



To: [Dan.mckiernan@state.ma.us](mailto:Dan.mckiernan@state.ma.us); [ray@capecodfishermen.org](mailto:ray@capecodfishermen.org); [Sarah.Peake@mahouse.gov](mailto:Sarah.Peake@mahouse.gov); [sarah.ferrara@mahouse.gov](mailto:sarah.ferrara@mahouse.gov)

Subject: Conservation-based TAC for Atlantic Menhaden

*Submitted via email*

October 16, 2020

Dear ASMFC Massachusetts Representatives,

Today the undersigned ask Massachusetts 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 striped bass, bluefish, weakfish, summer flounder, bluefin tuna and other species that drive the recreational fishing economy in the state of Massachusetts, 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 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 baymen and 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 that Massachusetts 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 Baker have already taken on fisheries conservation.

We thank you for your ongoing managerial leadership and we look forward to collaborating with you to rebuild striped bass and other key species managed by the ASMFC.

Sincerely,

**Patrick Herron, Ph.D.**

Executive Director

Mystic River Watershed Assn.

**Rob Moir, Ph.D.**

Executive Director

Ocean River Institute

**Thomas S. Kirk**

Restoration Committee Chair

Red Lily Pond Project Assn., Inc.