



LOUISIANA WILDLIFE FEDERATION

The voice of Louisiana's wildlife and natural resources since 1940.

PO Box 65239, Baton Rouge, LA 70896
8480 Bluebonnet Blvd. Suite F, Baton Rouge, LA 70810

(225) 344-6707
www.lawildlife.org

January 8, 2026

LWF Commission Members
LDWF Secretary Tyler Bosworth
Louisiana Department of Wildlife and Fisheries
2000 Quail Drive
Baton Rouge, LA 70898-9000

via e-mail: comments@wlf.la.gov

RE: Proposed NOI to Amend the Current ½-Mile Menhaden Buffer Zone

Dear LWF Commissioners and LDWF Secretary Bosworth:

The Louisiana Wildlife Federation (LWF) respectfully submits the following comments on the proposed Notice of Intent (NOI) to amend LAC 76: VII.307 regarding the existing half-mile commercial menhaden buffer zone. LWF's position—established in 2024—continues to support a coastwide one-mile buffer, along with enhanced buffer zones in areas with elevated user conflict, including Grand Isle, Grand Terre, and Holly Beach. We further support strong protections for areas recognized as critical wildlife habitat, such as the Chandeleur Islands, and believe these areas also warrant enhanced buffer protections.

Concerns raised by recreational fishermen, coastal users, and conservation organizations regarding the impacts of commercial menhaden harvest on Louisiana's fisheries and estuarine systems have persisted for years. As with the gill-net conflicts of the 1990s, user conflicts between recreational anglers and the commercial Menhaden industry have escalated to a level requiring focused regulatory action.

In 2024, following significant public opposition to ongoing user conflicts, the Louisiana Wildlife and Fisheries Commission considered an NOI that proposed a statewide one-mile buffer, a three-mile buffer around Holly Beach and Rutherford Beach, and new reporting and clean-up requirements related to intentional or unintentional spills. LWF strongly supported that NOI and urged the Commission to adopt the one-mile buffer and ensure adequate enforcement.

Ultimately, the Commission amended the original NOI to establish a half-mile coastwide buffer, a one-mile buffer around Holly Beach and Rutherford Beach, and a three-mile buffer around Grand Isle. The amendment also incorporated new spill-reporting and clean-up requirements. While the compromise fell short of LWF's preferred approach, we supported the action as a meaningful step forward. Now, less than eighteen months later, the industry seeks to reverse that agreement.

The protection of Louisiana's marine resources and access to high-quality fishing opportunities remains essential. If the Commission revisits changes to the buffer zone, we strongly urge reinstatement of the original one-mile and three-mile buffers, along with a renewed commitment to adequate enforcement. We also encourage LDWF and the Commission to assess menhaden harvest impacts from a holistic perspective that recognizes competing user groups, including beachgoers, recreational anglers, and coastal business operators.

Other Gulf states have already taken significant steps to reduce user conflicts by establishing enhanced buffers around sensitive areas, beaches, and barrier islands. Mississippi restricts menhaden harvest near shorelines and barrier islands, and Texas has implemented protections around major tidal passes. Louisiana should adopt comparable measures to protect our fisheries resources, preserve the ecological integrity of beaches and barrier islands, and reduce negative interactions between commercial vessels and coastal users.

The discussion before the Louisiana Wildlife and Fisheries Commission also highlights a broader and unresolved management concern: the absence of a total allowable catch for the menhaden fishery in Louisiana waters. While menhaden harvest is subject to limited spatial restrictions and a bycatch percentage threshold, the lack of an overall harvest cap effectively renders those bycatch limits variable and difficult to evaluate from a conservation or user-conflict perspective. When total harvest is unrestricted, even a small allowable bycatch percentage can translate into significant unintended impacts on other fisheries' resources.

Establishing a science-based total allowable catch would provide a clearer management framework, improve accountability, and allow LDWF and the Commission to better assess cumulative impacts of the fishery over time. A TAC would also align Louisiana's management approach with modern fisheries principles by ensuring that harvest levels remain consistent with ecosystem function, forage needs, and competing uses of nearshore waters.

LWF does not view buffer zones and catch limits as mutually exclusive tools. Rather, spatial protections and a total allowable catch should function together as complementary measures that reduce conflict, protect nearshore habitat, and provide greater certainty for all user groups. As the Commission considers any revisions to menhaden regulations, we

respectfully urge inclusion of a total allowable catch as part of a comprehensive, long-term management strategy.

We also appreciate that the current NOI recognizes the need for additional protection around critical wildlife habitat areas. LWF strongly supports the proposed protections for the Chandeleur Island area; however, we respectfully request that the designation be accurately identified as the Breton National Wildlife Refuge (NWR). Breton NWR encompasses the Chandeleur Islands as well as the Breton, Curlew, and Grand Gosier islands—areas that contain the last remaining seagrass beds in Louisiana, including manatee grass, shoal grass, turtle grass, and widgeon grass. These habitats provide essential ecological functions and merit equal protection.

