FORAGE FISH CAMPAIGN
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November 6, 2026

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

Re: Atlantic Menhaden Specifications and Commercial Quota Reallocation – Setting a Scientifically Sound Coastwide Quota and Ending Menhaden Reduction Fishing

Dear Chair Cimino and Members of the Menhaden Management Board:

On behalf of the more than 200 fishing businesses and organizations that support the Forage Fish Campaign, we request that the Atlantic Menhaden Management Board take three actions:

1. **Reduce the coastwide total allowable catch (TAC) to no more than 74,000 metric tons,** managed for the bait sector and the recreational and commercial fisheries that depend on menhaden as forage.
2. **Initiate an addendum to be completed at the ASMFC's Spring Meeting to reallocate all commercial quota to the bait sector and prohibit reduction fishing** for Atlantic menhaden on the Atlantic Coast, including in Chesapeake Bay.
3. **Initiate a new Atlantic menhaden stock assessment to be completed in 2027 that incorporates the most recent independent, peer reviewed natural mortality estimate.**

The Commission has both the authority and the obligation to adopt this management framework. The only question is whether it has the will.

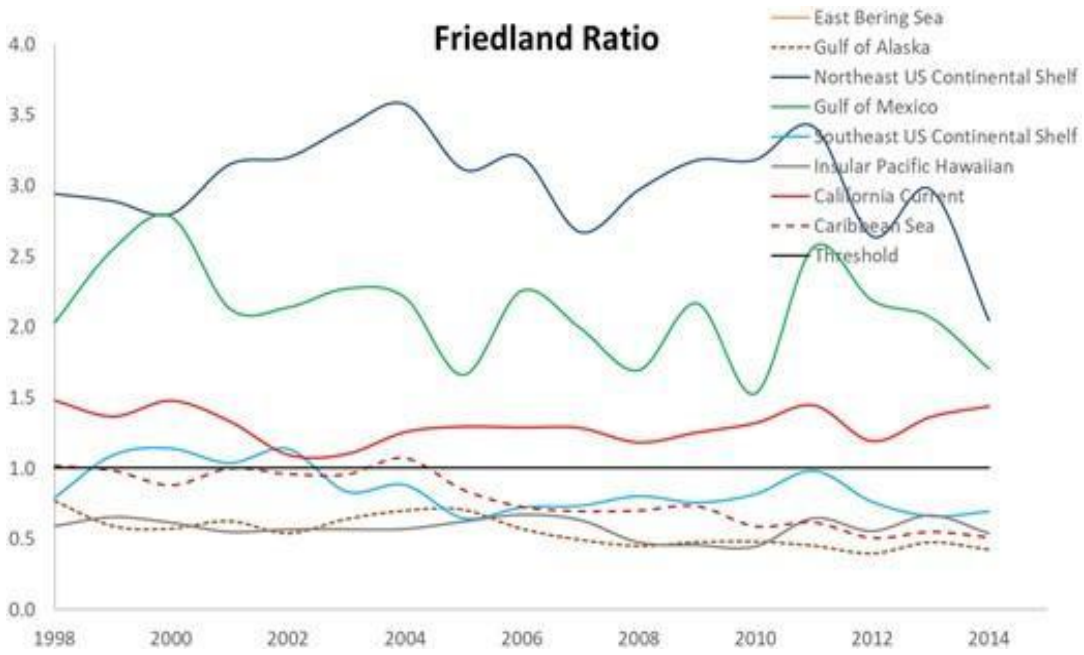
I. Permissive quotas, industrial fishing taking a toll on Atlantic menhaden and larger ecosystem

The reduction fishery is one of the most highly capitalized fisheries in the world with a squadron of spotter planes and a lethal fleet of catcher vessels and mother ships outfitted with the latest

technology. Since 2023, however, they have been unable to catch the quota authorized by the ASMFC. In 2025 the reduction fishery landed only 60% of its quota. Overall, the menhaden fishery landed less than 147,000 mt, or 63%, of the 233,550 mt quota. This is the smallest catch ever recorded, remarkably, under the largest quota ever established. Nearly 90,000 mt of menhaden went unprocessed in 2025 alone.

The 2025 quota shortfall followed shortfalls of 29% in 2023 and 20% in 2024, forgoing 67,000 and 47,000 mt of available catch in those years.[1] And although this fishery often operates under a cloud of secrecy, 2026 appears to be even worse; as of November 4th, 2026 the reduction fishery had not yet met the 51K MT Chesapeake Bay Reduction Fishery Cap. In the three years from 2023 to 2025, the fishery left a total of over 200,000 metric tons of quota uncaught. This was not an intentional long-term economic plan; it is contrary to historic corporate behavior and the economics of fish meal and fish oil commodities markets. Instead, this is a red flag warning that the Atlantic menhaden resource may already be collapsing under the pressure of years relentless industrial reduction fishing.[2] The warnings are showing up everywhere, from key predators like striped bass and osprey (discussed further below), to the larger ecosystem. The Board needs to take responsible action before it is too late.

The ecosystem is likely overfished. The Northeast U.S. Continental Shelf large marine ecosystem (Maine to North Carolina) has been fished beyond its productive capacity for decades according to a paper by NOAA scientist Jason Link.[3] In the figure below, the straight black line represents the ecosystem overfishing threshold.

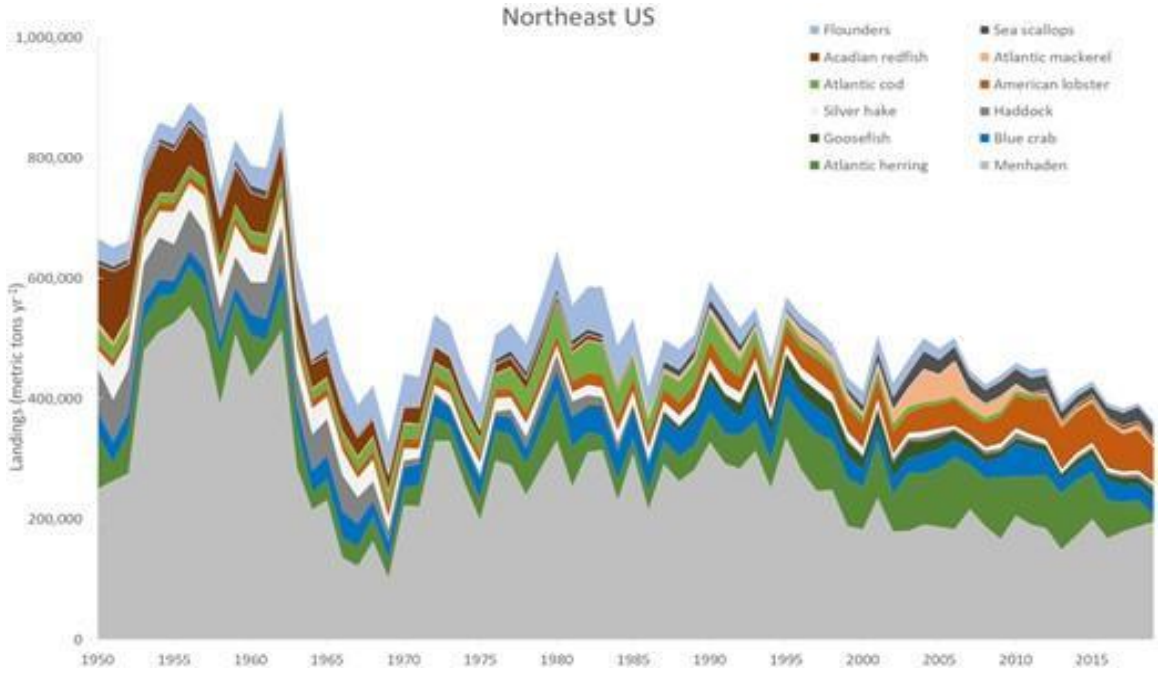


[1] *See also* Coastwide Commercial Catch vs. TAC, chart below.

[2] It also demonstrates that the industry's rhetoric about proposed quota reductions leading to job losses at its factory is empty rhetoric.

[3] J.S. Link, "Evidence of Ecosystem Overfishing in U.S. Large Marine Ecosystems," ICES Journal of Marine Science 78 (2021), doi:10.1093/icesjms/fsab185.

The next figure shows the total commercial catch in the Northeast Continental Shelf. Menhaden (grey) account for 25 to 40 percent of the total catch taken from this ecosystem.[4]



No other single fishery removes so much biomass from the base of the food web, and no other fishery's removals are so directly felt by the predators above it.

Predators are paying the price. Striped bass remain overfished, and the Commission's own 2024 assessment gives them less than a 50 percent chance of rebuilding by the 2029 deadline.[5] Menhaden harvest, the great majority of it for reduction, lowers striped bass abundance by roughly 6 percent according to the Commission's current assessment, and by as much as 30 percent according to peer-reviewed ecosystem modeling.[6] In the Chesapeake Bay, researchers at William & Mary have documented osprey chicks starving in their nests, with breeding success in high salinity areas similar to or below the levels recorded at the height of DDT more than 50 years ago, with "Atlantic menhaden availability is the primary driver of low reproduction."[7]

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[4]Id.

[5]ASMFC, "Atlantic Striped Bass Stock Assessment Update Finds Resource Remains Overfished with a Less than 50% Chance of Rebuilding by 2029" (Oct. 2024).

[6]ASMFC, Atlantic Menhaden Stock Assessment and Ecological Reference Point Assessment (2025) (approximately 6%); A. Buchheister, T.J. Miller & E.D. Houde, "Evaluating Ecosystem-Based Reference Points for Atlantic Menhaden," Marine and Coastal Fisheries 9 (2017): 457–478, doi:10.1080/19425120.2017.1360420 (up to approximately 30%).

