

CORRESPONDENCE

From: Suzannah Raber <nefco@me.com>

Sent: Wednesday, August 5, 2026 5:27 PM

To: comments <comments@nefmc.org>

Subject: Videos to share with members of the SSC and written comment

Char Salerno and Executive Director Cate O'Keefe, please see my written comment to share with the SSC. I have also included 3 short videos that were recently shot to demonstrate the critical crossroads in the America Herring Fishery. I urge every member to please view the videos for consideration for next weeks meeting. I appreciate your time and your attention.

Sincerely,

Suzannah Raber

F/V Providian and New England Fish Company

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~Suzannah Raber ~

F/V Providian

New England Fish Company

207.841.2610

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To Chair Daniel Salerno and Executive Director Cate O'Keefe of the New England Fishery Management Council and the Scientific and Statistical Committee:

I am writing to express my strong opposition to further reductions in the Atlantic herring quota and to urge the committee to reconsider its approval of the recent management track assessment. The Atlantic herring stock remains a vital component of our regional economy and marine ecosystem, yet the methodologies currently being applied raise significant concerns regarding the socioeconomic stability of our fishing communities. Our family has survived through the lowest quotas in the history of Atlantic Herring. We have held on for 6 years of cuts and promises of more quota only to have it cut even more with little Warning. We can not run a business when we have no long term knowledge of what the quota will be. The restrictions on herring are already so robust it limits fishing effort. Area 2 continues to receive allocation even though basically no landing have occurred from Area 2 in 10 years, we know that's the same biomass and it should be moved to other areas so it can be utilized. In addition to the Management track assessment , it is quite frankly flawed. We can not keep putting fisherman out of business on a "maybe" or missing data or broke down research vessels. We need to incorporate Acoustics , shore side state monitoring , using actual herring vessels to do surveys that are equipped with the proper gear to actually catch herring and know the right areas and time to find them. Climate change has caused herring to change its habits, they are showing up in areas later than 10 years ago. The Herring are out there and the biomass is rising, the last quota cuts since 2020 have been effective to increase the population. It is time to put Fisherman and their families, crews , vendors, fuel suppliers, first. This is not the time to cut the quota to non fishable levels with a flawed survey from missing data.

Canada is sitting on thousands of tons of herring in their weirs right now. Their surveys were fast tracked to support a rise in quota when the survey showed a healthy established biomass.

Canada quota has increased the last several years as ours has decreased. Canadian herring is right now crossing the border and being sold in America. This is NOT okay. American boats should be supplying America lobsterman bait. Canada should not be supplying America with herring while Americans herring fisherman are being held back with all the resources and tools to successfully supply America with Herring NOT CANADA. The American herring fleet has financially invested in the infrastructure and the economy and are capable of catching herring and growing the American economy. These lost opportunities have a severe impact on this fishery. Every fish from Canada is fish American boats could be catching.

If herring is cut to 1,000 MT it will also make the Mackerel fishery fail as we need to have both quotas for the times of the year they school together. In addition it will add even more burden to Lobsterman and bait availability and price.

It will also destroy our 3rd generation family business. We have used up all the emergency funding, savings account, boat loan deferrals and we have held on because last years projections showed a increased quota for 2026-2028 . Please consider the fisherman, our family and crew and all the business that supply us and grow the economy. We have enough restrictions in place please don't accept his survey as the end all be all, it will be a deathblow to us. There is more to consider and take into account.

Concerns Regarding Current Management

The management track assessment transition to the WHAM model presents challenges for continuity and accurate stock representation that demand closer scrutiny. Relying on evolving models without fully reconciling their impacts on the Atlantic herring industry threatens the viability of local operations that are already navigating historic lows in catch landings.

- Fishery catch data from the last three years shows record-low landings, suggesting that our current harvest levels are already significantly constrained.
- Socioeconomic impacts on our coastal communities must be weighed more heavily when the committee evaluates the consequences of further restricting access to this resource.
- Scientific peer review processes for these assessments should ensure that model changes do not unfairly penalize stakeholders without a transparent evaluation of the potential for economic non-viability.

Strengthening Future Assessments

Moving forward, we must ensure that the data used for decision-making is as robust and inclusive as possible. It is essential that the Atlantic herring assessment process incorporates the best available information to avoid unnecessarily harsh quotas that do not reflect the current reality on the water.

