ambition. Please set a fixed coastwide catch limit that moves management toward the ecological target and produces a meaningful reduction in actual removals. Reducing the Chesapeake Bay cap alone, or shifting quota among states, cannot accomplish that coastwide goal.

I also have a five-year-old daughter, Norah. I want her to grow up with the opportunity to enjoy these waters and develop her own connection to fishing and wildlife. The decisions made now will help determine whether that opportunity remains worthwhile and accessible when she is older.

Please act this November. Protecting abundant forage is an investment in the fisheries, coastal businesses, and family experiences that depend on it.

Thank you for considering my comments.

Eric Shannon
Narberth, Pennsylvania

310-902-5354

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James Boyle

From: Keith Houck <keithahouck@gmail.com>
Sent: Thursday, September 10, 2026 3:03 PM
To: Comments
Subject: [External] menhaden management

Categories: Menhaden 2 Auto Replied

I am offering my comments on management of the most important fish of the Atlantic Ocean, the menhaden. Menhaden stock assessment has had serious stock assessment errors. Studies support almost 40% fewer menhaden than previously calculated. The old total allowable catch will guarantee a 100% chance of overfishing. Previous TAC's were not even met due to the fewer total biomass. A cumulative reduction of around 50% is likely needed to help recover this fishery. I miss the days of the numerous menhaden found in the sounds and near-shore waters in NC. And miss the many ocean stripers that fed on them along the northern Outer Banks of NC. Please support good science and preservation of our coastal habitats by reducing allowable catch of menhaden.

Thank you,
Keith Houck
9622 Collins Creek Dr, Chapel Hill, NC 27516

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The Nature Conservancy

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

October 5, 2026

RE: 2027 – 2029 Coastwide TAC

Dear Mr. Boyle and the ASMFC Atlantic Menhaden Management Board:

Please accept The Nature Conservancy's (TNC) comments on the coastwide Total Allowable Catch (TAC) for consideration at the November 2026 Atlantic Menhaden Management Board meeting. TNC is a global organization that works to conserve the lands and waters upon which all life depends. We have marine programs in every Atlantic coast state and have worked on Atlantic menhaden science and management for the last 15 years.

The Nature Conservancy strongly urges the Menhaden Management Board to set the Atlantic Menhaden TAC at a level that has at least a 50% probability of achieving the Ecological Reference Point (ERP) fishing mortality rate target.

Last year, results of the single-species assessment update and the 2025 Ecological Reference Point (ERP) Assessment indicated that fishing mortality (*F*) was above the ERP *F* target and fecundity was below the ERP fecundity target. The Board set the 2026 total allowable catch (TAC) at 186,840 mt, a 20% decrease from 2023-2025 TAC —but even that reduced TAC carried a 100% probability of exceeding the ERP *F* target.

For several years, the fishery operated under a TAC that allowed a greater level of removals than it should have, because the previous assessment used a Natural Mortality (M) rate that was later found to be erroneously high. The Board corrected this in the 2025 assessment update, revising M downward by more than 20%.

Yet, a new peer-reviewed paper indicates the correction did not go far enough. A study published this month in *Fisheries Research* (Ault and Luo 2026) reanalyzed the original 1966–1971 coastwide tagging data underlying the M estimate and identified an M of 0.50 yr^{-1}, less than half the value used in SEDAR69 (1.17 yr^{-1}), and meaningfully below the corrected 0.92 yr^{-1} value adopted in the 2025 update. Based on the findings of this research, fishing mortality has been and continues to be underestimated by an even wider margin than the 2025 correction addressed. The idea that *F* is underestimated is supported by observations from watermen coastwide, who describe a lack of large, old menhaden. The scarcity of these larger fish, that were abundant less than 5 years ago, is a textbook manifestation of growth overfishing. When on-the-water observations corroborate the most recent and best available science, there is a very strong case for taking action. The TAC must be reduced now, to a level that will allow some of the smaller menhaden to grow. The Board, and the coastwide marine ecosystem, cannot afford to wait for the next benchmark assessment before adopting common-sense management.

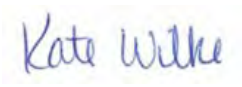
Atlantic menhaden are a critical forage species, and the health their predators depends on encountering abundant menhaden *at the right times and in the right places.* For more than two years, we have witnessed, and scientists have reported, low availability of adult menhaden in areas where birds, fish,

and marine mammal predators typically feed on them, including portions of Chesapeake Bay and the New York Bight. Given the current depleted stocks of other forage including Atlantic herring, Atlantic mackerel, and river herring, predators have fewer options, and menhaden availability is more important than ever. The ERP framework that ASMFC worked so hard to create exists for exactly this reason: its goal is to maximize Atlantic menhaden fishing mortality while still meeting the forage demands of Atlantic striped bass. A TAC that ignores these localized shortfalls risks leaving striped bass, and the broader predator community, without the forage base the ERPs are meant to guarantee.

Managers of the menhaden fishery are also responsible for the well-being of other Commission- and state-managed fisheries—such as American lobster and multiple crab fisheries—that are increasingly dependent on menhaden for bait. Other fisheries' reliance on menhaden for bait is further intensified by reduced availability of other large-bodied forage species including Atlantic herring and Atlantic mackerel. To help reconcile this bait dependence with the TAC reduction described above, the Management Board should consider initiating an action to re-evaluate the menhaden allocation. Bait demand is routinely discussed in TAC discussions, but the Board and Plan Development Team have not developed or used coastwide projections of bait demand when apportioning the TAC between bait and reduction. Unlike the reduction industry, which utilizes fish and invertebrates from around the globe, east coast bait fisheries have no such fallback. Moreover, importing bait from elsewhere in the world poses economic as well as ecological risk , not only for bait harvesters and distributors, but for thousands of tackle shops, trap fishermen, and other businesses across multiple states whose operations depend on reliable, domestic bait. Demand for menhaden as bait should be a factor when making management decisions, however it should not be used as rationale for setting a coastwide TAC that has less than 50% of achieving the management plan's targets.

We urge the Board heed the stock assessment science and reduce the TAC for 2027-2029 fishing years such that the fishery has at least a 50% chance of achieving the ERP fishing mortality target – not the threshold, which reflects only the level at which the stock would experience overfishing and which drives down the biomass. **According to the slides from the September 28, 2026 Atlantic Menhaden Technical Committee call, that would require at least a 39% reduction from 2026 levels**. There are credible reasons to believe that even the current *target* understates the reduction that is actually needed, and the paucity of menhaden in key predator habitats suggests the stock cannot support the current level of removals. Atlantic menhaden are too important to the ecosystem, and to fisheries in multiple states, to continue straining the stock with excessive fishing pressure. Thank you for your attention to this important matter and for considering our perspectives.

Sincerely,



Kate Wilke
Mid-Atlantic Seascape Director, The Nature Conservancy
Kate.wilke@tnc.org; 434.942.7652

Ault, J.S. and Luo, J. 2026. Investigation of Atlantic menhaden mortality rates. *Fisheries Research*. DOI: 10.1016/j.fishres.2026.107865

October 16, 2026

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

Re: Commercial Atlantic Menhaden Quota Reallocation

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

On behalf of the undersigned organizations representing recreational fishing, boating, and conservation communities along the Atlantic, **we urge the Board to initiate a process to reallocate state menhaden quotas at the 2026 Annual Meeting**.

Atlantic menhaden are a critical forage fish that support predators like striped bass, bluefish, tuna, whales, and ospreys. They also provide essential bait for commercial and recreational fisheries and support coastal businesses and working waterfronts from Maine to Florida. Yet the current system for allocating harvest access among states does not fully reflect today's fishery.

The current state allocation formula was last updated in 2022 using average landings from 2018, 2019, and 2021. The Board is therefore relying on landing patterns that are now five to eight years old to determine how access to today's menhaden fishery is distributed among states. Those data do not capture subsequent changes in menhaden distribution and availability, fishery participation, or the growing economic importance of menhaden as bait along the Atlantic Coast.

This disconnect is particularly apparent in New England, where menhaden have become more abundant in recent years while states in the region continue to have relatively limited harvest allocations. More than 75% of the coastwide TAC is allocated to Virginia, while bait suppliers and fishermen in the Northeast rely on quota transfers from other states to help meet demand. Reallocation would allow the Board to examine whether state allocations still reflect where menhaden are available and where fisheries and communities depend on access to them, without increasing coastwide harvest.

Reallocation and the coastwide TAC are separate management questions. We support establishing the TAC based on the best available science and ecosystem-based management. Whatever harvest level the Board determines is sustainable should be allocated among states in a way that reflects the current fishery.

A reallocation process could reduce reliance on temporary quota transfers, provide greater predictability for bait-dependent fisheries, and better account for the economic benefits generated by menhaden. Those benefits extend well beyond the states and sectors receiving the largest harvest allocations. In 2025, recreational fishing trips involving menhaden generated approximately $804 million in angler spending, supported more than 7,200 jobs, and generated more than $1.5 billion in annual economic

output.[1] Recreational anglers used menhaden on 13.9 million fishing days nationwide, including 2.5 million days in New England. These benefits should be considered when evaluating whether current allocations reflect all uses of the resource.

We recognize that reallocation involves complex ecological, economic, and fishery considerations. Initiating a process does not predetermine the outcome. It gives the Board an opportunity to evaluate whether current allocations remain appropriate, establish criteria for considering potential changes, and gather stakeholder input before any new allocation is finalized.

That process should consider:

- Current and changing patterns of menhaden distribution and availability;
- Recent and historical fishery participation and dependence on menhaden; and
- The ecological and economic benefits associated with menhaden harvest and use as bait.

Providing an opportunity for affected states, fishermen, bait suppliers, recreational fishing interests, conservation organizations, and other stakeholders to participate will help ensure that any eventual changes are informed by the best available information and a broad understanding of the fishery.

We therefore urge the Board to vote at the 2026 Annual Meeting to initiate a formal state quota reallocation process that evaluates current ecological, fishery, and economic conditions and provide meaningful opportunities for stakeholder input before any new allocation is finalized. Thank you for your consideration.

Sincerely,

American Bird Conservancy

American Sportfishing Association

Angler Action Foundation

BoatU.S.

Bonefish & Tarpon Trust

Coastal Conservation Association

Guy Harvey Ocean Fund

International Game Fish Association

Marine Retailers Association of the Americas

National Marine Manufacturers Association

Rhode Island Saltwater Anglers Association

Sportsmen's Alliance Foundation

Theodore Roosevelt Conservation Partnership

Virginia Saltwater Sportfishing Association

Wild Oceans

[1] The Economic Contribution of Recreational Fishing with Atlantic Menhaden, Southwick Associates, June 2026, available at: https://www.trcp.org/wp-content/uploads/2026/06/Atlantic-Menhaden-Fishing-Report-FINAL-6-22-26.pdf

October 13, 2026

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

Re: Commercial Quota Reallocation

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

As someone in the broad community of recreational anglers, charter businesses, boaters, working watermen, and conservationists who value healthy fisheries, I'm urging you to move to initiate a process to reallocate Atlantic state menhaden quotas. While responsible adjustments to the 2027-2028 total allowable catch (TAC) will ensure the long-term sustainability of a resource that multiple fisheries depend on, reallocation of a portion of menhaden quota among Atlantic states would:

- improve bait availability and price stability
- reduce operating risk for lobstermen and other watermen
- strengthen bait supply for recreational anglers and charter businesses
- promote equitable distribution of a public resource
- support the long-term economic stability of communities along the Atlantic coast

The current quota imbalance does not align with existing regional demand and quota fulfillment of all states and creates economic vulnerability for working waterfronts along the Atlantic.

As you weigh the pros and cons of initiating reallocation, I urge the Board to ask which allocation structure generates the broadest, most resilient, and most reasonable economic and ecological distribution of menhaden to ensure the greatest value of this shared public resource.

Know that as a stakeholder for this resource, I do not take these decisions lightly. Your vote on this matter will serve to promote regional equity in a public resource, encourage economic resilience for working waterfronts, and support sustainable fisheries management that reflects real-world economic and ecological impacts.

Thank you for your consideration.

Menhaden Reallocation Petition Signers List - All 1,609 Individuals Have Signed the Petition Above

Count	Last Name	First Name	Date	Home City	State	ZIP
1	Abbitt	Watkins	7/1/2026	Appomattox	VA	24522
2	abbott	john	9/2/2026	Pocomoke City	MD	21851
3	Abbott	Scott	8/9/2026	Charlottesville	VA	22911
4	Abdill	John	10/7/2026	Millville	NJ	08332
5	Abraham	Barbara	7/1/2026	Leominster	MA	01453
6	ACERRA	MICHAEL	7/20/2026	Babylon	NY	11702
7	adcock	charles	9/19/2026	Weems	VA	22576
8	Adelstein	Jordan	6/9/2026	Woodhaven	NY	11421
9	Ager	Wanda	7/31/2026	Magnolia	TX	77354
10	Agin	Harry	7/10/2026	Bayville	NJ	08721
11	albin	woodrow	8/29/2026	North Kingstown	RI	02852
12	Alexander	Andrea	8/7/2026	Prairieville	LA	70769
13	Alley	Shelton	9/30/2026	Cape Charles	VA	23310
14	Allmann	Kevin	7/16/2026	Whiting	NJ	08759
15	Alsop	Michael	6/19/2026	Heathsville	VA	22473
16	Alstrom	David	9/4/2026	West Chester	PA	19380
17	Aluska	Andrew	8/13/2026	Lindenhurst	NY	11757
18	Alvino	Kerry	8/17/2026	Newbury	MA	01951
19	Alway	James	6/19/2026	Lawton	OK	73505
20	Amorino	Richard	7/28/2026	Aberdeen	NJ	07747
21	Andaloro	Bernadette	7/2/2026	East Syracuse	NY	13057
22	Anderson	Christine	9/9/2026	Maple Grove	MN	55311
23	Anderson	Gary	7/11/2026	Levittown	NY	11756
24	Anderson	Gregg	6/10/2026	Forestdale	MA	02644
25	Anderson	Seth	10/7/2026	Moon	VA	23119
26	Anderson	Tate	6/12/2026	Murray	UT	84107
27	Andres	Mark	8/8/2026	Sayville	NY	11782
28	Andrews	Scott	10/7/2026	N Merrick	NY	11566
29	Anikis	Paul	9/2/2026	Delaplane	VA	20144
30	Apparao	Pranay	7/30/2026	Jacksonville	FL	32217
31	Araujo	Kristlyn	7/31/2026	Virginia Beach	VA	23456
32	Arduser	Steve	8/29/2026	Balsam Lake	WI	54810
33	Argleben	Ernest	10/7/2026	Hillsboro	VA	20132
34	Arguien	Richard	8/14/2026	Manchester	NH	03104
35	Arnold	Gary	6/9/2026	Bay Shore	NY	11706
36	Aronson	George	8/19/2026	Mount Sinai	NY	11766
37	Arrigali	Carl	9/2/2026	Tyler Hill	PA	18469
38	Arrigo	Charley	9/22/2026	Charlotte	NC	28202
39	Atha	Tom	7/1/2026	Alhambra	CA	91801
40	Athey	Thomas	8/30/2026	Seaford	VA	23696
41	Atkinson	Ellen	7/1/2026	Danville	VA	24541

42	Atkinson	Stephen	6/19/2026	Midlothian	VA	23113
43	Atkinson	Steve	7/1/2026	Midlothian	VA	23113
44	Auchmoody	Blake	6/9/2026	Henrico	VA	23233
45	aufiero	phil	8/9/2026	Eastchester	NY	10709
46	Austin	William	10/2/2026	Indian Rocks Beach	FL	33785
47	Avard	Paul	8/13/2026	Sanbornville	NH	03787
48	Aversano	Joseph	7/13/2026	Hicksville	NY	11801
49	B	Brett	7/6/2026	Elma	NY	14059
50	B	John	6/11/2026	Manahawkin	NJ	08050
51	bagatta	joanna	7/1/2026	Neptune	NJ	07753
52	Baginski	Brett	8/28/2026	Elma	NY	14059
53	Bahleda	Melissa	10/8/2026	Blowing Rock	NC	28605
54	Bailey	Mike	7/6/2026	Enfield	CT	06082
55	Bailey	Mike	9/4/2026	West Hartford	CT	06107
56	Baker	Columbus	9/21/2026	Charlottesville	VA	22901
57	Baker	David	6/15/2026	Kalispell	MT	59901
58	Baker	Karen	7/31/2026	Crystal River	FL	34428
59	Baker	Patrick	6/9/2026	Manahawkin	NJ	08050
60	Baker	Richard	10/7/2026	Sebastian	FL	32958
61	Baker	Richard	7/1/2026	Tallahassee	FL	32301
62	Baker	Rossie	9/2/2026	Virginia Beach	VA	23455
63	Baker	Shane	7/11/2026	Newport News	VA	23601
64	Baldan	Gian	8/19/2026	Seaford	NY	11783
65	Baldwin	Thomas	9/2/2026	Henrico	VA	23238
66	Balgley	Jesse	7/28/2026	Brooklyn	NY	11234
67	Ball	Austin	9/10/2026	Panama City Beach	FL	32407
68	Ball	James	7/14/2026	Riva	MD	21140
69	Banach	Darlene	10/7/2026	Danbury	CT	06813
70	Baney-Tucker	Claire	9/22/2026	Toms River	NJ	08757
71	Banks	Wesley	8/28/2026	Vancouver	WA	98682
72	Barbour	Travis	8/8/2026	Davidson	NC	28036
73	Barefoot	Charles	9/2/2026	Henrico	VA	23229
74	Bareford	Frank	8/13/2026	Deltaville	VA	23043
75	Barile	Susan	6/10/2026	Shoreham	NY	11786
76	Barker	Ron	8/18/2026	High Point	NC	27265
77	Barlow	Jeff	7/1/2026	Gloucester	MA	01930
78	Barnard	Sam	9/30/2026	Westport	MA	02790
79	Barnat	Brad	8/11/2026	Coventry	RI	02816
80	Barnes	Richard	6/10/2026	Virginia Beach	VA	23455
81	Barnhart	Shelley	8/28/2026	Marathon	NY	13803
82	Barnum	Jeff	6/8/2026	Strong	ME	04983
83	Barrett	Edward	7/1/2026	Ravena	NY	12143
84	Barrett	Preston	8/4/2026	Edgemoor	SC	29712
85	Bartsch	Jeanne	10/7/2026	Huntington	NY	11743

86	Basile	Francis	6/10/2026	East Greenwich	RI	02818
87	Bastien	Laura	6/20/2026	Waterford	CT	06385
88	bates	brian	7/1/2026	Huntington	NY	11743
89	bates	Simon	7/31/2026	Michigan City	IN	46360
90	Beard Raymond	Lori	7/13/2026	Shelter Island Heights	NY	11965
91	Bearden	Kevin	7/20/2026	Charleston	SC	29412
92	beasley	todd	7/2/2026	Columbia	SC	29201
93	Beck	Sean	7/1/2026	Columbia	MD	21045
94	Beeson	Marilyn	8/9/2026	Dunkirk	MD	20754
95	Beggs	Brian	9/30/2026	Chesterfield	VA	23838
96	Belack	Brandon	7/28/2026	Allison Park	PA	15101
97	Belamarich	Peter	8/14/2026	Falmouth	MA	02543
98	Bello	John	7/13/2026	Berryville	VA	22611
99	Benson	Frederick	9/2/2026	Lanexa	VA	23089
100	Berezoski	Donald	9/10/2026	Huntingtown	MD	20639
101	Bergan	Robert	7/2/2026	Pottsville	PA	17901
102	Bergan	Sandra	8/1/2026	Pottsville	PA	17901
103	Bertini	Jack	8/8/2026	East Setauket	NY	11733
104	Bertram	Andrea	6/12/2026	Johnstown	PA	15902
105	Beseke	Susan	6/13/2026	Maplewood	MN	55109
106	Bicking	Ann	9/2/2026	North Chesterfield	VA	23236
107	Bieback	Tom	6/10/2026	Ellington	CT	06029
108	BIRCH	Nancy	10/5/2026	Snow Hill	MD	21863
109	Bird	Christa	8/12/2026	Plainview	NY	11803
110	Bird	Paul	8/5/2026	Midlothian	VA	23112
111	Bivona	Patrick and Barbara	8/28/2026	Kenner	LA	70065
112	Black	C R	10/8/2026	Westminster	SC	29693
113	Blackett	Richard	9/25/2026	Mediapolis	IA	52637
114	Blanton	Charles	7/14/2026	Henrico	VA	23238
115	Bleakley	Bill	10/7/2026	Myrtle Beach	SC	29572
116	Bleke	Cole	9/7/2026	Bush	LA	70431
117	Blevins	Brian	9/30/2026	Castle Rock	CO	80109
118	Blinder	Farrah	10/9/2026	Woodmere	NY	11598
119	Blinder	Mo	10/9/2026	Woodmere	NY	11598
120	Bliss	Tucker	8/13/2026	Brooklyn	NY	11238
121	Blystone	Brian	10/4/2026	Levittown	PA	19057
122	Bock	David	9/8/2026	Fredericksburg	VA	22405
123	Boda	Elmer	10/4/2026	Waxhaw	NC	28173
124	Bogolub	Larry	7/1/2026	Ely	MN	55731
125	Bohan	Jeff	10/7/2026	Ridge	NY	11961
126	Bohan	Teresa	6/19/2026	Alexandria	VA	22302
127	Bonnanzio	John	8/11/2026	Pocasset	MA	02559
128	Boone	Jim	7/1/2026	Las Vegas	NV	89117
129	Boothe	Jason	10/7/2026	Dundalk	MD	21222

130	Bottar	T	7/3/2026	Syracuse	NY	13206
131	Bottar	Taylor	7/24/2026	Syracuse	NY	13206
132	Bouchard	Michele	7/1/2026	Waterville	ME	04901
133	boyd	alexander	9/2/2026	Henrico	VA	23238
134	Boyd	James	7/1/2026	Villas	NJ	08251
135	Boykin	Billy	10/6/2026	Powhatan	VA	23139
136	Boyle	Vincent	7/1/2026	West Chester	PA	19380
137	Boyle	Vincent E.	9/2/2026	West Chester	PA	19380
138	Brader	John	10/2/2026	Mount Airy	MD	21771
139	Bradley	Marie	6/11/2026	Greenville	NH	03048
140	Bradley lll	James	8/14/2026	Gainesville	FL	32608
141	brandt	kenneth	10/7/2026	Greene	NY	13778
142	Branham	James	6/11/2026	Kingston	NH	03848
143	Brannan	Danny	8/28/2026	Tooele	UT	84074
144	Bravo	Eileen	9/24/2026	Coral Gables	FL	33133
145	Brawner	Deborah	10/7/2026	Nashville	TN	37211
146	Brazell	Hunter	6/16/2026	Lexington	SC	29073
147	Breci	Pamela	9/21/2026	Omaha	NE	68116
148	Breheny	Michael	7/11/2026	Medford	NY	11763
149	Brenner	Gary	8/28/2026	Hillpoint	WI	53937
150	Bresnahan	Andrew	7/1/2026	Gloucester	MA	01930
151	Breton	Matthew	8/1/2026	West Charleston	VT	05872
152	Brewster	James	8/10/2026	Portsmouth	VA	23703
153	Brickell	Julie	6/12/2026	Anaheim	CA	92806
154	Brisby	Susan	7/1/2026	Corpus Christi	TX	78411
155	Briskin	Jordan	6/19/2026	Palo Alto	CA	94306
156	Brock	Casey	7/1/2026	Isle Of Palms	SC	29451
157	Brogna	Joseph	6/9/2026	Plainview	NY	11803
158	Brothers	Jack	7/1/2026	Anchorage	AK	99504
159	Brower	Daniel	6/12/2026	Burnsville	MN	55337
160	Brown	Bruce	8/19/2026	Hartford	CT	06114
161	Brown	David	6/10/2026	Goldsboro	MD	21636
162	Brown	Evan	7/31/2026	Thomasville	GA	31757
163	Brown	Jake	8/15/2026	Nahant	MA	01908
164	Brown	Valerie	6/10/2026	Crownsville	MD	21032
165	Bruestle	Ann	8/28/2026	New Orleans	LA	70115
166	Brunner	Paul	9/22/2026	Milfish	CT	06461
167	Bruno	Anthony	8/3/2026	Sackets Harbor	NY	13685
168	Bryant	Karen	9/30/2026	Fairfax	VA	22030
169	Bryant	Lori	7/14/2026	Pendleton	OR	97801
170	Bryant	Thomas	7/30/2026	Lynchburg	VA	24503
171	Buchholz	Scott	9/12/2026	Wurtsboro	NY	12790
172	Buck	John	9/30/2026	Salisbury	MD	21804
173	Bumgarner	James	6/12/2026	Osawatomie	KS	66064

174	Buresh	Stephanie	7/1/2026	King William	VA	23086
175	Burgess	Catherine A	8/10/2026	Falmouth	MA	03536
176	Burke	Donald	10/7/2026	Brooklyn	NY	11201
177	Burke	Frederick	8/10/2026	Millsboro	DE	19966
178	Burkett Jr	Richard	10/7/2026	Clearwater	FL	33756
179	Butch	Tom	6/12/2026	Salem	OH	44460
180	Butcher	Brent	10/11/2026	Round Hill	VA	20141
181	Butler	B.N.	7/1/2026	Deltaville	VA	23043
182	Butler	Devin	8/1/2026	Selkirk	NY	12158
183	Butler	Luke	8/12/2026	Havre De Grace	MD	21078
184	Butterworth	Scott	8/3/2026	Findlay	OH	45840
185	Buziak	Patricia	10/2/2026	Frederick	MD	21704
186	Bybee	Kim	8/30/2026	Boise	ID	83702
187	Byrnes	Gilbert	7/24/2026	Long Branch	NJ	07740
188	C Russo	Meredith	9/2/2026	Beaufort	SC	29907
189	Cafiero	Michael	8/28/2026	Brooklyn	NY	11207
190	Caicco	Jody	8/28/2026	Vancouver	WA	98682
191	Calamaro	Victor	7/1/2026	Rochester	NY	14624
192	Callaghan	Peter	6/9/2026	Galloway	NJ	08205
193	Calvert	Michelle	9/21/2026	Cornelius	NC	28031
194	Calvert	Rita	10/9/2026	Annapolis	MD	21409
195	Camerada	Domenick	10/2/2026	Staten Island	NY	10306
196	Candeloro Candeloro	Gene	8/22/2026	Havelock	NC	28532
197	Cantu	Solianni	7/17/2026	Corpus Christi	TX	78415
198	Caplinger	Charlie	7/1/2026	Mandeville	LA	70448
199	Carbonneau	Jim	7/14/2026	Richmond	VA	23235
200	Card	Darrell	8/23/2026	Chalfont	PA	18914
201	carder	Monroe	10/5/2026	Yarmouth Port	MA	02675
202	Carney	Tim	8/15/2026	Hazlet	NJ	07730
203	Carpenter	Alex	8/2/2026	Somerville	MA	02145
204	Carter	Brent	8/10/2026	Supply	NC	28462
205	Carter	william	9/2/2026	Midlothian	VA	23113
206	Carton	Barbara	7/1/2026	Locust	NJ	07760
207	Cartwright	David	10/7/2026	Englewood	FL	34223
208	Casey	Paul	8/10/2026	Fairhaven	MA	02719
209	Castellucci	Vincent	7/1/2026	Monrovia	MD	21770
210	Casto	Michael	9/10/2026	Milwaukee	WI	53207
211	Causey	Laura	9/22/2026	Edgewater	MD	21037
212	Cawrse	James	7/24/2026	Chesapeake	VA	23322
213	Cayton	Brent	10/7/2026	Morgantown	WV	26508
214	Ceci	Frank	8/15/2026	Riverside	CT	06878
215	Cefai	Frank	8/11/2026	New York	NY	10128
216	Centofanti	Joe	6/10/2026	Beachwood	NJ	08722
217	Ceperich	Lee	6/19/2026	White Stone	VA	22578