[7]Watts, B.D., et. al., **"**Widespread reproductive Deficits in Chesapeake Bay Ospreys*"* Frontiers in Marine Science (2026); *see also* Watts, B.D., et. al. "Demographic response of osprey within the lower Chesapeake Bay to fluctuations in menhaden stock." Frontiers in Marine Science (2024); Watts, B.D., and C. Hines, "Response: Commentary: Demographic response of osprey within the lower Chesapeake Bay to fluctuations in menhaden stock." *Frontiers in Marine Science,* (2025); Audubon Magazine, Ospreys in the Chesapeake Bay Are Starving to Death at Disastrous Rates. What Will It Take to Save Them?, (Summer 2026).

The economics favor leaving menhaden in the water. Globally, forage fish are worth roughly twice as much as food for commercially caught predators as they are when caught directly.[8] A 2026 Southwick Associates study found that Atlantic Coast recreational fishing using menhaden as bait alone generates about $1.5 billion in annual economic output.[9] That figure does not include the value of the striped bass, bluefish, weakfish, tuna, and other fisheries that menhaden support as forage. Striped bass fishing alone has been estimated to contribute more than $13 billion annually to the U.S. economy and support more than 100,000 jobs.[10] The reduction fishery's dockside value is a small fraction of what it takes from everyone else.

II. The quota must be cut to no more than 74,000 metric tons

The Board needs to meet its commitment to ecosystem-based management. The Atlantic Menhaden Technical Committee (TC) specifications memo states that a quota cut from 186,000 MT to 114,200 MT in 2027 is necessary to have a 50 percent chance of meeting the ecosystem target—which would give striped bass a 50 percent chance of meeting their biomass target (when striped bass are fished to their F target). A coin toss chance of successfully leaving enough forage for striped bass and other predators is not good enough.

In October of last year, the Board set the 2026 TAC at 186,840 metric tons, reflecting a 20 percent cut in from the 2025 TAC, but this was really status quo given 2024 landings (186,155 mt). Landings for 2025 were even lower at less than 147,000 metric tons, thus we now know the 2026 TAC was set at a level 27% higher than what the industry was able to catch in 2025. The Board was told that fishing mortality was above the ecological reference point (ERP) target, that fecundity was below the ERP target, and that with the selected TAC there was a 100 percent probability that fishing mortality would remain above its target in 2026. Only a cut of 50 percent or more would have changed that.[11] The Board chose the smaller cut anyway, citing socioeconomic concerns. In other words, the Board knowingly set a quota that its own analysts projected would miss its own ecosystem targets.

The currently applied science is flawed and inconsistent with all peer reviewed natural mortality estimates. Natural mortality (M) is one of the most consequential parameters in the menhaden assessment model. The higher it is set, the more menhaden the model assumes die of natural causes and the more fishing mortality it concludes the fishery can safely withstand. The 2020 menhaden benchmark assessment more than doubled the previous estimated M to 1.17 based on a 2019 paper by Emily Liljestrand, Michael Wilberg and Amy Schueller that

[8] E.K. Pikitch et al., "The Global Contribution of Forage Fish to Marine Fisheries and Ecosystems," Fish and Fisheries 15 (2014), doi:10.1111/faf.12004.

[9] Southwick Associates, The Economic Contribution of Recreational Fishing with Atlantic Menhaden, (June 22, 2026)(prepared for the Theodore Roosevelt Conservation Partnership).

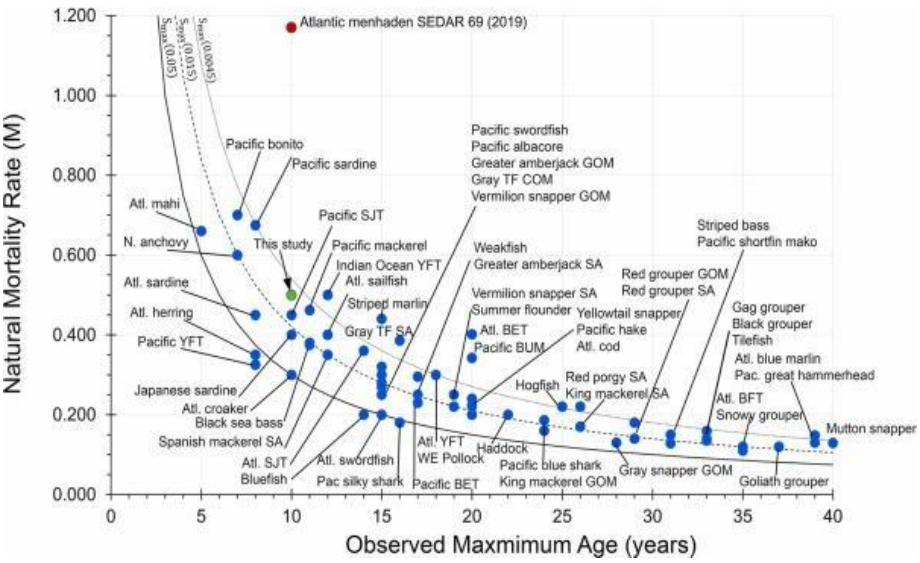
[10] American Sportfishing Association *citing* The Economic Contributions of Recreational and Commercial Striped Bass Fishing Southwick Associates, (2019).

[11] ASMFC, "Atlantic Menhaden Board Reduces 2026 TAC by 20% and Initiates Addendum for Chesapeake Bay Cap" (Oct. 2025), asmfc.org/news/press-releases.

reanalyzed tagging data from the 1960s.[12] This resulted in significantly increased population estimates and increased coastwide TAC.

On September 16, 2026 Drs. Jerald Ault and Jiangang Luo of the University of Miami published a paper reexamining the same tagging data and the analysis by Liljestrand, Wilberg and Schueller. They found that the 2019 reanalysis included consequential mistakes and substantially overstated M.[13] Drs. Ault and Luo noted that the authors' revised estimate, adopted in the 2019 benchmark assessment, was approximately 14 standard deviations above the previous estimate and the historical mean estimate of 0.46, which was based on more than a dozen published natural mortality estimates that ranged from approximately M=0.37 to 0.53.[14]

Drs. Ault and Luo had previously presented these problems to the Commission's Stock Assessment Subcommittee through public comment and their working paper.[15] While the Subcommittee ultimately acknowledged that the 2019 paper contained significant errors and had overestimated a key tag-recovery parameter, they declined to correct other errors or to adopt Drs. Ault and Luo's independent estimate of M. Instead, the Subcommittee settled on a compromise M value of 0.92.[16] This partial correction was the main reason the 2025 assessment found a smaller population and higher fishing mortality than the prior assessment.[17]



Drs. Ault and Luo's 2026 paper, now fully peer reviewed and published in the same journal as the earlier paper, concludes that M should be 0.50, nearly half the revised M of 0.92 underlying

[12]L.A. Liljestrand, M.J. Wilberg & A.M. Schueller, "Estimation of Movement and Mortality of Atlantic Menhaden During 1966–1969 Using a Bayesian Multi-State Mark-Recovery Model," Fisheries Research 210 (2019): 204–213; ASMFC, 2020 Atlantic Menhaden Benchmark Stock Assessment (SEDAR 69).

[13]Ault, J.S. and Luo, J., "Estimation of Atlantic Menhaden Mortality Rates," Fisheries Research 303 (2026); see also J.S. Ault et al. (2023), cited in ASMFC, 2025 Atlantic Menhaden Single-Species Stock Assessment Update (Oct. 2025) (estimating M = 0.56), and SEDAR 102 RW-11, public comment letter with enclosures (M ≈ 0.52; range 0.50–0.54).

[14] Id.

[15]SEDAR 102 AP-01, "Revised Estimates of Natural Mortality for Atlantic Menhaden," and AP-02, "Understanding Atlantic Menhaden Population Demographics: Reevaluation of the 1960s NMFS Tagging Data."

[16]ASMFC, 2025 Atlantic Menhaden Single-Species Stock Assessment Update (Oct. 2025) (finding that Liljestrand et al. overestimated the magnet-efficiency parameter, equivalent to a tag reporting rate, and adopting M = 0.92 with the Ault et al. approach as a sensitivity run).

[17]Id.; ASMFC, "Atlantic Menhaden Board Reduces 2026 TAC by 20% and Initiates Addendum for Chesapeake Bay Cap" (Oct. 2025).

the current 2025 assessment. Ault and Luo's estimated M is entirely consistent with previous peer reviewed M estimates, as well as natural mortality values used in more than 60 recent U.S. and international stock assessments.[18] The Liljestrand, Willberg, and Schueller estimate, as well as the compromise M estimate of 0.92, are clear scientific outliers.

An M of anywhere near 0.50 indicates that the Atlantic menhaden stock is smaller than the Commission believes, fishing accounts for a larger share of mortality, and the current quota is even further out of line with sound ecosystem science than the current ERP targets indicate. The Ault and Luo work likely confirms that the menhaden resource is already overfished and that the estimated population is substantially lower than even the 2025 downwardly revised estimate.

The Atlantic menhaden science must be addressed through a new assessment with independent scientists. The Stock Assessment Subcommittee that rejected Drs. Ault and Luo's analysis prior to its publication was chaired by Dr. Amy Schueller of NOAA Fisheries, one of the co-authors of the very paper containing the significant errors documented by their analysis and paper.[19] No credible science-based management body should allow the author of a legitimately disputed piece of critical science play a pivotal role in its review for potential correction--in this case effectively sitting in judgment for the Board. The very *same* journal that published the Liljestrand, Wilberg, and Schueller paper led a rigorous peer review process before publishing the Ault and Luo paper, and its results are consistent with the other peer reviewed science on the subject. There is little question that the Ault and Luo analysis provides a far superior estimate of M than the Liljestrand, Wilberg, and Schueller estimated M. Inexplicably, the ASMFC's 2025 review of the fishery, added late to the meeting materials on November 4, does not even acknowledge the Ault and Luo publication in its list of recent research relevant to menhaden assessment and management, nor does it list their working paper that led to the corrections of the flawed science made to date.[20] Based on the other meeting materials, it also does not appear that Board staff intend to address the issues with the M estimate, even as a significant source of uncertainty in the quota setting process.