- Re-incorporating age composition data from 2018-2023 is a critical step that must be prioritized to improve the accuracy of our population modeling.
- Harvest control rules should be applied with caution, ensuring they are not based on models that create undue retrospective patterns.
- Stakeholder engagement remains an essential component of this process, and I urge the committee to pause and seek further input before finalizing new quota specifications.

Using American herring boats to help with surveys.

There is fish out there we and many more fishermen see it, the directions already in. Places are sufficient to avoid overfishing. Remember there is real people and families to consider not just a survey.

Thank you for your time and your service in balancing the health of our marine resources with the needs of the working waterfront.

From: Anthony Holter <anthonyholter184@gmail.com>

Sent: Thursday, August 6, 2026 12:04 PM

To: comments <comments@nefmc.org>

Subject: Herring Fishery Comments

To both Chair Daniel Salerno or Executive Director Cate O'Keefe, why in the heck does Canada have more quota than the US? We share our oceans, being united from coastline to coastline, fishery to fishery, generational fishermen to generational fishermen.

Now. I'm a freshwater fisherman from Minnesota, recently having moved to New England to start my journey as a lobsterman.

The longterm lasting effect that of a heavily regulated, potentially less quota industry would be destructive.

Gambling with people's lives, livelihoods, and finances by not affording generations of fishermen the same opportunity due to real lack of scientific data and greediness is horrendous.

This doesn't just effect one group of people. It snowballs. It snowballs down the chain, effecting other fishery's. There is a much bigger picture here.

Fishing is a community, a family. It effects all of us. The shoe doesn't fit and things need to be fixed and reevaluated.

Nothing makes me prouder than to say I'm a fishermen. I just hope the wrongs will be made right, things will be equally shared, data bettered - so there is a future in the heart of the world.

Anthony Holter.

From: Jason Joyce <jason.joyce@nefishermen.org>
Sent: Thursday, August 6, 2026 4:50 PM
To: comments <comments@nefmc.org>
Subject: Atlantic Herring

Jason Joyce
Maine Lobsterman
Swan's Island Maine Town Selectman
Director of Advocacy, New England Fishermen's Stewardship Association (NEFSA)

Dear Chairman Salerno and Executive Director O'Keefe,

As a Maine lobsterman and to those I represent, we do not object to using the 2025 Research Track as the methodological foundation for the 2026 Management Track assessment. We recognize and appreciate the additional data updates and model refinements incorporated since the Research Track. However, several key scientific uncertainties remain.

The assessment still lacks an independent Age-1 recruitment index, state survey data have not been integrated, and questions persist regarding the independent biological support for current stock-abundance estimates. The assessment also notes unresolved numbers-at-age patterns and continued uncertainty in the projection outcomes.

We respectfully request that the SSC clarify that acceptance of the Research Track for management use does not indicate that these uncertainties have been resolved, nor that the Research Track alone should determine stock status or catch advice. These scientific limitations should remain clearly documented and explicitly carried forward into future deliberations on OFLs, ABCs, and management measures.

Thank you for your consideration of these requests.

Sincerely,
Jason Joyce

Capt. Jason Joyce
Director of Advocacy
New England Fishermen's
Stewardship Association
207-479-6490

From: Leslie Raber <salmonrunfarms@gmail.com>

Sent: Thursday, August 6, 2026 10:01 PM

To: comments <comments@nefmc.org>

Subject: Management track assessment

To Daniel Salerno and Cate O'Keefe of the New England Fishery Management Council and the Scientific Statistical Committee,

I am writing today to ask the committee to revisit the decision to approve the most recent management track assessment. The methods being employed to assess the herring stocks remain flawed by missing data, broken equipment and other issues. There needs to be updated equipment such as modern acoustic sonars, vessels with the gear successfully used by professional fishermen, as well as operators with current knowledge of the herring fishery. It makes no sense to bottom trawl for multiple species while doing a quota survey for herring and the other species they are entrusted with data collection. It's like counting oranges on an apple tree. Professional herring fishermen use a mid water trawl and try only to catch herring not multiple species. An operator needs local knowledge of the grounds to know the where and when of herring during the year. It is nearly impossible to just run out to an area, drop a bottom trawl and make accurate data collection for several species (incl. herring). An accurate assessment affecting an entire segment of mid water fishermen must be just that, accurate. It's also unacceptable to work off incomplete data because of vessel breakdowns. We cannot continue to manage the fishery in a haphazard manner that allows fisherman and their families to fail in a catastrophic blow up because the data is so flawed. Scientists can only make a judgement on the information they are given. If the information is not accurate the resulting data will be forever flawed.