218	Chabot	Stephen M	6/9/2026	Quincy	MA	02169
219	Chagnon	Jean	7/10/2026	New York	NY	10001
220	Chambers	Richard	6/30/2026	Southport	CT	06890
221	Chandler	Ethan	7/1/2026	Huntsville	AL	35803
222	Chandler Jr	Gregory	7/2/2026	Huntsville	AL	35803
223	Chappell	Cameron	8/11/2026	Virginia Beach	VA	23456
224	Charlock	Thomas	8/29/2026	Newport News	VA	23606
225	Charlton	Steve	7/11/2026	Manchester	MA	01944
226	Chaves	john	6/12/2026	Simsbury	CT	06070
227	Chayes	Fletcher	6/9/2026	Oceanport	NJ	07757
228	Cheatham	Sally	9/18/2026	White Stone	VA	22578
229	Chelius	Garrett	6/9/2026	Lloyd Harbor	NY	11743
230	Chellew	Justin	9/2/2026	Bethlehem	PA	18020
231	Chiala	Gay	7/1/2026	Murrysville	PA	15668
232	Childers	Barbara	10/7/2026	North Truro	MA	02652
233	Childress	Matt	6/12/2026	Morgantown	KY	42261
234	Chilton	Robert	6/12/2026	Virginia Beach	VA	23454
235	Cho	Curtis	8/14/2026	Oceanside	CA	92056
236	Christie	Bill	6/13/2026	Tucson	AZ	85711
237	Christoffers	Edward	6/19/2026	Easton	MD	21601
238	Ciccarelli	Carmine	8/11/2026	Bloomfield	CT	06002
239	Cicero	Ronald	8/9/2026	Tilghman	MD	21671
240	Cidoni	Stephen	7/29/2026	Shoreham	NY	11786
241	Ciulla	Joseph	7/15/2026	Nesconset	NY	11767
242	Clark	Adam	9/25/2026	Chariton	IA	50049
243	Clark	Diane	9/3/2026	Colfax	NC	27235
244	Clark	Duncan	10/6/2026	Delaplane	VA	20144
245	Claypoole	John	10/12/2026	Raleigh	NC	27614
246	Cline	Wes	7/1/2026	Watertown	TN	37184
247	Cloud	Jarrett	6/12/2026	Stanhope	NJ	07874
248	Cobb	John	9/30/2026	Norfolk	VA	23518
249	Cocca	Nicholas	9/2/2026	Duvall	WA	98019
250	Cohn	Robert	7/1/2026	Annapolis	MD	21403
251	Cole	James	7/25/2026	Lenexa	KS	66220
252	Cole	Richard	7/1/2026	Elm Springs	AR	72728
253	Coleman	Robin	10/4/2026	Las Vegas	NV	89121
254	Collins	Michael	6/14/2026	Wakefield	RI	02879
255	Comeau	Russell	8/8/2026	Breezy Point	NY	11697
256	Conlee	John	8/16/2026	Wingdale	NY	12594
257	Connelly	Ned	6/19/2026	Clifton Heights	PA	19018
258	Connor	Gabriele	7/1/2026	Fort Collins	CO	80526
259	Conover	Christian	8/2/2026	Poquoson	VA	23662
260	Cook	Bryan	7/1/2026	Gaston	OR	97119
261	Cook	Nicole	7/10/2026	Pittsburgh	PA	15210

262	Corcoran	John	8/10/2026	Wantagh	NY	11793
263	Cosby	Dan	6/9/2026	Lincolnville	ME	04849
264	Cosenza	John	7/16/2026	Brooklyn	NY	11234
265	Cossari	Tom	8/25/2026	Shamong	NJ	08088
266	Costello	Andrew	8/7/2026	Red Bank	NJ	07701
267	Costolo	Elaine	8/28/2026	Picayune	MS	39466
268	Cottrill	Mary	8/9/2026	Williamsburg	VA	23185
269	Coulter	David	6/12/2026	Clark	CO	80428
270	Cowan	Robert	8/22/2026	West Bath	ME	04530
271	Coyle	Bob	9/2/2026	Littleton	CO	80127
272	Cozine	Mark	7/1/2026	Long Beach	NY	11561
273	Craig	Todd	7/1/2026	Rapid City	SD	57703
274	Craig-Grubbs	Thomas	7/22/2026	Knoxville	TN	37921
275	Crane	Donna	8/1/2026	Anderson	CA	96007
276	Cratty	Bruce	6/12/2026	Akron	OH	44313
277	Crawford	Beverly	8/9/2026	Burlington	CT	06013
278	CRESCENZI	LUCY	6/20/2026	Clinton	CT	06413
279	Crino	Giovanni	7/11/2026	Middle Island	NY	11953
280	Crispo	Adam	7/12/2026	Jersey City	NJ	07307
281	Crockett	Gregory	10/7/2026	Manchester	MA	01944
282	Croft	John	7/1/2026	Manchester By The Sea	MA	01944
283	Cromwell	Will	8/10/2026	Virginia Beach	VA	23451
284	Cross	Georganna Cross	6/13/2026	Poquoson	VA	23662
285	Crouch	Austin	7/1/2026	Coatesville	PA	19320
286	Crowell	Ralph	10/8/2026	Marco Island	FL	34145
287	Crowley	Lawrence	6/12/2026	Louisville	CO	80027
288	Cunningham	Colin	10/8/2026	Atlantic Beach	FL	32233
289	Curry	Jack	7/1/2026	Littleton	CO	80127
290	cutts	matt	7/12/2026	Greeneville	TN	37743
291	Da Silva	Renato	8/11/2026	Pompano Beach	FL	33062
292	Dabovich	Joseph	7/18/2026	Massapequa Park	NY	11762
293	Dacus	Ricky	10/2/2026	Paragould	AR	72450
294	Dalberth	Lisa	8/14/2026	Cape Coral	FL	33914
295	Dalton	Tim	8/10/2026	Seekonk	MA	02771
296	Danforth	Shane	8/19/2026	Floral Park	NY	11001
297	Darby	Renee	9/2/2026	Mesa	AZ	85201
298	Dasher Rainone	Tricia	8/10/2026	Poquoson	VA	23662
299	Dauses	Tianna	6/9/2026	Sparrows Point	MD	21219
300	Davies	Lachlan	10/7/2026	Sharpsville	PA	16150
301	Davis	Brandon	9/14/2026	Queenstown	MD	21658
302	Davis	Christina	10/2/2026	Spanaway	WA	98387
303	Davis	Patricia	9/25/2026	Princeville	HI	96722
304	Dawson	Bill	10/7/2026	Street	MD	21154
305	Day	Michael	8/13/2026	Avalon	NJ	08202

306	de arteaga	Jose	9/2/2026	Milwaukee	WI	53202
307	DeAmico	Matthew	8/30/2026	Yakima	WA	98902
308	Dean	Mike	7/12/2026	East Quogue	NY	11942
309	Deane	Eric	10/7/2026	Woodbridge	VA	22192
310	DeCroix	Christina	6/9/2026	Cape Charles	VA	23310
311	Deeds	Albert	6/17/2026	Steamboat Springs	CO	80477
312	Deerin	James	7/18/2026	Washington	DC	20015
313	Defalco	Steven	6/19/2026	North Babylon	NY	11703
314	Defriest	Defriesi	8/12/2026	Cape Charles	VA	23310
315	Delamain	Bill	6/8/2026	Smithfield	VA	23430
316	Delcourt	Gary	8/28/2026	Marine City	MI	48039
317	Delgado	Douglas	9/3/2026	Hampton	VA	23666
318	Delligatti	Anthony	7/11/2026	Summerfield	NC	27358
319	Delozier	Chris	7/18/2026	Cranston	RI	02920
320	DeMicco	Renee	8/10/2026	Waretown	NJ	08758
321	Denkenberger	Joseph	10/7/2026	Cazenovia	NY	13035
322	DENNISON	HARRIE	8/1/2026	Reno	NV	89508
323	DePaulo	Robert	7/22/2026	Huntingtown	MD	20639
324	Dexter	Richard	9/6/2026	Copiague	NY	11726
325	Diakomihalis	Konstantinos	7/11/2026	Mineola	NY	11501
326	Dice	Alison	7/1/2026	Lakewood	CA	90713
327	Dickson	Melissa	9/21/2026	College Park	MD	20740
328	DiDonato	James	7/15/2026	Queenstown	MD	21658
329	Dietrich	Paul	7/14/2026	Madison	CT	06443
330	Diggle	Cody	6/8/2026	North Scituate	RI	02857
331	Dilauro	Chris	8/17/2026	Staten Island	NY	10305
332	Dillon	Wendy	6/11/2026	Monroe Township	NJ	08831
333	Dinale	Martina	6/10/2026	Marion	AL	36756
334	DiPhillipo	David	8/14/2026	Clifton Heights	PA	19018
335	Disney	William	9/4/2026	Heathsville	VA	22473
336	Dixon	Linda	6/12/2026	Fairlawn	OH	44333
337	Dobos	Paul	9/23/2026	Bluffton	SC	29910
338	Doe	James	8/24/2026	South Dartmouth	MA	02748
339	Doell	Gregory	9/22/2026	Shrub Oak	NY	10588
340	Doggett	Christopher	7/1/2026	Hamilton	MA	01936
341	Dolloff	Jacoba	6/19/2026	La Mesa	CA	91941
342	Dolowitz	Alexander	7/1/2026	Salt Lake City	UT	84121
343	Donna	Meadors	6/20/2026	West Haven	CT	06516
344	Donnaway	Joan	7/31/2026	Hesperus	CO	81326
345	Donnelly	Chris	7/22/2026	Bronx	NY	10462
346	Donofrio	Peter	8/13/2026	Brick	NJ	08724
347	Doudna	Jacob	9/21/2026	Virginia Beach	VA	23451
348	Douglass	Alan	8/28/2026	Atherton	CA	94027
349	Douville	Rich	7/1/2026	Sheldon	SC	29941

350	Dow	Richard	8/11/2026	Mount Holly	NJ	08060
351	Downey	Paul	8/10/2026	Poquoson	VA	23662
352	Downing	Cliff	10/2/2026	Lafayette	LA	70507
353	Doyle	Margaret	8/28/2026	Larkspur	CA	94939
354	Dreano	Josh	6/9/2026	Virginia Beach	VA	23455
355	Drew	John	7/1/2026	Wakefield	MA	01880
356	Drew	Rick	6/12/2026	East Hampton	NY	11937
357	Drobish	Robert	7/10/2026	Middletown	NJ	07748
358	Drummey	Mark	6/8/2026	West Simsbury	CT	06092
359	Duarte	Thomas	8/18/2026	Old Lyme	CT	06371
360	Duckworth	Paul	8/10/2026	Heathsville	VA	22473
361	Dudziak	Loretta	8/1/2026	Canyon Lake	CA	92587
362	Duffy	Jerry	8/25/2026	Warminster	PA	18974
363	Duffy	Kelly	10/7/2026	Severna Park	MD	21146
364	Duggan	Rick	8/8/2026	Salem	NJ	08079
365	Dumler	Katrina	8/3/2026	Mercer Island	WA	98040
366	Dunavant	Trey	10/6/2026	Shiloh	NC	27974
367	Dunn	Murdoch	8/14/2026	Wilmington	NC	28403
368	Dunphey	Floyd	8/5/2026	Virginia Beach	VA	23454
369	Dunton	Fletcher	6/30/2026	Virginia Beach	VA	23455
370	Dupont	Patricia	6/28/2026	Manchester	NH	03109
371	Dwyer	Michael	10/5/2026	Groton	CT	06340
372	Dysart	Gretchen	6/12/2026	Lake Oswego	OR	97035
373	Early	Melissa	10/7/2026	Ogden	UT	84404
374	Edick	Stefan	6/10/2026	Gloucester	MA	01930
375	Edwards	Leslie	7/31/2026	Palm Harbor	FL	34684
376	Ehmer	Adam	8/9/2026	Delray Beach	FL	33483
377	ehrlich	barbara	7/1/2026	New York	NY	10023
378	Eisenman	Robin	10/7/2026	Sherman	CT	06784
379	Eldredge	Scott	6/11/2026	York	ME	03909
380	Eldringhoff	James	6/19/2026	Centreville	MD	21617
381	Eldringhoff	Jim	10/5/2026	Centreville	MD	21617
382	Eller	Will	10/4/2026	Culpeper	VA	22701
383	elliott	david	10/1/2026	Midlothian	VA	23114
384	Elliott	Joy	8/17/2026	Heathsville	VA	22473
385	ellis	thomas	7/13/2026	Manakin Sabot	VA	23103
386	Ellsworth	Franklin	10/7/2026	Henrico	VA	23229
387	Emerson	Sherman	8/21/2026	Addison	ME	04606
388	English	Bradley	9/6/2026	Burlingame	CA	94010
389	Erbe	Chris	7/10/2026	Sneads Ferry	NC	28460
390	ERDELJAC	JOSEPH	7/1/2026	West Chester	PA	19380
391	Eric Molleur	Eric Molleur	8/20/2026	Ellington	CT	06029
392	Estrella	John	7/11/2026	Cranston	RI	02921
393	eudy	elaine	7/1/2026	Atlanta	GA	30344

394	Evans	Gary	6/15/2026	Tucson	AZ	85749
395	Evans	Tommy	7/9/2026	Virginia Beach	VA	23454
396	Everson	Dave	9/3/2026	Hammond	OR	97121
397	Fairbank	Joseph	9/2/2026	Cordova	MD	21625
398	Fairman	Tobias	9/25/2026	Glendora	CA	91740
399	Faison	Chris	7/20/2026	Virginia Beach	VA	23454
400	Falk	Darlene	10/7/2026	Boone	NC	28607
401	Farschon	Michael	7/1/2026	Gloucester	VA	23061
402	Fasciolo	Adam	9/22/2026	Norwalk	CT	06851
403	Fastovskiy	mark	8/18/2026	Brooklyn	NY	11224
404	Fean Sr	Stephen	9/1/2026	Ocean City	NJ	08226
405	Fenner	BenjaminFenner	8/14/2026	Westport	CT	06880
406	Ferguson	Roy	7/1/2026	Aurora	CO	80014
407	Ferreira	Marcus	9/2/2026	Philadelphia	PA	19146
408	Ferro	Frank	9/19/2026	Staten Island	NY	10308
409	Feurer	Nicholas	7/31/2026	Finksburg	MD	21048
410	Fichtner	Dean	8/9/2026	New Canaan	CT	06840
411	Fieffe	Andrew	7/28/2026	Brunswick	ME	04011
412	Field	Britne	8/9/2026	Pleasantville	NJ	08232
413	Field	Nancy	8/9/2026	Cape May Court House	NJ	08210
414	Fifer	Dolores	6/12/2026	Pittsburgh	PA	15201
415	Figured	Daniel	7/1/2026	Olyphant	PA	18447
416	Fin	Ed	8/10/2026	Brooklyn	NY	11209
417	Finch	John	7/1/2026	Newport News	VA	23602
418	Finney	Brian	8/10/2026	Kintnersville	PA	18930
419	Fiorani	Joseph	7/16/2026	Elkton	MD	21921
420	Fischer	David	10/8/2026	Delmar	NY	12054
421	Fish	Richard	6/19/2026	Minneapolis	MN	55417
422	Fisher	Frank	7/5/2026	West Chester	PA	19380
423	Fisher	Kyle	8/3/2026	New York	NY	10005
424	Fisher	Tim	8/20/2026	Charlotte	NC	28216
425	Fisher	Tim	7/11/2026	Staten Island	NY	10312
426	Fitzgerald	Lori	9/22/2026	Colonial Beach	VA	22443
427	Fleener	Teresa	7/21/2026	Yakima	WA	98901
428	Fleming	Kaye	9/29/2026	Bolinas	CA	94924
429	Fleschner	William	9/4/2026	Port Jefferson Station	NY	11776
430	Fletcher	Carol	7/1/2026	Ann Arbor	MI	48103
431	FLETCHER	JOHN	8/9/2026	Milford	CT	06460
432	Flood	Thomas	9/7/2026	West Chester	PA	19380
433	Flores	Ed	8/9/2026	Bayonne	NJ	07002
434	Flota	Alissa	6/10/2026	Midlothian	VA	23113
435	Fontaine	Peter	9/4/2026	Nottingham	PA	19362
436	Fortmuller	Don	8/10/2026	Disputanta	VA	23842
437	Foster	Katherine	7/1/2026	Princeton	NJ	08540

438	Foster	William	10/8/2026	Cherry Hill	NJ	08034
439	Foszcz	Roger M.	6/19/2026	Port Angeles	WA	98363
440	Foutz	Paul	6/10/2026	Jarrettsville	MD	21084
441	Fox	Brigitte	9/7/2026	Yorktown	VA	23690
442	Francis	Robert	9/4/2026	Chesapeake Beach	MD	20732
443	FRANCIS	ROBERT	10/7/2026	Tallahassee	FL	32308
444	Franckowiak	Joseph	8/11/2026	Flemington	NJ	08822
445	Frank	Mitzi	6/19/2026	Payson	AZ	85541
446	Freeman	Johnny	10/6/2026	Sandston	VA	23150
447	Frei	Edwina	7/1/2026	Eastham	MA	02642
448	Freisem	Robin	6/13/2026	Coatesville	PA	19320
449	Frye	Linda	7/17/2026	Lock Haven	PA	17745
450	Fuqua	Chad	6/12/2026	Houston	TX	77080
451	Gadoury	Allan	10/12/2026	Bozeman	MT	59715
452	Gagnon	Christopher	6/12/2026	Hudson Falls	NY	12839
453	Gannon	Thomas	6/10/2026	Montpelier	VA	23192
454	Gans	John G.	9/30/2026	Sagaponack	NY	11962
455	Gardner	Chris	7/1/2026	Las Cruces	NM	88012
456	Garland	Pete	7/1/2026	Chattanooga	TN	37415
457	Garland	Rick	6/9/2026	Cape Elizabeth	ME	04107
458	Garrigan	Charles	6/9/2026	Appleton	ME	04862
459	Gates	Andrew	8/28/2026	Kalamazoo	MI	49009
460	Gavin	John	6/9/2026	Plaistow	NH	03865
461	Gavitt	John	10/2/2026	Winchester	VA	22603
462	Gendvil	Derek	7/4/2026	Las Vegas	NV	89117
463	Gentilini	Ali	9/17/2026	Chesapeake	VA	23321
464	George	Brian	6/19/2026	Phoenix	AZ	85086
465	George	Michael	9/10/2026	Perth Amboy	NJ	08861
466	Gerber	John	5/29/2026	Queenstown	MD	21658
467	Gere	Andrew	8/15/2026	Santa Cruz	CA	95060
468	Gerecke	Harry	7/31/2026	Vashon	WA	98070
469	Gerstein	Tyler	8/13/2026	Park City	UT	84060
470	Geukens	Christopher	7/5/2026	Northridge	CA	91343
471	Gibbs	Matt	7/1/2026	Manchester	MA	01944
472	Gilgen	Scott	8/11/2026	Leamington	UT	84638
473	Gill	Shawna	8/14/2026	Shady Side	MD	20764
474	Gilliam	Abby	8/13/2026	Phippsburg	ME	04562
475	Gillingham	Logan	9/23/2026	Naugatuck	CT	06770
476	Gilman	Meg	8/28/2026	Portsmouth	NH	03802
477	Gilroy	Mark	8/14/2026	Farmington	CT	06032
478	Ginepro	Janet	6/13/2026	Monroe	MI	48162
479	Gingras	Brian	6/19/2026	Braintree	MA	02184
480	Gingras	Gordon	10/8/2026	Haddam Neck	CT	06424
481	Ginley	Ryan	8/5/2026	Fairfield	CT	06824

482	Giunta	Frank	6/10/2026	West Grove	PA	19390
483	Giurlanda	Angelo	8/19/2026	Lindenhurst	NY	11757
484	Givens	Marilynn	10/5/2026	Mechanicsville	VA	23116
485	Glass	Rebecca	9/25/2026	Shoreline	WA	98133
486	glassberg	david	6/10/2026	Little Silver	NJ	07739
487	Gleason	James	9/30/2026	Brooksville	FL	34614
488	Goettel	Tom	8/12/2026	Surry	ME	04684
489	Goldbas	Cathy	9/6/2026	New York	NY	10024
490	Goldberg	Daniel	9/22/2026	Riverside	CA	92506
491	Goldsmith	Ken	8/3/2026	Kitty Hawk	NC	27949
492	Goldstrom	David	7/1/2026	Murrysville	PA	15668
493	Gomes	Joe	10/7/2026	Cummington	MA	01026
494	Gonella	Logan	7/21/2026	Alexandria	VA	22310
495	Gonzales	Jason	9/2/2026	Milwaukee	WI	53224
496	Gonzalez	Olga	7/12/2026	Hialeah	FL	33012
497	Goodhart	James	6/29/2026	Newburyport	MA	01950
498	Goodman	Greg	6/19/2026	Granville	OH	43023
499	Goodrich-Stuart	Michael	7/10/2026	Warsaw	VA	22572
500	Gordon	Michael	10/7/2026	Richmond	VA	23222
501	Goshen	Bill	9/18/2026	Hellertown	PA	18055
502	Gosnell	Rebecca	10/9/2026	Fort Oglethorpe	GA	30742
503	Gosney	Garrison	7/1/2026	Edinburg	VA	22824
504	Gould	Jeffrey	7/1/2026	Gloucester	MA	01930
505	Govatski	David	10/7/2026	Jefferson	NH	03583
506	Graff	Kevin	8/4/2026	Jarrettsville	MD	21084
507	Graham	Damon	9/2/2026	Westfield	IN	46062
508	Graham	Michael	7/14/2026	North Chesterfield	VA	23236
509	GRAY	ERIK	10/7/2026	Ithaca	NY	14850
510	Gray	Michael	7/17/2026	Roanoke	VA	24018
511	Green	Corinne	7/2/2026	Mechanicsville	VA	23116
512	Green	D.Andrew	8/10/2026	Flemington	NJ	08822
513	Green	Dave	6/11/2026	Lewes	DE	19958
514	Green	Jamie	6/23/2026	Ventura	CA	93004
515	Green	John	7/2/2026	Mechanicsville	VA	23116
516	Greer	Helen	7/1/2026	Tucson	AZ	85705
517	greer	jill	8/28/2026	Stark City	MO	64866
518	gregg	chris	7/30/2026	East Meadow	NY	11554
519	Gregg	David	7/1/2026	Bozeman	MT	59718
520	Gregory	Bryan	8/19/2026	Massapequa	NY	11758
521	Greim	William	7/14/2026	Clinton	CT	06413
522	Greninger	Brent	7/31/2026	Carthage	MO	64836
523	Gries	Gabe	7/2/2026	Northfield	MA	01360
524	Griffin	Oliver	7/30/2026	Virginia Beach	VA	23456
525	Griffin	Richard	8/12/2026	Forked River	NJ	08731

526	Griffith	Joseph	8/8/2026	Milford	DE	19963
527	Grinstead	Kenneth	8/7/2026	Newport News	VA	23601
528	Groff	Francis	7/1/2026	Brielle	NJ	08730
529	Groff	Susan	10/8/2026	Brielle	NJ	08730
530	Grose	William	9/30/2026	Bargersville	IN	46106
531	Gross	Stephen	6/9/2026	Moorestown	NJ	08057
532	Grueter	Richard	9/5/2026	Grass Valley	CA	95945
533	Grunspan	Larry	7/1/2026	Olathe	KS	66061
534	Guay	Christopher	8/4/2026	Downingtown	PA	19335
535	Gugliocciello	Bob	9/16/2026	Toms River	NJ	08755
536	Guinard	Benjamin	8/18/2026	Lunenburg	MA	01462
537	Guion	Jonathan	9/2/2026	Virginia Beach	VA	23454
538	Gunning	Jean	8/12/2026	Baltimore	MD	21212
539	Haag	Jamison	9/22/2026	Cleveland	ND	58424
540	Haagenson	Don	6/20/2026	New River	AZ	85087
541	Haas	Jon	9/2/2026	Memphis	TN	38120
542	Habig	Bob	7/1/2026	Lancaster	PA	17601
543	Habig	Robert	9/30/2026	Lancaster	PA	17601
544	Habitz	LARRY	6/12/2026	Fenton	MI	48430
545	Hachtman	Steve	7/18/2026	Kitty Hawk	NC	27949
546	Hafker	Bill	10/7/2026	Oakton	VA	22124
547	Haga	Nathaniel	8/18/2026	Woodlawn	VA	24381
548	Halter	Cody	7/11/2026	Rising Sun	MD	21911
549	Hammeran	Karen	6/16/2026	Cape May	NJ	08204
550	Hammerstad	Charles	8/14/2026	San Jose	CA	95120
551	Hammerstad	Charles B	6/19/2026	San Jose	CA	95120
552	Hamp	Eric	6/9/2026	Sterling	VA	20164
553	Handel	Ben	9/30/2026	Annapolis	MD	21401
554	Handeland	Ryan	10/7/2026	Cushing	MN	56443
555	Hankins	Brett	8/11/2026	Manassas Park	VA	20111
556	Hanna	David	8/11/2026	West Simsbury	CT	06092
557	Hannigan	Bob	8/28/2026	Corvallis	OR	97330
558	Hanscom	Karen	6/20/2026	Groton	CT	06340
559	Hansen	Dean	8/1/2026	New Lisbon	WI	53950
560	Hansen	Julie	6/19/2026	Freeman	SD	57029
561	Hanson	Wayne	8/31/2026	Hemlock	MI	48626
562	Harber	Steven	8/12/2026	New York	NY	10023
563	Hardin	Ruth	8/10/2026	Chesapeake Beach	MD	20732
564	Hardt	Richard	7/21/2026	Staten Island	NY	10304
565	Harkins	Jeremiah	9/2/2026	Grafton	NH	03240
566	Harper	Shannon	10/7/2026	Castle Hayne	NC	28429
567	Harrell	Rick	6/9/2026	Leesburg	VA	20176
568	Harris	Bill	6/12/2026	Glen Allen	VA	23059
569	Harris	Timothy	9/2/2026	Williamsburg	VA	23185