The conflicts of interest that have derailed menhaden science do not stop there. The participation of the SAS Chair and others in the reduction industry dominated and funded Science Center for Marine Fisheries (SCEMFIS) presents a conflict of interest that must be immediately remedied.[21] The Policy Board should require conflict of interest disclosures and strictly prohibit all scientists participating in industry funded research or other potential conflicts of interest from participating in stock assessments and the ASMFC's technical and

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[18] Id.

[19] ASMFC, 2025 Atlantic Menhaden Single-Species Stock Assessment Update (Oct. 2025), list of Stock Assessment Subcommittee and Technical Committee members.

[20] ASMFC, Review of the Interstate Fishery Management Plan for Atlantic Menhaden; 2025 Fishing Year, pp. 8-9 (Nov. 2, 2026).

[21] *See also,* American Saltwater Guides Association, Who Pays for Menhaden Science, Part 1 – Conflicts of Interest, (2026).

other subcommittee, work group, and PDT work. Other entities creating similar potential conflicts of interest for scientists participating in the menhaden and ERP science processes include the Sustainable Fisheries Partnership/FishSource[22] and the Marine Stewardship Council.[23]

We request that the Board initiate a new Atlantic menhaden stock assessment update to be completed in 2027 that incorporates the most recent independent, peer reviewed natural mortality estimate from Drs. Ault and Luo, as well as updated catch and other data. The Board should ensure that the scientists associated with the prior (2019) erroneous natural mortality estimate, or that have other financial, professional or personal conflicts of interest have no role in the assessment, peer review, or Board committee processes. The Board should manage Atlantic menhaden on a precautionary basis until that review is complete. When the science is in dispute and the cost of being wrong falls on predators, recreational and commercial fishermen, and the ecosystem, precaution is the only responsible course.

The Atlantic menhaden resource is depleted: the Commission must adopt a precautionary approach and set the coastwide TAC at 74,000 metric tons. Even after last year's TAC reduction, the Commission authorized the removal of roughly 187,000 metric tons of menhaden in 2026, on the order of a billion fish, most of them destined for fishmeal and oil. The Board should base the 2027-2029 TAC on an assessment incorporating an M = 0.50 and a 75 percent fecundity-per-recruit (FPR) objective. This would result in a TAC at 74,000 metric tons.

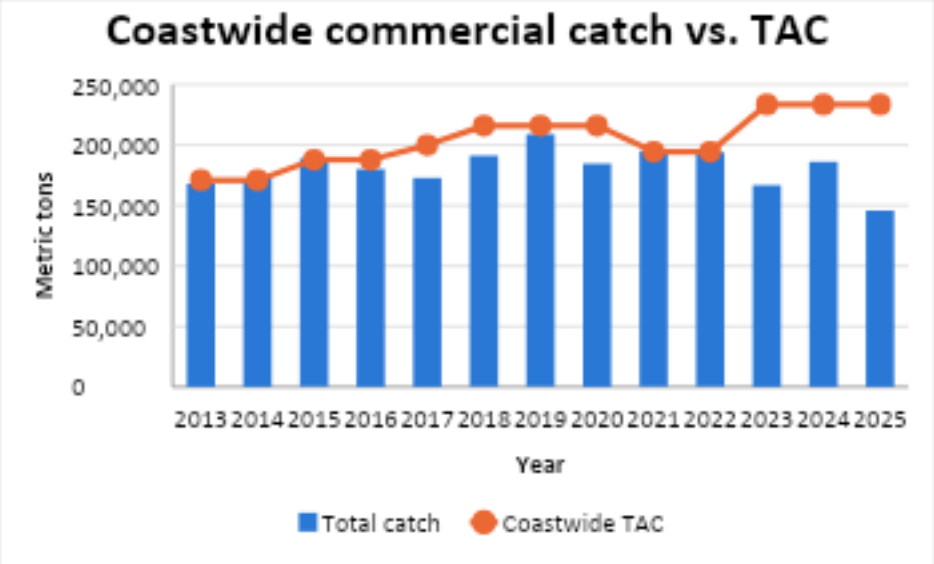
As discussed, M = 0.50 reflects the best available science. Maintaining a 75% FPR target—also frequently operationalized as preserving 75% of unfished biomass—is a widely recognized ecosystem-based management benchmark for keystone forage species.[24] Because keystone forage species like Atlantic menhaden are the primary energetic link transferring energy from plankton to upper-trophic-level predators, conventional single species maximum sustainable yield-based targets that allow a population's biomass to drop to 40%, or lower, of its un-fished state leave ecosystems highly vulnerable to collapse.[25] Basing the TAC on this natural mortality parameter and objective would yield an allowable catch of approximately 74,000 metric tons.[26]

A 74,000 mt TAC is also fully supported by the massive amounts of scientific uncertainty contained in the current stock assessments and other evidence of a sharply declining menhaden resource. The fact there is significant uncertainty is admitted in the Atlantic Menhaden TC's specifications memorandum, and it acknowledges there is additional uncertainty not captured in its projections. The memorandum fails to acknowledge possibly the biggest source of

[22] Sustainable Fisheries Partnership, (2026).
[23] Marine Stewardship Council, (2026).
[24] Pikitch, E., Boersma, P.D., Boyd, I.L., Conover, D.O., Cury, P., Essington, T., Heppell, S.S., Houde, E.D., Mangel, M., Pauly, D., Plagányi, É., Sainsbury, K., and Steneck, R.S., "Little Fish, Big Impact: Managing a Crucial Link in Ocean Food Webs," Lenfest Ocean Program. Washington, DC. 108 pp. (2012).
[25] *See* Buren, A.D., et. al., "The Collapse and Continued Low Productivity of a Keystone Forage Fish Species," Marine Ecology Progress Series, (2019); Okey, T.A., et. al., "Exploring the trophodynamic signatures of forage species in the U.S. South Atlantic Bight ecosystem to maximize system-wide values," (2014).
[26] Forage Fish Campaign calculation using M = 0.50 and a 75% fecundity-per-recruit objective.

uncertainty, the uncorrected M estimate. The 2025 partial correction resulted in a 37% reduction in the menhaden population estimate and significant decrease in the recommended total allowable catches. Given that the remaining difference in the M estimate is nearly twice as big as the last correction, the population estimates and the catch projections could both be substantially smaller, well below the 110,200 mt recommendation necessary to achieve the target fishing mortality with a 40% chance of exceeding the target.

Another source of significant scientific uncertainty noted but downplayed in the TC's specifications memorandum is the 2023 terminal year of the assessment. This means the projections for 2027 and 2028 are based on a minimum of three-to-four years of "modeled" fish. As discussed above, since 2023 this highly capitalized fishery has been unable to catch its quotas – the most recent 2025 data alarmingly shows that catch was "only" 147,000 mt, nearly 90,000 mt below the 233,550 mt quota. The Atlantic menhaden resource may already be in collapse yet the data reflecting this decline is not captured in the assessment due to the 2023 terminal year.



The declining menhaden resource has, however, been showing up in other science and fishery-related information. The Board's own ecosystem science has concluded that striped bass are overfished and need more menhaden in the water to recover. Independent scientific papers show that osprey nesting success rates from New England to Chesapeake Bay have plummeted to 50-year low levels, linked to the lack of menhaden availability.[27] Further, firsthand reports from bait shops and recreational anglers from Montauk to the Chesapeake Bay also report the lack of menhaden, which corresponds to the osprey and striped bass declines.[28] The modeling lag and reliance on highly uncertain projections, especially in the face of other alarming signals of distress, is *exactly* what preceded the recent collapse of the Atlantic herring fishery, a

[27] See *supra* note 6 and accompany text, see also Clark, Kathleen, *Report Based on the 2025 NJ Osprey Project Report by Ben Wurst and Kathleen Clark*, Conserve Wildlife Foundation of NJ (April 2026).
[28] Forage Fish Campaign, "Where's the Bait?" Tour, (2026); *supra* note 6 and accompanying text.

devasting but avoidable event that involved many of the same scientists involved in the current menhaden stock assessment process.

A 74,000 metric ton quota would be consistent with the quota recommended during last year's specifications process by the International Game Fish Association and Bonefish Tarpon Trust. In recent years, the amount of bait landed has been closer to 50,000 mt - 55,000 mt, thus a TAC of 74,000 mt entirely allocated to the bait sector would provide a greater than 50 percent probability of meeting the current ERP F target and account for the significant uncertainty in the assessments and projections, while allowing some room for growth in bait landings.

The commission's adoption of misguidedly high quotas for the past several years is having serious and widespread negative impacts on the water that models cannot calculate. The oceans are changing rapidly, and old assumptions may no longer apply. The cost of lobster and crab bait is high and bait shops, guides, captains and small businesses are closing because of the ripple effects of too few menhaden. It is long past time for the ASMFC and its Menhaden Management Board to stop protecting the industrial reduction fishery and start managing menhaden for abundance and resilience, which will benefit fisheries coastwide.

III. The Commission has the authority to reduce the quota and ban reduction fishing

Under Atlantic Coastal Fisheries Cooperative Management Act (ACFCMA) the Commission is required to prepare and adopt coastal fishery management plans to provide for the conservation of coastal fishery resources, and to specify the requirements necessary for States to comply with the plan.[29] This provides all the authority needed to ban reduction fishing. Consistent with the Act, the ASMFC already categorizes fishing based on how the catch is processed, defining reduction fishing as its own sector, separate from the bait sector, and caps the reduction harvest in the Chesapeake Bay at 51,000 metric tons.[30] If the Commission can cap reduction harvest, it can end it.

