

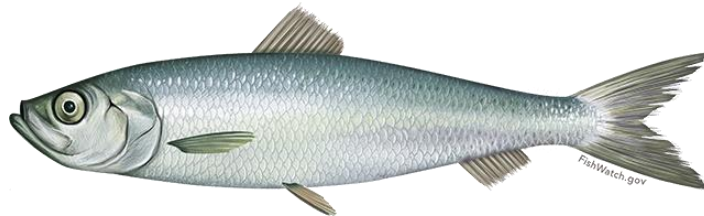
# **Atlantic Herring Fishery Management Plan**

## **INVITATION FOR PUBLIC COMMENT**

**for**

## **Management Strategy Evaluation**

**Debrief**



Prepared by the

New England Fishery Management Council

**Deadline: 8:00 a.m., August 9, 2019**

You may submit written comments on the Management Strategy Evaluation process used to develop Amendment 8 to the Atlantic Herring Fishery Management Plan by:

- Fax: (978) 465-3116;
- Email: [comments@nefmc.org](mailto:comments@nefmc.org)
- Mail at the address below.

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

The deadline for written comments is **8:00 a.m. EST on Friday, August 9, 2019.**

Please note on your correspondence; “Atlantic Herring MSE Debrief Comments.”

*Cover image*

Downloaded from FishWatch: [www.FishWatch.gov](http://www.FishWatch.gov).



## NEW ENGLAND FISHERY MANAGEMENT COUNCIL

### SEEKS YOUR COMMENTS ON THE MANAGEMENT STRATEGY EVALUATION PROCESS USED FOR AMENDMENT 8 TO THE ATLANTIC HERRING FISHERY MANAGEMENT PLAN

---

---

#### ***Your comments are invited***

The New England Fishery Management Council (Council) seeks public comment on the Management Strategy Evaluation (MSE) process used to develop and analyze Acceptable Biological Catch (ABC) control rule alternatives in Amendment 8 to the Atlantic Herring Fishery Management Plan (FMP). This document announces the Council's intent to gather public comments on this topic.

---

---

#### ***Why is the Council inviting comments?***

The Management Strategy Evaluation used to develop Amendment 8 to the Atlantic Herring FMP was the first time this Council used MSE in decision-making. The Council is now taking a step back to debrief and identify the benefits and/or drawbacks of the MSE process, as well as lessons learned.

This debrief is intended to evaluate the process used to integrate MSE into Amendment 8 and will help inform future decisions on using MSE to manage Atlantic herring or for other purposes.

The goals of the debrief are to:

- Identify perceptions of the MSE process,
- Identify pros and cons of the specific process used,
- Identify lessons learned from the process, and
- Inform future Council decisions on use of MSE for Atlantic herring management.

---

---

#### ***What was the Atlantic herring MSE?***

The Council conducted a Management Strategy Evaluation to help develop alternatives for an ABC control rule, or formula for setting catch limits. This MSE was intended to be a collaborative decision-making process, involving more public input and technical analysis earlier in the amendment development process than normal. An MSE involves modelling to determine potential outcomes of different management approaches, ABC control rules in this case. MSE can help evaluate tradeoffs among objectives and which control rules would most likely meet management goals.

The Council began working on Amendment 8 in 2015, conducting public scoping and setting the goals of this action. In January 2016, the Council decided to use MSE to help develop ABC control rule alternatives. MSEs typically take several years to finish and use invitation-only, small groups (15-25) of stakeholders to give input. The Council diverged from this norm for two reasons. First, the Council aimed to finish Amendment 8 in time to develop herring fishery catch limits for

---

---

2019-2021. Thus, this MSE had unusually constrained time limits. Second, the Council decided to have all points of stakeholder input (e.g., workshops) completely open to the public, so the MSE process could mirror the open Council process as much as possible. Relative to other MSEs, the degree of stakeholder participation was rare, if not unique, at least for U.S. fisheries. The Council completed the MSE within two years, in six distinct phases.

*Phase 1 – Identify parameters to be tested (January-June 2016).* The first public workshop, in May 2016, developed recommendations for objectives of the Atlantic herring ABC control rule, how progress towards these objectives may be measured (i.e., performance metrics), and the range of control rules to test. About 65 people attended, a diverse mix of fishermen, recreational anglers, scientists, managers, non-profit organizations, and others. In June 2016, upon review of the workshop recommendations and additional input from the Atlantic Herring Plan Development Team (PDT), Advisory Panel (AP), and Committee, the Council approved moving forward with the MSE. Although there was not universal support for all the recommendations, these groups supported evaluation of the full range of ideas.

*Phase 2 – Simulation testing (July-November 2016).* After Council approval of the fishery objectives, performance metrics and control rules to be tested, technical work proceeded over the summer and up until the second public workshop in December 2016. The Northeast Fisheries Science Center (NEFSC) technical team identified, refined, or developed models of Atlantic herring, predators, and fishery economics and tested control rule performance relative to the performance metrics.

*Phase 3 – Review results, identify additional improvements (December 2016).* The Council held another public workshop in December 2016 to see the modelling results and provide more opportunity for public input. About 65 people attended, again from diverse backgrounds. Participants were asked to identify what other MSE modeling and presentation of results would help in making Amendment 8 alternatives, considering what could be done within this current, first MSE and which may be done in future MSEs with improved data and/or models. To help the Council balance tradeoffs, participants were asked to identify acceptable ranges of performance for metrics and how the number of control rules modelled could be narrowed into an appropriate range of Amendment 8 alternatives.