570	Harrold	John	7/16/2026	Lindenwold	NJ	08021
571	Harry Fly	Dirty	7/16/2026	Kill Devil Hills	NC	27948
572	Hartnett	Richard	6/8/2026	Rehoboth Beach	DE	19971
573	Hartwell	Mack	9/30/2026	Plain City	OH	43064
574	Harvey	JIM	8/28/2026	Broken Arrow	OK	74012
575	Harvey	Randy	7/1/2026	Denver	CO	80221
576	Hasson	Pamela	8/17/2026	Woodbine	MD	21797
577	Hatch	Jennifer	6/21/2026	Ledyard	CT	06339
578	Hatch	William	7/14/2026	Edgefield	SC	29824
579	HATHAWAY	TED	6/19/2026	Midvale	ID	83645
580	Hauser	Richard	10/1/2026	Forest Hills	NY	11375
581	Hautaniemi	Lucinda	6/20/2026	Old Lyme	CT	06371
582	Hawkins	Andrew	8/10/2026	Stafford	VA	22556
583	Hawkins	Russell	7/1/2026	Rowley	MA	01969
584	Hayes	David	10/1/2026	Virginia Beach	VA	23464
585	Haynes	Ronald	9/13/2026	Deltaville	VA	23043
586	Hazel	Jack	9/4/2026	Broad Run	VA	20137
587	Heffernan	Barry	6/15/2026	Leonardo	NJ	07737
588	Heiden	Robert	10/7/2026	Plymouth Meeting	PA	19462
589	Heilman	Kip	8/9/2026	Parkland	FL	33076
590	Heim	Budd	10/7/2026	Berlin	MD	21811
591	Heitz	Marcia	6/13/2026	Cuba	IL	61427
592	Helck	Michael	8/18/2026	New York	NY	10009
593	Held	Joseph	8/9/2026	Farmington	CT	06032
594	Heller	Richard	9/2/2026	Clark	NJ	07066
595	Heller	Sidney	8/10/2026	Commack	NY	11725
596	Helsinger	Jacki	8/3/2026	Rockford	IL	61102
597	Heltebrake	Jane	9/25/2026	Perrysburg	OH	43551
598	Henderson	Bill	9/18/2026	Glenelg	MD	21737
599	Hendrix	Pam	7/14/2026	Midlothian	VA	23112
600	Henry	Claudia	9/2/2026	New Fairfield	CT	06812
601	Henthorne	Ray	9/2/2026	Hague	VA	22469
602	Henthorne	Raymond	9/2/2026	Hague	VA	22469
603	Herbert	Brian	7/18/2026	Churchton	MD	20733
604	Herbert	Megan	8/18/2026	Brielle	NJ	08730
605	Hermann	Suzanne	5/22/2026	Fairview	NC	28730
606	Hernandez	Aaron	7/31/2026	Norfolk	VA	23513
607	Herren	James	6/9/2026	Little River	SC	29566
608	Herrick	Russell	8/2/2026	Marshall	VA	20115
609	Herrington	Robert	8/28/2026	Kinnelon	NJ	07405
610	Hertzog	Brendan	9/25/2026	Wrightsville	PA	17368
611	Hess	Brian	7/1/2026	Butternut	WI	54514
612	Hess	Donna	6/19/2026	Butternut	WI	54514
613	Hess	John	10/5/2026	Manchester	MD	21102

614	Hewitt	Gerald	7/28/2026	Lumberton	NJ	08048
615	Higgins	James	9/15/2026	Merrick	NY	11566
616	Higgins	John	8/18/2026	Sedgwick	ME	04676
617	Higgins	vincnet	7/1/2026	Magnolia	DE	19962
618	Higgins	Will	9/16/2026	Eden Prairie	MN	55347
619	Highsmith	Kenneth	8/15/2026	Suffolk	VA	23434
620	Hildreth	Chris	8/9/2026	Islamorada	FL	33036
621	Hill	Charlie	6/11/2026	Charleston	SC	29403
622	Hill	Virgil	10/2/2026	Springfield	MO	65802
623	Hillhouse	George	9/2/2026	Austin	TX	78733
624	Hillman	Richard	7/19/2026	Virginia Beach	VA	23453
625	Hines	Norman	7/1/2026	Kensington	MD	20895
626	Hink	Robert	9/2/2026	Cape May Court House	NJ	08210
627	Hinshaw	Michael	7/1/2026	Inkster	MI	48141
628	Hintz	Zachary	8/6/2026	Portland	CT	06480
629	Hoffman	Garret	9/13/2026	Old Forge	NY	13420
630	Hoffman	Jake	8/28/2026	Columbus	OH	43201
631	Hoffman	Robert hoffman	7/14/2026	Miami	FL	33157
632	Hogg	John	9/16/2026	Gloucester	VA	23061
633	Hohol	Steven	7/31/2026	Mesa	AZ	85213
634	holcombe	jim	9/18/2026	Leonardo	NJ	07737
635	Holden	Charles	6/15/2026	Whiteville	NC	28472
636	Hollenshade	Thomas	8/28/2026	Essex	MD	21221
637	Hollenshade	Tom	9/30/2026	Essex	MD	21221
638	Holley	Daleth	9/22/2026	Suitland	MD	20746
639	Holley	Lynn	7/20/2026	Winchester	VA	22602
640	Hollingsworth	Drew	9/2/2026	Waxhaw	NC	28173
641	Holloway	Tyler	7/19/2026	Virginia Beach	VA	23453
642	Holmes	Abigail	8/14/2026	Westhampton	NY	11977
643	Holtz	Sigmund	7/1/2026	Poughkeepsie	NY	12603
644	Honeycutt	Jared	6/12/2026	Friendswood	TX	77546
645	Honsberger	Daniel	9/22/2026	Midlothian	VA	23113
646	Hontz	Kenneth	8/4/2026	Winston Salem	NC	27107
647	Hood	Mary	9/2/2026	Belle Haven	VA	23306
648	Hoover	Craig	8/8/2026	Costa Mesa	CA	92626
649	Hopen	Andrew	7/1/2026	Cumming	GA	30040
650	horak	Tyler	7/18/2026	Wilmington	NC	28409
651	Horgan	Jeannie	9/25/2026	Manchester	NJ	08759
652	Hornbaker	Matt	8/11/2026	Hague	VA	22469
653	Horton	Justin	9/21/2026	Rural Retreat	VA	24368
654	Hossain	Yamin	7/31/2026	Elmhurst	NY	11373
655	Hottel	Roy	10/7/2026	Stevensville	MD	21666
656	Howard	William	10/6/2026	Broad Channel	NY	11693
657	Howe	Nikolai	9/30/2026	Virginia Bch	VA	23454

658	Howell	Timothy	10/7/2026	Jarrettsville	MD	21084
659	hoy	orion	6/8/2026	Chesapeake	VA	23321
660	Hoyt	James	6/10/2026	Stafford	VA	22554
661	Hrobuchak	David	6/12/2026	Cary	NC	27519
662	Hubert	Frank	9/2/2026	Wilmington	DE	19803
663	Hult	Chris	7/31/2026	Long Beach	NY	11561
664	Humes	Laura	7/12/2026	Annandale	VA	22003
665	Hurd	Lorna	8/28/2026	Rock Hill	SC	29832
666	Hurden	Patricia	9/24/2026	Galloway	NJ	08205
667	Hutchings	Stewart	8/14/2026	New Haven	CT	06513
668	Hyer	Ron	7/31/2026	Colorado Springs	CO	80905
669	Illes	MaryAnne	8/15/2026	Ocean	NJ	07712
670	Imlay	Marc	10/7/2026	Bryans Road	MD	20616
671	Infield	Maryan	8/2/2026	San Luis Obispo	CA	93401
672	Inge	Eldridge	7/2/2026	Moon	VA	23119
673	Inman	Steven	7/1/2026	Demotte	IN	46310
674	J Frabizzio	Frank	7/15/2026	Bethany Beach	DE	19930
675	jack	charles	7/1/2026	Hampton	VA	23669
676	Jackson	Kathy	8/11/2026	Santa Fe	NM	87508
677	Jackson	Trey	10/7/2026	Lebanon	PA	17042
678	Jackson	Val	8/14/2026	Bayville	NY	11709
679	Jacquot	Mary	6/17/2026	Chesapeake Beach	MD	20732
680	Jaeger	Gail	10/6/2026	Montvale	NJ	07645
681	JaegerLaw	Gail	10/6/2026	Montvale	NJ	07645
682	Jakobs	Karl	6/10/2026	Lee	NH	03861
683	James	Brent	7/1/2026	Virginia Beach	VA	23452
684	james	nancy	6/21/2026	Oakdale	CT	06370
685	James	Silas	6/9/2026	Staunton	VA	24401
686	James	Wilfred	7/2/2026	Saugus	MA	01906
687	Janiec-Domino	Denise	8/15/2026	Califon	NJ	07830
688	Jeansson	Carolyn	9/22/2026	Tabernacle	NJ	08088
689	Jeffrey	James	8/28/2026	Virginia Beach	VA	23456
690	Jehn	Robert	9/28/2026	Cochranton	PA	16314
691	Jenkins	Frances Lynn	7/1/2026	Carson	VA	23830
692	Jensen	Eric	10/7/2026	Rocky Hill	CT	06067
693	jeppesen	craig	8/21/2026	Willington	CT	06279
694	Johanson	Erica	7/2/2026	Hopewell	NJ	08525
695	Johnson	Ana	8/28/2026	Longmont	CO	80503
696	johnston	therion	8/28/2026	Garden	MI	49835
697	Jones	Angela	7/1/2026	Lees Summit	MO	64086
698	Jones	Bill	6/11/2026	Bedford	NH	03110
699	Jones	Blair	8/14/2026	Woodbridge	VA	22192
700	Jones	Brett	7/31/2026	Fruita	CO	81521
701	JONES	JEFF	8/28/2026	Williamsburg	OH	45176

702	Jones	Kathrine	9/2/2026	Pottsville	AR	72858
703	JONES	PAMELA	6/21/2026	Bridgeport	CT	06605
704	Jones	Robley	7/1/2026	Richmond	VA	23225
705	Jurgensen	Todd	7/19/2026	Stow	MA	01775
706	Kaczmar	Steve	10/12/2026	King George	VA	22485
707	Kahl Sr	Brent	10/6/2026	Richland	PA	17087
708	Kaiser	John	8/21/2026	Crownsville	MD	21032
709	Kalinowski	John	10/2/2026	Rio Dell	CA	95562
710	Kanizai	Sheryl	7/9/2026	Pittsburgh	PA	15239
711	Kanno	Tracy	7/1/2026	Cranston	RI	02910
712	Kashanski	lynn	6/20/2026	Old Lyme	CT	06371
713	Kaster	Paul	7/10/2026	Red Bank	NJ	07701
714	Kaszubski	Matthew	8/11/2026	Shoreham	NY	11786
715	Katan	Richard	8/19/2026	Millerton	NY	12546
716	Katsouros	Tracey	7/31/2026	Waldorf	MD	20601
717	Katz	Anne	9/2/2026	Jupiter	FL	33477
718	Keane	THOMAS	10/1/2026	Port Jefferson	NY	11777
719	Keegan	Kelly	8/13/2026	Washington	DC	20003
720	Keehner	Wayne	10/7/2026	Baltimore	MD	21229
721	Kehl	Matt	9/11/2026	Glastonbury	CT	06033
722	Keir	Jeffrey	6/13/2026	Coeymans Hollow	NY	12046
723	Kelbaugh	Dan	9/2/2026	York	PA	17404
724	Kellam	Roberta	6/19/2026	Franktown	VA	23354
725	Keller	Kevin	6/9/2026	Mizpah	NJ	08342
726	Kelley	Steven	9/16/2026	Severn	MD	21144
727	Kelso	Ryan	8/4/2026	East Islip	NY	11730
728	Kemeza	Will	8/9/2026	Harvard	MA	01451
729	Kempema	Joel	10/7/2026	Ada	MI	49301
730	Kennedy	Patricia	9/2/2026	Morris	CT	06763
731	Kenny	Brendan	7/30/2026	Mendham	NJ	07945
732	Kenny	Jim	8/6/2026	Point Lookout	NY	11569
733	Kersta	Bonnie	7/16/2026	Yorktown	VA	23693
734	Kersznowski	Kathleen	9/8/2026	Williamstown	NJ	08094
735	Kesner	Justin	6/9/2026	Milton	MA	02186
736	Kettner	Nathan	7/1/2026	Monument	CO	80132
737	Keys	Adam	7/1/2026	Loveland	CO	80538
738	Kidwell	Ashley	8/14/2026	Queenstown	MD	21658
739	Kiefer	Marc	7/5/2026	Walnut Creek	CA	94596
740	Kilday	John	9/14/2026	Alexandria	VA	22304
741	Kilroy	Collin	8/14/2026	Darien	CT	06820
742	Kilroy	Quinn Kilroy	8/14/2026	Dallas	TX	75205
743	Kim	Andrew	7/19/2026	Virginia Beach	VA	23455
744	King	Jesse	8/8/2026	Centreville	MD	21617
745	King	RIK	10/5/2026	Virginia Beach	VA	23454

746	King	Robert	7/30/2026	Chester	VA	23831
747	King	Sean	9/27/2026	Mount Airy	MD	21771
748	Kingsley	Lisa	7/1/2026	Norfolk	VA	23517
749	Kinnear	Steve	9/30/2026	Fredericksburg	VA	22407
750	Kirk	Tom	9/29/2026	Hillsdale	NJ	07642
751	Kirkendoll	John	8/9/2026	Lawson	MO	64062
752	kleintop	gail	7/1/2026	Norfolk	VA	23517
753	kleintop	susan	9/2/2026	Norfolk	VA	23517
754	Klimavich	Doug	8/15/2026	Upton	MA	01568
755	Knight	Edward	7/1/2026	North Chesterfield	VA	23235
756	Knopf	Brian	6/19/2026	Onancock	VA	23417
757	Knopf	Georgann	6/19/2026	Onancock	VA	23417
758	Knowles	Kevin	7/10/2026	Virginia Beach	VA	23462
759	Knox	Richard	7/18/2026	Middle River	MD	21220
760	Knudtson	Cory	7/31/2026	Milford	IA	51351
761	Knuth	Lilly	10/7/2026	Garden City	NY	11530
762	Kocienski	Matthew	6/10/2026	Egg Harbor Township	NJ	08234
763	Koehler	Mason	7/30/2026	Mountville	PA	17554
764	Koehler	Virginia	9/18/2026	Shrewsbury	NJ	07702
765	Kohler	Edward	9/2/2026	Massapequa Park	NY	11762
766	Koivisto	Ellen	7/6/2026	Ithaca	NY	14850
767	Koontz	Jennifer	6/8/2026	Jefferson	MD	21755
768	Koppelman	Gary	6/12/2026	Grand Junction	CO	81501
769	Kostal	Michael	9/12/2026	East Northport	NY	11731
770	Kozak	Matthew	9/2/2026	Lancaster	PA	17601
771	Kozak	Teddy	8/3/2026	Richmond	VA	23226
772	Krafka	Josh	9/30/2026	Two Harbors	MN	55616
773	Kreiger	Alek	9/2/2026	Paoli	PA	19301
774	Krese	David	7/1/2026	Charlottesville	VA	22901
775	Kresge	Conrad	7/31/2026	Sandpoint	ID	83864
776	Kroll	Brent	7/31/2026	Fife Lake	MI	49633
777	Krug	Keith	7/10/2026	Wilmington	DE	19808
778	Krutchkoff	Max	8/9/2026	Waltham	MA	02451
779	Krzesinski	Kyle	7/1/2026	Katy	TX	77493
780	Kubacki	Katherine	6/12/2026	Antigo	WI	54409
781	Kuehne	Beth	8/10/2026	Harrisburg	PA	17111
782	Kuhlman	Richard	7/1/2026	Annapolis	MD	21401
783	KULA	Richard	7/1/2026	Enfield	CT	06082
784	Kulzer	W Michael	8/27/2026	New York	NY	10017
785	Kummer	Marvin	8/28/2026	Pittsville	WI	54466
786	Kuperstein	Danya	7/16/2026	Danvers	MA	01923
787	Kuperus	Daniel	6/13/2026	Portland	OR	97215
788	Kurtz	Ben	7/1/2026	Denver	CO	80223
789	Kurzendoerfer	Martin	6/21/2026	Louisville	KY	40220

790	Kushner	Ross	6/30/2026	Red Bank	NJ	07701
791	Kuyawa	Ryan	7/1/2026	Ave Maria	FL	34142
792	kuzma	David	8/3/2026	East Haven	CT	06512
793	Laahs	Robert	9/24/2026	Falls Church	VA	22042
794	Lacatell	Jeffrey	7/1/2026	Pittsfield	MA	01201
795	Lackey	Mercedes	6/20/2026	Claremore	OK	74017
796	LaGory	Dylan	8/19/2026	Providence	RI	02906
797	Laguardia	Ryan	8/12/2026	Stamford	CT	06902
798	Laird	Christopher	7/2/2026	Reedville	VA	22539
799	Lamb	Randal	8/29/2026	Charlestown	RI	02813
800	LAMBERTI	BIAGIO	10/9/2026	Ponce Inlet	FL	32127
801	LAMBERTI	BIAGIO	10/9/2026	Woodmere	NY	11598
802	Lambrow	Kathy	10/7/2026	Essex	MD	21221
803	Lampert	David	7/1/2026	Vail	CO	81657
804	Langer	Terry	7/1/2026	Leesburg	FL	34748
805	Lantz	Rob	7/31/2026	Spotsylvania	VA	22551
806	Lapetina	Melody	9/9/2026	Somers Point	NJ	08244
807	Larmoyeux	Mark	8/3/2026	Fayetteville	AR	72701
808	Larson	Eric	8/17/2026	Branford	CT	06405
809	LaSchiava	Dona	7/1/2026	Green Valley	AZ	85614
810	Latham	Bryan	9/2/2026	Stafford	VA	22554
811	Lauer	Mary	10/8/2026	Ocoee	FL	34761
812	Lauria	John	10/7/2026	Vineland	NJ	08360
813	Laurie	devon	7/21/2026	Huntington	NY	11743
814	Lavin	George	6/19/2026	Havertown	PA	19083
815	Lawlor	Michael	8/17/2026	North Wales	PA	19454
816	Lawrence	Christie	10/6/2026	Mohawk	TN	37810
817	Lawrence	James	8/9/2026	Virginia Beach	VA	23452
818	Lawrence	Robert	10/7/2026	Cambridge	MD	21613
819	lawson	john	10/7/2026	Virginia Beach	VA	23451
820	Lawson	Mark	7/2/2026	Virginia Beach	VA	23451
821	Lee	Cathy	5/29/2026	Wayzata	MN	55391
822	Lee	Matthew	6/8/2026	Virginia Beach	VA	23455
823	Lehmann	William	7/1/2026	League City	TX	77573
824	Lemoine	Kathryn	7/31/2026	West Monroe	LA	71291
825	Lennon	Marc	9/26/2026	Baltimore	MD	21224
826	Leopold	Ryan	9/21/2026	Virginia Beach	VA	23451
827	Leow	Jack	6/12/2026	Bowling Green	OH	43402
828	LePage	Albert	7/31/2026	Eugene	OR	97405
829	Lesinski	Peter	6/19/2026	Fort Gratiot	MI	48059
830	Leslie	Cathie	7/31/2026	Berthoud	CO	80513
831	Lessandrini	Mark	8/11/2026	Madison	CT	06443
832	Leverett	Mara	10/5/2026	New York	NY	10009
833	LEVIT	SHARON	10/7/2026	Philadelphia	PA	19111

834	Lewis	Lloyd	9/1/2026	Edgewater	MD	21037
835	Lewter	Raymond	7/19/2026	Aylett	VA	23009
836	Libera	Steve	7/14/2026	Portland	CT	06480
837	Liedlich	David	6/12/2026	Southbury	CT	06488
838	Liming	Robby	9/30/2026	Homer City	PA	15748
839	LINCOURT	SCOTT	10/2/2026	Manchester	VT	05254
840	Lindemann	G	7/1/2026	Norfolk	VA	23508
841	LIPUMA	JOSEPH P.	10/7/2026	Nantucket	MA	02554
842	Littlepage	Nancy	7/15/2026	Baltimore	MD	21218
843	Llamas	Teresa	6/17/2026	Capistrano Beach	CA	92624
844	Lobonc	Susan	10/4/2026	Naperville	IL	60540
845	Lockwood	Ryan	6/23/2026	Littleton	CO	80127
846	Lockwood IV	Frederick S.	10/7/2026	Watertown	NY	13601
847	Lohan	Scott	8/8/2026	Cold Spring Harbor	NY	11724
848	Loos	Eric	8/7/2026	Ft Mitchell	KY	41017
849	Lopes	William	6/10/2026	Old Saybrook	CT	06475
850	Lotz	Thomas	6/10/2026	Sayville	NY	11782
851	Loui	Rachel	9/21/2026	Mountain View	CA	94040
852	Louie	MIchael	9/30/2026	Maplewood	NJ	07040
853	Lovejoy	Sam	8/7/2026	Branford	CT	06405
854	Lower	Isabel	9/9/2026	Sarasota	FL	34239
855	Lowrance	Elizabeth	6/22/2026	Toms River	NJ	08753
856	Lowrance	Herb	6/22/2026	Toms River	NJ	08753
857	Lubonovich	D.J.	9/2/2026	Franklin	PA	16323
858	Luchka	Jarad	6/21/2026	North Scituate	RI	02857
859	Ludwig	Jeff	10/7/2026	Dunkirk	MD	20754
860	Lugo	Nicolas	7/14/2026	East Elmhurst	NY	11369
861	Lumsden	Wayne	7/1/2026	Springfield	VA	22150
862	Luna	Victoria	6/30/2026	Colonial Beach	VA	22443
863	Lunaas	Jaclyn	9/1/2026	Eden Prairie	MN	55347
864	Lundberg	Larry	7/1/2026	San Jose	CA	95112
865	Lundberg	Paul	10/2/2026	Aurora	CO	80013
866	Luniewski	John	7/1/2026	Hampton Bays	NY	11946
867	Lynes	Michael	10/7/2026	Hilton Head Island	SC	29928
868	Lynn	Michael	8/10/2026	Suffield	CT	06078
869	Lyons	Terrence	7/3/2026	Foxboro	MA	02035
870	Lyons	Thomas	7/23/2026	Elmer	NJ	08318
871	Maass	Robert	7/15/2026	Brooklyn	NY	11215
872	MacElhiney	Michael	8/10/2026	Ocean City	NJ	08226
873	Machek	Charlie	6/19/2026	White Stone	VA	22578
874	Machen	Jordan	9/1/2026	Laurel	MD	20723
875	Mackovyak	Justin	8/8/2026	Prince Frederick	MD	20678
876	MacLeod	Colton	8/28/2026	Vestavia	AL	35243
877	Macmillan	Christopher	8/19/2026	Henderson	MD	21640

878	Mahaffy	Gannon	7/24/2026	Millersville	MD	21108
879	Mainenti	Marco	7/10/2026	Locust Valley	NY	11560
880	Maiorano	Maureen	8/31/2026	Prescott	AZ	86305
881	Major	Melissa	8/24/2026	Ellicott City	MD	21042
882	Malach	Constance	8/13/2026	Avalon	NJ	08202
883	Maldonado	Joshua	8/1/2026	Hopewell Junction	NY	12533
884	Mancini	Kenneth	6/13/2026	Riverside	NJ	08075
885	Mann	Gary	8/11/2026	Alexander	NC	28701
886	Mantovani	David	6/9/2026	Sayville	NY	11782
887	Marc And Alice Imlay	Marc And Alice Marc	6/12/2026	Bryans Road	MD	20616
888	Marcisz	Leonard	8/28/2026	Scottsdale	AZ	85255
889	Marcus	Dave	8/19/2026	Merrick	NY	11566
890	Marcussen	Paul	6/16/2026	Benzonia	MI	49616
891	Marinelli	Paul	8/25/2026	Naples	FL	34110
892	Markey	Jon	7/1/2026	Jasper	GA	30143
893	marks	brian	9/10/2026	Whitestone	NY	11357
894	Marsh	Tiffany	8/29/2026	Midway	KY	40347
895	Marsik	George	8/28/2026	Phoenix	AZ	85016
896	Martin	Anthony	6/19/2026	Poquoson	VA	23662
897	Martin	Darren	6/10/2026	Oyster Bay	NY	11771
898	Martin	Julie	7/31/2026	Frederic	WI	54837
899	Martin	Tim	7/2/2026	Williamsburg	VA	23188
900	Martin	Tom	7/11/2026	Mclean	VA	22102
901	Martinez	James	10/7/2026	Grantsville	UT	84029
902	MASLEY	Joel	6/11/2026	Oxford	MA	01540
903	Mason	Rich	7/7/2026	Crownsville	MD	21032
904	Masten	Robert	8/8/2026	Henrietta	NY	14467
905	Matherly	Nathan	8/3/2026	Providence Forge	VA	23140
906	mathison	jon	10/5/2026	Tarboro	NC	27886
907	Matise	Joseph	9/11/2026	South Orange	NJ	07079
908	Matsinger	Beverly	8/10/2026	Snow Hill	MD	21863
909	Matsinger	Kenneth	8/10/2026	Snow Hill	MD	21863
910	Matt	Dennis	6/8/2026	Henrico	VA	23238
911	matthew	craig	7/1/2026	Powhatan	VA	23139
912	Matthews	Kimberly	8/9/2026	Hampden	ME	04444
913	Mauck	Andrew	7/1/2026	Beverly	MA	01915
914	Mauck	Parker	7/1/2026	Westport Point	MA	02791
915	Mauro	Jennifer	6/30/2026	Riverhead	NY	11901
916	may	mike	8/14/2026	Lottsburg	VA	22511
917	MAYBERRY	LARRY	10/2/2026	Bayville	NJ	08721
918	Maynes	Robert	10/7/2026	Miller Place	NY	11764
919	McAllister	Drew	8/28/2026	Maryland Heights	MO	63043
920	McAllister	Steven	7/1/2026	Fairfax	VA	22032
921	McAvoy	Brian	8/22/2026	Lynchburg	VA	24503

