



October 8, 2020

Kirby Rootes-Murdy  
Senior Fishery Management Plan Coordinator  
Atlantic States Marine Fisheries Commission (ASMFC)  
1050 North Highland Street, Suite 200 A-N  
Arlington, Virginia 22201

Dear Mr. Rootes-Murdy and members of the ASMFC Atlantic Menhaden Management Board:

On behalf of conservation-minded recreational anglers from Maine to Florida, we urge the ASMFC to adopt a precautionary Total Allowable Catch (TAC) for Atlantic menhaden that has no more than a 50% probability of exceeding the fishing mortality (F) target under the newly adopted Ecological Reference Points (ERPs) for 2021-2022.

We commend the Board for its decision to adopt ERPs at its August meeting, recognizing the integral role that menhaden play as forage for a broad array of fishes, marine mammals, and seabirds. Among the species menhaden supports are iconic target species for recreational anglers. Striped bass, which is the most intensely targeted recreational species along the Atlantic coast (16.6 million trips in 2018),<sup>1</sup> feed heavily on menhaden and was the most sensitive species to menhaden harvest in the NWACS-MICE model used to develop ERPs.<sup>2</sup> Further south, tarpon, which are an important contributor to East Florida's \$5 billion marine recreational fishing economy,<sup>3</sup> rely on menhaden during seasonal migrations up and down the South Atlantic coast.

With ERPs in place, the Board should move to implement management measures based on what now represents the best available science for menhaden management. And in line with precautionary approaches to setting the menhaden TAC in recent years—the TACs for 2017-2020 were never projected to have more than a 20.5% probability of exceeding the single-species target  $F^{4,5,6}$ —the Board should move to select a TAC that has no more than a 50% probability of exceeding the new ERP target F. According to the Atlantic Menhaden Technical Committee, the TACs that would lead to a 50% probability of exceeding the ERP target F for 2021-2022 combined is 176,800 mt.<sup>7</sup> 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).

In practice, however, a 50% probability of success should be considered a bare minimum given recent deterioration in the status of some stocks included in the NWACS-MICE model, along with the fact that the model only includes a handful of the numerous species that depend on menhaden. The recently adopted ERPs assume 2017 stock status for the five species other than menhaden included in the model. However, the recent stock assessment update for Atlantic herring—the sole menhaden prey substitute included in the model, which was neither overfished nor experiencing overfishing in 2017—determined that the species is now overfished, with recruitment having declined since 2013 and now at record-low levels.<sup>8</sup> This decline in Atlantic

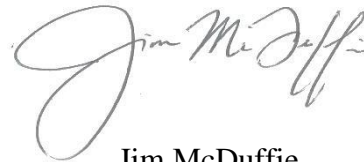
herring is likely to lead to increased predation pressure on menhaden not currently captured in the NWACS-MICE model. Moreover, a key predator of menhaden, striped bass, has also become overfished since 2017.<sup>9</sup> While reducing directed fishing mortality on striped bass is the most critical factor in helping the stock to rebuild, ensuring a robust forage base will help to ensure the species' ability to recover. Lastly, while the NWACS-MICE model represents the best available science for menhaden management, it only includes a small number of managed finfish species, to the exclusion of other menhaden predators such as marine mammals, seabirds, and fishes such as tarpon. In the absence of a more comprehensive ecosystem model, adopting a TAC with a precautionary buffer that ensures a greater than 50% probability of meeting the target F will help to account for the needs of these predators, while also recognizing recent declines in the striped bass and Atlantic herring stocks.

In August, the Board set a nationwide precedent by adopting ERPs for Atlantic menhaden and thus formally accounting for its ecosystem role in management. We urge the Board to take the crucial next step and adopt a precautionary approach to protecting both forage species and the predators that depend on them and support valuable coastal fisheries. We thank you for your consideration.

Sincerely,



Willy Goldsmith, Ph.D.  
Executive Director  
American Saltwater Guides Association



Jim McDuffie  
President and CEO  
Bonefish & Tarpon Trust

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<sup>1</sup> Personal communication from the National Marine Fisheries Service, Fisheries Statistics Division (Oct 6, 2020).

<sup>2</sup> ASMFC (Feb 2020). Atlantic Menhaden Assessments Overview.

[http://www.asmfc.org/uploads/file/5e5e84fbAtlanticMenhadenAssessmentsOverview\\_Feb2020.pdf](http://www.asmfc.org/uploads/file/5e5e84fbAtlanticMenhadenAssessmentsOverview_Feb2020.pdf)

<sup>3</sup> NOAA Fisheries. 2019. Addendum to Fisheries Economics of the United States 2016.

<https://www.fisheries.noaa.gov/resource/document/addendum-fisheries-economics-united-states-2016>

<sup>4</sup> ASMFC (Oct 2016). Timeline for Atlantic Menhaden Action. Presentation to the Atlantic Menhaden Management Board. <http://www.asmfc.org/files/Meetings/2016AnnualMeeting/AtlanticMenhadenBoardPresentationsOct2016.pdf>

<sup>5</sup> ASMFC (Nov 2017). Atlantic Menhaden Draft Amendment 3. Presentation to the Atlantic Menhaden Management Board.

[http://www.asmfc.org/files/Meetings/AtlMenhadenBoardNov2017/AtlanticMenhadenBoardPresentations\\_Nov2017.pdf](http://www.asmfc.org/files/Meetings/AtlMenhadenBoardNov2017/AtlanticMenhadenBoardPresentations_Nov2017.pdf)

<sup>6</sup> ASMFC (Aug 2019). 2019 Fishery Management Plan Review for Atlantic Menhaden. Presentation to the Atlantic Menhaden Management Board.

[http://www.asmfc.org/files/Meetings/2019SummerMtg/AtlMenhadenBoardPresentations\\_Aug2019.pdf](http://www.asmfc.org/files/Meetings/2019SummerMtg/AtlMenhadenBoardPresentations_Aug2019.pdf)

<sup>7</sup> ASMFC (Sep 2020). Atlantic Menhaden Technical Committee Stock Projection Memo.

<http://www.asmfc.org/files/Meetings/79AnnualMeeting/AtlanticMenhadenBoard.pdf>

<sup>8</sup> NOAA Fisheries Northeast Fisheries Science Center (Sep 2020). 2020 Management Track Peer Review Committee Report. [https://s3.amazonaws.com/nefmc.org/9a\\_2020-Management-Track-Assessment-Report-Revised-8-12-2020\\_508.pdf](https://s3.amazonaws.com/nefmc.org/9a_2020-Management-Track-Assessment-Report-Revised-8-12-2020_508.pdf)

<sup>9</sup> ASMFC (May 2019). ASMFC Stock Assessment Overview: Atlantic Striped Bass.

<https://www.asmfc.org/uploads/file/5cc9ba4eAtlStripedBassStockAssessmentOverview.pdf>