Because the Chandeleur protections proposed in the NOI were initially offered by industry, we believe this acknowledgment of critical wildlife habitat should apply uniformly to all islands within Breton NWR. Accordingly, LWF recommends establishing a two-mile enhanced buffer zone around all islands within the Breton NWR footprint to ensure consistent and effective protection of critical habitat, seabed resources, and dependent wildlife. We also note that federal refuge regulations already recognize an approximately 800-foot protection zone around these islands. As such, existing federal protections should not be characterized as new concessions within the NOI.

LWF is a statewide, nonprofit organization representing 23 affiliate organizations and more than 11,000 members dedicated to the conservation of Louisiana's wildlife and natural resources. We remain committed to working with LDWF and the Commission to promote science-based management and protect Louisiana's valuable coastal ecosystems.

Thank you for your consideration of these comments.

Sincerely,

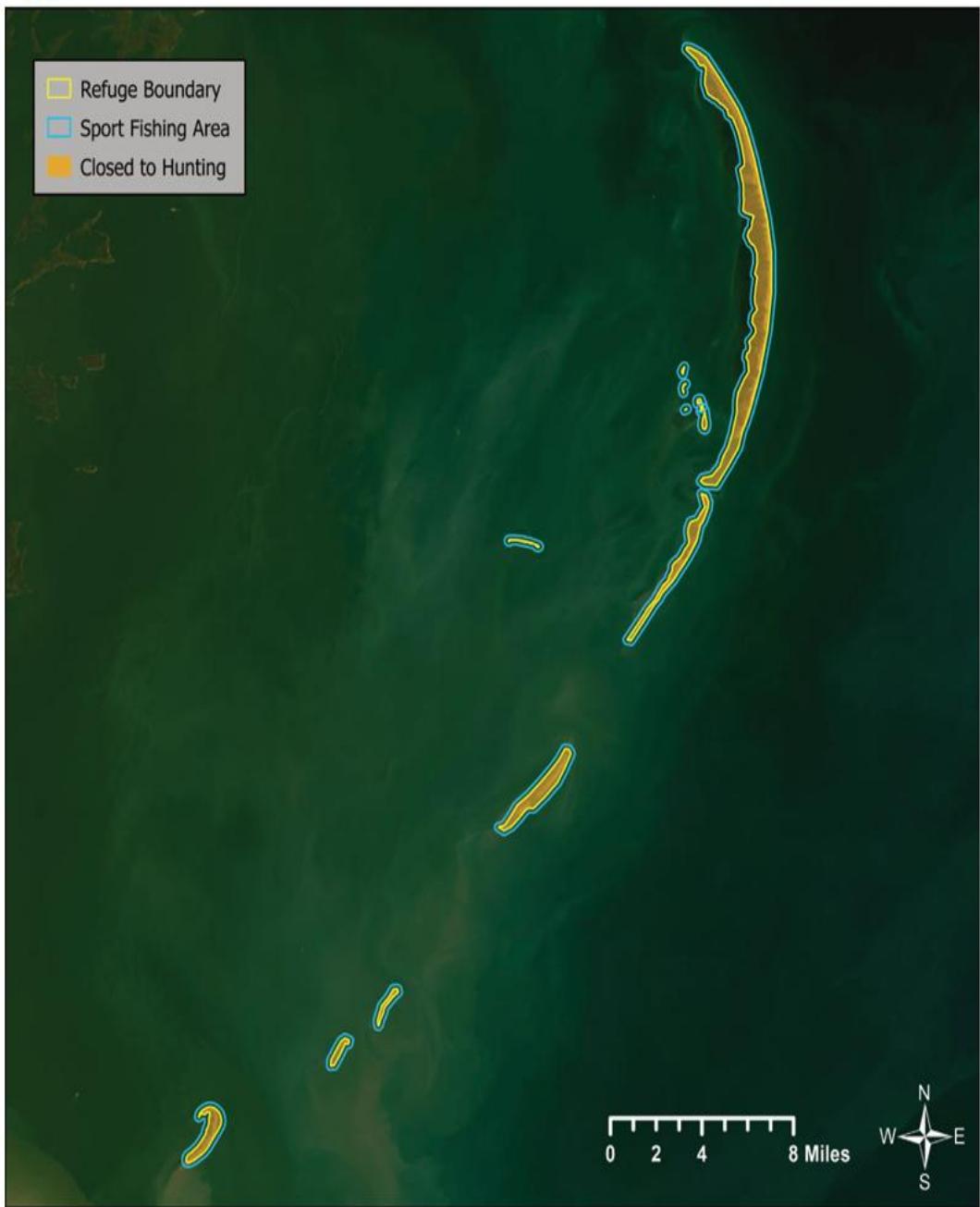


Rebecca Triche
Executive Director
Louisiana Wildlife Federation

Attachment: map of Breton National Wildlife Refuge



U.S. Fish & Wildlife Service
Breton National Wildlife Refuge
Plaquemines Parish and St. Bernard Parish, Louisiana



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