



Mystic River Watershed Association
your community • your watershed

April 28, 2015

Thomas A. Nies, Executive Director
New England Fishery Management Council
50 Water St., Mill #2
Newburyport, MA 01950

Re: Atlantic Herring Amendment 8 Scoping Comments

Dear Mr. Nies:

Thank you for the opportunity for the Mystic River Watershed Association to comment on Amendment 8.

The Mystic River Watershed Association (MyRWA) is a grassroots organization dedicated to the protection and restoration of the Mystic River, its tributaries, and related natural resources throughout the watershed's 22 communities. This past week, MyRWA began its 4th annual count of the river herring that pass through the fish ladder at the Upper Mystic Lake dam. One of the great teachings of the spring arrival of the river herring is the sudden presence of wildlife to feed on the herring. First to arrive are the early scouts, cormorants and herring gulls. When the pulse of the herring run is in place, black-crowned night herons and their more shy cousins, great blue herons appear. Bald eagles and osprey keep a distant, watchful, and opportunist eye, and fishermen announce the presence of striped bass.

The Mystic River Watershed Association applauds the New England Fishery Management Council in its shift from monitoring Atlantic herring as a sustainable single species to including its role as a forage fish within our region's ecosystem. Atlantic herring are a primary food source for tuna, cod, striped bass, humpback whales, porpoise and seabirds within the Gulf of Maine and beyond. We agree with the NEFMC that present standards for the catch of Atlantic herring are too low to support our ecosystem. The schooling of herring and the use of modern technology to locate these schools make it possible for fishing trawlers to remove entire populations of this species. Numerous reports, including one presented at your public hearing on March 26th in Danvers, MA, have documented how areas abundant with whale and seabird feeding activity on schools of herring became bare and silent after fishing trawlers combed the area.

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We recognize that the inclusion of herring's essential role in our ecosystem will be a balancing act. However, ecological trades-offs need to be considered regarding an inadequate setting of an Acceptable Biological Catch Control Rule (ABC-CR):

- Decreased food for depleted groundfish, such as cod
- Decreased food for mammals protected by Federal laws and managed for population recovery such as humpback and fin whales
- Localized depletion of herring schools for seasonally migrant as well as endangered or threatened species, such as the Atlantic puffin, roseate and common tern
- Depletion of food for ocean-wide seasonal feeders such as Bluefin tuna, which depend on herring as part of their diet.

Therefore Amendment 8 needs to contain an Atlantic herring management plan that ensures enough herring for dependent predators.

1. Due to the depletion of other forage fish (e.g., river herring, shad, menhaden, mackerel) the ABC-CR must go beyond keeping the Atlantic herring population healthy and set the herring biomass goal above a maximum sustainable yield.
2. Fishery cutoffs must be quickly put in place if the herring population falls to a specified minimal threshold.
3. Incremental decreases in an acceptable herring catch need to be put in place if the herring population continues to fall.
4. The ABC-CR needs to take into account seasonal predation and ecological sub-regional variations to protect local herring spawning populations.

Thank you for pursuing an ecologically based fishery policy for Atlantic herring. We look forward to reading the draft of the amendment when it is released for public viewing and comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'EkOngKar Singh Khalsa', with a long horizontal stroke extending to the right.

EkOngKar Singh Khalsa, Executive Director
Mystic River Watershed Association



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Organization Description

The Mystic River Watershed Association (MyRWA) is an innovative, grassroots environmental organization working to protect and improve environmental conditions for the more than one half million residents of 22 Boston-area communities in the Mystic River Watershed.

Our mission is to protect and restore the Mystic River, its tributaries, and watershed lands for the benefit of present and future generations, and to celebrate the value, importance, and great beauty of these natural resources.

We fulfill our mission by using science, community engagement, and advocacy to address the root causes of local environmental threats.

Established in 1971, MyRWA has a long history of environmental protection and grassroots organizing. In the 1970s and 1980s MyRWA met success in ensuring local implementation of the Clean Water Act, clean up of local hazardous waste, and protection of nearby wetlands. In the 1990s we expanded our charter, and created and promoted a program of individual and organizational membership, resulting in a renaissance of environmental action and education throughout the watershed. In 2000, MyRWA instituted a certified water quality monitoring program that incorporates the help of trained, local volunteers. Local governments depend on our water quality data to make watershed decisions, and the EPA used results from our monitoring program to give the Mystic River Watershed its first formal grade in April 2007 and for a variety of enforcement actions.

As part of its public outreach and education effort, MyRWA provides support of the annual Mystic River herring migration. The Mystic River, despite nearly a century of polluted waters, still boasts one of the largest herring runs in the state. Each year, the Mystic River Watershed Association works diligently to celebrate and protect this important part of our living river system. Since 2003, the ***Mystic River Herring Run and Paddle*** celebrates the return of the herring that make their way up the Mystic River in order to reach their native spawning grounds with a popular race and paddle on the river. Through this signature event MyRWA focuses attention on the Mystic and brings residents to the water's edge. On May 18, 2014 more than 730 runners and 110 paddlers participated! Also in 2012 MyRWA initiated another important new conservation effort - the ***Mystic River Herring Monitoring Program***. With more than 100 MyRWA trained volunteers, scientific monitoring of the annual river herring migration in the Mystic is now being undertaken at the Mystic Lakes dam. These Citizen Scientists counted more than 31,000 fish as they entered the very desirable spawning grounds of Upper Mystic Lake – through a newly built fish ladder – for the first time since the Civil War.

Through river herring fish counts, water quality monitoring, river cleanups, nature walks, river rides, paddles, and public forums, MyRWA champions a healthy Mystic River Watershed and has received many awards for public service. On June 19th last year, the **Universities Council on Water Resources (UCOWR)** awarded MyRWA the 2014 *Education and Public Service Award* at its annual banquet held at Tufts University in recognition of this important work.

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