*Phase 4 – Prepare for Peer Review MSE (January-February 2017).* Based on the input from the second workshop, the NEFSC technical team refined the models and presentation of outcomes and made a summary report by February 2017.

*Phase 5 – Peer review (March 2017).* Since the technical models had novel aspects, and this was the first MSE in the Northeast U.S., the MSE models and process were peer reviewed in March 2017. The review panel recognized that a tremendous amount of work was completed in a rigorous manner under the time and resource constraints of this MSE. The panel agreed that the models (Atlantic herring, predator, and economic) were appropriate for evaluating ABC control rules for the Atlantic herring fishery in the context of herring's role as a forage fish. The panel concluded that the data, methods, and results of the MSE are appropriate for Council use when identifying and analyzing a range of ABC control rule

---

---

alternatives for the Atlantic Herring FMP. The panel also concluded that the Atlantic herring MSE was the *best available science* at the time for evaluating the performance of herring control rules and their potential impact on key predators. The Council received the peer review results in April 2017.

Phase 6 - Incorporation into DEIS (January-September 2017). Concurrent with Phases 4 and 5, the Council developed a range of ABC control rule alternatives, approving them in April 2017. With the peer review input, the MSE results were further refined and integrated into the impact analysis of Amendment 8 alternatives over the summer. A contractor helped present MSE results in more user-friendly formats. In September, the Council approved the parts of the draft Amendment 8 related to the ABC control rule.

More information: <http://www.nefmc.org/library/amendment-8-2>.

---

---

---

---

***Why should I comment?***

Public comment is important to the Council process. This is a key opportunity for you to give feedback on the Atlantic herring MSE. Your comments will help the Council evaluate this MSE and consider future MSEs.

---

---

---

---

***Who should comment?***

While anyone may respond to this invitation, the Council is particularly interested in understanding the viewpoints of those involved in the MSE (e.g., attended an MSE workshop) and are invested in the future of herring management.

---

---

---

---

***What should my comments address?***

You may address any aspect of the MSE but are encouraged to focus on the MSE as a decision-making process, rather than the technical aspects of the MSE or the outcomes of Amendment 8 (e.g., the Council's preferred alternatives, regulatory changes). The Council is seeking input on:

- ***Clarity of purpose and need*** for using MSE in Amendment 8.
- ***Sufficiency of general education*** about MSE, how well MSE was understood (e.g., models, role of stakeholder input) and any ideas for improving the education process (e.g., more literature, online instructional webinars, in-person seminars)?
- ***Utility of the six distinct phases of this MSE*** (described above), whether some phases (or aspects of phases) more useful or successful than others and whether the time provided for each phase enough.
- ***Appropriateness of using open-invitation, public workshops*** for this MSE and/or recommendations for other formats.
- ***Utility of how MSE results were presented*** in helping characterize the tradeoffs associated with various alternatives.
- ***How well the Council integrated the MSE results and workshop input*** in developing Amendment 8 alternatives.
- ***Utility of the MSE in balancing tradeoffs*** between objectives.
- ***The benefits, if any, in using an MSE*** for Amendment 8, and if the benefits outweighed the costs.
- ***How this MSE process compared*** to how else the Council could have developed and selected alternatives.

---

---

***What is the  
debrief process?***

The Council, its Herring Committee and AP have had preliminary public discussions on this MSE debrief, which is proceeding as in Table 1. The publication of this invitation for comment and an announcement in the *Federal Register* is the first formal part of the debrief process. Written public comment will be accepted starting in July and continue until 8:00 a.m., August 9, 2019.

**Table 1 - Phases and timeline of the Atlantic herring MSE debrief**

Phases	Purpose and/or steps	Timeline (2019)
Planning	PDT and Committee develop purpose, goals and workplan (with AP input).	April-May
	Council approves the purpose, goals and work plan.	June 11-13
Gathering comments	Council has public comment period.	July 1-Aug. 9
	Public comments are summarized.	By Sept. 11
	Comments reported to Committee and AP. Solicit AP and Committee input.	Sept. 16-19
Reporting	Council receives progress update.	Sept. 24-26
	PDT drafts final report (compiling public comment and PDT/AP/Committee input and recommendations).	Sept.-Oct.
	AP and Committee review draft report and provide further input and recommendations.	By Nov. 15
	PDT finalizes report.	By Nov. 22
	Council receives final report.	Dec. 3-5

After the public comment period, the comments will be summarized, along with any PDT input and recommendations, and discussed by the Herring AP and Committee. The Council will be updated in September. The PDT will draft a final report for discussion AP and Committee meetings in the fall, and the Council will receive a final report in December 2019. Note that the Council has several ongoing work priorities related to Atlantic herring management, and if necessary, this debrief may stretch into early 2020.

---

---

***How do I  
comment?***

You may send written comments by email ([comments@nefmc.org](mailto:comments@nefmc.org)), fax (978-465-3116), or postal mail by **8:00 a.m. EST on Friday August 9, 2019**.

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

Please note on your correspondence; “Atlantic Herring MSE Debrief Comments.”

If you wish to be on the mailing list for future meetings of the Herring Committee, please contact the Council office at 978-465-0492.