Considering it is a commingling of biomass it seems unreasonable and hard to understand why Canada has increased their quota in a timely manner and there is Canadian herring flooding the American market while American fisherman are struggling with inaccurate negative data affecting their quota share. We can and must do better.

We have an abundance of rules such as trip limits, days out, gear and seasonal restrictions, bycatch, windmills and many other management rules. In addition climate change has affected the behavior of herring. One of changes we have seen first hand is they are showing up later in some areas. In the case of Area 2 a case could be made that herring have all but disappeared because of the proliferation of windmills. Could this quota be pushed to another area? We need to be aware of these and other issues and be able to make changes quickly to the management plan if needed. If we are not armed with the tools to make changes in a timely manner it can and likely will be catastrophic for fishermen.

While herring management is important to keep stocks at a healthy level so is the livelihood of the fishermen depending on those stocks. To make sudden and dramatic changes to the quota creates a difficult and oftentimes fateful situation to the business plans fishermen are depending upon. From personal experience I have watched my adult children and grandchildren be torn apart by the quota cuts. The entire extended family has thrown all their life savings over the last 5 years at the business to keep it floating (literally). We are now faced with choices I have never faced during more than 5 decades in this business. I cannot pay my property taxes and I'm forced to sell my home I thought I would die in. Mortgage payments, insurances, employees, utilities, taxes- they don't stop. I am literally faced with the possibility of being homeless at 73. No hardworking American should be forced to either pay the mortgage or buy groceries for their families. We are now in that position and until you have experienced it there's no way you can understand the anguish. Most especially the grandkids that watch it crumble around them, they will be forever scarred by this experience.

Fishermen have to live by decisions from an entire pyramid of government people, each level depending on the validity of the information from the level before them. If one level fails the group at the bottom is decimated. I believe that is the situation we are facing today. The biomass is healthy and year classes are aptly represented. Earlier this year we had some of the biggest herring we have ever seen mixed in with other year classes. At the time it was an exciting find and gave us much needed encouragement about the future of Atlantic Herring. I'm hoping you can help that little bit of encouragement bloom.

Thank-you,
Leslie Raber



New England Fishermen's Stewardship Association

500 Southborough Dr. Suite 204

South Portland, ME 04106

NEFishermen.org

August 6, 2026

Daniel Salerno, Chair
Cate O'Keefe, Ph.D., Executive Director
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, Massachusetts 01950

Re: Atlantic Herring Catch Advice and 2027 Management-Area Allocations

Dear Chair Salerno, Dr. O'Keefe, and Members of the Scientific and Statistical Committee:

The New England Fishermen's Stewardship Association (NEFSA) respectfully submits two requests concerning Atlantic herring for 2027. First, we ask the SSC to evaluate a total catch level of 15,435 mt. Under the 2026 Management Track projection accounting, the assumed 5,283 mt of fixed-gear catch would leave approximately 10,152 mt for the U.S. mobile fleet. We ask the SSC to determine whether that level prevents overfishing, satisfies the rebuilding requirements, and preserves a viable domestic fishery. If it does not, we ask the SSC to identify the highest level that can while preserving at least the fishing opportunity already specified through 2027.

Second, we ask the Council and NMFS to determine whether the current management-area allocations are stranding quota and, if so, to redistribute the 2027 sub-ACLs without increasing the stock-wide catch limit. The basis for these requests follows.

1. NEFSA ACCEPTS THE ASSESSMENT FOR MANAGEMENT USE.

The 2026 Management Track finds Atlantic herring overfished, but not experiencing overfishing in 2025. Mobile-fleet fishing mortality was 0.121, or 44 percent of the 0.272 overfishing threshold. NEFSA accepts the assessment for management use; rebuilding and preventing overfishing remain the controlling requirements.

