

Representative Thad Altman
150 5th Avenue
Suite A
Indialantic, FL 32903-3154

Mr. Jim Estes
Deputy Division Director
Division of Marine Fisheries Management
2590 Executive Center Circle E, Suite 201
Tallahassee, FL 32301

Mr. William R. Orndorf
1950 Palomino Road
Melbourne, FL 32934

October 16, 2020

Dear ASMFC Florida Representatives,

Today the undersigned ask Florida State's delegation to the Atlantic States Marine Fisheries Commission to demonstrate conservation leadership when voting to establish the 2021-2022 coast-wide Total Allowable Catch limits for Atlantic Menhaden at the upcoming Atlantic Menhaden Management Board meeting on October 20th.

Atlantic menhaden serve as forage for tarpon, redfish, king mackerel, cobia and many other species that drive the recreational fishing economy in the state of Florida, as well as whales, dolphins, birds that contribute to ecotourism activities.

The Atlantic States Marine Fisheries Commission's visionary action in August 2020 to adopt Ecological Reference Points for Atlantic menhaden management was an important acknowledgement of the key role menhaden play in the ecosystem. Now, at its October meeting, the Commission must effectively implement this new system by setting a coast-wide catch limit that is likely to succeed in meeting the new ecological target.

Specifically, we request that the Florida delegation to the Atlantic States Marine Fisheries Commission advocate and vote for a 2021-2022 Total Allowable Catch limit (TAC) that the Commission's own scientific advisors predict will have no more than a 50% probability of exceeding the newly adopted Ecological Reference Point Target Fishing Mortality.

According to the Atlantic Menhaden Technical Committee, the TAC that would lead to a 50% probability of exceeding the new ecosystem target fishing mortality rate for 2021-

2022 (combined) is 176,800 mt per year. While this TAC represents an approximate 18% reduction from the current 216,000 mt TAC, it is similar to the TACs implemented for 2013-2014 (170,800 mt) and for 2015-2016 (187,880 mt). **Setting the Total Allowable Catch at this level or lower would have little to no negative impact on commercial fishers who harvest and land Atlantic menhaden in Florida and would better position forage fish availability to facilitate sustainable populations of Florida's ecologically and economically important predators and gamefish.**

There are many reasons that Florida's State delegation to the Atlantic States Marine Fisheries Commission should not consider Atlantic menhaden catch limits that have less than a flip of a coin chance of maintaining fishing mortality rates at or below the newly adopted Ecosystem Based Reference Point target, not the least of which is that doing so would be inconsistent with the leadership that the State legislature and Governor DeSantis have already taken on fisheries conservation.

We thank you for your ongoing managerial leadership and we look forward to collaborating with you to advance ecosystem-based management approaches for other key species managed by the ASMFC.

Sincerely,

Rob Kramer
President
Wild Oceans
Tallahassee, FL 32318

Jason Schratwieser
President
International Game Fish Association
Dania Beach, FL 33004

Brett Fitzgerald
Executive Director
Angler Action Foundation
Lake Worth, FL 33460

Preston T. Robertson
President and CEO
Florida Wildlife Federation, Inc.
Tallahassee, FL 32301

Tom Twyford
President
West Palm Beach Fishing Club
201 Fifth Street
West Palm Beach, FL 33401

Mike Conneen
Executive Director
Anglers for Conservation
Satellite Beach, FL 32950

Dominic Agostini
Owner
Dominic Agostini Photography
Melbourne, FL 32937

Colin Hutton
Owner
Jewelwing Photography
Jupiter, FL 33478

Capt. Jon Reynolds
Owner/President
Drop Back Charters
South Atlantic Fishing
Environmentalists
Islamorada, FL 33036

Derek June
Owner
DRJ Home Improvement
West Palm Beach, FL 33407

Nikole Heath
Social Media Director and Event
Coordinator
Force-E Scuba Centers
Riviera Beach, FL 33404

Hannah Medd, MSc.
President
American Shark Conservancy
Palm Beach Gardens, FL 33418

cc: Jessica McCawley, Director, FWC Division of Marine Fisheries Management

National Audubon Society * Conservation Law Foundation * National Wildlife Federation * Wild Oceans

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

RE: Total Allowable Catch for the Atlantic Menhaden Fishery, 2021-22

Dear Chairman Woodward:

The undersigned organizations write in support of the Atlantic Menhaden Management Board (Board) using the Ecological Reference Points (ERPs) adopted at the August, 2020 meeting to set an Atlantic Menhaden Total Allowable Catch (TAC) for 2021 and 2022 at the Board's October, 2020 meeting. **We urge you to adopt a TAC for menhaden that represents a $\leq 50\%$ probability of exceeding the ERP target of $F=0.19$.** Setting a TAC at $\leq 50\%$ risk of exceeding the ERP fishing mortality target should not significantly limit commercial catches but would ensure that myriad coastal and marine predators, including striped bass, other large predatory fish, coastal birds, sea turtles, and marine mammals have sufficient access to this critical food resource, which will benefit other coastal businesses as well.