Further, every state on the Atlantic Coast except Virginia has already effectively, and legally, banned reduction fishing. Limiting or eliminating specific gear types is a common fisheries management practice in the U.S. and at the ASMFC. For example, the ASMFC currently prohibits purse seines and drift gillnets in the Spanish mackerel fishery.[31] Under the menhaden plan itself, under the "Small-Scale Fishery" exceptions only specific gears are permitted to continue operating under strict daily trip limits, purse seines being prohibited.[32]

The ASMFC can also enforce a reduction fishing ban. Under the ACFCMA, the Commission adopts fishery management plans that the states must implement, and the Secretary of Commerce may close the fishery of any state that fails to comply.[33] In 2019, when the reduction

[29] Atlantic Coastal Fisheries Cooperative Management Act, 16 U.S.C. §§ 5104–5106.
[30] ASMFC, Draft Addendum II to Amendment 3 to the Atlantic Menhaden FMP for Public Comment (Aug. 2026).
[31] ASMFC, Spanish Mackerel, (2026)(Memorandum providing differences between the Interstate and Federal management plans, (Oct 20, 2022).
[32] ASMFC, Atlantic Menhaden, (2026).
[33] Atlantic Coastal Fisheries Cooperative Management Act, 16 U.S.C. §§ 5104–5106.

fishery exceeded the Bay cap, the Commission found Virginia out of compliance and the Secretary of Commerce upheld that finding.[34]

The ASMFC has full discretion to ban reduction fishing and set a precautionary quota, consistent with its mandate to conserve coastal fishery resources and its adoption of ecosystem management. The ERP framework gives the Board discretion to set the TAC below what the single-species reference points allow. And nothing requires the Board to fish at the edge of its own targets, or past them. Because menhaden are critical forage fish, literally the base of the Atlantic Coast's food web, the ASMFC formally and rationally adopted ERPs. This established a legal and scientific rationale to make the decisions necessary to manage menhaden to benefit the predator fish they support, including by limiting quotas and restricting gear types that are inconsistent with ecosystem management.

IV. Industrial reduction fishing no longer has a place in U.S. waters

Reduction fishing wastes one of our nation's most valuable marine resources. It grinds and presses our keystone forage fish into low-value products to sell in a global commodities market for the benefit of foreign interests. In the Atlantic, the only remaining reduction facility is run by a single company, Omega Protein, a subsidiary of the Canadian industrial fishing conglomerate Cooke Inc., operating out of Reedville, Virginia. Canada prohibits fishing for reduction purposes[35], and yet, the ASMFC allows this Canadian company to reduce approximately a billion wild US menhaden, commonly known as the "most important fish in the sea." While every East Coast state except Virginia has banned reduction fishing, one foreign company and a single state are dictating poor fisheries management policy that is negatively impacting thousands of fishermen and the entire Atlantic coastal economy.

Reduction fishing is not the highest and best use of this critical natural resource. The menhaden management plan requires the Board to equitably allocate the ecological and economic benefits of the Atlantic menhaden fishery among those who extract menhaden for human use, those who extract and utilize predators that rely on menhaden as a source of prey, and those whose livelihood depends on the health of the marine ecosystem, through a "holistic management approach which allocates the resource in a method that is biologically and socially sound in order to protect the resource and those who benefit from it."[36] In fact, reduction fishing is causing immense harm to Atlantic coastal economies and the marine ecosystem.

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[34] Secretary of Commerce, Notification of determination of non-compliance; declaration of a moratorium , 84 Fed. Reg. 71329 (Dec. 27, 2019); see also, Virginia Mercury, "Federal government orders Virginia menhaden fishery shut down" (Dec. 19, 2019).

[35] *Fisheries Act*, R.S.C. 1985, c. F-14, s. 31.

[36] ASMFC, *Amendment 3 to the Interstate Fishery Management Plan for Atlantic Menhaden*, Section 2.0 (Goals and Objectives). This is similar the Magnuson-Stevens Act's mandate to manage our nation's fisheries resources for the "greatest overall benefit to the nation". 16 U.S.C. § 1802(33)(The term "optimum", with respect to the yield from a fishery, means the amount of fish which— (A) will provide the greatest overall benefit to the Nation, particularly with respect to food production and recreational opportunities, and taking into account the protection of marine ecosystems.)

Menhaden can be processed into feed for farmed fish, pets, and livestock, or they can sustain striped bass, ospreys, whales, and the coastal economies built on them. The Commission must stop turning the Atlantic Coast's most important forage fish into a low value commodity. It is both wasteful and contrary to the ecosystem management principles the Board committed to years ago. We urge the Board to make the difficult decisions necessary to help sustain the Atlantic Coast's predator populations, ecosystem, and marine economy.

Sincerely,

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Whit Fosburgh
Executive Director
Forage Fish Campaign

cc: The Honorable Howard W. Lutnick, U.S. Secretary of Commerce
Neil A. Jacobs, Ph.D., Under Secretary of Commerce for Oceans and Atmosphere
Laura Grimm, Deputy Under Secretary of Commerce for Oceans and Atmosphere
Edward Russo, Chairman, White House Environmental Advisory Task Force
Eugenio Piñeiro Soler, Assistant Administrator for NOAA Fisheries
Michael Pentony, Regional Administrator, Greater Atlantic Regional Fisheries Office, NOAA Fisheries
Andy Strelcheck, Regional Administrator, Southeast Regional Fisheries Office, NOAA Fisheries
Robert E. Beal, Executive Director, ASMFC
James Boyle, Atlantic Menhaden FMP Coordinator

Chair Joseph Cimino
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

11/3/2026

Redacted on 11/4/2026 to exclude comments on Addendum II at the advisement of the ASMFC - DNM

Re: [redacted] 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.

[redacted] we urge the Board to strengthen protections for Chesapeake Bay by reducing the Bay's reduction-fishery cap [redacted]

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 [redacted]**



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. [redacted]

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 [redacted]. 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]

[redacted]

[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

[redacted]

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.

---

[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 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

Allison McLeod
Interim Executive Director
New Jersey League of Conservation Voters

Jaclyn Rhoads
Executive Director
Pinelands Alliance

Dr. Kenneth Green
President Operation Osprey

Madeline Dennis Raleigh
Administrator
Osprey Stewards East Coast Alliance

Paul Spitzer, PhD
Ecology and Evolutionary Biology Cornell University

Jessica Yorke Executive Director
Bayshore Center at Bivalve
Melanie Schroer Instructor of Biology Stockton University

Nick Lund
Acting Advocacy Director
Maine Audubon

Russell Comeau
Chief Executive Officer
Bassdozer Worldwide Fishing LLC

Amy Hansen
Policy Manager
New Jersey Conservation Foundation

Joseph Albanese
President
Hudson River Fishermen's Association

Dr. Adam Aguiar
Professor of Biology Fisheries Research

Jen Coffey
Executive Director
NJ Association of Env. Commissions

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

Brian Brooks
American Bird Conservancy
Vice President, Advocacy and Threats

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

Melanie Schroer
Instructor of Biology, Osprey Researcher
Stockton University

Chris Allieri
Executive Director and Founder
NYC Plover Project

Greg Remaud
Executive Director
NY/NJ Baykeeper

Fred Akers
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Great Egg Harbor Watershed Association

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'We're All Commercial Fishermen': Maine and Virginia Stand Together on Menhaden

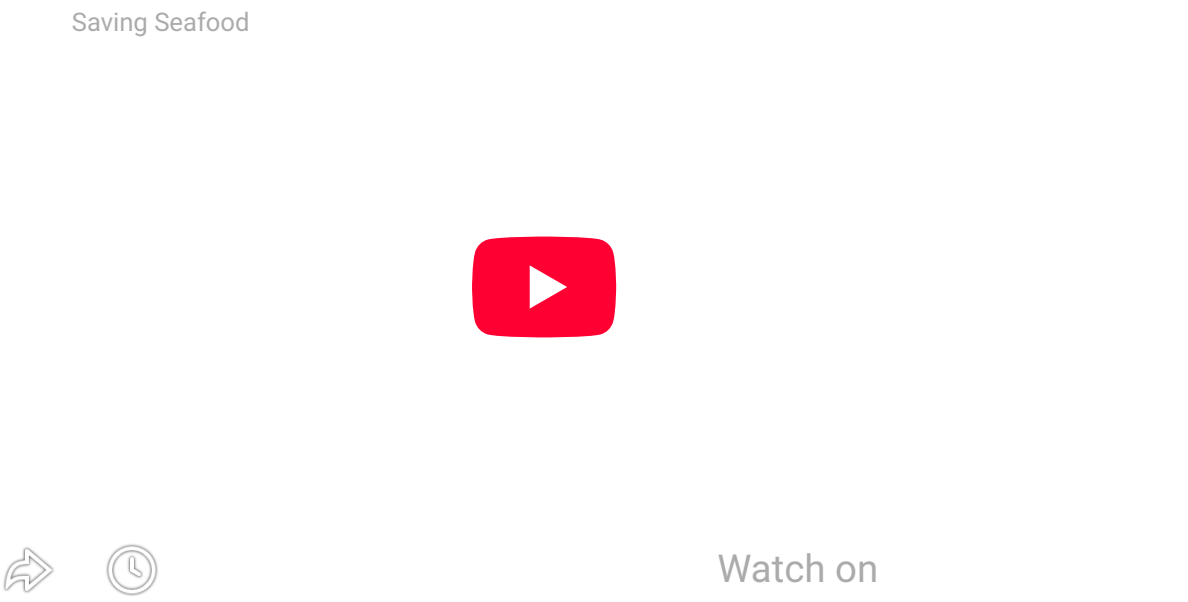
Thursday, 05 November 2026 08:10 PM

Topic: Environmental, Social and Governance

NEFSA video highlights a healthy fishery and the people, livelihoods, and communities affected by proposed cuts

WASHINGTON, D.C. / ACCESS Newswire / November 5, 2026 / Fishermen from Maine and Virginia are standing together in support of a healthy Atlantic menhaden fishery, calling on fisheries managers to maintain the coastwide quota after a 20% reduction took effect this year.

In a new video, produced by the New England Fishermen's Stewardship Association (NEFSA), Maine fishermen Dustin Delano and Jim Wotton join Ben Landry, a spokesperson for the Virginia menhaden reduction fishery, to discuss what menhaden mean to fishing families and working waterfronts along the Atlantic Coast.