922	McCabe	William	7/24/2026	Massapequa	NY	11758
923	Mccarthy	Thomas	7/1/2026	Freeport	ME	04032
924	mcchain	Edward	9/13/2026	Saluda	VA	23149
925	Mcclaugherty	Robert	9/15/2026	Cape Charles	VA	23310
926	McClelland	Scott	10/12/2026	Rockville Centre	NY	11570
927	McComiskey	Ron	7/14/2026	Seaford	NY	11783
928	McCoun	David	6/8/2026	Arnold	MD	21012
929	McDonald	Holly	8/29/2026	Robbinsville	NJ	08691
930	McDonald	James	8/11/2026	Tiverton	RI	02878
931	McDonald	Roger C.	8/15/2026	Falmouth	MA	02540
932	McDonnell	Marge	9/27/2026	Mattituck	NY	11952
933	McEwan	Ed	6/10/2026	Manalapan	NJ	07726
934	McG	M	8/9/2026	Rehoboth Beach	DE	19971
935	Mcgee	Abby	7/14/2026	Frederick	MD	21702
936	Mcgeeney	Thomas	7/28/2026	Rockaway Park	NY	11694
937	McGetign	Patricia	9/2/2026	Assawoman	VA	23302
938	McGettigan	Patricia	8/20/2026	Assawoman	VA	23302
939	McGrath	Raymond	8/28/2026	Enterprise	AL	36330
940	mcgrory	danny	8/11/2026	Holbrook	NY	11741
941	McGuire	Philip	10/7/2026	Elkhorn	NE	68022
942	McIntyre	Doug	10/7/2026	Newton	NJ	07860
943	McKellar	Peter	7/1/2026	Canandaigua	NY	14424
944	McKenna	Karl	9/9/2026	Leonardo	NJ	07737
945	McLaughlin	Lea	10/7/2026	Charlotte	NC	28205
946	MCLAUGHLIN	NANCY	6/12/2026	Naples	FL	34116
947	McMenamin	Kevin	6/14/2026	Annapolis	MD	21409
948	McMullen	Patrick	7/23/2026	Landenberg	PA	19350
949	Meadors	Don	9/2/2026	Virginia Beach	VA	23455
950	Mechner	Tricia	7/2/2026	Clifton	VA	20124
951	Medved	Mark	8/12/2026	Mahtomedi	MN	55115
952	mellon	ernest	6/12/2026	Southampton	NJ	08088
953	Mellon	Ernie	10/1/2026	Southampton	NJ	08088
954	Menage	Frederick	9/10/2026	Edgewater	MD	21037
955	Mendez	Raymond	8/28/2026	New York	NY	10021
956	Mendler	Taylor	7/31/2026	Virginia Beach	VA	23452
957	Menschner	Alan	9/2/2026	Minotola	NJ	08341
958	Merg	Kurt	7/1/2026	Cheney	WA	99004
959	Merrow	Richard	6/12/2026	Fairlawn	OH	44333
960	Mginnis	Allison	8/12/2026	Stillwater	MN	55082
961	Micheo	Alex	7/13/2026	Mechanicsville	VA	23116
962	Mickey	Kyndal	7/11/2026	Brooksville	FL	34601
963	Middour	Sandra	7/1/2026	Round Hill	VA	20141
964	MIKE	KENNETH	8/22/2026	Niantic	CT	06357
965	Mikita	Michael	7/1/2026	Vero Beach	FL	32967

966	Milanese	Nino	8/2/2026	Hydes	MD	21082
967	Miller	Alynda	6/9/2026	Gloucester	VA	23061
968	Miller	Brian	7/1/2026	Powell	TN	37849
969	Miller	Joshua	7/1/2026	Newville	PA	17241
970	Miller	Lynn	10/7/2026	Winchester	VA	22601
971	Miller	Matthew	6/12/2026	Bay Shore	NY	11706
972	Miller	Tim	7/14/2026	Arlington	VA	22201
973	Mills	Wayne	10/7/2026	Hutchinson Island	FL	34949
974	Millward	Joan	6/28/2026	Colonial Beach	VA	22443
975	Miska	Gene	10/7/2026	Alexandria	VA	22308
976	Miskulnig	Paul	6/22/2026	North Ferrisburgh	VT	05473
977	Mistretta	Lisa	7/1/2026	Kirkwood	NY	13795
978	Mitcehll	Beverly	9/30/2026	Boise	ID	83709
979	Mitchell	Beverly	7/1/2026	Boise	ID	83709
980	Mitchell	Curtis	7/4/2026	Norfolk	VA	23518
981	Mitchell	Joanne	10/6/2026	Perryville	MD	21903
982	Mitchell	Travis	6/25/2026	Roseville	MN	55113
983	Mize	Jim	8/14/2026	Hampstead	NH	03841
984	Mizutani	Joann	6/12/2026	Sacramento	CA	95816
985	Molina	Nelson	8/5/2026	Buena Park	CA	90620
986	Montesi	Robert	8/18/2026	Simsbury	CT	06070
987	Montgomery	Daniel	7/1/2026	Madison	AL	35758
988	Moon	Liam	8/5/2026	Garden City	NY	11530
989	Moore	Anthony	7/31/2026	Garland	TX	75044
990	Moore	Chris	6/19/2026	Denver	CO	80210
991	Moore	Kallan	9/28/2026	Washington	DC	20003
992	Moore	Robert	7/1/2026	Wake Forest	NC	27587
993	Moore	Travis	8/10/2026	Chesapeake	VA	23322
994	MOORS	WILLIAM	7/1/2026	North	VA	23128
995	Moran	Brian	8/28/2026	Marysville	MI	48040
996	Moran	Kathleen	9/21/2026	Colonial Beach	VA	22443
997	Morawski	JANE	7/1/2026	Shelton	CT	06484
998	Moreira	Antonio	8/14/2026	Cape Coral	FL	33914
999	Moreland	Thomas	10/3/2026	Marydel	MD	21649
1000	Moreno	Jordan	9/22/2026	Orange	NJ	07050
1001	Morgan	Daniel	10/7/2026	Cazenovia	NY	13035
1002	Morgan	Matthew	10/1/2026	Landenberg	PA	19350
1003	Morgan	Meredith	9/25/2026	Fairlawn	OH	44333
1004	morgan	Ryan	7/14/2026	Davison	MI	48423
1005	Morris	Lee	7/11/2026	Charlottesville	VA	22903
1006	Morris	Timothy	7/2/2026	Henrico	VA	23231
1007	Morrissette	Andrew	10/7/2026	Billings	MT	59102
1008	Moser	Stephen	6/10/2026	Hazlet	NJ	07730
1009	Moses	Peter	7/30/2026	Woodridge	NY	12789

1010	Mosher	Adam	9/22/2026	Centereach	NY	11720
1011	Moskal	Maryanna	7/1/2026	Buffalo	NY	14221
1012	Mosley	Vern	9/3/2026	Deltaville	VA	23043
1013	Mowen	Robert	7/1/2026	Clear Spring	MD	21722
1014	Mozitis	Christopher	9/30/2026	Linwood	NJ	08221
1015	Mueller	Jim	8/9/2026	Marstons Mills	MA	02648
1016	Muenzen	Mark	6/9/2026	Burke	VA	22015
1017	Mullen	Mark	7/16/2026	Midlothian	VA	23112
1018	muller	mike	9/2/2026	Virginia Beach	VA	23452
1019	Mullinix	Bill	6/9/2026	Ocean City	MD	21842
1020	Mulqueen	Michael	6/11/2026	Blue Point	NY	11715
1021	Murphy	Jane	7/3/2026	Congers	NY	10920
1022	Murphy	Jeffrey	7/1/2026	Sarasota	FL	34236
1023	Murphy	Kevin	7/28/2026	Jackson	NJ	08527
1024	Murray	James	6/9/2026	Milford	CT	06460
1025	Nakayama	Ian	9/1/2026	Alexandria	VA	22306
1026	Nalywayko	Zhenya	10/7/2026	Pittsburgh	PA	15210
1027	Nance	Demetrius	7/28/2026	Lancaster	VA	22503
1028	Nash	James	8/10/2026	Deale	MD	20751
1029	Nathan Ankersen	Nathan Ankersen	6/16/2026	Metairie	LA	70005
1030	Neal	Dale	7/1/2026	Richmond	VA	23225
1031	Neill	Robert	8/8/2026	West Greenwich	RI	02817
1032	Nellis	John	6/13/2026	Brooklyn	NY	11234
1033	Nelson	Kurt	7/27/2026	Old Lyme	CT	06371
1034	Nerud	Benjamin	10/7/2026	Germantown	MD	20874
1035	Neubauer	John	6/19/2026	Shawano	WI	54166
1036	NICCHITTA	CHRISTOPHER	10/7/2026	Durham	NC	27705
1037	Nicchitta	Joel	10/7/2026	Durham	NC	20773
1038	Nicchitta	Mark	10/7/2026	Fairfax	VA	22033
1039	Nickels	John	9/30/2026	Jupiter	FL	33469
1040	NIELSEN	ROBERT	9/2/2026	Milan	MN	56262
1041	Nightingale	Karen	9/2/2026	Toms River	NJ	08753
1042	Nightingale	Robert	7/3/2026	Toms River	NJ	08753
1043	Nikolaus	Eric	6/10/2026	Quarryville	PA	17566
1044	Nirenberg	Theresa	6/10/2026	Somers Point	NJ	08244
1045	Nischan	Chris	9/2/2026	Nashville	TN	37215
1046	Nocito	Anton	10/7/2026	Huntington Station	NY	11746
1047	Nolan	David	9/2/2026	Herndon	VA	20170
1048	Nolan	John	9/2/2026	Markham	VA	22643
1049	Nolan	Pam	7/1/2026	Wilton Manors	FL	33311
1050	Noland	Buddy	7/11/2026	Chester	VA	23836
1051	Noonan	Jerome	9/9/2026	Longmeadow	MA	01106
1052	Norell	Ryan	7/16/2026	Merrick	NY	11566
1053	Norris	David	6/12/2026	Laveen	AZ	85339

1054	Norris	Richard	9/12/2026	Edgewood	MD	21040
1055	Norton	Josh	7/1/2026	Browns Summit	NC	27214
1056	Noto	Paul	6/11/2026	West Islip	NY	11795
1057	Nunez	Guillermo	9/30/2026	Falmouth	MA	02540
1058	Nunn	Thomas	7/28/2026	Allentown	PA	18104
1059	Nunnally	Paul	6/11/2026	Mechanicsville	VA	23111
1060	OBrien	Daniel	7/9/2026	Highland	NY	12528
1061	OBrien	Rachel	7/19/2026	Landrum	SC	29356
1062	ODonnel	Kealan	8/13/2026	Philadelphia	PA	19148
1063	ODonnell	Deanne	7/1/2026	Derry	PA	15627
1064	oertel	tom	7/18/2026	Plymouth	MA	02360
1065	Ogilvie	Liz	6/18/2026	Falls Church	VA	22042
1066	OHandley	Christopher	9/30/2026	Virginia Beach	VA	23453
1067	OHearn	William	7/13/2026	Warwick	RI	02888
1068	Ohrstrom	Clarke	6/12/2026	The Plains	VA	20198
1069	Okeefe	Edward	9/4/2026	Norfolk	VA	23505
1070	Okun	Andrew	8/6/2026	Los Angeles	CA	90066
1071	olander	Doug	10/7/2026	Orlando	FL	32819
1072	Oliver	Marc	7/31/2026	Fort Collins	CO	80524
1073	Oliver	Miles	9/16/2026	New York	NY	10009
1074	Olivieri	Ann	7/20/2026	Virginia Beach	VA	23451
1075	Olmscheid	Jeremy	9/2/2026	Albany	MN	56307
1076	Olsen	Brandon	8/9/2026	Friendship	ME	04547
1077	Ombalski	Katie	8/9/2026	Boalsburg	PA	16827
1078	Ondrey	Kevin	8/10/2026	Glen Cove	NY	11542
1079	Oneill	Sheila	7/1/2026	Poughkeepsie	NY	12601
1080	O'Neill	Anthony	9/2/2026	Warwick	NY	10990
1081	Opsatnic	Levi	9/21/2026	Hadlyme	CT	06439
1082	Optenberg	Ian	8/8/2026	Philadelphia	PA	19123
1083	Ortolano	frank	7/14/2026	Damascus	PA	18415
1084	Osipowich	Brian	6/9/2026	Ronkonkoma	NY	11779
1085	O'Sullivan	Mark	8/9/2026	Dallas	GA	30157
1086	Otis	Lancaster	7/10/2026	Spotsylvania	VA	22553
1087	Otwell	Jackie	8/8/2026	Finksburg	MD	21048
1088	Oxley	Jamie	10/7/2026	Rutherfordton	NC	28139
1089	Ozkan	Nuri	7/31/2026	Denver	CO	80224
1090	P	Ken	7/19/2026	Port Washington	NY	11050
1091	Packard	Eric	7/19/2026	Solomons	MD	20688
1092	packer	karen	6/19/2026	Chattahoochee	FL	32324
1093	Pallotta	Arthur	8/6/2026	Bay Shore	NY	11706
1094	Palma	Erik	8/11/2026	New York	NY	10009
1095	PANASCI	MICHAEL	9/22/2026	Lubbock	TX	79416
1096	Park	Daniel	8/7/2026	Norfolk	VA	23507
1097	Parker	Stephen	10/9/2026	Box Elder	SD	57719

1098	Parrish	Thomas	7/30/2026	Richmond	VA	23224
1099	Parsell	Suzanne	7/1/2026	Ann Arbor	MI	48108
1100	Partlow	Ralph	9/1/2026	Baltimore	MD	21218
1101	patrizio	richard	9/2/2026	East Northport	NY	11731
1102	Patterson	Ethan	8/1/2026	Yorktown	VA	23693
1103	Patterson	Heather	8/17/2026	Ridgway	CO	81432
1104	Pawloski	Linda	6/19/2026	Peoria	AZ	85345
1105	Payne	Meriwether	7/14/2026	Locustville	VA	23404
1106	Pearlman	Jeff	7/18/2026	West Hempstead	NY	11552
1107	Pearson	Chad	8/13/2026	New York	NY	10010
1108	Peay	Michelle	6/11/2026	Westport	MA	02790
1109	Peck	Greg	7/21/2026	Fairfield	CT	06824
1110	Peel Salvadore	Karen	6/8/2026	Ship Bottom	NJ	08008
1111	Pelletier	Levi	10/7/2026	Brunswick	ME	04011
1112	Pemberton	Linda	8/15/2026	Fredericksburg	VA	22405
1113	Pendergast	Patrick	8/28/2026	Redding	CA	96002
1114	Peoples	Linda	6/9/2026	Kensington	MD	20895
1115	Pereira	Joseph	6/9/2026	New Bedford	MA	02740
1116	Perkowski	Richard	7/1/2026	Bluff	UT	84512
1117	Perry	Adeline	8/9/2026	Riva	MD	21140
1118	Perry	Christopher	8/9/2026	Mitchellville	MD	20721
1119	Perry	Sarah	6/8/2026	Suffolk	VA	23437
1120	Peters	Derek	8/10/2026	Kennebunk	ME	04043
1121	Peters	John	7/1/2026	Lincolndale	NY	10540
1122	Peterson	Terry	6/8/2026	Exmore	VA	23350
1123	Peterson	Walter	6/11/2026	Millstone Township	NJ	08535
1124	Petillo	Gavin	9/30/2026	Manasquan	NJ	08736
1125	Petitte	Ron	6/10/2026	Bridgeport	CT	06606
1126	Petrera	Pasquale	8/9/2026	Salisbury	MD	21801
1127	Petrone	Anthony	8/12/2026	Oceanside	NY	11572
1128	Pettit	CA	10/7/2026	Rochester	NY	14620
1129	Pfohl	Red	8/10/2026	White Plains	NY	10605
1130	Philistin	Wilthere	8/7/2026	Orlando	FL	32808
1131	Picchetti	Gloria	6/12/2026	Chicago	IL	60613
1132	Pierri	Judith	9/3/2026	Oakland Gardens	NY	11364
1133	Pillers	Nancy	9/24/2026	Cape May Court House	NJ	08210
1134	Pinello	Thomas	7/28/2026	Hyattsville	MD	20781
1135	Pippin	Joseph	8/28/2026	Centreville	MD	21617
1136	Piva	Jim	8/16/2026	S Dartmouth	MA	02748
1137	Plumly	Chad	10/1/2026	Atlanta	GA	30328
1138	pocock	hugh	8/16/2026	Baltimore	MD	21211
1139	Podesta	Andy	8/3/2026	Lakeville	MA	02347
1140	Pollard	Robert	10/7/2026	Henrico	VA	23238
1141	Porporino	Joseph	7/1/2026	Oswego	NY	13126

1142	Port Ward	William	10/7/2026	Selma	NC	27576
1143	Porter	Susan	7/1/2026	Lords Valley	PA	18428
1144	Potocsnak	Jeff	9/2/2026	Medina	OH	44256
1145	Potvin	Brian	10/2/2026	Marblehead	MA	01945
1146	poulter	johnie	7/4/2026	Virginia Bch	VA	23455
1147	poulter	sandra	7/5/2026	Virginia Beach	VA	23455
1148	Poulter	WAllace	7/3/2026	Virginia Beach	VA	23455
1149	Pounder	Scott	8/28/2026	Saratoga Springs	UT	84045
1150	Powell	Charles	6/9/2026	Virginia Beach	VA	23455
1151	Powell	David	8/27/2026	Absecon	NJ	08201
1152	Powell	Elizabeth	7/1/2026	Washington	DC	20024
1153	Powell	Jason	7/31/2026	Huntsville	AL	35816
1154	Pratley	Sean	9/10/2026	Riverside	CT	06878
1155	Presutti	Lenard	8/28/2026	Athens	OH	45701
1156	Pridgen	Bruce	7/22/2026	Jacksonville	NC	28540
1157	Proett	Thomas	8/18/2026	Valley Springs	CA	95252
1158	Proffitt	Brittany	6/29/2026	Palmyra	VA	22963
1159	Provencher	Greg	7/1/2026	Virginia Beach	VA	23451
1160	Pulliam	Sydney	8/13/2026	Richmond	VA	23233
1161	Pushkara	Antar	6/19/2026	Eugene	OR	97405
1162	Quartuccio	Richard	10/3/2026	Merrick	NY	11566
1163	Quinn	Harold	6/10/2026	Flemington	NJ	08822
1164	Rachael	Jerel	8/28/2026	Glen Rock	PA	17327
1165	Radigan	Michael	7/13/2026	Blairstown	NJ	07825
1166	Radosevich	Matthew	8/28/2026	Fairfield	CA	94534
1167	RALEIGH	MADELINE	6/20/2026	Bridgeport	CT	06605
1168	RANCOURT	LEON G	10/8/2026	Plainville	MA	02762
1169	Randolph	William	10/4/2026	Prescott Valley	AZ	86315
1170	Raper	Connie	6/29/2026	Rougemont	NC	27572
1171	Rasnick	Sam	9/11/2026	Hopewell	VA	23860
1172	Ray	Jerry	7/1/2026	Gibbstown	NJ	08027
1173	Raymond	Gregory	7/12/2026	Shelter Island Heights	NY	11965
1174	Reed	Dameon	10/7/2026	Sumter	SC	29154
1175	Reeves	David	6/10/2026	Frederick	MD	21704
1176	Reiger	Christopher	7/1/2026	Santa Rosa	CA	95405
1177	Reiger	John	6/12/2026	Worthington	OH	43085
1178	reigher	mason	9/10/2026	Lucama	NC	27851
1179	Reinhardt	Jacob	6/12/2026	Baton Rouge	LA	70808
1180	Rensberger	Terry	8/28/2026	South Bend	IN	46614
1181	Ressler	Adam	10/7/2026	Wyomissing	PA	19610
1182	Reuter	Rocky	7/31/2026	Greensboro	NC	27406
1183	Reves	Mickey	9/3/2026	Breckenridge	TX	76424
1184	Revkin	Andrew	7/30/2026	Lamoine	ME	04605
1185	Rewolinski	Daniel	7/1/2026	Milwaukee	WI	53207

1186	REYNOLDS	CHRISTOPHER	8/8/2026	Mckinney	TX	75070
1187	Reynolds	Lisa-May	6/12/2026	Ladys Island	SC	29907
1188	Riccobene	Rachael	6/19/2026	Panama City	FL	32405
1189	Riccobono	Anthony	7/20/2026	East Brunswick	NJ	08816
1190	RICHEY	DONALD	9/2/2026	Columbia City	IN	46725
1191	Richmond	Susan	9/13/2026	Avondale Estates	GA	30002
1192	ricker	gere	7/10/2026	Fair Haven	NJ	07704
1193	riggs	james	8/10/2026	Westerly	RI	02891
1194	Rinando	Chris	7/31/2026	Saint Petersburg	FL	33713
1195	Ritchey	Cary	7/31/2026	Roaring Spring	PA	16673
1196	Rivera	Edwin	8/8/2026	Yonkers	NY	10703
1197	Robar	William	8/17/2026	Filer	ID	83328
1198	robb	lanse	7/1/2026	Wenham	MA	01984
1199	Roberts	Eben	9/2/2026	Dover	DE	19901
1200	Roberts	Thomas	10/7/2026	Black Mountain	NC	28711
1201	Robinson	Angela	5/22/2026	Weaverville	NC	28787
1202	Robinson	Brian	6/12/2026	Camden	ME	04843
1203	Robinson	Tim	10/7/2026	Woodbine	NJ	08270
1204	Rodgers	Matthew	7/1/2026	Centennial	CO	80112
1205	Roedel	Julie	9/2/2026	Saint Louis	MO	63122
1206	Rogers	James	8/14/2026	Richmond	VA	23221
1207	Rogers	Michelle	9/22/2026	Lewes	DE	19958
1208	Roll	John	8/28/2026	Mead	WA	99021
1209	Rollins	Christopher	5/30/2026	Grand Junction	CO	81503
1210	Roman	Kevin	7/13/2026	New York Mills	NY	13417
1211	Roman	Lynn	9/30/2026	Bala Cynwyd	PA	19004
1212	Romero	Edward	6/10/2026	Gloucester	VA	23061
1213	Rook	Hunter	6/9/2026	Goochland	VA	23063
1214	Root	Jeff	7/1/2026	East Nassau	NY	12062
1215	Rose	Chris	6/12/2026	Atherton	CA	94027
1216	Rose	Jean	8/8/2026	Los Gatos	CA	95030
1217	Rose	Joe	9/30/2026	Cape Charles	VA	23310
1218	Rosen	Mark	9/29/2026	Fuquay Varina	NC	27526
1219	ROSEN	RONA	10/7/2026	Phila	PA	19115
1220	Ross	Liam	8/8/2026	Hampton	NH	03842
1221	Ross	Mark	7/24/2026	Mechanicsville	VA	23111
1222	Rossi	Patricia	10/7/2026	Levittown	PA	19056
1223	roth	jeffrey	10/7/2026	Lehighton	PA	18235
1224	Rowe	John	6/8/2026	N Cape May	NJ	08204
1225	Rowell	William	7/1/2026	Tuscaloosa	AL	35406
1226	Royal	Ryan	8/4/2026	Newport News	VA	23602
1227	Ruede	Dan	10/7/2026	Watervliet	NY	12189
1228	Ruhl	Gary	6/12/2026	Palm Harbor	FL	34685
1229	Rustowicz	Kevin	9/2/2026	Grand Island	NY	14072

1230	Ryan	Dennis	8/28/2026	Las Cruces	NM	88012
1231	ryan	rick	6/9/2026	Deltaville	VA	23043
1232	Rzezwicki	Lukasz	8/19/2026	Putnam Valley	NY	10579
1233	S	C	7/23/2026	Berkeley Springs	WV	25411
1234	Sadrian	Stas	10/7/2026	Rockaway Beach	NY	11693
1235	Sagal	Wayne	6/10/2026	Kingsville	MD	21087
1236	Saggese	Christopher	10/2/2026	West Chester	PA	19382
1237	Sailer	Randy	6/20/2026	Beulah	ND	58523
1238	Salo	Thomas	6/12/2026	West Burlington	NY	13482
1239	Salvadore	Karen	8/6/2026	Ship Bottom	NJ	08008
1240	Sampson	Geoff	6/9/2026	Glastonbury	CT	06033
1241	Sander	Jessica	7/23/2026	Amityville	NY	11701
1242	Sanders	Joshua	6/10/2026	Prince Frederick	MD	20678
1243	Sanders	Robert	6/19/2026	Salem	SC	29676
1244	Santee	Andrew	10/2/2026	Mansfield	TX	76063
1245	Santo	Joe	8/10/2026	Rumney	NH	03266
1246	Sargent	Shawn	7/1/2026	West Yarmouth	MA	02673
1247	sarli	Teresa	10/6/2026	Barrington	RI	02806
1248	Sarnoski	Michelle	6/19/2026	Lakewood	WA	98499
1249	SAUNDERS	F M	6/13/2026	Hayes	VA	23072
1250	Savage	Michael	7/1/2026	New York	NY	10075
1251	Sawyer	Lloyd	9/11/2026	Virginia Beach	VA	23455
1252	Saxon	Rick	6/9/2026	York	PA	17408
1253	Schandall	Alison	10/10/2026	Charleston	SC	29403
1254	Schanze	Christopher	9/2/2026	Hayes	VA	23072
1255	Scharlack	Ron	10/1/2026	Newton Highlands	MA	02461
1256	Scheierl	Robert	7/31/2026	Grand Rapids	MN	55744
1257	scheinberg	Jonathan	7/30/2026	New York	NY	10171
1258	Schenck	Stephen	7/28/2026	Sebastian	FL	32958
1259	Schenck	Steve	7/23/2026	Sebastian	FL	32958
1260	Schertler	Eric	7/10/2026	Washington	DC	20008
1261	Schiavo	Daniel	6/9/2026	White Stone	VA	22578
1262	Schissler	Dillon	8/10/2026	Westminster	MD	21157
1263	Schlenker	Robert	8/10/2026	Warren	NJ	07059
1264	Schmidt	Roger	9/25/2026	Madison	WI	53714
1265	Schmitt	Tara	9/2/2026	Lewes	DE	19958
1266	Schneider	Jeremy	8/9/2026	Monroe	NY	10950
1267	Schneider	Sam	7/18/2026	Elmont	NY	11003
1268	Schorle	Bruce	9/2/2026	Machipongo	VA	23405
1269	SCHULER	CHARLES	9/7/2026	Bel Air	MD	21015
1270	Schulz	Peter	7/31/2026	Wilmington	NC	28405
1271	Schvejda	Dennis	6/10/2026	North Haledon	NJ	07508
1272	Schwartz	Jake	8/3/2026	Margate City	NJ	08402
1273	Schwarz	Marlene	9/28/2026	Auburndale	MA	02466