According to the analyses developed in the last two months by the Atlantic Menhaden Technical Committee (TC) at the request of the Board, setting a TAC that has a $\leq 50\%$ probability of exceeding the ERP target would result in a TAC of $\leq 176,800$ metric tons (mt) for 2021. Given uncertainties inherent in the future stock projections, we believe the TAC of $\leq 176,800$ mt should be maintained for the 2022 fishing year. In addition to implementing the new ERP framework, this approach ensures F does not result in a $>50\%$ risk of exceeding the established Target.

When the Board voted unanimously to adopt ERPs for menhaden, it did so recognizing the benefits to other Commission-managed species and the fisheries that depend on them. The suite of other species included in the NWACS-MICE model used to develop and test the ERPs are in poor condition. Striped bass, bluefish and weakfish are all overfished, and spiny dogfish is heavily exploited. Most concerning is the current state of the Atlantic herring population which is overfished at just 29% of its target biomass. These factors, together with the uncertainties associated with the newest Atlantic Menhaden Stock Assessment¹, call for a conservative approach to managing menhaden. Therefore, any TAC option that would result in a $>50\%$

¹ SEDAR (Jan. 2020). SEDAR 69: Benchmark Stock Assessment Report: Atlantic Menhaden. http://www.asmfc.org/uploads/file/5e4c3a4bAtlMenhadenSingleSpeciesAssmt_PeerReviewReports.pdf

probability of exceeding the ERP Target would be inconsistent with the fishery management plan's objective, to "maintain the Atlantic menhaden stock at levels which sustain viable fisheries and support predators which depend on the forage base."² In addition, the Board should consider a buffer to further reduce the TAC to more fully account for these risks and uncertainties.

The adoption of an ERP for Atlantic Menhaden and Associated Board Action

At its August, 2020 meeting, the Board adopted an ERP target of $F=0.19$, representing the maximum fishing mortality rate (F) on menhaden that sustains striped bass at their biomass target when striped bass are fished at their F target. With this action the Board established a framework to explicitly manage this forage species to protect its vital role coastwide. We applaud this major step forward to achieving the ASMFC's goal of achieving ecosystem-based management of its fisheries. Once implemented, the new ERP framework will go far to ensure there is sufficient forage for wildlife including seabirds, marine mammals, and sea turtles, as well as commercially and recreationally caught fish species.

At its August meeting the Board requested the TC generate TAC projections that have a 25%-60% probability of exceeding the ERP target, in 5% increments, using 2021-2022 combined and as separate years. The Board also requested the TC calculate the percent risk of exceeding the ERP target and threshold if the current TAC was changed by -10% to +10% in 5% increments.

The importance of adoption of a TAC for Menhaden that represents a risk of $\leq 50\%$ of exceeding the ERP target of $F=0.19$.

A TAC for 2021 that is set to manage menhaden to its ERP target with a high degree of certainty is important for many reasons. It implements the ecosystem-based ERP framework by prioritizing menhaden's role in sustaining the Atlantic coast ecosystem. The ERPs are designed to be responsive to highly-dependent predators. Striped bass was selected as the primary predator against which to evaluate forage requirements through ERPs due to its high level of sensitivity to menhaden biomass. This is vital because, as the TC has previously stated, in the models used to develop the ERPs, coastal piscivorous birds including Brown Pelicans, Bald Eagles, Ospreys, Northern Gannets, Common Loons, terns and gulls are about as sensitive to menhaden biomass as striped bass.

A risk-averse TAC is also needed in light of the overfished condition of Atlantic herring. This oil-rich forage fish is an important dietary component of many predators that also consume menhaden, including seabirds, marine mammals, and many species of commercially and recreationally important fish. The 2020 update stock assessment for Atlantic herring adopted by the New England Fishery Management Council found that Atlantic herring spawning stock biomass (SSB) has been declining since 2014. Atlantic herring SSB in 2019 was 78,883 mt, the lowest since the late 1980s, at a mere 29% of the SSB_{Target} and 57.9% of the $SSB_{Threshold}$.