"We're all commercial fishermen," says Wotton, a fisherman from Friendship, Maine. "I think we need to stick together. We need to work together."

The video comes as the Atlantic States Marine Fisheries Commission (ASMFC) prepares to consider Atlantic menhaden

quotas for 2027 and beyond. The Commission's latest assessment found that the coastwide stock is not overfished and that overfishing is not occurring. Its ecological approach to management accounts for the needs of predators that depend on menhaden.

The ASMFC reduced the coastwide quota by 20% for 2026. When it adopted that quota, the Commission projected a 0% probability of overfishing in 2026.

Wotton says fishermen need time to see how that reduction plays out before managers consider another cut.

"I think we need status quo right now," he says in the video. "I think we leave it where it is and we can work something out with the different sectors of the fishery."

Menhaden provide bait for New England lobstermen. In Virginia's Northern Neck, the reduction fishery supports fishing families and a community whose connection to the water spans generations.

"If you've not been to the Northern Neck of Virginia, the menhaden facility there and the fishing operations is the lifeblood of the Northern Neck," Landry says in the video. He warns that severe restrictions would reach beyond the boats and affect families in a rural coastal community where other jobs are not always available.

Delano, chairman and chief strategist of NEFSA, says fishermen rely on a healthy fishery for their future.

"Fishermen rely on these fisheries for future generations," Delano says. "But we need to take advantage of this fishery when it's here."

The fishermen are asking managers to maintain the quota and give the people who depend on menhaden a voice in decisions about the fishery's future.

Watch the video: NEFSA: Maine and Virginia Stand United on Menhaden

Sources

- NEFSA: Maine and Virginia Stand United on Menhaden: Produced by the New England Fishermen's Stewardship Association (NEFSA). The quotations in the release are drawn from the supplied transcript.
- ASMFC Atlantic menhaden stock-status page: current coastwide stock-status findings.
- ASMFC, Atlantic Menhaden Board Reduces 2026 TAC by 20%, October 31, 2025, page 1: stock status, ecological reference points, the 2026 quota and the projected probability of overfishing.
- ASMFC Atlantic Menhaden Management Board annual meeting materials, November 2026: agenda and materials for consideration of 2027-2029 specifications.
- New England Fishermen's Stewardship Association leadership page: Dustin Delano's title.

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.

Press Contact

Stove Boat Communications
202-595-1212
contact@smallpelagics.com

SOURCE: American Small Pelagics Network

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By: .....

October 26, 2026

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

Re: Reduce the Atlantic Menhaden Coastwide Total Allowable Catch

Dear Mr. Boyle;

Coastal Conservation Association of New Hampshire urges the Atlantic States Marine Fisheries Commission to reduce the coastwide total allowable catch (TAC), which applies to all states from Maine to Florida. This coastwide TAC is separate from the Chesapeake Bay menhaden fishery.

The Commission should stop overfishing and follow the recommendations of the Atlantic Menhaden Technical Committee when establishing future coastwide quotas. The Commission did not follow that recommendation when setting the coastwide quota for 2026.

A precautionary approach is essential to ensure that harvest levels do not undermine the health of the stock or the ecosystems that depend on it. Management decisions concerning the coastwide TAC should account for the limited contribution of the Chesapeake Bay nursery and prioritize the long-term sustainability of the coastal resource.

It is extremely important that the Commission follows the science. Only one in five adult menhaden comes from the Chesapeake Bay nursery along the coast. The coastwide TAC set for 2027 and 2028 must protect the resource and future spawners. It must also ensure that the stock does not exceed the ecological reference point for 2026 through 2027.

Sincerely,

Zakary Robinson

Zakary Robinson, President CCA NH

CC:
Renee Zobel NH Marine Fisheries
Dennis Abbott
Doug Grout

DEDICATED TO CONSERVING NEW HAMPSHIRE'S MARINE RESOURCES

The Coastal Conservation Association of NH ("CCA NH") is an unincorporated state chapter of the Coastal Conservation Association ("CCA"), which has over 96,000 members in seventeen states. CCA is a nonprofit, public charity corporation that is qualified under IRC §501(c)(3).
Donations to CCA NH are tax deductible under IRC §170.

From: Willis Spear
To: Comments
Subject: [New] [External] My Position on Maine"s Commercial Menhaden Quota and Fishery Management
Date: Friday, November 6, 2026 7:30:09 AM

Good morning,

I would like to share my recommendations regarding management of Maine's commercial menhaden fishery. As a commercial fisherman holding two menhaden licenses, I believe we can improve fairness, efficiency and accountability while protecting the resource.

1. INCREASE MAINE'S QUOTA
   Maine should pursue an increase in its menhaden allocation to support participating fishermen and provide bait for the lobster industry, consistent with sustainable coastwide management.

2. EQUAL INDIVIDUAL ALLOCATIONS PER LICENSE
   Divide Maine's available commercial quota equally among eligible licenses—not boats or license holders. Each license receives one allocation. Because I hold two licenses, I would receive two allocations. License holders should be able to harvest their allocations efficiently, subject to accurate reporting and all applicable vessel and conservation rules.

3. REDISTRIBUTE UNUSED QUOTA
   When 75% of Maine's total harvestable quota has been landed, or at a clearly announced late-season date, DMR should review unharvested allocations. After adequate notice and a fair deadline, unused pounds could be reclaimed and divided equally among eligible license holders who request additional quota. This would avoid wasted opportunity or a second race to fish, without exceeding the statewide limit.

4. ALLOW SURVEYED FISH HOLDS
   Permit direct loading into vessel fish holds rather than requiring barrels, provided hold capacity is professionally surveyed, documented and approved, with an acceptable method for verifying and reporting actual landed weight. This would reduce handling, labor and cost.

5. REMOVE THE MONDAY/WEDNESDAY/FRIDAY RESTRICTION
   The current three-day schedule forces fishermen working in multiple fisheries to repeatedly re-rig their vessels. Individual allocations would let us fish when weather, crew and vessel schedules make sense, reducing unnecessary work, fuel use and expense.

6. CREATE AN APPRENTICESHIP AND WAITING LIST
   Establish a structured apprenticeship for prospective participants, with a transparent waiting list and clear criteria for future license eligibility. This would protect existing participants while creating a pathway for the next generation.

Overall, I support a fishery that protects the resource but lets licensed fishermen harvest their

fair share as safely, quickly and efficiently as possible. I appreciate your consideration and welcome discussion of these proposals.

Willis “Obie” Spear III
Owner, Old-Spec Fisheries
Maine Commercial Fisherman

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Friday, November 6, 2026 9:23 AM
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

Zachary Knapp

Email

zknapp92@gmail.com

State

Maine

Comment

I fish commercially for lobster out of Kittery Point, Maine. I'm asking the Board to keep the coastwide Atlantic menhaden quota at 186,840 metric tons. The quota was already cut by 20 percent for 2026, and I oppose another coastwide cut.

Pogies are a big part of how we bait our traps. When I haul, I need enough bait to set my gear back. If pogies are hard to get, I still have to find bait, and whatever extra I pay comes straight out of what I make on the boat. The Maine fishermen who catch pogies and the bait dealers who supply our boats depend on this fishery, too.

Menhaden are an important forage fish, and I understand why people are concerned about their availability in Chesapeake Bay. How much the reduction fleet catches in the Bay tells you very little about what's available to Maine's bait fleet. If the Board wants to look at whether the reduction fishery is affecting menhaden availability in Chesapeake Bay, focus that review on the Bay. Keep the coastwide quota where it is and give Maine's bait fishery the stability it needs to supply our boats.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Friday, November 6, 2026 7:13 AM
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

David Earl

Email

dave@midcoastboat.com

State

Maine

Comment

I am a Lobster fisherman from Sprucehead and we do not need any more regulations on the Menhaden fishery. We need to penalize the big businesses that are taking to many fish up and down the coast. Pogies are a very important part of the Lobster fishery for bait and we need to be able to harvest them when needed. If we add more regulations then that will hurt the individual fisherman that depend on the income from Menhaden. More regulations will just keep things from going smoothly.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Friday, November 6, 2026 6:58 AM
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

Erik Hansen

Email

erikhansen1214@gmail.com

State

Maine

Comment

I think these fish have made a migration north over the last years, plenty of pogies in Maine all summer. We need this fish for lobstermen. If you're going to limit anything it should be the factory trawlers from different countries. Us fish should be our fish. Please dont take our only reasonable priced bait away from Maine lobstermen.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Friday, November 6, 2026 6:33 AM
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

Douglas Heath

Email

lobstermj@aol.com

State

Massachusetts

Comment

My name is Douglas Heath and have held a commercial menhaden fishing license in Massachusetts since 1976 and have seen menhaden stocks go up and down through the years, we all know it is a cyclical stock. I am in favor of keeping total allowable catch the same. I say this due to my on the water observation of the menhaden stock over the years especially the past five years, the stock has changed the areas they migrate to and feed from inshore to much deeper water than any previous years. I would also like to point out that I feel the stock is also migrating in greater abundance to the north than before, therefore less is being scene in the southern end of population. Canada observed a large increase in menhaden stocks over last five years more than ever scene before. the stock is there just in a more northern range, we all have to face that fact especially the southern states that are most effected. KEEP TAC THE SAME thank u, Douglas! Heath

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Friday, November 6, 2026 6:27 AM
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

Dixon Smith

Email

fvsizematters@gmail.com

State

Maine

Comment

To whom it may concern:
The menhaden fishery in Maine is not overfished, and does not need more cuts to appease a problem in the reduction fishery far to our south. Menhaden are an important bait source for our lobster industry. With climate change the fish will be venturing further northeast every season and canadian fishermen will catch them. And as we all well know they will pay no attention to our limits. This has been proven with the herring fishery for many years. . With our small, well regulated bait fishery in Maine we doesn't take enough biomass to hurt the species or the animals that rely on it. I urge you to reallocate quota away from foreign governments and not cut the Maine bait fishery.
Thank you
Dixon Smith Capt. F/V SIZE MATTERS

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Friday, November 6, 2026 6:00 AM
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

Lee Moore

Email

leemoore91011@yahoo.com

State

Maine

Comment

Dear council,

My name is Lee Moore. I have been a commercial fisherman for over 30 years. I am writing to ask you please leave the Menhaden TAC alone. For me here in Maine 100% of my income in the summer months relies on the commercial Menhaden fishery. In Maine we are small Family run boats that are supplying the Local Lobster fishery there bait. We have already had our quota affected by the cut in quota that was put in place to try and impact the very large scale Menhaden fishery down South. Our Menhaden fishery is small scale and very sustainable with the over abundance of Menhaden on the end of their life cycle that I have seen over the past year's. In closing I ask again please leave the TAC alone the State of Maine and its many fishing families rely on it to make their livings. Thank you very much.

