



Herring Ponds Watershed Association

Preserving our Ponds and Watershed

PO Box 522, Sagamore Beach, MA 02562

RE: Proposed Rule - Fisheries of the Northeastern United States: Atlantic Herring Fishery; Specification of Management Measures for Atlantic Herring for the 2016-2018 Fishing Years

Docket ID: NOAA-NMFS-2016-0050

Agency: National Oceanic and Atmospheric Administration, US Department of Commerce

John K. Bullard, Regional Administrator, Greater Atlantic Region
NOAA/DOC
55 Great Republic Drive
Gloucester, MA 01930

July 11, 2016

Dear Mr. Bullard,

The all-volunteer Herring Ponds Watershed Association (HPWA), 250 members and friends strong, works to promote stewardship safeguarding the Herring River Watershed, a state-designated Area of Critical Environmental Concern, and prime river herring habitat in Bourne and Plymouth, Massachusetts.

We are perplexed and concerned with the recent New England Fishery Management Council vote to increase the amount of river herring that can be caught at sea by the Atlantic herring fleet, and more so by NOAA's proposed rule to agree and accept the proposed increases in bycatch caps, especially by 144% in the Cape Cod region. We believe this is a flawed move that threatens the forage fish base of both ocean and freshwater food pyramids. Spring migration counts at the electronic fish counter at Cape Cod Canal for the sentinel Monument River run in Bourne, MA show continuing declines of 14% in 2015 and another 40% in 2016 (preliminary data communicated via email from MA DMF). This is a run that has long provided healthy adult herring for stocking and restoration of other runs.

Allowing more depleted river herring to be caught offshore by the industrialized Atlantic herring fishery is clearly in conflict with ongoing land and freshwater efforts to restore important spawning habitats and runs of these forage fish species so critical to marine commercial fisheries. States and communities throughout New England, including the Town Brook, Eel River, and Tidmarsh Farms restoration projects in Plymouth, Massachusetts have invested

significant time and millions of dollars to restore anadromous river herring runs. NOAA has been a key partner in these efforts. This proposed rule which avoids robust river herring accountability and management at sea is contrary to the exemplary coordinated NOAA, state, town and NGO efforts to restore anadromous fish habitat and passage in freshwater lakes and ponds, rivers and coastal waters.

We strongly urge NOAA to reject the NEFM Council's flawed plan to increase bycatch of these vastly depleted species, take an ecosystem-based approach to fishery management, and implement caps and monitored management that will reduce the amount of river herring caught at sea.

Thank you for careful re-consideration of NOAA responsibilities toward potentially endangered river herring species.

Herring Ponds Watershed Association

Brian Harrington, President *Brian Harrington* Lee Pulis, Vice President: *Lee Pulis*

Directors:

John B. Foye *Jerry Levine* *Lee Pulis*
Paula Kukut *Tom Wright*
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2016 HPWA Herring Count Volunteer Coordinators:

DONNA GAGE

Members present at July 11, 2016 HPWA public meeting:

Marken von Goller *Chuck Huber* *Carl J. Salie*
Eveland von Goller *John Scimin*
Ed A. Smith *Carole Anne*
Brian A. Harrington *William C. Stone*
Paul Muthen *Barbara Salinis*
Andrew *Charles A. Salie*
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Chad *Daniel J. McLaughlin*
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Dan Reedy *John M. Randall*