² ASMFC. 2017. Amendment 3 to the Interstate Fishery Management Plan for Atlantic Menhaden.

Atlantic Herring recruitment has been declining since 1965, and precipitously so since 2009. In 2019, it was less than 20% of R_{med} .³

At the same time, herring are a key part of striped bass diets.⁴ After the 2018 benchmark stock assessment, striped bass were declared overfished with overfishing occurring in 2017, the terminal year of the assessment. The Striped Bass Management Board put in place rebuilding measures that includes reducing fishing mortality for this cherished sport species. Given the significant dependence of striped bass on menhaden as forage, especially in light of the overfished condition of herring; plus the overfished status of striped bass and the inherent uncertainty in rebuilding projections, it is critical that sufficient menhaden are left in the water to help striped bass rebuild. Though some have claimed that no amount of menhaden left in the water will enable striped bass to rebuild to their target SSB based on the multi-species model because the Striped Bass Management Board must effectively enact measures to reduce F, conservatively managing menhaden will help the striped bass population to move in the right direction.

Uncertainties in stock assessment and future research

Further uncertainties also warrant a conservative approach. First, as noted above, estimates of predator consumption or productivity for several of the predators used in the ERP models were in an overfished state at the terminal year of the models. In addition, the ERP models developed for this assessment did not include spatial or seasonal dynamics, meaning that prosecution of the fishery in certain places and at certain times could induce negative effects on the local or even coastwide population. Menhaden have only recently returned to the Gulf of Maine in appreciable quantities, for example, so a conservative approach will help to support that continued abundance.

Also, the natural mortality rate applied to Atlantic menhaden in the most recent benchmark stock assessment⁵ was high, more than 2.5 times greater than that estimated by NOAA Fisheries for other forage species such as Pacific sardine, Atlantic sardine, and Atlantic herring. This difference between many other national and international stock assessments speaks to the significant uncertainty in estimates of menhaden stock size, exploitation rate and stock sustainability.

Finally, the Board, ERP Work Group, TC, Advisory Panel, and the wider public must continue to work to improve how menhaden are managed in the context of their predators, related prey like Atlantic herring, and the ecosystem. As some of the undersigned noted in our August letter to the

³ Wilberg, M., E. Houde, & F. Serchuk (2020). 2020 Management Track Peer Review Committee Report.

https://s3.amazonaws.com/nefmc.org/2020-Management-Track-Assessment-Report-Revised-8-12-2020_508.pdf

⁴ SEDAR. 2020. SEDAR 69 – Atlantic Menhaden Ecological Reference Points Stock Assessment Report. SEDAR, North Charleston SC. 560 pp. available online at: <http://sedarweb.org/sedar-69>

⁵ SEDAR (Jan. 2020). SEDAR 69: Benchmark Stock Assessment Report: Atlantic Menhaden.

http://www.asmfc.org/uploads/file/5e4c3a4bAtlMenhadenSingleSpeciesAssmt_PeerReviewReports.pdf

Board, we support the research and modeling recommendations of the ERP Work Group, including:

- evaluating other models (e.g., Multi-Species Statistical Catch-At-Age, Stock Synthesis) for use in addition to or as a replacement for the NWACS-MICE and/or BAM models;
- incorporating additional species, both predator and prey, into multi-species models and ERP-generation, especially groups found in the model to be sensitive to menhaden abundance (e.g., nearshore piscivorous birds); and,
- continuing to address uncertainties related to the changing population status of stocks like Atlantic herring and striped bass.

Thank you for your continued commitment to ecosystem-based management of Atlantic menhaden.

Sincerely,

Anna Weinstein
National Audubon Society

Zach Cockrum
National Wildlife Federation

Erica Fuller
Conservation Law Foundation

Pam Lyons Gromen
Wild Oceans



TOWN OF WELLFLEET

300 MAIN STREET WELLFLEET MASSACHUSETTS 02667

Tel (508) 349-0300 Fax (508) 349-0305

www.wellfleet-ma.gov

Dear ASMFC Commissioners:

October 16, 2020

The Wellfleet Natural Resources Advisory Board requests the Atlantic States Marine Fisheries Commission to demonstrate conservation leadership when voting to establish the 2021-2022 coast-wide Total Allowable Catch limits for Atlantic Menhaden at the upcoming Atlantic Menhaden Management Board meeting on October 20th.