1274	Schwasnick	Michael	6/8/2026	Baldwin	NY	11510
1275	Schweinler	Bonnie	7/3/2026	Short Hills	NJ	07078
1276	Scofield	Mark	9/2/2026	Canon City	CO	81212
1277	Scott	Cody	8/10/2026	Phippsburg	ME	04562
1278	Scott	Jarred	10/7/2026	Mechanicsburg	PA	17050
1279	Scott	Michael	6/15/2026	Grand Haven	MI	49417
1280	Scott	Tammy	9/25/2026	Littleton	CO	80127
1281	Scuderi	Ben	6/22/2026	Grand Junction	CO	81505
1282	Seever	Thomas	6/12/2026	Austin	TX	78732
1283	Seguin	Aldric	8/12/2026	Old Greenwich	CT	06870
1284	Seib	Scott seib	8/14/2026	Westfield	NJ	07090
1285	Seifert	Steven	6/12/2026	Stamford	CT	06902
1286	seigal	david	8/14/2026	Montclair	NJ	07042
1287	Seils	Drew	9/2/2026	Guilford	CT	06437
1288	Sem	Devin	8/19/2026	Philadelphia	PA	19145
1289	Sennett	Jim	7/10/2026	Lewistown	MT	59457
1290	Sewall	Sam	7/13/2026	York	ME	03909
1291	Shafer	Mike	9/17/2026	Reno	NV	89521
1292	Shaffer	Parker Shaffer	6/10/2026	Gloucester	VA	23061
1293	Shanahan	Michael	8/28/2026	Franklin	MA	02038
1294	Shannon	John	7/12/2026	Staten Island	NY	10306
1295	Shaul	Donald	7/22/2026	Los Angeles	CA	90064
1296	Shaw	John	9/30/2026	West Grove	PA	19390
1297	Sheets	David	8/28/2026	Allison Park	PA	15101
1298	Sheffield	Matthew	7/1/2026	Mountain Brk	AL	35213
1299	Shelton	Iris	7/2/2026	Jacksonville	FL	32221
1300	Sherman	Allan	10/8/2026	Forked River	NJ	08731
1301	SHERMAN	CARL	6/10/2026	Pine Bush	NY	12566
1302	Short	Lauren	9/21/2026	San Diego	CA	92115
1303	Shumaker	Brian	7/1/2026	Gardners	PA	17324
1304	Siconolfi	Michael	8/8/2026	Locust Valley	NY	11560
1305	Siddons	Athena	8/10/2026	Montclair	NJ	07042
1306	Sidebotham	Nancy S	7/1/2026	Oakland	CA	94605
1307	Silva	Grace	10/2/2026	North Hollywood	CA	91605
1308	Simonson	Sheila	6/12/2026	Bryan	TX	77808
1309	Simpson	Christopher	7/28/2026	Arrington	VA	22922
1310	Simpson	Douglas	9/30/2026	Knoxville	TN	37918
1311	Simpson	Jeff	8/18/2026	Rumson	NJ	07760
1312	Singleton	Nicholas	6/12/2026	Houston	TX	77096
1313	Sirko	Alex	10/3/2026	White Bear Lake	MN	55110
1314	Sivak	John	7/13/2026	Burgettstown	PA	15021
1315	Skinner	Gail H.	8/28/2026	Tucson	AZ	85735
1316	Sleter	Dylan	9/4/2026	York	PA	17404
1317	sluyk	james	7/18/2026	Neponsit	NY	11694

1318	Smith	Bob	8/9/2026	Richmond	VA	23221
1319	Smith	Carlos	9/30/2026	Islamorada	FL	33036
1320	Smith	Daniel	10/2/2026	Boise	ID	83705
1321	Smith	Donald	7/31/2026	Capitan	NM	88316
1322	Smith	Jeff	7/31/2026	Sarasota	FL	34240
1323	Smith	Kyle	8/8/2026	Noblesville	IN	46060
1324	Smith	Robert	6/9/2026	Bensalem	PA	19020
1325	Smith	Robert	6/8/2026	Bristol	CT	06010
1326	Smith	Sandra	7/1/2026	Richmond	VA	23229
1327	Smith	Steve	7/31/2026	Huntington	NY	11743
1328	smith	susan	7/31/2026	Santa Rosa	CA	95409
1329	Smoker	Art	10/5/2026	Goshen	IN	46526
1330	Smolka	Thomas	7/15/2026	Staten Island	NY	10306
1331	Snow	Douglas	6/9/2026	Charlestown	RI	02813
1332	Snow	Jeff	10/7/2026	North Chesterfield	VA	23234
1333	snow	john	9/3/2026	Kingston	NY	12401
1334	Snow	Rina	7/16/2026	Queens	NY	11418
1335	Snyder	Keith	10/7/2026	Albany	GA	31721
1336	Sohn	Erich	7/31/2026	Providence	RI	02906
1337	Sommers	Thomas	8/10/2026	Berlin	NJ	08009
1338	Sondberg	tyler	8/11/2026	Cambridge	MD	21613
1339	Sorbi	Meaghan	6/10/2026	South Hadley	MA	01075
1340	Sorensen	Timothy	8/28/2026	Torrance	CA	90505
1341	Souhrada	Michael	10/7/2026	Bay Shore	NY	11706
1342	Sowers	William	7/16/2026	Midlothian	VA	23113
1343	spaits	carrie	10/9/2026	Richmond	VA	23223
1344	spell	judah	8/13/2026	Marblehead	MA	01945
1345	Spencer	Rich	6/11/2026	Leesburg	VA	20175
1346	Speranza	Ilya	10/7/2026	Brooklyn	NY	11233
1347	Spiegel	Kimberly	7/31/2026	Hammonton	NJ	08037
1348	Spirio	Joe	8/9/2026	West Babylon	NY	11704
1349	Sprinkel	Francis	6/19/2026	Ashland	VA	23005
1350	Spruill	Catherine	7/19/2026	Gloucester	VA	23061
1351	Spurlock	Jason	8/7/2026	Mount Airy	MD	21771
1352	Spurr	Karen	7/1/2026	Virginia Beach	VA	23453
1353	St. John	Clay	6/12/2026	Colorado Springs	CO	80907
1354	St. John	Clay	9/2/2026	Gardner	CO	81040
1355	Stachera Simon	Elaine	9/22/2026	Las Cruces	NM	88005
1356	Stadler	Stephen	8/2/2026	Naples	FL	34114
1357	Staheli	Ed	8/4/2026	Lansing	IA	52151
1358	Stainback	RD	10/7/2026	Shacklefords	VA	23156
1359	Stamper	Jonathan	7/13/2026	Troutdale	VA	24378
1360	Stampfl	Willie	6/8/2026	Milton	GA	30004
1361	Stancil	CJ	10/1/2026	Gatlinburg	TN	37738

1362	Stanwood	Aaron	8/20/2026	Steuben	ME	04680
1363	Stanwood	Jesse	8/21/2026	Steuben	ME	04680
1364	Stanwood	Taylor	8/21/2026	Steuben	ME	04680
1365	Stapler	Carl	6/12/2026	Evanston	WY	82930
1366	Stark	Louise	8/28/2026	Phoenix	AZ	85007
1367	Starkin	Donald J	5/29/2026	Lyle	WA	98635
1368	Stavitz	J	7/10/2026	Toms River	NJ	08755
1369	Stawinoga	Greg	6/19/2026	South Holland	IL	60473
1370	Stearns	Ronald	6/12/2026	Phoenix	AZ	85044
1371	Stefanick	Don	6/10/2026	Drums	PA	18222
1372	Steffe	Ron	9/4/2026	Oley	PA	19547
1373	Steidinger	Tammie	9/2/2026	Lehighton	PA	18235
1374	Steidle	Joanna	8/9/2026	Southampton	NY	11968
1375	Stein	Rich	10/3/2026	Bridgeport	CT	06604
1376	Steinau	Todd	7/31/2026	Crittenden	KY	41030
1377	Steinke	Sean	8/14/2026	Houston	TX	77081
1378	Stell	Gerard	7/28/2026	Longs	SC	29568
1379	Steptoe	Ryan	7/31/2026	Apo	AE	09096
1380	Sterzel	Daniel	6/8/2026	Haskell	NJ	07420
1381	stevens	g	8/15/2026	Falmouth	MA	02540
1382	Stevens	Keven	9/2/2026	Gloucester	MA	01930
1383	Stevenson	Charles	6/12/2026	Peaks Island	ME	04108
1384	Stevenson	Gary	6/9/2026	Island Park	NY	11558
1385	Stevenson	Jeff	7/1/2026	Lusby	MD	20657
1386	STEVENSON	Jeffrey	6/12/2026	Lusby	MD	20657
1387	Stickle	Dave	10/7/2026	Monmouth Beach	NJ	07750
1388	Stimpfle	Darren	8/18/2026	Baltimore	MD	21224
1389	Stimus	Timothy	8/11/2026	Merrick	NY	11566
1390	Stoakes	Mike	7/1/2026	Lees Summit	MO	64063
1391	Stoakes	MW	6/19/2026	Lees Summit	MO	64063
1392	Stokes	Duff	8/9/2026	North Kingstown	RI	02852
1393	Stonebraker	Brad	6/12/2026	Astoria	NY	11102
1394	Storino	John	7/27/2026	Port Chester	NY	10573
1395	Strand	Benjamin	6/19/2026	Eugene	OR	97404
1396	Strickland	Blair	10/6/2026	Highlands Ranch	CO	80129
1397	Strohmeyer Jr	Raymond	8/12/2026	Gretna	LA	70053
1398	Strong	Peter	7/1/2026	Manchester	MA	01944
1399	Stuart	Rowan	7/17/2026	Norfolk	VA	23518
1400	Stubbs	Eric	7/14/2026	South Ozone Park	NY	11420
1401	Sturm	Michael	8/11/2026	Bloomingburg	NY	12721
1402	Styron	Ralph	9/9/2026	Virginia Beach	VA	23464
1403	Sumrell	James	10/5/2026	Bumpass	VA	23024
1404	Surace	Ron	6/9/2026	Broomall	PA	19008
1405	Surovick	Louis	6/10/2026	Voorhees	NJ	08043

1406	Susca	Peter	7/1/2026	Wethersfield	CT	06109
1407	Swanson	Carl	8/10/2026	Westport	MA	02790
1408	Swartz	Michael	10/6/2026	Green Spring	WV	26722
1409	Sweeney	James	10/7/2026	Schererville	IN	46375
1410	Sweeney	Jim	7/1/2026	Schererville	IN	46375
1411	Switzer	Bruce	7/1/2026	Tucson	AZ	85750
1412	Szalay	Joseph	6/20/2026	Ashford	CT	06278
1413	T.	Allen	8/20/2026	Rahway	NJ	07065
1414	Tabor	Randall	6/15/2026	Yorktown	VA	23692
1415	Taft	Brent	7/2/2026	Sandia Park	NM	87047
1416	Tarplee	William	7/22/2026	Grantsboro	NC	28529
1417	Taylor	James	9/2/2026	Temperanceville	VA	23442
1418	Taylor	Jennifer	8/29/2026	Winder	GA	30680
1419	Taylor	John	8/28/2026	Missoula	MT	59804
1420	Taylor	Robert	8/8/2026	Smithfield	VA	23430
1421	Taylor	Stuart	8/29/2026	Winston Salem	NC	27104
1422	Tedder	Tom	10/7/2026	Branford	CT	06405
1423	Tedmond	Michael	7/21/2026	Breezy Point	NY	11697
1424	Teetor	David	6/12/2026	Kennett Square	PA	19348
1425	Tefankjian	John	6/8/2026	Brigantine	NJ	08203
1426	Tefankjian	John	7/18/2026	Port Republic	NJ	08241
1427	Tennyson	Jesse	6/12/2026	Tucson	AZ	85710
1428	Tepper	Pam	8/12/2026	Wildwood	MO	63011
1429	Tereschak	Cassandra	7/1/2026	Scranton	PA	18510
1430	Terry	Marjorie	7/22/2026	Hudgins	VA	23076
1431	Terry	Ryan	8/5/2026	Virginia Beach	VA	23456
1432	Tesson	Owen	7/24/2026	Buffalo	MN	55313
1433	Thacker	Frank	8/29/2026	Ironton	OH	45638
1434	Thomas	John	9/3/2026	Gainesville	VA	20155
1435	Thomas	Michelle	6/12/2026	Lake Geneva	WI	53147
1436	Thomas	William	6/12/2026	Ventnor City	NJ	08406
1437	THOMPSON	ARLENE	7/15/2026	Boca Raton	FL	33498
1438	Thompson	Elizabeth	8/9/2026	Leesburg	NJ	08327
1439	Thompson	Jim	9/30/2026	Pedricktown	NJ	08067
1440	Thompson	Ronald	9/2/2026	Lanexa	VA	23089
1441	Thorpe	Mary	10/7/2026	Van Etten	NY	14889
1442	Tighe	Michael	7/12/2026	Bloomingdale	NJ	07403
1443	Tillman	Laura	8/8/2026	Heathsville	VA	22473
1444	Tkach	Jon	6/9/2026	Huntingtown	MD	20639
1445	Tobin	Gary	8/16/2026	Bennington	VT	05201
1446	Todd	William	6/9/2026	Breezy Point	NY	11697
1447	Tomaselli	Vincent	7/17/2026	Huntington Station	NY	11746
1448	Tomasello	Joseph	9/2/2026	Virginia Beach	VA	23456
1449	Toohey	Dave	7/29/2026	Cockeysville	MD	21030

1450	Toohey	Joe	6/10/2026	Warrington	PA	18976
1451	Toohey	Joel	8/28/2026	Waterford	CT	06385
1452	Toohey	John	9/2/2026	Somers	CT	06071
1453	TOPPINGS	DEBORAH	7/31/2026	Newport	TN	37821
1454	Tormay	Beth	6/20/2026	Canton	CT	06019
1455	Torti	Cameron	7/19/2026	New York	NY	10044
1456	Toven	Wayne	7/31/2026	Ravenna	OH	44266
1457	Towarnicki	Stanley	7/31/2026	Lolo	MT	59847
1458	Townsend	Pam	7/1/2026	Machipongo	VA	23405
1459	Traina	Kevin	8/11/2026	Auburn	MA	01501
1460	Treanor	Jeremiah	7/10/2026	Weymouth	MA	02191
1461	Treichler	Jacob	7/1/2026	Northampton	PA	18067
1462	Trent	Richard	6/22/2026	Kennett Square	PA	19348
1463	Trobridge	Tim	7/1/2026	Virginia Beach	VA	23455
1464	Trombley	Frederic	7/2/2026	Preston	CT	06365
1465	Troutner	Henry	10/8/2026	Smithfield	VA	23430
1466	Truslow	William	6/19/2026	New Kent	VA	23124
1467	Tuccinardi	Fred	8/23/2026	Norwalk	CT	06854
1468	Tucker	Susan	7/1/2026	Warren	PA	16365
1469	Turner	Alec	7/1/2026	Evington	VA	24550
1470	Turner	Pete	8/8/2026	Lynn Haven	FL	32444
1471	Tutihasi	R-Laurraine	7/1/2026	Oracle	AZ	85623
1472	Tutwiler	Adam	8/28/2026	Mount Olive	AL	35117
1473	tyson	matthew	7/1/2026	Arlington	VA	22209
1474	Ulshoffer	Lee	9/2/2026	Littleton	CO	80123
1475	Umetsu	Stacie	6/12/2026	Huntington Beach	CA	92649
1476	United States	Jennifer	7/2/2026	Winder	GA	30680
1477	Urban	Robert	6/11/2026	Kilmarnock	VA	22482
1478	Valade	Mary	6/20/2026	Fairfield	CT	06824
1479	Van Aken	Richard	6/26/2026	Southampton	PA	18966
1480	Van De Water	Donald	6/10/2026	Quogue	NY	11959
1481	Vandiviere	Diana	9/22/2026	Carlisle	KY	40311
1482	Vantre	Scott	8/11/2026	Hudgins	VA	23076
1483	Vaughan	Ryan	8/8/2026	Lutherville Timonium	MD	21093
1484	Verin	John	8/28/2026	Urbana	OH	43078
1485	Verity	Robert	7/1/2026	North Bellmore	NY	11710
1486	Vezza	Mario	10/7/2026	Oyster Bay	NY	11771
1487	Vick	Michael D	7/31/2026	Lavernia	TX	78121
1488	Vickerman	Jim	8/18/2026	Clinton	CT	06413
1489	Vickstrom	William	10/7/2026	Plymouth	MA	02360
1490	Villani	Seb	7/1/2026	Chula Vista	CA	91912
1491	Villavicencio	Dennis	7/1/2026	Three Rivers	CA	93271
1492	Viveros	Mary	6/13/2026	Cleveland	OH	44124
1493	Viveros	Mary Ann	9/30/2026	Mayfield Hts	OH	44124

1494	Vosteen	David	7/1/2026	Powhatan	VA	23139
1495	Voyles	Bryan	7/15/2026	Bartlett	IL	60103
1496	Vye	Christian	7/1/2026	Wakefield	RI	02879
1497	W	R	8/22/2026	Fanwood	NJ	07023
1498	WADE	BRUCE	9/30/2026	Mount Vernon	WA	98274
1499	Wade	Teresa	10/8/2026	Mechanicsville	VA	23111
1500	Wagenhauser	Pete	6/10/2026	Smithtown	NY	11787
1501	Wages	Britt	8/29/2026	Dallas	TX	75214
1502	Wagman	Lori	8/12/2026	Painter	VA	23420
1503	Wagner	Katherine	8/1/2026	Ventura	CA	93003
1504	Wagner	Vickie	7/31/2026	Three Oaks	MI	49128
1505	Wainwright	Harry	8/1/2026	Munster	IN	46321
1506	Wakefield	Zach	8/14/2026	Hannibal	NY	13074
1507	Walker	Brennan	9/29/2026	Salt Lake City	UT	84106
1508	Walker	Cameron	10/2/2026	Casper	WY	82601
1509	Wallace	Diane	7/1/2026	Kernersville	NC	27284
1510	Wallace	Nathaniel	9/2/2026	Rockville	MD	20850
1511	Wallack	David	7/23/2026	Baltimore	MD	21210
1512	Walsh	Gerald	7/5/2026	Brewster	NY	10509
1513	Walsh	Gregory	7/31/2026	Weymouth	MA	02188
1514	Walsh	Kevin	6/12/2026	Silver Spring	MD	20910
1515	Walsh	Marge	8/12/2026	Cumming	GA	30040
1516	Walter	Jason	6/9/2026	East Hampton	NY	11937
1517	Walters	Brian	6/9/2026	Beachwood	NJ	08722
1518	Walters	Steven	7/31/2026	Parker	CO	80138
1519	Walton	Sandra	7/2/2026	Center Cross	VA	22437
1520	Wanko	Charles	7/1/2026	Glen Burnie	MD	21061
1521	Warchal	Ken	8/3/2026	Point Pleasant Boro	NJ	08742
1522	Ward	Kenneth	9/23/2026	Bloomfield	CT	06002
1523	Ward	Matthew	9/30/2026	Bryan	TX	77808
1524	Warren	Harrison	7/13/2026	Mechanicsville	VA	23116
1525	Warstler	Austin	7/21/2026	Virginia Beach	VA	23453
1526	Waterhouse	Olivia	9/22/2026	Riverhead	NY	11901
1527	Watkins	Justin	7/14/2026	Virginia Beach	VA	23453
1528	Watt	Alston	10/4/2026	Thomasville	GA	31792
1529	Watt	Christopher	10/7/2026	Chatham	MA	02633
1530	Weaver	David	8/10/2026	Elkton	MD	21921
1531	Weaver	Kevin	9/30/2026	Elverson	PA	19520
1532	Weaver	Todd	7/31/2026	Jacksonville	FL	32218
1533	Weeks	Jeff	9/22/2026	Ocean City	MD	21843
1534	Weidlich	Kent	10/7/2026	Norfolk	VA	23503
1535	Weinberger	Mark	7/1/2026	Daly City	CA	94015
1536	Weir	Edward	8/1/2026	Catonsville	MD	21228
1537	Weiss	r	7/6/2026	Hamilton	WA	98255

1538	Wells	Robert	9/30/2026	Cape Charles	VA	23310
1539	Wells	Steve	9/2/2026	Huntingtown	MD	20639
1540	Wells	William	10/6/2026	Monroe	VA	24574
1541	Welz	Philip	6/9/2026	Brimfield	MA	01010
1542	Wenher	Jackie	9/17/2026	Millsboro	DE	19966
1543	Wessells	Judith	9/2/2026	Temperanceville	VA	23442
1544	Wessels	Richard	10/2/2026	Chesapeake	VA	23322
1545	Westfall	Chad	8/10/2026	Belle Haven	VA	23306
1546	Westlake	TOM	8/1/2026	Huntsville	AL	35810
1547	Wheatley	Wayne	8/8/2026	Virginia Beach	VA	23464
1548	Wheeler	Colleen	6/19/2026	Atlanta	GA	30327
1549	Whetham	Henry	8/11/2026	Chebeague Island	ME	04017
1550	whitcomb	joyce	8/4/2026	Platte City	MO	64079
1551	White	Alan	8/28/2026	Missoula	MT	59803
1552	White	Bryon	6/9/2026	Yorktown	VA	23692
1553	White	Corinne	10/7/2026	Voorhees	NJ	08043
1554	WHITE	Ronald	10/7/2026	Henrico	VA	23228
1555	Whitney	Jack	10/1/2026	Brush Prairie	WA	98606
1556	Whitten	Kyle	7/19/2026	Manassas	VA	20112
1557	Wichmann	G.R.	8/14/2026	Media	PA	19063
1558	Wicks	James	10/2/2026	Missoula	MT	59801
1559	Wicks	Susanna	8/28/2026	Missoula	MT	59801
1560	Wieder	Gary	9/10/2026	Damascus	MD	20872
1561	Wietsma	Christian	6/29/2026	Clifton	NJ	07014
1562	Wiley	David	8/28/2026	Sublimity	OR	97385
1563	Williams	Billy	8/12/2026	Powells Point	NC	27966
1564	Williams	Harry	8/9/2026	Wexford	PA	15090
1565	Willis	Michael	9/5/2026	Pearland	TX	77584
1566	Wilson	Eric	7/17/2026	Newport News	VA	23606
1567	Wilson	Matthew	6/19/2026	South Kingstown	RI	02879
1568	wilson	tina	7/31/2026	Pahrump	NV	89048
1569	Wine	Stanley	7/12/2026	New York	NY	10075
1570	Wink	Andrew	7/27/2026	Brookline	NH	03033
1571	Winsett	Betty	8/28/2026	Red Oak	TX	75154
1572	Winslow	Robert	7/31/2026	Olympia	WA	98506
1573	WIRTS	ALEX	7/1/2026	Sedona	AZ	86351
1574	Wondzell	John	10/2/2026	Laramie	WY	82073
1575	Wood	Adam	7/1/2026	Lake Forest	CA	92630
1576	Wood	Austin	7/28/2026	Huffman	TX	77336
1577	Wood	Dale	8/28/2026	Fairhope	AL	36532
1578	Wood	Johnny	6/10/2026	Moseley	VA	23120
1579	Woodford	Scott	6/9/2026	Westbrook	CT	06498
1580	Woodhead	Quentin	9/30/2026	Richmond	VA	23223
1581	Woodling	Charles	7/1/2026	Fort Wayne	IN	46804

1582	Woodring	Jeff	7/1/2026	Wilton	CT	06897
1583	Woods	Christopher	9/30/2026	Richmond	VA	23225
1584	Woodson	Koi	6/12/2026	Livingston	MT	59047
1585	Woody	Carolinn	7/1/2026	Cape May	NJ	08204
1586	Wooley	James	6/14/2026	Indianola	IA	50125
1587	Worley	David	6/19/2026	Reno	NV	89512
1588	Worrall	Joan	7/1/2026	Ocean City	MD	21842
1589	Wroton	Charles	8/10/2026	Norfolk	VA	23518
1590	Wyatt	Jeff	7/1/2026	West Palm Beach	FL	33418
1591	Wyse	Matt	7/16/2026	Hampton	VA	23665
1592	Yarnell	Karen	6/14/2026	Marietta	OH	45750
1593	Yelinek	Frank	8/8/2026	Kitty Hawk	NC	27949
1594	Yellin	Shane	7/20/2026	Carlsbad	CA	92008
1595	Yerxa	David	8/19/2026	Milford	CT	06460
1596	Yi	Jason	8/13/2026	Scarsdale	NY	10583
1597	Yingst	William	7/1/2026	Swansboro	NC	28584
1598	Young	Sharon	7/31/2026	Ocala	FL	34470
1599	Youngblood	Jacob	8/10/2026	La Plata	MD	20646
1600	Yousey	Jake	7/10/2026	Watertown	NY	13601
1601	Z	Josh	8/2/2026	Fargo	ND	58103
1602	Zaker	Marie	8/10/2026	Silver Spring	MD	20906
1603	Zanger	Manfred	7/31/2026	Roscoe	NY	12776
1604	Zebrowski	Eddie	8/14/2026	Oyster Bay	NY	11771
1605	Zeeck	Glen	6/9/2026	Blairstown	NJ	07825
1606	Zeno	Thomas	9/4/2026	Asbury	NJ	08802
1607	ZIMMERMAN	WILLIAM	7/1/2026	Hudgins	VA	23076
1608	Zublionis	Walter	8/10/2026	Port Jefferson Station	NY	11776
1609	Zupanovich	John	9/4/2026	Fort Myers	FL	33908

James Boyle

From: Comments
Sent: Wednesday, October 21, 2026 2:13 PM
To: James Boyle
Subject: FW: [New] [External] New public comment for 2026 Annual Meeting

From: ASMFC <info@asmfc.org>
Sent: Monday, October 19, 2026 2:20 PM
To: Comments <comments@asmfc.org>
Subject: [New] [External] New public comment for 2026 Annual Meeting

2026 Annual Meeting

Action Title

2026 Annual Meeting

Action URL

https://asmfc.org/events/2026-annual-meeting/

Name

Ben Mirin

Email

bmirin@safinacenter.org

State

New York

Comment

Subject: Comment on Specifications for the 2027-2029 Atlantic Menhaden Fishing Years

October 19, 2026

To the Atlantic Menhaden Management Board:

We wrote to you on October 3 regarding Draft Addendum II. We are writing again ahead of your first decision on November 10 about the coastwide TAC and the specifications to be set for the 2027-2029 fishing years.

The parameter that governs these specifications has moved twice in eighteen months, and it is still moving.