-Lee Moore

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Friday, November 6, 2026 5:32 AM
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

Christopher Moniz

Email

cmmoniz08@gmail.com

State

Massachusetts

Comment

Hi my name is Chris Moniz, I've been commercial fishing for over thirteen years. I fished offshore for lobster for about 10 years and now fish inshore off of Cape Ann. Before I was a fisherman I was a dairy farmer, so I understand fully what it means to be a good steward to the land or sea, so it may give us bounties year after year. Reducing the TAC would do nothing but hurt the strength of our coastal fishery here off Cape Ann. We have a tight knit fishing community here in Gloucester and a reduction would not only hurt the income that many of us rely on during the slow lobstering season, but also take away from our own source of affordable local bait. It is my understanding that the poggies come and go here but, as of recently, they keep coming back stronger and stronger. Please consider the harm you would do to the small owner operators if you keep reducing the TAC of this fishery.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Friday, November 6, 2026 5:21 AM
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

Kevin Glover

Email

kevinjglover239@gmail.com

State

Maine

Comment

My name is Kevin Glover. I am a Commercial lobster fisherman from Maine as well as a Menhaden fisherman from Maine. I am writing this to inform you of how important the menhaden fishery and the quota we get is to the Maine lobster industry. Most of the menhaden I catch supplies bait for my lobster fishery, as well as a few other local people I deal with. We are owner operator ,small scale and rely on being able to catch fresh local bait to put back into our business. I really want to stress the importance of leaving the TAC alone. If we have another cut in our menhaden fishery it will really weight heavily on the lobster fishery. With rising cost of Fuel, supplies, and living in general, being able to provide fresh local bait to our industry is a key for our lobster fishery.

Thank you for your time,

Kevin Glover

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Friday, November 6, 2026 4:42 AM
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

Galen Plummer

Email

junglerooster1@hotmail.com

State

Maine

Comment

I've sailed from NY to Downeast Maine and from inside Long Island NY to Block Island RI and beyond up into Downeast Maine and have seen acres of menhaden. Last year off Block Island I saw schools of menhaden that covered football fields. This season in Maine waters have equally been as abundant. Fish migrate and land where the food is they may not always be in the same areas despite being in a place for decades that doesn't mean fish stocks are low. Take cod for instance the government agencies saw stocks are depleted but in Maine they're abundant. Monkfish I've never seen so many and in 20 fathom of water too. I'm totally against any coastwide reductions if anything make Virginia owner operator and reduce their75% cut and redraw the maps. Quit making blanket policies what's good there is terrible here

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Friday, November 6, 2026 1:47 AM
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
Al Eagles
Email
acelob64@gmail.com
State
Rhode Island
Comment
Leave the tac in place no changes

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: ASMFC <info@asmfc.org>
Sent: Friday, November 6, 2026 1:40 AM
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

Jason Joyce

Email

Lobstermobster729@yahoo.com

State

Maine

Comment

Dear Commissioners,

Thank you for the chance to submit comments as a Town Selectman on a small Maine unbridged island fishing community. I also represent Maine's Zone B lobstermen(505 licenses) on our Maine Lobster Advisory Counsel.
My community, and the Maine Lobster industry are operating on very tight margins these days. 80% of Swan's Island tax base relies upon our island lobstermen's ability to earn enough to pay their property taxes which run our school, public works, public safety, and fund our local government. We also need to earn enough to afford ferry tickets to get supplies on the mainland and other life essentials.
Having enough affordable menhaden available for our fishermen enables them to make a living and contribute to the functioning costs of our town by paying property taxes.
Imported baits are twice the cost of menhaden and the savings directly benefit island fishing families. Menhaden fishing also provides jobs and opportunities some Lobstermen pursue full time, thereby reducing lobstering effort.
Being a small community we also recognize how negatively a fishing reduction can hurt established fishing communities.
Therefore, I am writing to express the need to resist reductions in TAC and the existing bay cap until the relevant scientific work is completed.
Maine's lobster industry has needlessly suffered over the last few years due to a process intended to protect right whales while basing their data on old, outdated data.

Thankfully, through a regulatory pause paired with funding(secured by Maine Senator Collins) for right whale research, the federal government now has vastly improved available data to make better regulatory decisions to meet the needs of whales and fishermen.
We also ask that while the relevant scientific work is done, that the Commission shift a considerable amount of quota to the New England states through reallocation based on a northward movement of the resource and the needs of the lobstering community.
I look forward to attending the meetings in person and would be happy to further explain our opinions on menhaden management.

Thank you,
Capt. Jason Joyce
Swan's Island Maine
207-479-6490

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Friday, November 6, 2026 1:21 AM
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

Chris Scola

Email

scolathecrab@yahoo.com

State

New York

Comment

The only reduction to menhaden quota that should be implemented is to eliminate Cooke Aquaculture's access to the stock . Half of what they catch should be divided among the states so that the smaller seine , pound trap , and gillnet operations can have more consistent access to the resource . Going forward all management decisions should be skewed to the benefit of smaller operators while eliminating access to large industrial scale corporate operations . The other half of the reduction fleets quota should remain uncaught to help guarantee the sustainability of the fishery

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 11:35 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

Marley Matthews

Email

kjm5291@gmail.com

State

New Hampshire

Comment

Re: Opposition to Proposed Atlantic Menhaden Coastwide TAC Reductions

Dear Atlantic States Marine Fisheries Commission,

I am writing on behalf of a family-owned, multi generational commercial fishing business, operating throughout New England. Our business harvests Atlantic menhaden for use as bait in the commercial lobster industry.

I strongly oppose any proposed coastwide reduction in the Atlantic menhaden Total Allowable Catch (TAC).

A blanket reduction in the coastwide TAC unfairly impacts commercial bait fisheries that are already operating within restrictive state quotas. These fisheries provide an essential product to other commercial fishing industries and support countless fishermen, families, and coastal communities.

Before considering any reduction in the coastwide TAC, the Commission needs to address the longstanding issue of quota allocation. Reducing the total allowable catch while maintaining the existing allocation structure only compounds the inequities already present in the fishery.

If the Commission determines that a reduction is absolutely necessary, that reduction should be postponed until a comprehensive quota reallocation can be implemented simultaneously. It is unreasonable to continue reducing access to a resource without first ensuring that access is distributed appropriately among the states and the different sectors of the fishery.

Furthermore, I believe the Commission needs to distinguish between the commercial bait fishery and the industrial reduction fishery when developing management measures.

The bait fishery harvests menhaden for direct use in other commercial fisheries, particularly the lobster industry throughout New England. The reduction fishery, on the other hand, harvests menhaden on an industrial scale for processing into fishmeal and fish oil. These are fundamentally different operations, and they should not be treated as though their impacts and purposes are identical.

If additional conservation measures are necessary, the Commission should prioritize stronger regulations and greater accountability for the reduction fishery rather than continuing to place additional restrictions on commercial bait fishermen.

We are not opposed to responsible fisheries management or conservation. We understand the importance of maintaining a healthy and sustainable menhaden population. However, conservation measures must be equitable, justified by the best available science, and designed with consideration for the economic consequences to the fishermen and communities affected.

Our business, like many others in New England, continues to face rising fuel costs, operating expenses, and increasingly limited fishing opportunities. Further reducing our access to menhaden without addressing the underlying allocation issues threatens the viability of our operations and the industries that depend on us.

I urge the Commission to reject any across-the-board reduction in the coastwide TAC. If a reduction is deemed unavoidable, postpone implementation until quota reallocation can occur at the same time, and pursue management measures that more appropriately distinguish between industrial reduction fishing and commercial bait fishing.

The Commission should not continue to reduce the available resource without first addressing who is receiving access to it and whether that allocation remains logical.

Thank you for your consideration.

