Mystic River Watershed Association
your community • your watershed

July 21, 2016

Mr. John K, Bullard, Regional Administrator,
NOAA Fisheries
Greater Atlantic Regional Fisheries Office
55 Great Republic Drive
Gloucester, MA 01930

RE: Comments on the Proposed Rule for Fisheries of the Northeastern United States: Atlantic Herring Fishery; Specification of Management Measures for Atlantic Herring for the 2016-2018 Fishing Years (NOAA-NMFS-2016-0050)

Dear Mr. Bullard,

With the support of our Massachusetts Division of Marine Fisheries, the Massachusetts Department of Conservation and Recreation, the Massachusetts Water Resources Authority (MWRA) and thousands of volunteers, the Mystic River Watershed Association (MyRWA) has been directly addressing freshwater impediments that have been cited as playing a part in the great decline of river herring over the last six decades—dams, pollution and predation.

- Thanks to dozens of volunteers, we have just completed our 6th annual count of river herring, which was made possible by the construction of a fish ladder at the dam that separates the Mystic Lakes. This year's count was 62,562 herring, which gives us an estimated run of 448,060 fish. This is greater than a twofold increase over the first year's count of river herring!
- Our river herring's final obstacle, the Center Falls Dam on the Aberjona River, will be removed when a fish ladder is constructed there this fall.
- Because striped bass cannot pass through the Upper Mystic Lake fish ladder, river herring predation has been reduced.
- Last year, MWRA completed a several-year project, which has substantially reduced the volume of combined sewage overflows (CSOs) discharged to Alewife Brook during heavy rainstorms. Also, MWRA constructed a wetland to filter stormwater runoff before it enters the Little River, which flows into Alewife Brook.
- Over 800 volunteers removed water chestnut plants from the Mystic River last summer. The water chestnut is an invasive species that deprives our herring of dissolved oxygen.
- MyRWA right now is engaged in a Total Maximum Daily Load (TMDL) project in order to address phosphorous pollution throughout our watershed.

We urge NOAA show its support of these many freshwater activities by doing its part and protect our river herring when they are in the ocean. Specifically, the agency should reconsider its decision backing the New England Fishery Management Council's recommendation to increase the cap on the river herring/shad catch. It should do so for the following reasons:

- Allowing more river herring and shad to be caught by the commercial fleet will be a serious setback to our efforts to restore our river herring population. As a recent study states, "bycatch in the marine fisheries, particularly the southern New England Atlantic herring fishery, may be a contributing factor in the persistent depression of population abundances observed for the most depleted river herring generic stocks."[1] Within its genetic study of alewife bycatch, scientists found that between the northern New England, the southern New England and mid-Atlantic genetic stocks of alewife; the southern New England stock had the highest total proportion (67%) of alewife bycatch. As southern New England areas have indeed reported serious population declines, the trawlers within this region should not be given a catch cap increase.
- NOAA's own scientists assessed the climate vulnerability of fish and invertebrate species in the Northeast region and concluded that the overall vulnerability for both alewife and blueback herring is "very high."[2] This is the time to rebuild the population, not to allow more river herring to be killed.
- The lack of onboard monitoring to oversee slippage makes it highly likely that more river herring will be discarded at sea than official reports indicate.
- A higher river herring/shad catch cap will not discourage the Atlantic herring fishing fleet from trawling in areas where river herring and shad are found schooling with Atlantic herring.
- A higher river herring/shad catch cap directly undermines the hard-fought progress that the Mystic River Watershed Association and other watershed stewards up and down the New England coast have made to restore our river herring population.

The Mystic River Watershed Association, as well as many other organizations and agencies within our watershed, are actively engaged in efforts to dramatically improve existing habitat for spawning alewives and bluebacks.

We respectfully request that the NOAA Fisheries assist us by declining to approve an increase in river herring/shad catch caps. To do otherwise will only contribute to the calamitous decline of our river herring species.

Sincerely,

EkOngKar Singh Khalsa, Executive Director
Mystic River Watershed Association

[1]Hasselman, et.al. 2016. Genetic stock composition of marine bycatch reveals disproportional impacts on depleted river herring genetic stocks. Canadian Journal of Fisheries and Aquatics Science. 73: 1–13.

[2]https://www.st.nmfs.noaa.gov/ecosystems/climate/northeast-fish-and-shellfish-climate-vulnerability/index