Atlantic menhaden serve as forage for striped bass, bluefish, weakfish, summer flounder, bluefin tuna and other species that drive the recreational fishing economy in the Commonwealth of Massachusetts, as well as whales, dolphins, birds that contribute to many ecotourism activities. The Atlantic States Marine Fisheries Commission's visionary action in August 2020 to adopt Ecological Reference Points for Atlantic menhaden management was an important acknowledgement of the key role menhaden play in the ecosystem. Now, at its October meeting, the Commission must effectively implement this new system by setting a coast-wide catch limit that is likely to succeed in meeting the new ecological target.

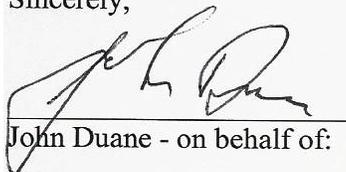
Specifically, we request that the Massachusetts delegation to the Atlantic States Marine Fisheries Commission advocate and vote for a 2021-2022 Total Allowable Catch limit (TAC) that the Commission's own scientific advisors predict will have no more than a 50% probability of exceeding the newly adopted Ecological Reference Point Target Fishing Mortality. Given the poor condition of other forage species, especially Atlantic herring, the Board should adopt an additional conservation buffer to assure adequate forage for striped bass and other species.

According to the Atlantic Menhaden Technical Committee, the TAC that would lead to a 50% probability of exceeding the new ecosystem target fishing mortality rate for 2021-2022 (combined) is 176,800 mt per year. While this TAC represents an approximate 18% reduction from the current 216,000 mt TAC, it is similar to the TACs implemented for 2013-2014 (170,800 mt) and for 2015-2016 (187,880 mt). **Setting the Total Allowable Catch at this level or lower would have no negative impact on commercial fishermen who harvest and land Atlantic menhaden in Massachusetts and would better position forage fish availability to facilitate the coast-wide recovery of striped bass, bluefish, and weakfish to their target levels.**

There are many reasons why our State delegation to the Atlantic States Marine Fisheries Commission should not consider Atlantic menhaden catch limits that have less than a 50 /50 chance of maintaining fishing mortality rates at or below the newly adopted Ecosystem Based Reference Point target, not the least of which is that doing so would be inconsistent with the leadership that the State legislature and Governor Baker have already taken on fisheries conservation.

We thank you for your ongoing managerial leadership and look forward to collaborating with you to rebuild striped bass and other key species managed by the ASMFC which are so critical to the socio-economic wellbeing of all residents of Massachusetts.

Sincerely,



John Duane - on behalf of:

The Wellfleet Natural Resources Advisory Board

John Riehl (Chair), John Duane, Thomas Flynn

Laura Hewitt, Thomas Slack

10.14.20

Dear ASMFC NY Representatives,

In 2019 the New York State Legislature and Governor Cuomo took decisive action to help maintain abundant Atlantic menhaden and a productive marine ecosystem by restricting the use of purse seines to harvest menhaden in New York State waters. This action was universally supported by fishermen, marine businesses, scientists, whale enthusiasts, and environmental advocates. Today the undersigned ask New York State's delegation to the Atlantic States Marine Fisheries Commission to continue New York's leadership when they vote to establish the 2021-2022 coast-wide Total Allowable Catch limits for Atlantic menhaden at the upcoming Atlantic Menhaden Management Board meeting on October 20th.

Atlantic menhaden serve as forage for striped bass, bluefish, weakfish, summer flounder, bluefin tuna and other species that drive the recreational fishing economy in the state of New York, as well as for whales, dolphins, and birds that contribute to ecotourism activities.

The Atlantic States Marine Fisheries Commission's visionary action in August 2020 to adopt Ecological Reference Points for Atlantic menhaden management was an important acknowledgement of the key role menhaden play in the ecosystem. Now, at its October meeting, the Commission must effectively implement this new system by setting a coast-wide catch limit that is likely to succeed in meeting the new ecological target.

Specifically, we request that the New York delegation to the Atlantic States Marine Fisheries Commission advocate and vote for a conservative 2021-2022 Total Allowable Catch limit (TAC) that the Commission's own scientific advisors predict will have no more than a 50% probability of exceeding the newly adopted Ecological Reference Point Target Fishing Mortality Rate. An additional conservation buffer is also advisable given the scientific and management uncertainty, and the poor condition of other forage species such as Atlantic herring.