The 2015 benchmark assessment used a natural mortality rate of M = 0.50. The 2019 benchmark adopted M = 1.17, more than double, and well outside the range of every estimate published before it. Your own Stock Assessment Subcommittee's Natural Mortality Working Group subsequently confirmed inconsistencies in the tag releases, recapture totals, fishing-effort inputs and magnet-efficiency values behind that figure, and found that nominal fishing effort had been underreported by an annual average of 41 percent. A corrigendum lowered the estimate to 0.92, which the 2025 assessment update adopted. On September 16, 2026, a peer-reviewed reanalysis of the same 1966-71 coastwide tagging study by Ault and Luo placed it at 0.50, with a 95 percent confidence interval of 0.387 to 0.621.

Natural mortality is not a technical detail. Overestimating it understates fishing mortality, overstates spawning biomass, ignores the life history of menhaden, and carries that error forward into every biological reference point derived from them. You must revise these models if you wish to make any credible decisions about fisheries management going forward.
We ask the Board to do three things.

1. Do not lock three years of quota to a parameter under active revision. Setting 2027-2029 specifications now commits this coast to a harvest level derived from a grossly inaccurate mortality estimate. If multi-year specifications are set, they should be explicitly revisable upon the Technical Committee's reassessment of natural mortality, and that reassessment should be scheduled rather than left to discretion.

2. Rerun the projections at an M of about 0.50 before setting a quota. The quota now in force does not meet your own target: the 20 percent reduction this Board adopted last October was projected to leave a 100 percent probability of exceeding the ERP fishing mortality target in 2026. The Technical Committee has projected that coastwide catch would have to fall by more than half before that probability came down to 50 percent, and 50 percent still means the Board expects to exceed its own target in one year out of two. Those projections were run at M = 0.92. At 0.50 they will not return the same answer, and the Board cannot know what quota its own target implies until they are rerun. We ask that they be rerun before 2027-2029 specifications are set, and that the quota then be set at a level with no more than a 25 percent probability of exceeding the target. A quota as likely to fail as to succeed is not a precautionary standard.

3. Broaden the ecological reference points. The current ERPs were derived from a model in which striped bass served as the indicator species, on the stated expectation that forage adequate for striped bass "would likely not cause declines for other predators in the ecosystem, including osprey."

The ERPs have failed their own test. Six years on, striped bass is assessed as overfished, below its spawning stock biomass threshold, with a rebuilding deadline of 2029. That removes any basis for assuming the reference points incidentally protect anything else.

Your assumption that current ERPs would not harm other predators also has not held. On September 14 the Center for Conservation Biology reported that 2026 was the worst osprey breeding season ever recorded in the Chesapeake Bay. Eighty-one percent of pairs in salt water fledged no young, and the breeding population is projected to decline by 14 percent per year. You must establish reference points that account for birds, marine mammals, and a wider range of fishes that depend on menhaden for their survival.

On Commercial Quota Reallocation: our position is a total permanent closure on the menhaden reduction fishery coastwide. Quota reduction is not enough and reallocation misses the point. Moving quota between sectors leaves no additional fish in the water. The question the Board should really prioritize is how quickly it can end commercial reduction fishing so that menhaden have a chance to recover and support the ecosystems that depend on them up and down the Atlantic Coast.

We request that this comment be distributed to the Atlantic Menhaden Management Board and included in the briefing materials for its November 10 meeting.

Sincerely,

Dr. Carl Safina, President
Dr. Ben Mirin, Director of Programs
The Safina Center
Reference: Ault, J.S. and J. Luo. 2026. Investigation of Atlantic menhaden mortality rates. Fisheries Research 303:107865.

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The Safina Center

Advancing the Case for Life on Earth

Subject: Comment on Specifications for the 2027–2029 Atlantic Menhaden Fishing Years

October 19, 2026

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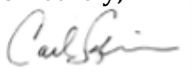
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Ault, J.S. and J. Luo. 2026. Investigation of Atlantic menhaden mortality rates. *Fisheries Research* 303:107865.

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James Boyle

From:	Gerald Winegrad <geraldwinegrad@gmail.com>
Sent:	Monday, October 19, 2026 3:19 PM
To:	Comments
Cc:	James Boyle
Subject:	[External] Atlantic Menhaden 2027-2028 TAC
Attachments:	Dr. Watts 2026 Bay Osprey Report.docx; Watts Menhaden Report News Advisory Atlantic Coast 9-18-26.docx

GERALD W. WINEGRAD
Maryland State Senator (1983-1995)
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October 19, 2026

REDUCE MENHADEN TAC TO NO MORE THAN 114,200 MT FOR 2027-2029

Members of the Atlantic Menhaden Management Board,

My recommendations for the ASMFC and its Atlantic Menhaden Management Board are:
1. ***Reduce the menhaden Total Allowable Catch (TAC) from 186,840 mt to no more than 114,200 metric tons (a 39% cut) for 2027 through 2029.*** This reduction to the coastwide harvest was found scientifically necessary by the Menhaden Technical Committee to achieve a 50/50 probability of staying under the ecological fishing target for menhaden.

2. **As to Draft Addendum II to the Fishery Management Plan for Atlantic Menhaden**, I join with many others including 29 Maryland legislators (see attached letter), the Chesapeake Bay Foundation, Maryland League of Conservation Voters, Maryland Ornithological Society, more than 60 other organizations including fishing groups, and tens of thousands of other conservationists in supporting these changes:

a. Under Section 3.1, Chesapeake Bay Reduction Fishery Cap Amount, adopt Option Cle, which would ***set the Bay CAP at 13.6% of the coastwide total allowable catch*** (a 50% reduction under the current TAC).

b. Under Section 3.2, Chesapeake Bay CAP Distribution, adopt Option B2, which ***would establish three even-length quota periods and distribute harvest 25% in period one, 25% in period two, and 50% in period three***, and Option B, which would ***establish quota-period overage payback and rollover of unused quota within a fishing year.***

c. Under Section 3.3, Chesapeake Bay Reduction Fishery CAP Revisit Provision. Adopt Option B, which would ***require the Board to reassess the efficacy of these management tools every three years.***

In support of these 4 critically needed measures, I submit these justifications:

I. ECOLOGICAL REFERENCE POINT-BASED MANAGEMENT (ERP) REQUIRES A MINIMUM OF A 39% CUT IN TAC. The ASMFC Ecological Reference Point-Based Management (ERP) system was established to guide fishery management for each separate species. In the case of menhaden, striped bass are used as the critical species ecologically affected by menhaden declines. In reality, the TAC should be reduced to 100,000 mt to increase the likelihood of helping striped bass recover.

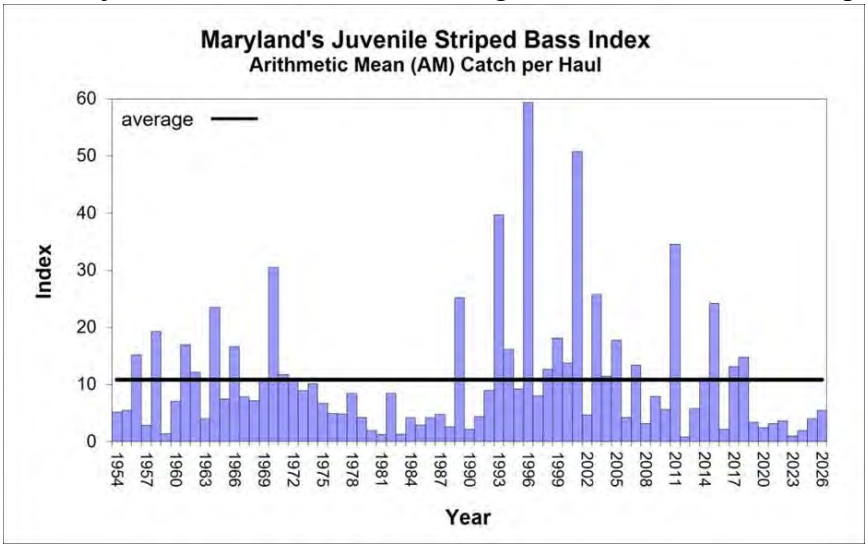
The ASMFC has found that striped bass are experiencing overfishing and poor reproductive success. The lack of menhaden is at the center of this decline. Chesapeake Bay striped bass depended on menhaden for 70% of their diet in the 1970s. Recent monitoring document that menhaden has been reduced to about 8% of the adult striped bass diet.

This is why the ASMFC uses the striped bass as its Ecological Reference Point species for menhaden and why the Menhaden Technical Committee continues to advise the ASMFC and its Atlantic Menhaden Management Board that the harvest of menhaden needs to be significantly reduced to meet its ERP. Last November, a 54% reduction was noted as necessary to have a 50/50 probability of staying under the ecological fishing target for menhaden to protect striped bass and assist in its recovery.

Unfortunately, the Menhaden Management Board decided to only cut the TAC by 20%, knowing this would not affect Omega Protein's reduction harvest and its reduction plant in Reedville, VA because they had not been harvesting 20% of their quota for years. The Board decided to revisit such a cut this November as it only set the TAC of 186,840 mt for one year. This means it must act in setting a TAC this year.

Given the severe striped bass decline, the 39% TAC reduction to 114,200 mt should be further reduced to 100,000 mt—if you aspire to improve the likelihood of a striped bass recovery—and this lower TAC should be set for 3 years.

Just a few hours ago, the Maryland Department of Natural Resources released its 2026 juvenile striped bass survey with another low young-of-year index of 5.5. This is only 52% of the 62-year average of 10.5. This is the eighth consecutive year of very low spawning success for striped bass. This definitive survey is one of the longest-running continuous fish surveys in the United States. It has been conducted in Maryland's Chesapeake Bay since 1954 and is an extremely accurate prediction tool to assess future striped bass populations on the entire east coast. See the just released chart documenting this serious decline in striped bass reproductive success:



SOURCE: Maryland DNR

The Chesapeake Bay produces 70% to 90% of the entire Atlantic coast striped bass population. We know them as rockfish and these fish rely on the Bay's tidal rivers and shallow grass flats as their primary spawning and nursery grounds. Menhaden was their most important food resource. Not any longer. The decline of menhaden is linked to the reduction fishery out of Virginia which has been allowed to take more than a billion pounds of menhaden over the last decade, more than 70% of all such harvest.

II. ***MARYLAND'S DRASTIC DECLINE IN MENHADEN AFFECTS ROCKFISH AND MEHNADEN HARVESTERS.*** There is compelling evidence that the overharvest of menhaden is adversely affecting the critical availability of menhaden in the Chesapeake Bay food chain and the Bay's proper ecological functioning. This affects striped bass.

According to NOAA, roughly 70% to 90% of the entire Atlantic coast striped bass stock spawns in the Chesapeake Bay, and young fish typically live in the Bay's tidal tributaries and shallows for their first 2 to 4 years. They often spend the first 2 years right where they were born before joining coastal migrations and depend on an abundance of prey items for survival. This makes the Chesapeake Bay critical not just for reproduction but also for ensuring a healthy rate of survival of juveniles before they migrate out of the Bay and join the coastal fishery.

And no prey items were as important as menhaden to striped bass. Now they are much scarcer.

Menhaden also support a working fishery in Maryland, mainly by pound netters. Our watermen harvest menhaden, and our crabbers rely on them for bait. Menhaden are not present in sufficient numbers anymore to support rockfish and the small fishery. Since 2017, Maryland has been unable to harvest even half of its small quota.

In 2024, Maryland harvested less than 10% of its TAC menhaden quota of 1.17%. Virginia's quota is 75.21% with 90% handed over to Omega Protein for its reduction fishery. This Maryland fishery has declined sharply as menhaden harvest dropped by more than 80% since 2020 and still is below 10% of the TAC quota. Menhaden fishers in Maryland simply cannot find enough menhaden to make economic sense. This leaves crabbers, our main fishery, struggling to find affordable bait as menhaden harvesters are unable to participate in the fishery.

The Potomac River Fishery Commission (PRFC) 2025 Commercial Finfish Report documents a radical decline of pound net bait harvest in the Potomac, crashing to 169,423 pounds in 2025 down to 2.4% of the 1964-2025 average and 8.2% of the 2024 take of 2 million pounds. In 1983, 20.8 million pounds were harvested. See this data at: https://www.prfc.us/pdfs/2026/2025finfish.pdf.

The number of licensed Potomac pound netters for menhaden has stayed at a hundred for quite some time. The ASMFC should be aware of this data in making any decisions on menhaden restrictions in November,

For several years, Maryland's delegates to the Atlantic States Marine Fisheries Commission, including a DNR fisheries expert and a fisher, have decried the absence of any meaningful numbers of menhaden from Maryland's Chesapeake Bay. They believe the reason is Virginia's reduction fishery.

While the ASMFC bends over backwards to accommodate Canadian owned Omega Protein and the workers taking menhaden and operating the reduction plant in Virginia, rockfish and our fishers are being damaged.

III. ASMFC DECLARES STRIPED BASS OVERFISHED, IMPOSES TAKE RESTRICTIONS. Maryland has been forced to cut rockfish harvest by the ASMFC as have all coastal states. The situation is dire with failing reproduction for striped bass in Chesapeake Bay. First, the ASMFC ordered an 18% reduction coastwide for

striped bass under Addendum VI, which required all member states, including Maryland, to slash their total harvests relative to 2017 baseline levels.

Since that initial 18% cut, the ASMFC has implemented further emergency actions and updates (such as Addendum II), which capped recreational limits in the Chesapeake Bay to one fish per day between 19 and 24 inches, and reduced the commercial quota by an additional 7%. While a further 12% cut was proposed for 2026, the ASMFC ultimately voted it down to maintain the status quo.

These restrictions have financially impacted Maryland commercial and recreational fisheries. Following the 2024 elimination of the two-fish daily limit for charter customers (reducing it to one fish), Maryland charter boats saw their harvested striped bass numbers drop from approximately 100,997 fish in 2023 down to 34,985 in 2024. Captains and industry representatives testified to a 75%–85% drop in bookings and revenue, which cascaded into bait-and-tackle shops, marinas, and guide service

From August 1–August 31, Maryland had a complete recreational fishing closure--no targeting permitted to prevent high thermal stress and mortality. Maryland also tightened reporting by using preliminary weekly tracking to monitor commercial landings more closely.

You on the Menhaden Management Board should adhere to the warnings and vote to honor the science and reduce menhaden harvest by at least 39% to have a 50/50 chance of meeting the striped bass bases ERP.

You need to act forcefully on this reduction and the other changes under Addendum II to the Fishery Management Plan for Atlantic Menhaden as mentioned unless you can control any other potential causes for striped bass declines such as climate change, habitat degradation, predation on juveniles by invasive species like blue catfish, and pollutants form toxins and excessive flows of nutrients and sediment.

IV. ASMFC MENHADEN MANAGEMENT BOARD DENIED TECH COMMITTEE 54% REDUCTION IN THE TAC. The Menhaden Technical Committee reported last fall that the menhaden coastal stock assessment found that the average menhaden biomass was 37% lower along the Atlantic Coast than previously thought. The ASMFC menhaden stock assessments resulted in forecasts indicating the need for a 54% cut to the menhaden harvest to have a better than 50% chance of meeting the target population for menhaden.

Only a 20% cut was adopted for 2026 by the ASMFC Menhaden Management Board citing economic concerns for the industrial fishery. According to conservationists, this mathematical revision revealed that previous catch limits were set too high under the corrected ecological targets needed to meet the requirements of predators like striped bass, osprey, and marine mammals.

While all the non-reduction fishers, recreational, including charter, and commercial suffer financially the tale wags the dog in fishery management of menhaden as Virginia is allowed to take 75.21% of all menhaden with 90% of that for the reduction fishery.

The ASMFC allows the tale to wag the dog, influenced not by science but by the powerful Richmond lobbying firm of McGuireWoods Consulting retained by Omega Protein and by the PR firm of Stove Boat Communications also retained by Omega Protein. And the $1.1 million in political donations given by Omega Protein also greases the way for support of Virginia governors and legislators. Science is twisted, distorted, and ignored.

Public disclosure records from the Virginia Public Access Project (VPAP) show that McGuireWoods Consulting has a team of 7 lobbyists actively working to block menhaden restrictions who are retained by Omega Protein and its fishing partner, Ocean Harvesters. Omega Protein even employs a long time ASMFC Commissioner from NJ to fight menhaden restrictions.

Will the Menhaden Management Board again turn a blind eye to setting the TAC to the Technical Committee's findings of the need for a 39% reduction in the TAC just to have a 50% chance of meeting the ERP for rockfish?

V. MARYLAND EXPEREINCING A COMMERCIAL FISHERY DISASTER. In March 2023, Maryland Governor Moore petitioned the U.S. Commerce Department/NOAA to declare a commercial fishery disaster, documenting the disastrous decline of seven of Maryland's key fisheries from 27% to 91% from 2012 to 2022. This chart was submitted with Gov. Moore's request for federal money. The request was denied. Note the rockfish drop of 40% in harvest and 22% in dockside value:

Species	2022 Harvest (pounds)	Average Dockside Value (2012- 2022)	% Change Harvest Since 2012	% Change Dockside Value Since 2012
Hard Crab (blue)	22,060,449	46,051,018	-45%	-12%
Soft Crab	700,544	9,052,308	-59%	-27%
White Perch	174,751	1,089,539	-91%	-83%
Yellow Perch	31,555	75,146	-27%	-29%
Striped Bass	1,174,800	5,371,422	-40%	-22%

SOURCE: Maryland DNR,

VI. WHITE PERCH DOWN 91%. White perch, which also prey on menhaden, have seen their harvest decline by 91%. Living just off the Chesapeake, I know personally how radically this once abundant species has declined.

VII. OTHER MENHADEN DEPENDENT FISH DECLINE. Fish species noted by the ASMFC as relying on menhaden as a forage fish of ASMFC conservation concern include bluefish (rebuilding), weakfish (depleted), and spiny dogfish (reproduction declining).

VIII. THOUSANDS OF OSPREY CHCICKS STARVE TO DEATH. The cruelest, most disturbing aspect of billions of pounds of menhaden being removed for the reduction fishery is an estimated 5,000 osprey chicks starving to death in Chesapeake Bay in 2026 linked to the decline in menhaden. In the 1980s, Atlantic menhaden provided 75% of Chesapeake osprey diets by weight and frequency of delivery from the mainstem saltier regions and lower sections of the Chesapeake Bay. In 2026, these important fish were reduced to less than 30% of ospreys' diets where 70% of Bay Ospreys mate and breed.

For the information on ospreys in this document, please see Dr. Bryan Watts, Director of the Center for Conservation Biology at William & Mary. His two newly published reports are attached. The first was released on September 16, 2026, "Osprey Chesapeake Bay Breeding Report". The second was released on September 18, 2026, "2026 Osprey Breeding Performance Along The Atlantic Coast".

So, we have the most up to date science on ospreys before us.

IX. 50% DECLINE IN BAY OSPREY POPULATION PROJECTED. Dr. Watts noted in the first publication from the examination of 937 nesting pairs throughout Maryland and Virginia Bay waters that "2026 Osprey breeding performance was the worst ever recorded for the Chesapeake Bay…Current reproductive rates are less than 50% of those recorded during the height of the DDT pesticide crisis … we would expect the breeding population to decline at an average rate of 14% per year. This annual loss rate is dramatic and without a change in course would be expected to result in a 50% decline in the population over the next decade."

X. OSPREY REPRODUCTION SUCCESS BELOW WORST DAYS OF DDT. Osprey fledging success for 70% of Bay ospreys has dropped to a frighteningly low 0.25 fledglings per nesting pair in 2026 which is well below the ideal replacement level of 1.15 or minimum to prevent a population decline of 0.8. His data shows that in 2024 it was 0.5 and dropped to 0.35 in 2025.

XI. SCIENTISTS LINK LACK OF MENHADEN TO OPSREY CHICK CRASH. Dr. Watts rebuts contentions of Omega Protein, their menhaden harvest and reduction industry PR firm, and their lobbyists that there is any connection between the decline in ospreys, their chicks, and reproduction linked to a lack of menhaden.

"In 2026, as in the past several years, the factor driving widespread nesting failure was food stress.

A constellation of quantified metrics of food stress including high rates of females not laying clutches, low provisioning rates, emaciated chicks with stunted development, asymmetric broods, sequential brood reduction, shifts in mean brood size, pairs abandoning viable clutches or broods, pairs abandoning breeding areas en masse and high failure rates support this conclusion. Beyond these quantified metrics, we are observing young starve in nests.

The extreme food stress documented in recent years appears to be caused by changes in the availability of Atlantic menhaden to nesting ospreys in the Chesapeake Bay. For decades, menhaden have been considered to be a keystone prey species for the osprey population due to their high abundance, high energy density, and schooling behavior.

In some parts of the Chesapeake, ***the rate of delivery of menhaden to nests has declined by more than 80% since the 1980s. The shift in diet away from menhaden has resulted in a 50% decline in the energy content of osprey diets. The combination of a reduced rate of menhaden delivery to nests and lower energy content of the diet has resulted in an increased rate of nest failure and reduced mean brood size."***

I would also note that Dr. Watts found that 30% of adult female Ospreys failed to breed. The historic average of such failures was 2%. I have witnessed this failure to nest close to my home in Annapolis. This was the first year since I moved here in 1998 that Ospreys did not attempt to breed on their nest on Oyster Creek where I live. The nest is on the Creek and also faces Chesapeake Bay.

Contentions by the profiteer propagandists plundering the keystone menhaden are fully rebutted that it is other than the lack of menhaden that is causing the crash in osprey reproduction and populations. It is not as they argue that it could be other than menhaden shortages as alleged in a recent PR firm's release trying to minimize any connection to the scarcity of menhaden.

I hope the ASMFC Menhaden Management Board members carefully read Dr. Watts findings on this issue.

XII. OSPREY CHICK PROBLEMS PERSIST IN COASTAL AREAS OF MANY STATES IN SALTY WATERS WHERE MENHADEN ARE MAJOR FOOD. Recent contentions by the profiteer propagandists plundering menhaden also allege that other osprey numbers away from the Chesapeake Bay have stopped growing or are in decline away from Chesapeake Bay.

Dr. Watts September 18 Report analyzed this. His study was entitled: "Are ospreys experiencing reproductive deficits in waters beyond the Chesapeake Bay?" It covered the 2026 breeding season for 2,886 pairs from 65 study areas across 10 states along the Atlantic coast. Pairs nesting within freshwater systems produced an average of 1.15 young/pair compared to only 0.59 young/pair in salty or marine systems where their primary diet consists of menhaden. The latter rate signifies population decline as found in Chesapeake Bay.

More importantly for population stability, all but one (93%) of the freshwater study sites produced more young than needed for population maintenance (minimum 0.8 young/pair), compared to only 28% (14 of 50) of saltier sites. Besides the Chesapeake Bay, regions along the coast that are experiencing reproductive deficits include the Atlantic coasts of Delaware and New Jersey, outer Long Island, the Connecticut coast, and coastal systems

between Narraganset Bay Rhode Island through Buzzards Bay Massachusetts. The Atlantic Coast of the Delmarva Peninsula in Virginia is not shown because the osprey population has collapsed by more than 90% over the past 20 years.

"Within the Chesapeake Bay food stress is driving low reproductive rates. Broods are starving in the nest. The extreme food stress documented in recent years appears to be caused by changes in the availability of Atlantic menhaden to nesting ospreys in the Chesapeake Bay…Ospreys within the Chesapeake Bay have been experiencing low reproductive rates for several years. Documentation of extreme reproductive deficits elsewhere along the Atlantic Coast is more recent. Although the underlying cause of low reproductive rates for other study areas along the Atlantic Coast is less clear, observations in numerous study areas implicate food stress and starvation as an important driving factor." See Dr. Watts' attached report.

So, the lack of menhaden in these saltier areas likely could also be driving the nest failures and osprey chick starvation elsewhere, just as in the Chesapeake.

XIII. CHESAPEAKE OSPREY CRASH IS BAYWIDE. Dr. Watts' previous Osprey publications on the historic decline of Osprey breeding performance focused on Mobjack Bay (a sub-estuary of the lower Chesapeake) and the role of menhaden in driving the decline. One of the criticisms of this early work was that "Mobjack Bay only reflects conditions within a small area of the larger Bay" and is not representative of the entire Bay.

He notes in the 2026 Report how his more recent studies covered the entire Chesapeake Bay and included a survey of 937 nesting pairs throughout Maryland and Virginia Bay waters. Dr. Watts' newly published data shows frightening results as well proving that the findings in Mobjack Bay are not an anomaly as ospreys throughout the main stem of the Bay are suffering unsustainable production, most likely due to food stress from the lack of menhaden.

XIV. PATUXENT RIVER OSPREY REPRODUCTION CRASHING. Greg Kearns, Principal Park Naturalist at Maryland's Patuxent River Park, has researched, studied, and banded ospreys on the Patuxent River for more than 40 years. He joined with Dr. Watts in his Bay-wide study.

Greg is appalled at the collapse of osprey reproductive success. He has seen an 83% drop from 2019 to 2026 in successfully nesting osprey pairs in his studies of the Lower Patuxent—108 to 9. The number of fledglings dropped from 201 to 12 in 2026. Of an initial 44 pairs occupied nests, only 26 produced eggs and only 9 finished 2026 with 12 chicks surviving to fledge.

There were only 0.46 chicks fledged per nest, well below the key 1.15 per nest to sustain a healthy population. Greg spoke at the Annapolis ASMFC public hearing on Addendum II, and his work has convinced him that it is the harvest by Omega Protein that is causing the decline in Osprey reproductive success.

XV. OSPREYS ARE CANARIES IN THE MINE AND INDICATIVE OF DRASTIC NEED TO CURB REDUCTION FISHERY. As Dr. Watts concluded: We should view ospreys as sentinels for the marine ecosystem rather than a species imperiled. Most osprey breeding populations throughout the world have recovered from lows driven by the DDT pesticide crisis. Ospreys appear to be secure throughout much of their range but are struggling within some coastal sites. Many of these sites have been considered to be important global strongholds for many decades. **Ospreys are apex predators and are considered to be effective indicators of aquatic ecosystem health. Recent declines in reproductive rates raise a red flag on the health of marine ecosystems along portions of the Atlantic Coast.**

XVI. LACK OF CHESAPEAKE MENHADEN STOCK ASSESSMENT. While the ASMFC insists that the Atlantic population is not overfished, no evaluation or stock assessment has been conducted of the population in

the Chesapeake Bay. The ASMFC "initiated the Menhaden Draft Addendum in response to concerns regarding declining pound net harvest and catch per unit effort in the Bay in recent years, coinciding with an increase in the concentration of reduction harvest In the summer months, and the possible downstream effects on menhaden predators."

