October 13, 2020

Spud Woodward
Chair
Atlantic Menhaden Management Board
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200 A-N
Arlington, Virginia 22201

Dear Chairman Woodward and Members of the Atlantic Menhaden Management Board,

As members of the recreational fishing and boating industry, we write to encourage the Board to capitalize on its visionary decision to establish ecological reference points (ERPs) by adopting a conservative total allowable catch which allows striped bass to reach its biomass target.

As you know, menhaden are an important food source for striped bass, bluefish, and other gamefish that keep Americans coming back to Atlantic waters and spending money in our coastal communities. Unfortunately, many menhaden predators are in decline, including striped bass, the species most dependent on menhaden as forage. Scientific studies have shown Atlantic menhaden make up between 23%[1] and 66%[2] of striped bass diets.

This is of particular concern to the recreational fishing and boating community because striped bass fishing is the largest marine recreational fishery in the United States, contributing billions of dollars to the economy. Striped bass are now overfished, so it is imperative that the ASMFC do what it can to improve the viability of this fishery, including leaving more menhaden in the water to help them rebuild.

According to the Atlantic Menhaden Technical Committee projections, in order to have a 50% probability of achieving the menhaden ERP fishing mortality (F) target that will bring striped bass back to its spawning stock biomass target (when striped bass are fished at their respective F target), menhaden catch must be reduced to 176,800 metric tons. Given the importance of menhaden to striped bass, we encourage the Board to adopt a more conservative quota, one that has a greater than 50% probability of achieving the ERP F target.

Furthermore, the purpose of the ecosystem modeling was to establish menhaden ERPs that enable striped bass to rebuild to its biomass target. To put it simply, if menhaden are not maintained at their ERP F target, then striped bass are unlikely to rebuild to their biomass target no matter what measures are put in place to reduce striped bass fishing mortality. Our community was supportive of measures to reduce the striped bass fishery to its F target and maintaining menhaden at their ERP F target is the complimentary management step needed to rebuild the valuable striped bass fishery.

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[1] Overton, A. S. 2003. Striped Bass predator-prey interactions in Chesapeake Bay and along the Atlantic coast. University of Maryland, Eastern Shore, Princess Anne

[2] Hartman, K. J., and S. B. Brandt. 1995. Comparative energetics and the development of bioenergetics models for sympatric estuarine piscivores. Canadian Journal of Fisheries and Aquatic Sciences 52:1647-1666

Our community is also concerned with the recent overfished status of Atlantic herring, an important alternative prey for striped bass identified through the development of ERPs. The ERP F target is based in part on the 2017 condition of Atlantic herring when the stock was above its SSB threshold. However, even after accounting for seasonal prey availability, if Atlantic herring were modeled at their current SSB level, menhaden F would need to be significantly reduced. Therefore, in the context of ecosystem-based management of forage, our community recommends that the Board use an additional buffer to account for management and scientific uncertainties.

The tradeoffs associated with setting a conservative quota for menhaden are worth it when you consider that saltwater recreational fishing along the Atlantic is enjoyed by 6 million anglers annually, contributing $11.3 billion to the economy and supporting 120,236 jobs. The jobs 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 we recover economically from this unprecedented pandemic, it is vital that the recreational fishing community have abundant fishing opportunity and that gamefish have adequate forage.

Over the past decade, recreational fishing organizations, coastal businesses and hundreds of thousands of individual anglers and conservationists have called on managers to leave enough menhaden in the water to feed the wildlife that support vibrant recreational fishing, boating and other industries that boost coastal economies. As stewards of our shared public resources, we are partners in the ASMFC process and share a unified goal of healthy fish populations and fishing communities. We urge the Board to follow through on its visionary step to establish ecological reference points, by adopting a conservative coastwide total allowable catch that will help rebuild the iconic striped bass fishery.

Sincerely,

**Glenn Hughes**
President
American Sportfishing Association
Alexandria, VA

**Chris Edmonston**
President
BoatU.S.
Springfield, VA

**Jeff Angers**
President
Center for Sportfishing Policy
Baton Rouge, LA

**Patrick Murray**
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**Chris Horton**
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**Whit Fosburgh**
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**Matt Gruhn**
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Marine Retailers Association of the Americas
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**Frank Hugelmeyer**
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National Marine Manufacturers Association
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