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Raymond W. Kane
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Rep. Sarah K. Peake
Attn: Ongoing Proxy: Sarah Ferrara
House of Representatives
State House, Room 540
Boston, MA 02133

Submitted via email: Dan.mckiernan@state.ma.us; ray@capecodfishermen.org;
Sarah.Peake@mahouse.gov; sarah.ferrara@mahouse.gov

Re: Conservation-based Total Allowable Catch (TAC) for Atlantic Menhaden

Dear ASMFC Massachusetts Representatives,

As Massachusetts' delegation to the Atlantic States Marine Fisheries Commission (ASMFC), please demonstrate leadership when voting to establish the 2021-2022 coast-wide Total Allowable Catch (TAC) 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, as well as whales, other marine mammals, and birds that fuel ecotourism businesses in the Commonwealth of Massachusetts.

The ASMFC'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 ASMFC 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 Atlantic herring and the critical predator needs of species like marine cetaceans, birds, and other game fish populations which are not yet included within the ERP framework, the Board should adopt a conservation-driven TAC to assure adequate prey source for the larger Atlantic Ocean ecosystem.

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 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 while concurrently safeguarding iconic bald eagle, humpback whale, osprey, and other species that rely on menhaden.**

There are many reasons that Massachusetts State delegation to the ASMFC 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 – a scientifically valid approach that supports fisheries; people and wildlife that depend on this resource; and the associated economic benefits of sustainable management.

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,



E. Heidi Ricci
Director of Policy