According to the Atlantic Menhaden Technical Committee, the TAC that would lead to a 50% probability of exceeding the new ecosystem target fishing mortality rate for 2021-2022 (combined) is 176,800 mt per year. While this TAC represents an approximate 18% reduction from the current 216,000 mt TAC, it is similar to the TACs implemented for 2013-2014 (170,800 mt) and for 2015-2016 (187,880 mt). **Setting the Total Allowable Catch at this level would have no negative impact on baymen and commercial fishermen who catch and land Atlantic menhaden in New York and would better position forage fish availability to facilitate the coast-wide recovery of striped bass, bluefish, and weakfish to their target levels.**

There are many reasons that New York State delegation to the Atlantic States Marine Fisheries Commission should not consider Atlantic menhaden catch limits that have less than a flip of a coin chance of maintaining fishing mortality rates at or below the newly adopted Ecosystem Based Reference Point target, not the least of which is that doing so would be inconsistent with the leadership that the New York State legislature and Governor Cuomo have already taken on this important issue.

We thank you for your ongoing managerial leadership and we look forward to collaborating with you to rebuild striped bass and other key species in your portfolio.

Sincerely,

Captain David Blinken
Northflats Guiding
East Hampton, NY 11937

Mike Bottini
Long Island Nature Organization
Sag Harbor NY, 11963

Merry Camhi, PhD
Director, New York Seascape
Wildlife Conservation Society
New York Aquarium
Brooklyn, NY 11224

Captain Vinnie Catalano
Joey C. Charters
Greenport, NY 11944

Captain Andrew Derr
Long Island on the Fly
Greenport, NY 11944

Captain Paul Dixon
To The Point Charters
East Hampton, NY 11937
www.flyfishingmontauk.com

Peter Douma
Windward Outfitters
East Hampton, NY 11937
windwardoutfitters.com

Captain Paul Eldman
Menhaden Defenders
<https://www.menhadendefenders.org/>

Adriene Esposito
Executive Director
Citizens Campaign for the Environment
Farmingdale NY, 11735

Captain Tom Falco
Jenny E Charters, Inc
Sayville, NY 11782

Curtis Fisher
Regional Executive Director, National Wildlife
Federation's Northeast Regional Center

Captain Ernie French
Fly Fish Montauk
Montauk, NY
www.flyfishmontauk.com

John Gans
Northeast Field Representative
Theodore Roosevelt Conservation Partnership

Captain Bryan Goulart
Point to Point Charters
<http://www.nysaltfly.com/home.htm>

George Jackman, PhD
Senior Habitat Restoration Manager
Riverkeeper, Inc.
Ossining, NY 1062

Arthur Kopelman PhD
President
Coastal Research & Education Society of Long
Island, Inc.
West Sayville NY, 11796

Jeffrey Levinton, Ph.D.
Distinguished Professor, Stony Brook University
Department of Ecology & Evolution
Stony Brook NY 11794

Carl LoBue
NY Oceans Program Director
The Nature Conservancy
Cold Spring Harbor, NY

Bill Lucey
Soundkeeper
Save the Sound
New Haven, CT 06510

Kevin McAlister
Founding President
Defend H2O
Sag Harbor, NY 11963

Patrick McCellan
Policy Director
New York League of Conservation Voters
New York, NY 10004

Erin McGrath
Policy Manager
Audubon New York
Albany, NY 12203

Captain Jim Miller
Endurance charters
Babylon NY 11702
endurancecharters.wordpress.com/

Ken Morse
Tight Lines Tackle, Inc
Sag Harbor, NY 11963

Enrico Nardone
Executive Director
Seatuck Environmental Association
Islip NY, 11751

Janet Nye, Ph.D.
Assistant Professor, Stony Brook University
School of Marine and Atmospheric Sciences
Stony Brook, NY 11794

Chris Paparo
Fish Guys Photo
Calverton, NY 11933

Ellen Pikitch, Ph.D.
Professor and Executive Director
Stony Brook University
Institute of Ocean Conservation Science; SoMAS
Stony Brook, NY 11794

Stuyve Pierrepont
Marsh Private Equity and M&A Services
New York, NY 10022

Don Riepe
Director, Northeast Chapter
American Littoral Society
Broad Channel, NY 11693

Klaus (Cooky) Rondinella
President
Long Island Beach Buggy Association
Babylon, NY 11702

