

December 14, 2023

Chairman Andrew Blanchard  
Louisiana Wildlife and Fisheries Commission  
PO Box 98000  
2000 Quail Drive  
Baton Rouge, LA 70898

Dear Chairman Blanchard,

As members of the recreational fishing and boating community and impacted stakeholders, we would like to express our strong support for the Commission's Notice of Intent (NOI) to amend rules to the menhaden fishery regarding buffer zones and spill reporting, and urge its passage into regulation. Thousands of Louisiana anglers, boaters, and sportsmen are represented by the undersigned national organizations.

The extension of the coastwide buffer zone to 1-mile, additional 3-mile beach buffer zones, and comprehensive spill reporting requirements will help conserve the menhaden resource and those marine species that depend on their availability in nearshore waters, as well as expand the social and economic benefits to coastal communities that rely on recreational fishing and tourism activity.

During the 2023 menhaden fishing season alone (*through Sept. 15*), an estimated 2.5 million menhaden were wasted by the industry in 18 individual spill events. Hundreds of dead red drum were found by members of the public throughout the season, on the water and strewn along beaches, due to these spills. Moving menhaden vessel operations into deeper waters 1- and 3-miles offshore will undoubtedly decrease the number of net tears from fishing in shallow waters and will likely reduce the number of wasted menhaden and other marine species caught or released as bycatch each year.

A lack of food availability for predators from forage removals has been established as a cause of declining predator populations. Menhaden are estimated to make up nearly 20% of the diets of red drum and spotted seatrout populations.<sup>1</sup> Spawning is the primary driver of red drum movement into coastal areas during the fall months, typically August through November.<sup>2</sup> Decreased interactions with menhaden fishing vessels in the nearshore areas that are critical for red drum during their spawning season will increase the chances that those adults are able to feed, spawn, and return offshore successfully – and to ultimately rebuild the stock. Based on a 2002 NOAA study, 55% of the menhaden harvest is caught between 0-3 miles from shore and

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<sup>1</sup> [Identifying Trade-offs and Reference Points in Support of Ecosystem Approaches to Managing Gulf of Mexico Menhaden](#), Berenshtein et al. 2023.

<sup>2</sup> [Recruitment and movement ecology of red drum \*Sciaenops ocellatus\* differs by natal estuary](#), Walters Burnsed et al. 2020.

is concentrated in Louisiana and Mississippi waters.<sup>3</sup> Additionally, 20% of the total catch was found to take place between 0-1 miles from shore. This study is the only one of its kind and would qualify as the best available science. While this study is dated and fishing operations naturally change over time, there is no public data to suggest that these numbers are dissimilar from catch today. This fishery harvests over 1 billion pounds of menhaden annually in one of the most critical nursery habitats in the Gulf of Mexico.<sup>4</sup> Gulf shorelines, particularly those in Louisiana, are plagued by deterioration from a myriad of factors. With vital coastal habitat dwindling for iconic predators like red drum and spotted seatrout, consideration of the spatial component of fishery operations is paramount. Fishing effort is not the only lever that can be pulled to rebuild fish stocks effectively and sustainably.

Regulators considering the passage of this NOI into final rule must be confident that its effects will provide measurable contributions towards both ecosystem health and economic opportunities alike. This NOI should reduce purse seine interactions with red drum, spotted seatrout, and other coastal predators that utilize nearshore areas heavily during spawning seasons and will improve their recovery in the long run. This could, in turn, enhance opportunities for recreational fishing and coastal tourism throughout Sportsman's Paradise. The recreational fishing industry supports nearly 18,000 jobs and provides \$2.5 billion in economic output each year to Louisiana.<sup>5</sup> In the state's coastal US Congressional districts alone (*Districts 1, 3, and 6*), a combined \$1.29 billion in annual economic output and 9,150 jobs are derived from recreational fishing. The effects of the proposed regulations could add more than \$64 million in economic output to these coastal districts if recreational fishing activity increased by a mere 5%. While it is not possible to forecast these compounding benefits with certainty, at a minimum, the amendments within the NOI will reduce user conflicts on the water in high traffic areas. These amendments will additionally benefit coastal communities and beachgoers as fewer dead fish will foul public beaches and reduce access, and the accelerated cleanup timeline will lower the potential for bacteria-related issues to arise. Louisiana's coastal communities rely on healthy coastal habitats and sustainable economic opportunities that promote their unique and iconic culture. The NOI to amend rules to the menhaden fishery will allow for this future to continue for generations to come.

We commend the Commission for taking action to protect Louisiana's coastal habitat and marine resources, and we urge the Commission to finalize the proposed amendments to rules in the menhaden fishery within the NOI. We further encourage the Commission to continue to work with all stakeholders, including the recreational fishing, boating, and wildlife conservation communities to develop ecologically-based management for menhaden that considers the needs of sportfish, birds, and marine mammals.

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<sup>3</sup> [The Distribution of Purse-Seine Sets and Catches in the Gulf Menhaden Fishery in the Northern Gulf of Mexico, 1994-98](#), Smith et al. 2002.

<sup>4</sup> [NOAA Fisheries commercial landings report](#).

<sup>5</sup> [Economic Contributions of Recreation Fishing – Louisiana](#), American Sportfishing Association, 2021.

Sincerely,

Brett Fitzgerald  
Executive Director



**Angler Action Foundation**

Martha Guyas  
Southeast Fisheries Policy Director



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**Guy Harvey Foundation**

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**International Game Fish Association**

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**Louisiana Charter Boat Association**

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**National Audubon Society**

Ben Murray  
Director, State Government Relations



**National Marine Manufacturers Association**

Chris Macaluso  
Director, Center for Marine Fisheries



**Theodore Roosevelt Conservation Partnership**