Kimberly Matthews
B M Matthews Inc.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 10:31 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

Eric Knight

Email

knightshift88@gmail.com

State

Maine

Comment

Hello, thank you for the time to comment publicly on a resource that holds so much value here on the coast of Maine; Menhaden. My name is Eric Knight, I am a full time fisherman. I am writing to you to stop the upcoming quota reduction of the menhaden fishery. Lobstermen catching bait is not the problem, we are a small scale fishery full of independent fisherman. We are not a massive corporate operation wiping out thousands of tons in one set. Please make an exception for our lobster bait fishery. I'm all for good science but overfishing is just not happening here in Maine.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 9:41 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

Forrest Moody

Email

forrestemoody@gmail.com

State

Maine

Comment

Quit messing with something not broken. The fish
Allocation needs to be divided up more equally among the states. I

Give us back our fisheries, it's not yours too take away.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 8:54 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

Obediah Miller

Email

nokm19@outlook.com

State

Maine

Comment

The proposed quota reduction would absolutely cripple the lobster Industry. Bait is already way too high and adding more strain to the market is only going to make things much worse. The Menhaden population seemed extremely abundant this year up and down the coast and I think the fishermen could attest to that. We could've caught fish right through October if it had been open.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 8:39 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

WI Denton Frey

Email

dennyfrey05@gmail.com

State

Maine

Comment

To whom this may concern I have a big problem with what some of these rec fisherman are claiming about strippers starving cause lack of menhaden. Strippers don't just survive on one type of food they eat many types of stuff from lobsters crabs mackerel they are opportunists and as far as osprey they eat what ever fish they can catch not just menhaden did u ever think as far as ospreys that the pollution in areas where down Chesapeake bay is a part of the problem cause here in Maine the ospreys are plentiful and the strippers r fat. I just find it funny that every study u read says that menhaden are not being over fished and r not in any danger of being over fished and to cut the quote more would hurt lots of fishermen up here in Maine. If anything we should get more quota for we use menhaden for bait for other fisheries and we are all small scale menhaden operations. Thank your time

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 8:37 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

Joshua Hupper

Email

jhupp7@yahoo.com

State

Maine

Comment

The commercial fishing industry is struggling enough right now. The trickle down effect from decreased quotas will be catastrophic. I'm a 6th generation commercial lobsterman, it's hard to watch the regulations being jammed at us repeatedly.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 8:33 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

Dale Damon

Email

kgringeri@gmail.com

State

Maine

Comment

Menhaden is the only bait that is cost friendly to the Maine lobstermen! I use menhaden everyday I go out haul my traps if possible. If you reduce the menhaden quota you will be putting most fishermen out of business.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 8:09 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

Ed Smith

Email

smithed@comcast.net

State

Massachusetts

Comment

I participate in the Massachusetts menhaden fishery. This fishery is a small scale fishery which primarily harvests large post spawn menhaden. Even though we have a very limited impact on the menhaden biomass we are being lumped in with the industrial scale fishers. At the present time we have a limited number of fishers(no more than 15 statewide),fixed overall quota,daily quota and weekends out of the fishery.

I ask that our quota remain unchanged for fishing year 2027. Given Massachusetts small percentage of the overall quota a no reduction vote would be prudent and and allow for local bait supply at a time when lobster bait is scarce and at an all time high price.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 7:58 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

Alan Talgo

Email

alantalgo79@gmail.com

State

Maine

Comment

I am from Stonington maine , and I am a pogy . My only license is is my shellfish license and this pogy license. It is a very short quick season. It seems like it ends as fast as it starts. As it is, we've got such a small quota. it is hard for me to make a real living with my small Boat. It is very hard for me to compete with the others and taking that big quoter away from us. It's not only taking my work away which I rely on it to support my family. it has also been a very big help for the lobsterFisherman to be able to count on pogies as a cheaper form of bait and as it is our quota is already way too small. Cutting it is only gonna hurt Fisherman that count on this. The boats that are hurting the menhaden population is the big boats that are off the Chesapeake Bay in the deep waters sucking up metric tons of fish in filling Boat after boat after boat.we lobster fishermen in Maine deserve a bigger quota, not a reduction. Any reduction in the quote should be drafted towards the big boats like the ones off the Chesapeake Bay. Thank you.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 7:57 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

Joseph Locurto

Email

secondtry1@yahoo.com

State

Maine

Comment

Any reductions for menhaden should be handled on a state by state basis. Just because there are less in one state waters and more in another does not mean that the biomass is depleted. The ocean is vast and biomass moves. The state of maine the past four or five years has had a bumper crop of fish and years before there wasn't any for twenty or so years.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 7:55 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

Richard Hildings

Email

richardh7903@icloud.com

State

Maine

Comment

Why cut our quota why not cut the millions of pounds that the mid Atlantic can catch

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 7:50 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

Joshua Harvey

Email

joshuaharvey7900278@gmail.com

State

Maine

Comment

Menhaden in the state of maine is a crucial part of our fishing community it was bad enough loosing quota this year. We can't afford to lose anymore quota than we already have. Menhaden population is healthy from what I've seen.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 7:48 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

Andrew santapaola

Email

asantapaola2010@gmail.com

State

Massachusetts

Comment

This cut is unnecessary for the northern new England states. This cut should only be done down the Chesapeake bay ware the real damage is being done. Are quota here is so small and insignificant to the overall problem it will not help a thing, are quota is so small to start all this is going to do is devastate the small scale fishier of new England who need the menhaden for lobster bait through out the season. And have devastating damage to are coastal fisheries. Please do not pass this without compensation to the new England states.

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: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 7:46 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

Dillon Harvey

Email

dillonharvey2@gmail.com

State

Maine

Comment

Hello, My name is Dillon Harvey I am a 5th generation lobsterman. Pogies or menhaden are becoming a critical part of my industry due to massive quota cuts to Herron fisheries the only local bait with decent quota left for us is pogies, which are plentiful in the Gulf of Maine or atleast Muscongus sound where I lobster. Not only are they plentiful and crucially needed bait but they also tend to be cheaper than frozen trucked in bait for out of state as the cost of everything rises use lobstermen need to get a break wherever possible. Ontop of the financials of the cheap bait is the ecosystems the pogies where I lobster at times run so thick they will smuther themselves out on mud flats when the tide goes out. I'm not a marine biologist but I can tell you for sure that thousands of pounds of decomposing fish on our mud flats is definitely going to have negative impacts, from bacteria to an increase in predatory fish due to the the surplus of feed and more. From what I have seen with my own eyes I see no reason for this quota cut

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 7:22 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
Andrew Feeney
Email
andrew.frank.feeney@gmail.com
State
Maine
Comment
Leave the TAC alone! Maine needs the Menhaden fishery

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: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 7:13 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

F/V Sophia Ella

Email

williamclayton79@gmail.com

State

Maine

Comment

KEEP THE MENHADEN QUOTA INTACT!!!
It would be completely irresponsible to reduce this quota. As a Maine lobsterman, the poggie fishery is what keeps our spring, summer and early fall lobster business solvent.
The continued rise in fuel and bait costs cannot be counterracted by individual fishermen. We rely solely on what the dealers wish to pay us. The relief we get in a lesser price for a superior menhaden bait is oftentimes the difference in a profitable day versus one in the red.

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: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 7:09 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

David O'Connell

Email

davidtobyoconnell@yahoo.com

State

Massachusetts

Comment

I am 3rd generation commercial fisherman with 29 years on the water off New England and Alaska. I have done lobstering, ground fishing, scalloping and purse seining for menhaden. I have seen these fish come and go because of their cyclical nature not overfishing.
I cannot stress enough that we need these fish for the Lobster industry and for the coastal communities. My crew and I spend a good part of our spring and summer catching them to use for bait in the summer and into the fall, which is our source of affordable bait.
I think this fish stock are in excellent shape and continue to become stronger every year off Cape Ann. I hope you will not reduce our total allowable catch quota.
Thank you
Toby

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: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 7:07 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

Shane Hatch

Email

shanehatch86@gmail.com

State

Maine

Comment

Please consider the Maine and upper New England states in which use menhaden for their lobster fisheries. A reduction would greatly hinder many family's income on both sides of the spectrum. As you know the price of fuel and expenses are getting out of hand. The menhaden fishery has eased that pain along with income for the fishermen catching them as well. Here in Maine we have only had menhaden back for a few years and don't know when may be the last for another cycle. As menhaden fishermen we have huge investments to prepare for this fishery and need to take full advantage of this fish while their are still on hand.

Thank you for your time

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 7:03 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

Matt Clemons

Email

matthew.james.clemons@gmail.com

State

Maine

Comment

I am a menheden fishermen from maine. I strongly urge you to relocate more menhaden quota to Maine. More quota would ease soaring bait prices in maine. I currently catch my weekly quota in just a few short hours in one day. I would love to grow my business but my hands are tied with such a small allowance. Maine fishermen are fusterated when they learn Maine has just 4.5% of the TAC while Virginia has far more than there fair share.

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: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 6:48 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

Nicholas Lunt

Email

lobsterlunt@gmail.com

State

Maine

Comment

I belive the state of Maine should be allocated a larger quota basted on the last years of very mature and abundant stock in our waters. A reduction would cause hardship on many parts of our fishing communities and all that are connected even if it's not directly. Thank you for considering my opinion.

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: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 6:39 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

Matthew Clemons

Email

matthew.james.clemons@gmail.com

State

Maine

Comment

As a commercial lobstermen and menhaden fishermen from maine, I just wanted to explain how important it is to me and my fellow fishermen that you NOT cut the coast wide TAC for menhaden. Menhaden availability for lobster bait is so crucial to our lobster industry. Maine already has such a small percent of the coastwide TAC that any reduction would drive our bait prices through the roof. As menhaden fishermen myself I catch my entire weekly quota in just a few short hours. All my bait is sold fresh directly to the fishermen. Unlike the reduction fishery, the bait fishery returns menhaden back into the sea and they are absorbed back into the ecosystem. I hope the bait fishery is left out of any cuts that need to be made.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 6:39 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

Matthew Clemons

Email

matthew.james.clemons@gmail.com

State

Maine

Comment

As a commercial lobstermen and menhaden fishermen from maine, I just wanted to explain how important it is to me and my fellow fishermen that you NOT cut the coast wide TAC for menhaden. Menhaden availability for lobster bait is so crucial to our lobster industry. Maine already has such a small percent of the coastwide TAC that any reduction would drive our bait prices through the roof. As menhaden fishermen myself I catch my entire weekly quota in just a few short hours. All my bait is sold fresh directly to the fishermen. Unlike the reduction fishery, the bait fishery returns menhaden back into the sea and they are absorbed back into the ecosystem. I hope the bait fishery is left out of any cuts that need to be made.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 6:35 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

Travis Robinson

Email

travrobinson65@gmail.com

State

Maine

Comment

This is what we all use for bait everything has gone up in price already and I have a hard time finding it as is so this would make it so much harder to fish and live i saw alot of fish after the year was shut down so I dont believe its hurting the fish population

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 6:11 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