Funds were finally allocated by Virginia and Congressionally to conduct a $4.5 million Bay stock assessment and evaluation of menhaden and harvest pressures. For 21 years, Omega Protein blocked all attempts for a detailed science-based stock assessment of the Chesapeake Bay menhaden population and a survey of the effects of the reduction fishery on menhaden in the Bay and overall. They continue to this day arguing to use the lack of such data as a reason for not restricting their overly generous and ecologically damaging harvest quotas. Most recently, Omega protein stated they want the ASMFC to forego any further reductions in their allotted harvest quotas until a planned study is completed in two years.

This is disingenuous hypocrisy! If anything, the ASMFC Menhaden management Board should at least adhere to the Technical Committee's findings to meet ERP if not cut harvests by more than 39% until the two-year study is completed. This is to err on the side of conservation until the study is completed. It makes no sense to manage the menhaden fishery in Chesapeake Bay blindly without a stock assessment and to allow 51,000 mt to be taken for reduction while a $4.5 million study is underway.

XVII. IT IS SIMPLY WRONG TO ALLOW ONE FOR PROFIT CORPORATION TO BE ALLOWED TO TAKE 296 MILLION POUNDS OF MENHADEN, MORE THAN 67% OF ALL HARVEST. In closing, as an attorney looking at this issue from both sides, I am struck as to how and why one for profit industry is allowed to take 296 million pounds of a keystone fishery, the Atlantic menhaden, termed the most important fish in the sea. Where is this a right? Here are the current allocations in the menhaden TAC:

Addendum I Quota Allocat

State	Addend Allocatio
Maine	4.80
New Hampshire	1.19
Massachusetts	2.12
Rhode Island	0.81
Connecticut	0.33
New York	0.84
New Jersey	11.00
Pennsylvania	0.01
Delaware	0.27
Maryland	1.17
Potomac River Fisheries Commission	1.09
Virginia	75.21
North Carolina	0.37

Yes, I know the long history of this fishery and the number of folks employed in the reduction fishery, but times have changed radically and years of taking billions of these oily fish have negatively affected viability.

Yes, one has to be sympathetic to the workers employed at Ocean Harvesters and the Reedville, VA reduction plant. But their jobs are likely to be impacting many other jobs as rockfish and many other commercial species decline that are dependent on menhaden.

Many once super-abundant species were harvested beyond recovery: sturgeon in Chesapeake Bay (both species now endangered), shad in Chesapeake Bay (closed for 40 years-once the largest by weight fishery in the Bay), the soft-shell clam whose harvest has shrunk by more than 95% in the Chesapeake, the Georges Bank Atlantic Cod Fishery (once the iconic lifeblood industry of New England, suffered an abrupt, catastrophic collapse in the early 1990s due to the rise of massive, foreign and domestic industrial factory trawlers), New England's commercial Atlantic cod fishery remains essentially shuttered, New England's Northern Shrimp Fishery prized as a regional delicacy from the Gulf of Maine, placed under an emergency fishing moratorium by the ASMFC in 2014, with the moratorium extended repeatedly, effectively ending a centuries-old commercial harvest.

There are many more such cases. A non-fish case is the industrial whaling industry. This industry in the United States lasted for roughly 300 years, from its origins in the 17th century until the last American whaling ship departed in 1927. At its peak in 1853, the industry employed approximately 70,000 people, making it the fifth-largest sector of the U.S. economy. The industry experienced a rapid collapse after 1860. The U.S. government officially outlawed commercial whaling in 1971.

Under the U.S. Endangered Species Act, 12 whale species or distinct population segments are currently listed as endangered due to the legacy of commercial whaling including the blue whale, fin whale, sperm whale, and bowhead whale. All those whaling jobs are gone but so are most of the whales.

All of these cases in mismanagement in the name of profit and jobs should serve as an example to avoid in the ASMFC's management of menhaden.

Respectfully Submitted,

Gerald W. Winegrad

ABOUT THE AUTHOR: I live on the Chesapeake Bay and have fished and crabbed and swum in its waters for 75 years and still tend my crab pots. My wife and I had a few steamed crabs two nights ago for dinner. I have 57 years of experience in natural resource management, beginning out of law school in 1969 with the National Wildlife Federation in Washington, DC.

I served in the Maryland legislature from 1978 to 1995, the last 12 years in the Senate where I chaired the Environment and Chesapeake Bay Subcommittee. In that role, I managed all environmental legislation on the senate floor, including measures dealing with fishery and wildlife management. I also taught graduate college courses in Wildlife Management, including fishery management, and in Chesapeake Bay restoration. I prepared the curriculum for both of these courses which included case studies in fishery management, including on menhaden.

I sponsored and promoted the rockfish (*Morone saxatilis*) mortarium bill that triggered Maryland's closure in 1985 that led to the Congressional law giving the ASMFC the authority to enforce rockfish quotas and other FMPs. I testified before Congress on this federal legislation. Together with Maryland's ban, this forced Virginia and other state to close down harvest. We saved the rockfish and this allowed us to reopen the fishery in 1990 under tight regulation from the ASMFC with annual quotas established each year. Now the rockfish is in trouble again.

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NEWS ADVISORY

FROM: Center for Conservation Biology, William & Mary

FOR IMMEDIATE RELEASE: 14 September, 2026

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2026 osprey breeding performance was the worst ever recorded for the Chesapeake Bay

BRIEF

(Williamsburg, VA)--- The Center for Conservation Biology at William & Mary has compiled the 2026 breeding performance results for osprey in the Chesapeake Bay. The monitoring effort included 937 osprey pairs distributed among twenty-three study areas. Study areas were distributed across the salinity gradient, from tidal-fresh waters near the fall line to ocean-strength waters around the mouth of the Bay. The primary objectives for the 2026 nesting season were to assess reproductive rates and evaluate the stability of the Bay-wide osprey population based on patterns observed. Breeding pairs were monitored throughout the nesting season (March-August) to determine nesting success and productivity.

The 2026 breeding season was the worst productivity year ever recorded for osprey in the Chesapeake Bay. Average productivity in waters above 5 parts per thousand (ppt) salinity (N = 769) was 0.25 young/pair. On a global scale, the annual breeding performance required to maintain a stable population ranges from 0.8 to 1.3 young/pair. Only pairs nesting within tidal fresh waters (N = 168 nests producing 1.04 young/pair) exceeded the breeding performance threshold required for population maintenance. Eighty-one percent of all pairs nesting in waters above 5 ppt failed to fledge any young. Of pairs that did produce young, 70% were single-chick broods. The 2026 results extend the ongoing trend of productivity decline throughout saltier regions of the Bay. Productivity in the Chesapeake has dropped in recent years from 0.51 in 2024 to 0.35 in 2025 to 0.25 in 2026. Estimates of reproductive deficits should be considered conservative. We have only monitored the survival of young to fledging and there is increasing evidence that post-fledging survival may be low.

Implications for the Population

The Chesapeake Bay supports the largest osprey breeding population in the world and has been considered for many decades to be a global stronghold for the species. Given the poor reproductive rates recorded in recent years, this population is not sustainable. Current reproductive rates are

less than 50% of those recorded during the height of the DDT pesticide crisis. Based on the current demographics, we would expect the breeding population to decline at an average rate of 14%/year. This annual loss rate is dramatic and without a change in course would be expected to result in a 50% decline in the population over the next decade. However, rates of decline are expected to vary geographically within the Chesapeake. Noticeable declines in the number of occupied territories are ongoing within several study areas.

The Chesapeake Bay osprey population will not be rescued by pairs nesting within the tidal-fresh reaches of the Bay that continue to produce above maintenance levels. If we consider the minimum production threshold for stability (i.e., 0.8 young/pair), the 2026 results suggest that in order for the Bay-wide population to be stable we would need ~2.75 pairs in the area of surplus (tidal-fresh waters) for every pair in the area of deficit (>5 ppt waters). During the last systematic survey of the Chesapeake Bay osprey population (1995-1996) there were 7.5 pairs within the area of deficit for every one pair in the area of surplus.

Causes of Nesting Failures

Many factors may cause nest failures in Chesapeake osprey including storms, predation, human disturbance and heat stress. The contribution of individual factors to nest losses varies from year to year. Many of these factors have recognizable signatures in the field that do not match current observations. In 2026, as in the past several years, the factor driving widespread nesting failure was food stress. A constellation of quantified metrics of food stress including high rates of females not laying clutches, low provisioning rates, emaciated chicks with stunted development, asymmetric broods, sequential brood reduction, shifts in mean brood size, pairs abandoning viable clutches or broods, pairs abandoning breeding areas en masse and high failure rates support this conclusion. Beyond these quantified metrics, we are observing young starve in nests.

The extreme food stress documented in recent years appears to be caused by changes in the availability of Atlantic menhaden to nesting ospreys in the Chesapeake Bay. For decades, menhaden have been considered to be a keystone prey species for the osprey population due to their high abundance, high energy density and schooling behavior. In some parts of the Chesapeake, the rate of delivery of menhaden to nests has declined by more than 80% since the 1980s. The shift in diet away from menhaden has resulted in a 50% decline in the energy content of osprey diets. The combination of a reduced rate of menhaden delivery to nests and lower energy content of the diet has resulted in an increased rate of nest failure and reduced mean brood size. The underlying causes of reduced availability of menhaden to osprey are not clear. Climate change, commercial harvest, changes in distribution or delayed entry into Bay waters may be contributing factors. Ospreys require high fish abundance during April, May and June to successfully raise broods. Ospreys are unable to successfully adjust their breeding chronology when large numbers of menhaden do not arrive until late June or July.

ADDITIONAL DETAILS

2025-2026 Objectives

In recent years we have published papers on the historic decline of osprey breeding performance in Mobjack Bay (a subestuary of the lower Chesapeake) and the role of menhaden in driving the decline. One of the criticisms of this early work is that "Mobjack Bay only reflects conditions within a small area of the larger Bay" and is not representative of the entire Bay. In 2024, we collected reproductive data in ten study areas throughout the main stem (>10 ppt) of the Bay where ospreys are believed to be menhaden-dependent and two study areas within low salinity (<5ppt) reference sites where osprey depend on catfish and gizzard shad. Results from 2024 were published in Frontiers in Marine Science during the spring of 2026 (https://www.frontiersin.org/journals/marine-science/articles/10.3389/fmars.2026.1685158/full). This work showed that findings in Mobjack Bay are not an anomaly as ospreys throughout the main stem of the Bay are suffering unsustainable production most likely due to food stress. The 2024 season also showed that pairs within low-salinity areas were producing above maintenance levels.

The objective of fieldwork in 2025-2026 was to evaluate whether or not the low reproductive rate in the main stem (>10 ppt) of the Bay represents a risk to the broader Bay-wide osprey breeding population. To evaluate the metapopulation dynamics we needed to understand the relative magnitudes of reproductive deficits and surpluses across subpopulations.

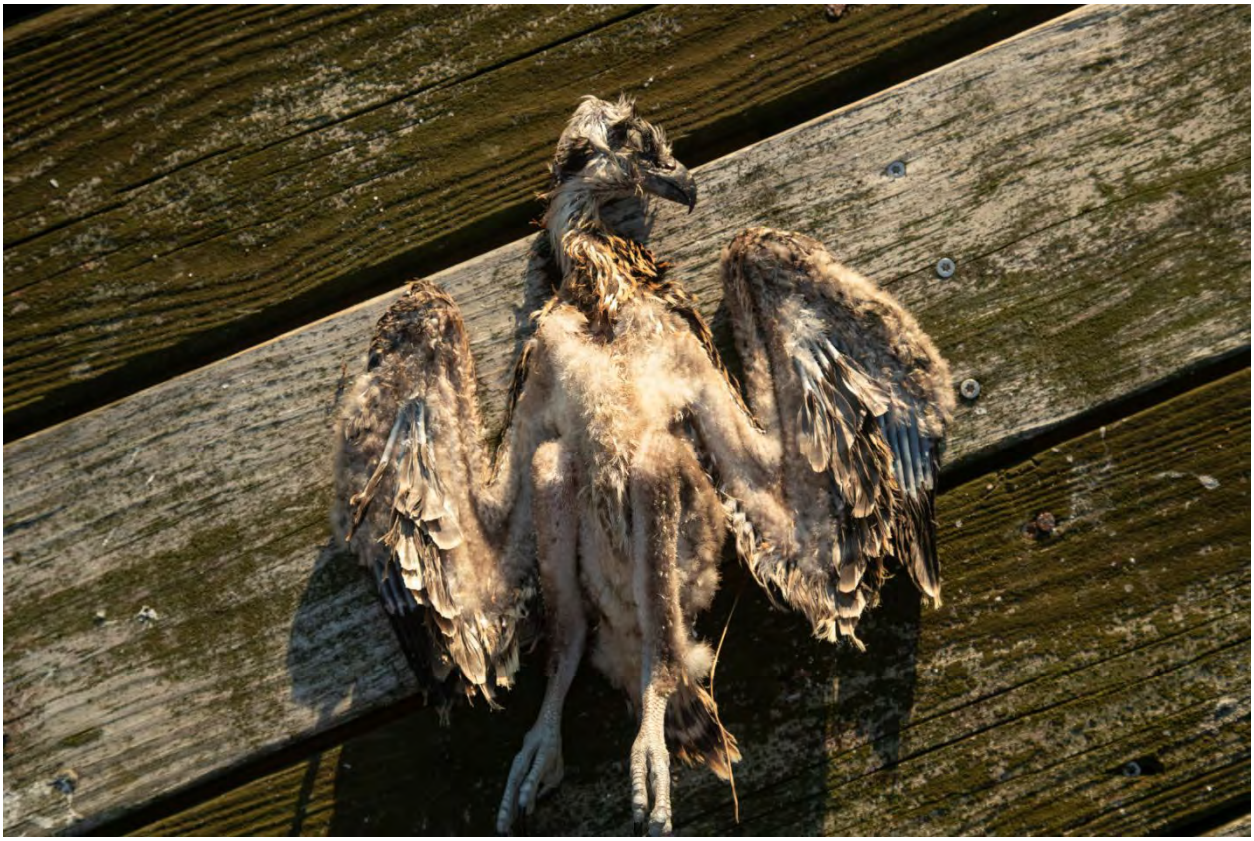
Study Areas

The study area included the tidal reach of the Chesapeake Bay from the fall line (landward extent of tidal influence) to the Atlantic Ocean. The study area was subdivided into salinity zones to ensure adequate coverage of conditions. Salinity zones included low salinity (0–4.9 ppt), low mesohaline (5.0-11.9 ppt), high mesohaline (12.0–17.9 ppt) and polyhaline (18.0–30.0 ppt). Specific study areas by salinity zone include **low salinity** – Upper Chester River, Upper Patuxent River, Upper Potomac River and Upper James River, **low mesohaline** – Lower Chester River, Severn River, Upper Rappahannock River, Lower Patuxent River, Colonial Beach, Middle Rappahannock River, Middle York River, and Middle James River, **high mesohaline** – Choptank River Vicinity, Lower Rappahannock River, Piankatank River, Lower York River, Lower James River and Elizabeth River, **polyhaline** – Bayside Eastern Shore, Mobjack Bay, Lower York River, Poquoson River and Lynnhaven River.

Data Contributors

Center for Conservation Biology, William & Mary
Eastern Ecological Science Center, U.S. Geological Survey
Virginia Department of Wildlife Resources
Virginia Aquarium & Marine Science Center
Maryland-National Capital Park

Eco-Ed Endeavors
Virginia Osprey Foundation
Operation Osprey
Center for Environment and Society, Washington College



An emaciated osprey chick that starved on Mobjack Bay. Several recorded metrics as well as starved chicks indicate that the low productivity recorded in 2026 was driven by food stress. Photo by Bryan Watts.

News Advisory

FROM: Center for Conservation Biology, William & Mary

FOR IMMEDIATE RELEASE: 18 September, 2026

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2026 osprey breeding performance along the Atlantic Coast

Some populations are reproducing below limits for sustainability

(Williamsburg, VA)--- The Center for Conservation Biology at William & Mary has compiled the 2026 breeding performance results for osprey populations along the Atlantic Coast of North America. Within the Chesapeake Bay, breeding performance in ospreys has been poor for several years due to extreme food stress during the nesting season. Productivity has declined to critical levels that now threaten the stability of the largest osprey breeding population in the world. The primary objective for compiling osprey monitoring results for the broader Atlantic coast is to visualize breeding performance at scale and address the question "Are ospreys experiencing reproductive deficits in waters beyond the Chesapeake Bay?" The 2026 effort includes monitoring results for 2,886 pairs from 65 study areas across 10 states (Table 1, Figure 1).

Maintenance Reproductive Rates for Osprey

On a global scale, the annual breeding performance required to maintain a stable osprey population ranges from 0.8 to 1.3 young/pair depending on the specific location. We adopt the most optimistic (0.8 young/pair) reproductive rate as the "break even" threshold. The monitoring effort compiled here includes data from a wide variety of sources including academic institutions, government agencies, NGOs and private citizens (Table 1). Our focus is on breeding outcomes of the 2026 season rather than on clutch sizes, hatching rates, etc. Although nest visitation schedules varied somewhat between monitoring programs, we included only data sets that provided clear season outcomes. Estimates of reproductive rates should be considered optimistic. We have only monitored the survival of young to fledging and there is increasing evidence that post-fledging survival may be low. In addition, some programs only monitored pairs that made breeding attempts which in some populations may underestimate the population size and by doing so overestimate reproductive rates (Table 1).

Breeding Performance

The coast-wide sample of 2,886 pairs collectively produced 1,936 young resulting in an average reproductive rate of 0.67 young/pair. Success rate (portion of pairs that fledged at least 1 young) was 44.5%. Breeding performance was influenced by salinity. Fifteen study areas (405 pairs) were located within freshwater or tidal fresh systems and 50 study areas (2,481 pairs) were located within tidal waters (coastal marine) with salinities above 5 parts per thousand (ppt). Pairs nesting within freshwater systems produced an average of 1.15 young/pair compared to only 0.59 young/pair in salty or marine systems. More importantly for population stability, all but one (93%) of the freshwater study sites produced more young than needed for population maintenance (minimum 0.8 young/pair, see below) compared to only 28% (14 of 50) of saltier sites. Regions along the coast that are experiencing reproductive deficits include the Chesapeake Bay, the Atlantic coasts of Delaware and New Jersey, outer Long Island, the Connecticut coast north of the Quinnipiac River and coastal systems between Narraganset Bay Rhode Island through Buzzards Bay Massachusetts (Figure 2). The Atlantic Coast of the Delmarva Peninsula in Virginia is not shown because the population has collapsed by more than 90% over the past 20 years.

Several regions along the coast stand out for producing either very high or very low productivity. Regions reporting large deficits (<50% of requirement for population maintenance) in productivity include the Chesapeake Bay, the outer coast of Delaware and the area from the mouth of Long Island Sound to Westport River in Massachusetts (Figure 3). If these deficits continue, populations are expected to decline at an average rate of ~10%/year. Regions on the outer coast that reported good productivity include the Hilton Head Island in South Carolina, the southern coast of Connecticut and the offshore islands of Nantucket and Martha's Vineyard in Massachusetts.

Chesapeake Bay continues to be ground zero

Sixteen study areas experienced extreme deficits (below 25% of maintenance levels) in reproduction during the 2026 breeding season (Figure 4). Fifteen of these sites were located in the saltier portions of the Chesapeake Bay. Based on the current demographics, we would expect the breeding populations within these study areas to decline at an average rate of 14%/year. This annual loss rate is dramatic and without a change in course would be expected to result in a 50% decline in these population over the next decade. Ospreys within the Chesapeake Bay have been experiencing low reproductive rates for several years. Documentation of extreme reproductive deficits elsewhere along the Atlantic Coast is more recent.

Causes of Nesting Failures

Many factors may cause nest failures in ospreys including storms, predation, human disturbance and heat stress. The contribution of individual factors to nest losses varies from year to year. Many of these factors have recognizable signatures in the field. Within the Chesapeake Bay

food stress is driving low reproductive rates. Broods are starving in the nest. The extreme food stress documented in recent years appears to be caused by changes in the availability of Atlantic menhaden to nesting ospreys in the Chesapeake Bay. For decades, menhaden have been considered to be a keystone prey species for the osprey population due to their high abundance, high energy density and schooling behavior. In some parts of the Chesapeake, the rate of delivery of menhaden to nests has declined by more than 80% since the 1980s. The shift in diet away from menhaden has resulted in a 50% decline in the energy content of osprey diets. The combination of a reduced rate of menhaden delivery to nests and lower energy content of the diet has resulted in an increased rate of nest failure and reduced mean brood size. The underlying causes of reduced availability of menhaden to osprey are not clear. Although the underlying cause of low reproductive rates for other study areas along the Atlantic Coast is less clear, observations in numerous study areas implicate food stress and starvation as an important driving factor.

Imperiled Species vs Ecosystem Indicator

We should view ospreys as sentinels for the marine ecosystem rather than a species imperiled. Most osprey breeding populations throughout the world have recovered from lows driven by the DDT pesticide crisis. The North American' population has surpassed historic benchmarks largely because pairs have colonized reservoirs created within inland areas. Ospreys appear to be secure throughout much of their range but are struggling within some coastal sites. Many of these sites have been considered to be important global strongholds for many decades. Ospreys are apex predators and are considered to be effective indicators of aquatic ecosystem health. Recent declines in reproductive rates raises a red flag on the health of marine ecosystems along portions of the Atlantic Coast.

Figures

Figure 1. Distribution of study areas with available osprey monitoring data for the 2026 nesting season. Monitoring was conducted by a wide range of contributors. Data presented includes 2,886 nesting pairs within 65 study areas across 10 states. Colors denote whether or not pairs exceeded the reproductive rate (0.8 young/pair) required for population maintenance.

Figure 2. Distribution of study areas within waters above 5 ppt salinity. Colors denote whether or not pairs exceeded the reproductive rate (0.8 young/pair) required for population maintenance.

Figure 3. Distribution of study areas with large (<50% of maintenance levels) deficits in reproductive rate.

Figure 4. Distribution of study areas with large (<50% of maintenance levels) deficits in reproductive rate.

Table 1. Results of osprey monitoring results along the Atlantic Coast for the 2026 breeding season. Reproductive rate values are means ± standard errors.

State	Study Area	Salinity	Pairs	Reproductive Rate	Contact Person	Organization
NH	Lakes Region	Fresh	20	1.65±0.26	Iain MacLeod	Squam Lakes Natural Science Center
MA	Westport	>5ppt	101	0.42±0.06	Alan Poole Gina Purtell	South Coast (MA) Osprey Project
MA	Buzzards Bay	>5ppt	33	0.88±0.12	-----	OspreyWatch (Mass south coast)
MA	Nantucket	>5ppt	41	1.41±0.13	Libby Buck	Linda Loring Nature Foundation
MA	Martha's Vineyard[1]	>5ppt	125	1.50±0.08	Rob Bierregaard	None
RI	Narragansett Bay	>5ppt	150	0.78±0.06	Sydney Brown	Audubon Society of Rhode Island
RI	Inland Rhode Island	Fresh	22	1.09±0.16	Sydney Brown	Audubon Society of Rhode Island
RI	Southern Coast	>5ppt	31	1.13±0.16	Sydney Brown	Audubon Society of Rhode Island
CT	Hammonasset Beach	>5ppt	56	0.23±0.07	Matt Joyce	The Connecticut Audubon Society
CT	Lower Connecticut River	>5ppt	51	0.29±0.08	Matt Joyce	The Connecticut Audubon Society
CT	New London	>5ppt	60	0.52±0.10	Matt Joyce	The Connecticut Audubon Society
CT	Pine Orchard	>5ppt	74	0.61±0.07	Matt Joyce	The Connecticut Audubon Society
CT	Upper Connecticut River	T Fresh	28	0.71±0.16	Matt Joyce	The Connecticut Audubon Society
CT	Inland North	Fresh	29	0.86±0.15	Matt Joyce	The Connecticut Audubon Society
CT	Southport	>5ppt	31	1.16±0.17	Matt Joyce	The Connecticut Audubon Society
CT	Southwest Coast	>5ppt	42	1.17±0.13	Matt Joyce	The Connecticut Audubon Society
CT	Inland South	Fresh	52	1.27±0.12	Matt Joyce	The Connecticut Audubon Society
CT	Silver Sands	>5ppt	25	1.36±0.17	Matt Joyce	The Connecticut Audubon Society
NY	Gardiners Island[1]	>5ppt	77	0.29±0.06	Mike Scheibel	None
NJ	Ocean County[1]	>5ppt	151	0.51±0.06	Ben Wurst	Conservation Wildlife Foundation, NJ
NJ	Cape May[1]	>5ppt	99	0.61±0.07	Ben Wurst	Conservation Wildlife Foundation, NJ
NJ	Atlantic County[1]	>5ppt	82	0.61±0.10	Ben Wurst	Conservation Wildlife Foundation, NJ
NJ	Sandy Hook[1]	>5ppt	70	0.90±0.11	Ben Wurst	Conservation Wildlife Foundation, NJ
NJ	Monmouth[1]	>5ppt	63	1.06±0.11	Ben Wurst	Conservation Wildlife Foundation, NJ
NJ	Meadowlands[1]	T Fresh	21	1.29±0.14	Ben Wurst	Conservation Wildlife Foundation, NJ
NJ	Maurice River[1]	>5ppt	58	1.41±0.13	Ben Wurst	Conservation Wildlife Foundation, NJ
NJ	Red Bank – DE River[1]	T. Fresh	9	1.89±0.39	Ben Wurst	Conservation Wildlife Foundation, NJ
NJ	Harmony – DE River[1]	Fresh	11	2.09±0.21	Ben Wurst	Conservation Wildlife Foundation, NJ
DE	South Rehobeth	>5ppt	71	0.31±0.07	Jodi McLauphlin	OspreyWatch Delaware
DE	North Rehobeth	>5ppt	39	0.36±0.09	Jodi McLauphlin	OspreyWatch Delaware
DE	Assawoman Bay	>5ppt	21	0.52±0.15	Jodi McLauphlin	OspreyWatch Delaware
DE	Lewes	>5ppt	17	0.59±0.17	Jodi McLauphlin	OspreyWatch Delaware
DE	Milford	>5ppt	6	0.83±0.31	Jodi McLauphlin	OspreyWatch Delaware
DE	Nanticoke	T Fresh	8	1.50±0.50	Francie Davis	OspreyWatch Delaware
MD	Lower Choptank	>5ppt	26	0.00±0.00	Barnett Rattner	United States Geological Survey
MD	Poplar Island	>5ppt	10	0.00±0.00	Bobby Callahan	United States Fish & Wildlife Service

Table 1. Continued

State	Study Area	Salinity	Pairs	Reproductive Rate	Contact Person	Organization
MD	Severn[1]	>5ppt	35	0.09±0.05	Tom Guay	Eco-Ed Endeavors
MD	Kent Island	>5ppt	16	0.19±0.10	Judy Wink	Chesapeake Bay Environmental Center
MD	Lower Patuxent	>5ppt	44	0.20±0.07	Greg Kearns	Patuxent River Park
MD	Lower Chester	>5ppt	89	0.67±0.08	Barnett Rattner	United States Geological Survey
MD	Jug Bay	T Fresh	47	0.81±0.14	Greg Kearns	Patuxent River Park
MD	Upper Chester	T Fresh	31	1.19±0.19	David Kramar	CES, Washington College
VA	Bowlers Wharf	>5ppt	46	0.02±0.02	Bryan Watts	Center for Conservation Biology, W&M
VA	Mattox Creek	>5ppt	37	0.05±0.04	Bryan Watts	Center for Conservation Biology, W&M
VA	Urbanna	>5ppt	31	0.10±0.05	Bryan Watts	Center for Conservation Biology, W&M
VA	Lower York	>5ppt	51	0.12±0.06	Bryan Watts	Center for Conservation Biology, W&M
VA	Mobjack Bay	>5ppt	63	0.17±0.05	Bryan Watts	Center for Conservation Biology, W&M
VA	Elizabeth River	>5ppt	26	0.19±0.08	Bryan Watts	Center for Conservation Biology, W&M
VA	Poquoson River	>5ppt	29	0.21±0.10	Bryan Watts	Center for Conservation Biology, W&M
VA	Piankatank River	>5ppt	39	0.23±0.09	Bryan Watts	Center for Conservation Biology, W&M
VA	Middle York	>5ppt	33	0.24±0.09	Bryan Watts	Center for Conservation Biology, W&M
VA	Eastern Shore Bayside	>5ppt	61	0.25±0.08	Bryan Watts	Center for Conservation Biology, W&M
VA	Lynnhaven River	>5ppt	40	0.28±0.09	Keriann Spiewak Reese Lukei, Jr	VA Aquarium & Marine Science Center Center for Conservation Biology, W&M
VA	Lower James	>5ppt	25	0.32±0.11	Bryan Watts	Center for Conservation Biology, W&M
VA	Upper York	>5ppt	17	0.35±0.12	Bryan Watts	Center for Conservation Biology, W&M
VA	Upper Rappahannock	>5ppt	33	0.42±0.14	Bryan Watts	Center for Conservation Biology, W&M
VA	Middle James	>5ppt	44	0.45±0.12	Bryan Watts	Center for Conservation Biology, W&M
VA	Colonial Beach	>5ppt	38	0.53±0.14	Joanie Millward	Virginia Osprey Foundation
VA	Dahlgren Naval Base	>5ppt	21	0.81±0.20	Joanie Millward	Virginia Osprey Foundation
VA	Upper James	T Fresh	52	1.04±0.16	Bryan Watts	Center for Conservation Biology, W&M
VA	Dyke Marsh	T Fresh	28	1.07±0.18	Dan Rauch	Wildlife Division, Washington D.C.
VA	Pohick Bay	T Fresh	38	1.18±0.15	Bryan Watts	Center for Conservation Biology, W&M
VA	Back Bay	T Fresh	9	1.67±0.47	Reese Lukei, Jr.	Center for Conservation Biology, W&M
SC	North Hilton Head	>5ppt	30	1.07±0.14	Joanne Voulelis Carol Clemens	OspreyWatch Hilton Head Island
SC	South Hilton Head	>5ppt	23	1.13±0.16	Joanne Voulelis Carol Clemens	OspreyWatch Hilton Head Island

[1]Reproductive estimates were based on active nests (pairs making breeding attempts) rather than all pairs in the population. These study areas underestimate breeding populations and by doing so overestimate reproductive rates.