Carl Safina Ph.D.
Safina Center, Stony Brook University
Stony Brook NY, 11794

Christine Santora
Stony Brook University
Institute for Ocean Conservation Science
Stony Brook, NY 11794

Brad Sewell
Senior Director, Oceans
Natural Resources Defense Council

Paul Sieswerda
President
Gotham Whale
Staten Island NY, 10301

Robyn Silvestri
Executive Director
Save the Great South Bay
Sayville, NY
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David Taylor, Ph.D.
Assistant Professor, Stony Brook University
Sustainability Studies Program
Stony Brook NY 11794

John Wanag
MTK Custom Rods and Repair LLC
Springs NY 11937

Rob Weltner
President
Operation SPLASH
Freeport NY, 11520

Captain Merritt White
Long Island Skiff Guide
Southampton, NY 11969

Kimberly R. Williams
President
Coastal Solutions Inc.
Cold Spring Harbor NY, 11724

Captain Scott Worth
North Fork Light Tackle Charters
Cutchogue, NY 11935
www.northforklighttackle.com

John Waldman, PhD.
Fisherman, Author, Professor of Biology
Queens College
Queens, New York 11367

Captain Sal Zatkowski
Lucky Dog
Montauk NY, 11954

From: [Barry Jorich](#)
To: [Comments](#)
Subject: [External] Limit the Atlantic Menhaden Harvest
Date: Friday, October 16, 2020 11:20:48 AM

Dear Chairman Armstrong,

As an avid angler, conservationist and outdoor enthusiast, I write to urge the Menhaden Management Board to adopt the ecological reference point with the more conservative allowable catch which would allow the striped bass to reach its biomass target. Menhaden are an important food source for a wide variety of marine animals including striped bass, whales, sharks, osprey and eagles just to name a few.

Unfortunately, many predators that consume menhaden are in decline, including the striped bass, the species most dependent on menhaden forage. This is of concern to the recreational fishing and boating community. Striped bass is the largest marine recreational fishery in the United States contributing billions of dollars to the economy. According to the Atlantic Menhaden Technical Committee projections, menhaden catch must be reduced to 176,800 metric tons if the striped bass is to meet its spawning stock biomass target. Simply put, if the menhaden catch is not reduced, the striped bass are unlikely to rebuild, no matter what measures are put in place to reduce striped bass fishing mortality.

The trade off associated with the setting a conservative quota for menhaden harvest are worth the short-term inconvenience. When you consider saltwater recreational fishing along the Atlantic is enjoyed by 6 million anglers annually, contributing \$11.3 billion to the economy and supporting over 120,000 jobs. The employment created by these fisheries are the lifeblood of our Atlantic coastal communities as more than 90% of the sportfishing and boating industry is made up of small businesses.

As stewards of our shared public resource, we are partners in the ASMFC process and share a unified goal of healthy fish populations and fishing communities. I respectfully request the board to follow through on its imaginative step to establish ecological reference points by adopting a conservative, coastwide allowable menhaden catch that will help rebuild the iconic Atlantic striped bass fishery.

Sincerely,

Barry Jorich
11369 N Mertig Rd Apt N
Hayward, WI 54843
bjorich@gmail.com

This form letter was received by 31 individuals.

From: steven.j.puffenbarger@everyactioncustom.com on behalf of [Steven Puffenbarger](#)
To: [Comments](#)
Subject: [External] Please weigh in on fishing catch limits
Date: Thursday, October 15, 2020 10:40:47 PM

Dear Atlantic Menhaden Management Board,

As a recreational angler, I want to encourage the Menhaden Management Board to support a responsible catch limit for the Atlantic menhaden—a small oily baitfish that serves as the food source for striped bass and other sportfish.

The Atlantic States Marine Fisheries Commission will soon be considering this issue and it's of utmost importance to the fishing economy along the coast. I urge commissioners and state leaders to do the right thing by supporting the recreational fishing economy and science-based conservation.

I am asking specifically that the Commission adopt what is known as the "total allowable catch" for the commercial harvest of menhaden in 2021 and beyond. The best available science indicates that the total allowable catch for next year should be no more than 176,800 metric tons, and preferably 148,700 metric tons.

This decision will leave more menhaden in the water, and that is good for everyone, including striped bass and the anglers who pursue them.

Sincerely,
Steven Puffenbarger
Lexington Park, MD 20653
steven.j.puffenbarger@gmail.com