Lyndee Emerson

Email

lyndeebentley97@gmail.com

State

Maine

Comment

I would like for the poggie quota for maines coastline to be at least left alone if it can not be increased. As the wife of a fisherman who unfairly lost his ability to keep his license when the state decided to change rules/laws about holding the license for 2 consecutive years, taking quota now would basically be taking food off our table.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 5:53 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

Christopher Nunan

Email

remington1238@yahoo.com

State

Maine

Comment

I'm a Maine lobsterman . We depend on the menhaden for bait . We do not need to loose any more bait from our fishery.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 5:51 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

Nick Heal

Email

nickheal86@gmail.com

State

Maine

Comment

Menhaden in New England waters have become one of the staples for the bait supply in the northeast. With the rising costs of everything recently, being able to catch our own bait has moved from a luxury to a necessity. We are all small business owners (owner operator) here in Maine. For many lobsterman and their families this is all they have ever known, most of these families go back multiple generations. A drastic cut in the availability of fresh/affordable bait may be the end of many of these families fishing heritage. I understand there will most likely be a TAC reduction. But we have ALOT of fish here in New england easterly all the way into Canada. There are no studies that I am aware of, studying this biomass when they are here both inshore and offshore. The fish we see hear a generally large fish in the 10 to 14 inch range. I ask that you consider reallocation for Maine. We have less fish to achieve our quota because they are larger and possibly at the end of their life cycle. Every fish we use ends up feeding the ecosystem that they were caught in. i.e. Not supplying fish farms in another country. By increasing the allocation in the northeast less fish will be killed to achieve the TAC, therefore maybe not such a large cut will be needed. Thank you.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 5:19 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

Jason Tyler

Email

jtyler@msad37.org

State

Maine

Comment

The menhaden fishery is an important bait supply for the lobster fishery. Menhaden have been in increasing in numbers tremendously in the last few years along our coast. I have not seen such big groups of menhaden along our coast like these since I was a kid in the 1980s. Cutting the quota on a thriving fishery is uncalled for given the number of fish out there. There are a lot of people in our that area rely on menhaden fishing for income besides being a main bait supply for the lobster fishery. Please reconsider your cut of the quota and leave it where it is. The menhaden fishery is not being overfished at the current quota.
Jason Tyler
Maine Lobster Fisherman

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 5:13 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

Shaun McLennan

Email

fvthunder@gmail.com

State

Maine

Comment

The Menhaden fishery is very important to the state of Maine. Please do not let the TAC have an impact on Maine. If anything, we need more quota. The fish have been here in abundance, and when harvested, they are 100% used for lobster bait and put back into their natural ecosystem. There is a dozen menhaden fishing boats just in my harbor that supply menhaden bait for upwards of 75 lobster boats.

If the mid-atlantic and southern states have not been achieving their quota, make an adjustment down there, but Maine cannot be penalized with a TAC reduction, and no quick way to get a increased share percentage. We have caught our alloted quota and then used transfers, even under a strict daily/weekly quota structure.

There are 350 Maine menhaden fishermen that are invested and depend on a full menhaden season for a large percentage of their annual income, while supplying lobster bait for over 5,000 lobster fisherman. Any reduction will have direct negative impacts.

If the Mid Atlantic needs change in their fishery, please find a way to do it without impacting Maine.

Thank you for your time.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 5:09 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

John Harvey

Email

johnharvey6780@gmail.com

State

Maine

Comment

The maine lobster industry is under a lot of pressure and its so expensive to even go lobstering anymore menhaden have help in having a little bit cheaper bait there are so many around .I the late 80s they smothered themselves out all up and down maines coast line stinking up the shores of maine this proposal cut isnt needed for conservation its just another way to put more pressure on the lobster industry. Please do not cut the quota. They allow then to catch the tiny ones down south why cut the quota on the nice larger fish we catch up here in maine .If you truly wanted to protect the fish you would do something about the ones catching the juveniles not the people catching the fish at there maximum size .

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 5:09 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

Desiree Welling

Email

desiree.smith2686@gmail.com

State

Maine

Comment

I lobster commercially in the state of Maine. I rely on menhaden to bait my traps. Any reduction in quota will hurt my lobster business. I am requesting the quote to remain the same.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 5:06 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

Aaron Welling

Email

peachfuzz3489@gmail.com

State

Maine

Comment

I am a commercial lobsterman in Maine that uses primarily menhaden for bait. I am requesting the quota to remain the same. Any reduction in quota will put negatively impact my lobster business.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 4:56 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

Lee Watkinson

Email

lwatkinson@roadrunner.com

State

Maine

Comment

Im writing to urge the advisory board to leave the Menhaden quota at its current level. The North East has seen tremendous growth in our fishery and stocks seem to be thriving. It is a crucial bait source for the Maine Lobster fishery and thousands of jobs depend on the fish.
Thank you for your time,
Lee Watkinson
F/v Darcie Lynne
Maine

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 4:52 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

Alan Poland

Email

apoland65@icloud.com

State

Maine

Comment

In the northeast USA trap fishiers need this resource to substane its bait supply if a reduction in quota target the small menhaden been harvesting and the reduction fleet we could use more quota for the state of Maine

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 4:50 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

Russell Leach

Email

fvmygirls@yahoo.com

State

Maine

Comment

Why would you give maine a reduction..where not taking advantage of this fishery.where using all of our quota for lobster bait ..we catch all big mature fish and not taking millions of pounds of small fish that should be left alone to mature..reduction should be on the canadian factory boats if anything..we saw more fish this yr then any other. and they was here longer in the season when we got shut dwn

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 4:47 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

Charles Griffin

Email

charles.griffin@atwoodlobster.com

State

Maine

Comment

Reducing Menhaden landing for the state of Maine will have a severe impact on its lobster fishery.

Menhaden are the lobster fisheries biggest source of bait.

Maines quota allotment represents a tiny slice of the overall national quota.

It makes very little sense to cut Maines quota.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 4:38 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

George Bamford

Email

gbamford74.gb@gmail.com

State

Maine

Comment

I don't understand the reduction for all of the allocation. The ones that come to Maine go to Canada and are fish without limits cause they say there an invasive species and they eat lobsters . So it doesn't make sense for Maine to just let them go by to buy them back from Canada . Is there proof of a decline or maybe they have moved up towards Maine more so it seems like a decline in other parts of the. I disagree with the reduction.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Thursday, November 5, 2026 4:33 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

Thomas McLennan

Email

bugga3119@hotmail.com

State

Maine

Comment

please leave the TAC alone. The maine lobster Industry relys on the locally caught menhaden. Maines menhaden fishery is a huge part of the coast. There is 350 menhaden fishermen in maine, all independent owned and operated.

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James Boyle

From: ASMFC <info@asmfc.org>
Sent: Tuesday, November 3, 2026 6:53 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

Douglas McLennan

Email

lobstarz@hotmail.com

State

Maine

Comment

Members of the Atlantic States Marine Fisheries Commission, My name is Douglas McLennan, and I am a commercial fisherman from Spruce Head Maine.i would like to offer my appreciation of the comment period for Atlantic Menhaden. I am a commercial harvester using a purse seine catching bait for the Maine Lobster Industry. I have two sons and a daughter in law that also have menhaden harvesting licenses in Maines closed entry fishery.All of my family members are involved in our fishing operations.The menhaden season has become a very important source of a domestic bait supply for the lobster fleet in Maine, and a source of income for our coastal families.We have built up a workable quota thru the last 5 season up until the 20% cut this last season. Maine used to have a very small quota , but thru the work of the Maine Department of Marine Resources, Maine has received increases in the quota that have worked in our favor , and made menhaden a viable source of income to many coastal families.I cannot stress enough how important this local bait supply is to the survival on the Maine lobster fishery. The cost of operations has reached a tipping point for the lobster fishermen. Everything involved in operating a lobster boat has risen , except the dock price for lobster. Being able to catch your own bait, and supply others with a local product is a crucial key to making ends meet. Imported frozen bait is not only expensive to obtain, but also can become short in supply if it was the only option, and supply and demand will increase prices even higher if it's is the only option..The menhaden, I believe were a cyclical resource in Maine waters in previous years, but the fish seem to be in larger numbers as the cycle progresses. Just maybe the warming oceans we hear so much about are changing the migratory patterns , and the fish are living in the Gulf of Maine year round. The current problem in Menhaden seems to be coming from the Chesapeake Bay Area, stemming from the Industrial Reduction Fishery. There has never been such a political movement against a fishing

practice as this years quota reduction process. If the problem is clearly one company, studies should have to prove this will make a difference in the Chesapeake.I personally do not believe in the reduction fishery having such a large allocation of the TAC. This is a historic based quota allocation,so my opinion doesn't matter. If a cut must be made, it shouldn't have a adverse effect on states miles from the target. The bait fishery could be seperate from the reduction quota so we could retain a workable quota based fishery. There is talk of reallocation if something changes in the Chesapeake, but this will take years to figure out, and Maine needs to have the quota available on a seasonal basis to keep the lobster fishery in a viable bait supply. We have our own constraints on harvest that are also strict to prevent overfishing, on top of the quota. I would ask the members to think wisely on the impacts to other states fisheries that are doing well with the abundance of menhaden. Menhaden have become common in the Canadien Maritimes , along with striped bass. There is a clear connection of the resource moving north.The lack of any science of the biomass of menhaden in the waters north of Rhode Island should also be considered in any cuts to the TAC that will reduce Maines quota. Maine should be able to maintain our current quota level at the least, and an increase in quota if a reallocation is considered. I cannot stress enough how important this is to the coastal communities in Maine.These are all small independent family owned and operated business that are multi generational.I have many points that could be made,but I know there will be many letters to be reviewed, so I will leave it to the committee to please consider the entire coast of the United States when making the decisions of cuts, and use them where they will do the most good. This decision will be something we as fishermen will have to live with for the next three years. With the evolving economics in the commercial fishing business, it will be a crucial source of an affordable , domestic bait supply. Please support the oldest industry in the nation, family operated commercial fishing.
Thank You for your consideration, Douglas McLennan F/V Nora June Spruce Head Maine.

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