In Dr. Bryan Watts second Osprey research paper (attached), “Are ospreys experiencing reproductive deficits in waters beyond the Chesapeake Bay?”, he covered the 2026 breeding season for 2,886 pairs from 65 study areas across 10 states along the Atlantic coast. Pairs nesting within freshwater systems produced an average of 1.15 young/pair compared to only 0.59 young/pair in salty or marine systems. The latter rate signifies

population decline. These saline areas are where menhaden dominate Osprey food supplies as found in Chesapeake Bay.

“Ospreys within the Chesapeake Bay have been experiencing low reproductive rates for several years. Documentation of extreme reproductive deficits elsewhere along the Atlantic Coast [outside of Chesapeake Bay] is more recent. Although the underlying cause of low reproductive rates for other study areas along the Atlantic Coast is less clear, observations in numerous study areas implicate food stress and starvation as an important driving factor.”

So, the lack of menhaden in these saltier areas could also be driving the nest failures and Osprey chick starvation elsewhere, just as in the Chesapeake.

“Regions along the coast that are experiencing reproductive deficits include the Chesapeake Bay, the Atlantic coasts of Delaware and New Jersey, outer Long Island, the Connecticut coast north of the Quinnipiac River and coastal systems between Narraganset Bay Rhode Island through Buzzards Bay Massachusetts (Figure 2). The Atlantic Coast of the Delmarva Peninsula in Virginia is not shown because the population has collapsed by more than 90% over the past 20 years.”

James Boyle

From: THOMAS ARMSTRONG <tomann870@yahoo.com>
Sent: Monday, August 17, 2026 3:31 PM
To: James Boyle
Subject: [External] Menhaden Quota

Dear Sir:
What are we going to do? Wait until all of the menhaden predators are gone?
Having a study is just wasting time which Omaga and the State has been doing for years.
50% reduction is a good start but be prepared to restrict them further.
Sincerely,
Thomas Armstrong
870 Bridge Creek Circle
REEDVILLE, VA 22539
410 703 2881

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James Boyle

From: Bill B <bbreitba44@gmail.com>
Sent: Wednesday, August 12, 2026 11:32 AM
To: James Boyle
Subject: [External] Menhaden

A total moratorium on menhaden harvesting in the bay
and save the bay are one and the same.

Restrict menhaden harvesting to three miles off the coast
like all other states do.

Bill Breitbach
804-270-3042

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James Boyle

From: Jen Budai <jennifer.budai@gmail.com>
Sent: Sunday, August 23, 2026 11:26 AM
To: James Boyle
Subject: [External] Menhaden population in CT
Attachments: imrs.php

Hello! Is this the proper channel to submit public comment?

Here are my observations in support of eliminating or greatly reducing menhaden catch, if there are even any to be found.
1) Reports of juvenile osprey starving to death in CT! I was contacted by my Mayor in Stratford, CT earlier this month. He'd received several reports of an injured osprey and asked if I knew who to contact for help. I did. And she did. A friend of mine is a citizen bird enthusiast who has relationships with rehabbers. She single-handedly tracked down the osprey and took it to a local rehabber who advised her the bird was not injured, it was suffering from malnutrition and ospreys starving to death has been an alarming trend this year.
2) I spend hours at the beach every summer performing independent field work on the horseshoe crab and recently was assigned to the ASMF horseshoe crab commission. In my field work, I re-meet the same fishers every year who've been complaining about the low fish count this year. I'm not a fisher, but I hear them.
3) Each year in mid to late August, we go to a specific place called Captain's Cove in Bridgeport CT to watch the thousands of bunker fish feed on an effluent pipe. We went a few days ago and they just weren't there. None. Zero. Zip. Then I remembered the osprey. And then I saw this article. My observations might not be precisely scientific, but they are replicable datapoints and are visually obvious. We must restrict or pause or place some type of moratorium on the taking of this animal out of the Atlantic.



Opinion | This little fish anchors the East Coast food web. A fight over it is brewing.
wapo.st

Thank you,
Jen

—

Jennifer Budai
Stratford, CT
C-203-520-8032

—-

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James Boyle

From: Info (ASMFC)
Sent: Monday, August 17, 2026 3:02 PM
To: James Boyle
Subject: FW: [External] New website contact submission from Contact Us

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From: info@asmfc.org <info@asmfc.org>
Sent: Monday, August 17, 2026 1:55 PM
To: Info (ASMFC) <info@ASMFC.ORG>
Subject: [External] New website contact submission from Contact Us

Name
John Carey
Email
johnmdcarey@yahoo.com
Get in Touch
Menhaden shares going to an international company appears to be an outlandish state of affairs. Quotas should be redistributed and limited to benefit US Coastal fisherman. The oceans are a lawless place and overfishing is on the verge of apocalyptic. Please do everything you can while you can in a responsible way!

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James Boyle

From: Duncan Fox <duncangfox@gmail.com>
Sent: Friday, August 14, 2026 5:09 PM
To: Info (ASMFC)
Subject: [External] Concerned Fisherman

Hi ASMFC,

I am reaching out because i'm very concerned about three things. One being the amount of brown sharks in Long Island Sound and around Block Island. I have never seen so many brown sharks in these waters. They have made it so impossible to fish for striped bass or any fish really. I have brought countless brown sharks to the boat this year and even more striped bass bitten in half. Secondly, the number of striped bass i've seen throughout the spring until know is very concerning. I love fishing for these fish but i think there needs to be a moratorium while figuring out how to manage the brown shark infestation. Thirdly, my concern is there are no bunker. I know the industrial fishing of bunker in Chesapeak Bay has been overharvested by millions of tons.

I have never reached out to you before which shows my dire concern.

Best,
Duncan

--

Duncan Fox
Duncangfox@gmail.com
(203) 912-0715

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James Boyle

From: Sharon Jones <sissoy1@hotmail.com>
Sent: Tuesday, August 25, 2026 7:39 AM
To: James Boyle
Subject: [External] Menhaden Resrictions

My husband and I live on the York River in Gloucester Point. We have seen the effects of low menhaden counts in our area. The osprey had no chicks this year and every type of fish here is quickly dwindling in population.
We have been for menhaden catch restrictions for many years and want our voices to be heard.
Thank you for your time.
Bill Jones and Sharon Crowder

Sent from my iPad
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James Boyle

From: Ed MALONE <emalone46@verizon.net>
Sent: Thursday, August 20, 2026 8:39 AM
To: Info (ASMFC)
Subject: [External] Menhaden

Hello,

I am writing you to ask that this pillaging of the Atlantic Menhaden that is currently happening be stopped.

These massive ships are decimating the bunker population, which as you are fully aware is the number 1 forage fish for MANY different species up and down the east coast. You guys are the stewards of the oceans, I find it funny that you're based in Virginia, and the boats are based in Virginia, and Canada makes all the $$$. It's disgusting, costing every single fishing related business to hemorrhage money as when there's no bait, there are no fish, and therefore no customers.

Watching these boats operate with impunity leads me to a couple of conclusions…….. No one on your board has any skin in the game, nor annyone understand the consequences of this type of reduction, OR, there is a benefit being paid to someone, somewhere to let the status quo continue. NOTHING about these boats destroying the bunker stock benefits anyone who lives near and depends on the sea for a living. In fact, the ONLY people benefiting are the ones who work for and are paid by OMEGA Protein.

I respectfully ask you to do your due diligence here, there really is only one sane answer. This has to stop.

Thank you for hearing me,
Respectfully,
Ed Malone
Tuna fisherman (rod and reel)
Staten Island NY
Sent from my iPhone

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James Boyle

From: Mike <g600fa@gmail.com>
Sent: Monday, August 10, 2026 10:30 AM
To: James Boyle
Subject: [External] Reduce Menhaden Catch

Hi James,

Please work to limit the permissible annual commercial menhaden limit. It's always perplexing to me when people work against their own best interest. Would you rather catch all of a species make some $$$ and collapse the fishery, (cod in the North Atlantic) or show constraint to maintain a sustainable fishery to ensure a long career for yourself and those that follow? If the products that use the reduced menhaden increase in price due to more stringent catch limits then that price is a more accurate representation of the commodity's "true" cost.

These fish are one of the foundational species for the bay. Their health and availability determines the general overall health of the bay.

My voice will surely be faint compared to the larger commercial concerns, but I bet there are many that share my sentiment who simply don't, or don't know how, weigh in. I imagine that the commercial folks show up at meetings and conferences to make themselves heard. But just because they have a bigger megaphone doesn't mean they speak for everyone.

Thanks so much!

Mike

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RECEIVED
AUG 26 2026
By: .....

Aug. 17, 2026
67 Oak St.
Ext
Dalton, MA
01226

Dear Mr. Boyle,

Regarding public comment on Menhaden in the Chesapeake, please DO reduce the bay's reduction fishery cap by 50 percent and create quota periods to distribute harvest under the cap more evenly throughout the fishing season.

Sincerely,

Jon Rutter

James Boyle

Subject: RE: [External] RE: ASMFC Stock Assessment Happenings: Upcoming Meetings: Atlantic Striped Bass Assessment Workshop, Cobia Methods Workshop, and Spot Stock Assessment Committee Planning Webinars

From: Adam Sabella <asabella4@optimum.net>
Sent: Thursday, August 20, 2026 3:39 PM
To: Tina Berger <TBerger@ASMFC.org>
Cc: Bob Beal <RBeal@ASMFC.org>; ISFMP Staff <ISFMPstaff@ASMFC.ORG>; Science Department <ScienceStaff@ASMFC.ORG>
Subject: [External] RE: ASMFC Stock Assessment Happenings: Upcoming Meetings: Atlantic Striped Bass Assessment Workshop, Cobia Methods Workshop, and Spot Stock Assessment Committee Planning Webinars

Dear ASMFC

Unless there is an immediate cessation of the commercial fishing for Bunker, we are going to see a complete collapse of the northeast fishery.

Please act now before it is too late.

Adam Sabella
917-689-2598

Atlantic States Marine Fisheries Commission

1050 N. Highland Street • Suite 200A-N • Arlington, VA 22201
703.842.0740 • asmfc.org

MEMORANDUM

TO: Atlantic Menhaden Management Board

FROM: James Boyle, FMP Coordinator

DATE: October 27, 2026

SUBJECT: Update on Recent Menhaden Fishery Performance

This memorandum serves as a review of recent (2018-2025) landings information relative to commercial allocations and quota transfers. The information is provided to aid the Board in revisiting the quota allocations established in Addendum I to Amendment 3 to the Atlantic Menhaden Fishery Management Plan (FMP).

Overview of Amendment 3 Quota Allocations

Addendum I to Amendment 3, approved in November 2022 and implemented for the 2023 fishing year, established new commercial quota allocations to manage the annual Total Allowable Catch (TAC). Each jurisdiction is allocated a fixed minimum quota with Pennsylvania receiving 0.01%; South Carolina, Georgia, Connecticut, Delaware, North Carolina, and Florida receiving 0.25%; and the remaining states continuing to receive a minimum of 0.5%. The remainder of the TAC, excluding the 1% for episodic events in the states of New York through Maine under the Episodic Event Set Aside (EESA) Program, is allocated based on landings from 2018, 2019, and 2021. On an annual basis, jurisdictions have the option to relinquish part of or all of their fixed minimum quota by December 1st of the preceding fishing year. Any quota relinquished by a jurisdiction is redistributed to other jurisdictions that have not relinquished their quota, based on landings data from 2018, 2019, and 2021. Any overage of quota allocation is determined based on final allocations (inclusive of transfers) and the overage amount is subtracted for that jurisdiction's quota allocation in the subsequent year on a pound-for-pound basis. Quota allocations are to be revisited every three years following implementation of Amendment 3 (2018).

Summary of Recent Landings Trends

Table 1 shows each jurisdiction's total landings as a percentage of the annual coastwide total. Total Landings data from 2018-2025 are included to show trends before and after the implementation of Addendum I. Total landings include directed bait and reduction landings, incidental catch/small-scale fisheries (IC/SSF) landings, and landings occurring under the EESA Program. Total landings may encompass more than a jurisdiction is allocated in a given year due to quota transfers, episodic landings or incidental catch. For these same reasons, annual landing percentages higher than Addendum I allocations do not necessarily indicate a quota overage. Since the implementation of the Addendum, the TAC has not been exceeded. The EESA Program has been in place since the 2013 fishing year and landings under this program have changed in volume and distribution. Since 2023, Maine was the only jurisdiction to opt

into the EESA program every year (Massachusetts opted into the program in 2025). While IC/SSF landings increased annually from 2018-2022, peaking at about 18 million pounds, there have been no reported landings under this provision since the implementation of Addendum I in 2023.

Table 1. Jurisdiction total landings as a percentage of coastwide landings, 2018-2025. Total landings include directed bait and reduction landings, incidental catch, and harvest under EESA. Amendment 3 allocations were implemented beginning in 2018, and Addendum I allocations were implemented in 2023. To protect confidentiality, information for New Hampshire, Pennsylvania, South Carolina, and Georgia have been removed.

Jurisdiction	Amendment 3 Directed Landings Allocations (%)	2018	2019	2020	2021	2022	Addendum I Directed Landings Allocations (%)	2023	2024	2025
Maine	0.52%	3.48%	4.91%	6.33%	5.12%	5.99%	4.80%	7.96%	6.60%	9.95%
New Hampshire	0.50%						1.19%			
Massachusetts	1.27%	1.35%	1.51%	2.17%	2.31%	2.42%	2.12%	0.81%	3.01%	3.76%
Rhode Island	0.52%	0.17%	0.01%	0.05%	0.83%	0.14%	0.81%	0.04%	0.46%	0.11%
Connecticut	0.52%	0.20%	0.02%	0.03%	0.04%	0.07%	0.33%	0.05%	0.01%	0.02%
New York	0.69%	0.22%	0.31%	1.00%	0.75%	0.27%	0.84%	0.18%	0.28%	0.23%
New Jersey	10.87%	11.95%	10.95%	12.27%	10.62%	10.89%	11.00%	11.11%	11.72%	14.70%
Pennsylvania	0.50%						0.01%			
Delaware	0.51%	0.04%	0.02%	0.04%	0.01%	0.01%	0.27%	0.01%	0.01%	0.01%
Maryland	1.89%	0.74%	0.73%	0.64%	0.65%	0.78%	1.17%	0.54%	0.25%	0.14%
PRFC	1.07%	0.79%	0.51%	0.54%	0.59%	0.83%	1.09%	0.56%	0.17%	0.05%
Virginia	78.66%	80.79%	79.86%	75.70%	77.84%	77.27%	75.21%	77.28%	76.78%	68.82%
North Carolina	0.96%	0.17%	0.12%	0.15%	0.10%	0.13%	0.37%	0.22%	0.09%	0.14%
South Carolina	0.50%						0.25%			
Georgia	0.50%						0.25%			
Florida	0.52%	0.06%	0.05%	0.06%	0.03%	0.04%	0.29%	0.04%	0.01%	0.01%
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

Figure 1 shows each jurisdiction's directed landings as a percentage of their base quota from 2018-2025 and then just from 2023-2025 to see the period after Addendum I's implementation. Since the base quota does not include quota transfers or redistributed relinquished quota, values over 100% do not necessarily indicate an overage. Additionally, directed landings do not include landings under the EESA or IC/SSF provisions.

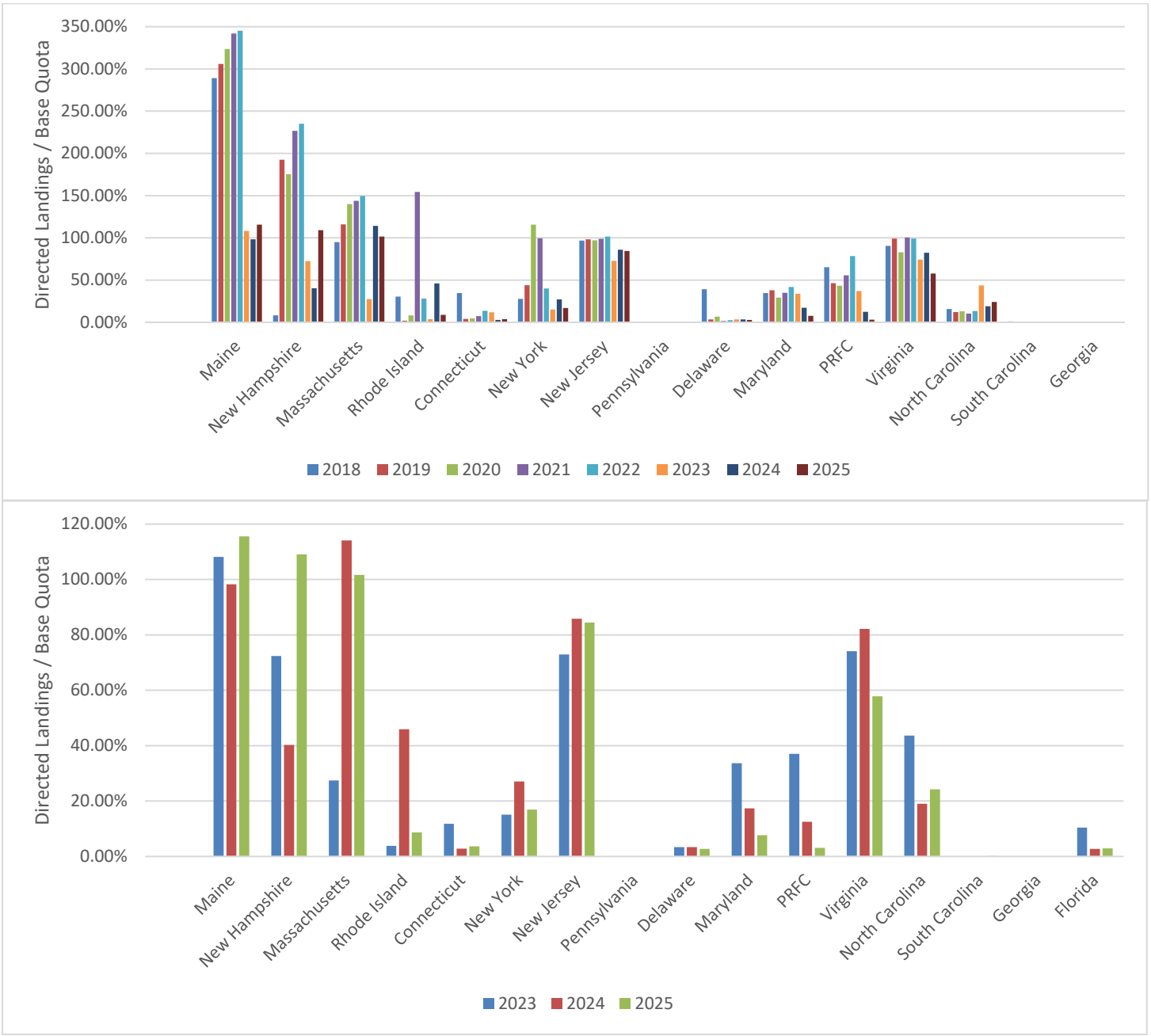


Figure 1. Directed landings as a percentage of base quota by jurisdiction for 2018-2025 (above) and 2023-2025 (below).

Prior to Addendum I, Maine, Massachusetts, and New Hampshire were consistently harvesting above their base quotas through quota transfers, and in 2022, New Jersey also exceeded its directed quota. Since 2023, Maine, New Hampshire, and Massachusetts all harvested above their base quotas for at least one year, including all 3 states in 2025, but no jurisdiction has harvested above their base quota for all 3 years.

Quota Transfers

Table 2 outlines quota transfers from 2018-2025. Not every jurisdiction transferred quota consistently; only Maine either gave or received quota every year from 2018-2025. Prior to Addendum I, the only jurisdictions to have a net increase in quota through transfers were Maine, New Hampshire, and Massachusetts. After Addendum I, Maine, Massachusetts, and Virginia had a net increase in quota through transfers. In 2020 and 2021 there were a total of 16 state-to-state quota transfers, which then increased to 24 in 2022. Since then, there were 5 quota transfers in 2023, 3 quota transfers in 2024, and 7 quota transfers in 2025.

Table 2. Quota transfers in pounds by jurisdiction for 2018-2025.

Jurisdiction	2018	2019	2020	2021	2022	Pre-Addendum I Total	Pre-Addendum I Average	2023	2024	2025	Post-Addendum I Total	Post-Addendum I Average
Maine	5,400,000	6,573,592	5,450,000	5,437,698	5,380,000	**28,241,290**	**5,648,258**	1,150,000	2,000,000	3,250,000	**6,400,000**	**2,133,333**
New Hampshire	0	3,373,592	2,300,000	2,686,318	3,070,000	**11,429,910**	**2,285,982**	0	-2,000,000	1,000,000	**-1,000,000**	**-333,333**
Massachusetts	0	1,300,000	2,350,000	2,492,791	3,020,000	**9,162,791**	**1,832,558**	-100,000	1,700,000	160,000	**1,760,000**	**586,667**
Rhode Island	0	-400,000	-1,800,000	1,240,675	-1,460,000	**-2,419,325**	**-483,865**	-300,000	-500,000	-410,000	**-1,210,000**	**-403,333**
Connecticut	-500,000	-2,400,000	-2,000,000	-2,000,000	-2,110,000	**-9,010,000**	**-1,802,000**	-750,000	0	-1,500,000	**-2,250,000**	**-750,000**
New York	-1,000,000	-1,900,000	500,000	0	0	**-2,400,000**	**-480,000**	0	0	-1,000,000	**-1,000,000**	**-333,333**
New Jersey	0	0	0	275,000	1,850,000	**2,125,000**	**425,000**	0	0	0	**0**	**0**
Pennsylvania	0	0	-500,000	-1,086,318	-1,300,000	**-2,886,318**	**-577,264**	0	0	0	**0**	**0**
Delaware	-150,000	0	-100,000	0	-870,000	**-1,120,000**	**-224,000**	0	0	0	**0**	**0**
Maryland	-1,500,000	-1,000,000	-1,350,000	-1,000,000	-2,500,000	**-7,350,000**	**-1,470,000**	0	0	-1,000,000	**-1,000,000**	**-333,333**
PRFC	0	0	0	-900,000	-1,000,000	**-1,900,000**	**-380,000**	-1,992,297	0	0	**-1,992,297**	**-664,099**
Virginia	-1,000,000	-1,000,000	0	0	4,310,000	**2,310,000**	**462,000**	1,992,297	0	0	**1,992,297**	**664,099**
North Carolina	0	-600,000	-1,800,000	-2,000,000	-2,950,000	**-7,350,000**	**-1,470,000**	0	0	-500,000	**-500,000**	**-166,667**
South Carolina	0	-2,347,184	-1,650,000	-1,775,000	-2,120,000	**-7,892,184**	**-1,578,437**	0	-700,000	0	**-700,000**	**-233,333**
Georgia	0	0	0	-1,971,164	-2,000,000	**-3,971,164**	**-794,233**	0	-500,000	0	**-500,000**	**-166,667**
Florida	-1,250,000	-1,600,000	-1,400,000	-1,400,000	-1,320,000	**-6,970,000**	**-1,394,000**	0	0	0	**0**	**0**