



October 21, 2025

Chairman John Clark
Atlantic Menhaden Management Board
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200
Arlington, Virginia 22201

Dear Chairman Clark:

On behalf of the Congressional Sportsmen's Foundation (CSF), we thank you for the opportunity to comment on the menhaden management measures before the Atlantic Menhaden Management Board (Board) at the Annual Meeting of the Atlantic States Marine Fisheries Commission (ASMFC). CSF commended the Board and the ASMFC for taking the historic and monumental step of implementing ecological reference points (ERP's) in the menhaden fishery in 2020. In light of the 2025 Atlantic menhaden benchmark assessment and subsequent Technical Committee projections, we urge you to continue that commitment to innovative, science-based management by making further adjustments to the ERP's and reducing the total allowable catch (TAC) to a level conducive to achieving management success.

Specifically, CSF recommends the Board:

- Accept the updated ERP, including an ERP F_{target} of 0.15 and an ERP $F_{\text{threshold}}$ of 0.46, along with the corresponding fecundity reference points.
- Set the 2026–2028 Total Allowable Catch (TAC) at no greater than 108,450 metric tons (mt) to ensure a greater than 50% probability of achieving the ERP fishing mortality target.

The ERP's for Atlantic menhaden first implemented in 2020 were a significant first step in attempting to scientifically account for the immense importance of menhaden as an ecosystem component species. Further refinement of ERP values was expected as more data was collected, and stock assessments were refined. The ERP values derived from the 2025 benchmark stock assessment are based on peer-reviewed, best available science and offer the opportunity to further refine management of Atlantic menhaden to balance ecosystem needs, striped bass abundance, and commercial fishing interests. It is essential that the new ERP's are accepted by the Board in order to truly achieve this balance.

Projections indicate that maintaining a status quo TAC of 233,550 mt will ensure that the target fishing mortality rate has a zero probability of being achieved in the next three years. TAC options that simply maintain a fishing mortality rate below the maximum threshold to avoid overfishing status undermine the purpose and goals of the ERP's and the commitment by the Board to manage menhaden for

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ecosystem benefits. A TAC of 108,450 mt would provide a greater than 50% probability that the target fishing mortality can be achieved.

One of the most important Atlantic Coast species for recreational anglers from both a cultural and economic perspective is the striped bass, and the ERP's are largely based on the sensitivity of the species to menhaden abundance. While striped bass populations are still considered "overfished", striped bass fishing mortality is at an all-time low. It is clear that environmental variables, particularly in the Chesapeake Bay, are primarily driving the depleted spawning stock biomass condition and the overfished status. Managing menhaden to the ERP targets is essential to ensuring striped bass have sufficient prey and the best opportunity to rebuild to a healthy population abundance.

In conclusion, we respectfully urge the Board to implement the updated Atlantic menhaden ERP's and set an Atlantic menhaden TAC that does not exceed 108,450 mt. These actions would reaffirm the Board's science-based commitment to maintaining menhaden as a vital forage species and enhance striped bass recovery efforts to the benefit of the Atlantic coast economy and communities.

Sincerely,

A handwritten signature in dark ink, appearing to read "Chris Horton". The signature is fluid and cursive, with the first name "Chris" and last name "Horton" clearly distinguishable.

Chris Horton
Senior Director, Fisheries Policy