2. THE 2027 PROJECTION LEAVES ONLY 939 MT FOR THE U.S. MOBILE FLEET.

The example projection provides 6,222 mt of total catch for 2027. It separately assumes 5,283 mt of fixed-gear catch, including 5,130 mt from Canada and approximately 152 mt from U.S. fixed gear. After that assumed catch is accounted for, only about 939 mt remains for the U.S. mobile fleet. The projection associates that 939 mt mobile catch with fishing mortality of 0.021, only 7.7 percent of the 0.272 threshold. This is not an ordinary quota adjustment. It would reduce the directed mobile fishery to a level at which continued participation is no longer practicable.

3. THE CURRENT OFL AND PRIOR SSC ADVICE SUPPORT 15,435 MT AS THE INTERMEDIATE LEVEL.

The federal specifications currently establish a 2027 OFL of 31,075 mt, an ABC of 13,165 mt, and an ACL of 9,134 mt. A total catch level of 15,435 mt would be 49.7 percent of that OFL and would remain 15,640 mt, or 50.3 percent, below it. After the assessment's 5,283 mt fixed-gear assumption is accounted for, approximately 10,152 mt would remain for the U.S. mobile fleet. That mobile amount equals 32.7 percent of the currently specified OFL. The SSC itself recommended a 15,435 mt ABC for 2027 in July 2024 and increased its recommendation to 17,187 mt in April 2025. The Council subsequently held the 2027 ABC at 13,165 mt. This makes 15,435 mt a scientifically grounded intermediate level, not an arbitrary quota request. Under the existing OFL it would not constitute overfishing in catch terms; the remaining question is whether the updated assessment produces a lower OFL or a mobile-fleet fishing mortality at or above 0.272. The SSC should calculate those values directly.

4. PROJECTION UNCERTAINTY SHOULD BE ADDRESSED DIRECTLY.

The Peer Review Panel found the assessment technically sufficient for management use, but found the projection term of reference only partially met and considered the primary projection likely overly optimistic. The recent-five-year numbers-at-age sensitivity also has acknowledged limitations and is not fully consistent with the estimation model. The absence of an independent age-1 recruitment index, the lack of integrated state-survey information, and unresolved numbers-at-age patterns remain important. NEFSA is not asking the SSC to resolve these uncertainties by selecting the most optimistic result. We ask the SSC to test the 15,435 mt intermediate level and explain how the remaining uncertainty affects its conclusion.

5. THE COUNCIL'S RISK POLICY PROVIDES THE APPROPRIATE FRAMEWORK.

The policy approved June 24, 2026 directs the Council and its subordinate bodies to minimize large swings in annual specifications, promote rebuilding within timeframes that allow functioning fisheries, and provide an avenue for socioeconomic impacts. It

permits phased ABC changes over as many as three years when overfishing is prevented in each year. The policy does not replace the herring control rule, but it calls for the stability question to be considered and documented. The reduction to 939 mt of mobile-fleet opportunity is precisely the type of abrupt change the policy was designed to examine.

6. THE FISHERY-PERFORMANCE EVIDENCE BELONGS IN THIS DECISION.

The SSC's Social Sciences Subcommittee recommended consideration of fishery interactions, revenue, employment, port infrastructure, distributional effects, and long-term business viability during specification setting. NEFSA board member Suzannah Raber of the F/V Providian has provided first-hand evidence concerning a third-generation family business, its crew and shoreside vendors, the operational connection between the herring and mackerel fisheries, and the effect on lobster-bait availability. Those facts are not a substitute for the stock assessment. They are the fishery-performance evidence the Social Sciences Subcommittee said the SSC should receive, and they **support evaluating the fishery as high stress under the Risk Policy.**

7. REQUESTED SSC ACTION.

NEFSA respectfully asks the SSC to: (a) evaluate a total 2027 catch level of 15,435 mt; (b) report the corresponding OFL, U.S. mobile-fleet fishing mortality, spawning-stock biomass trajectory, and rebuilding performance; and (c) recommend that level if total catch remains below the updated OFL, mobile-fleet fishing mortality remains below 0.272, and the rebuilding requirements are satisfied. If 15,435 mt does not meet those standards, we ask the SSC to separately evaluate 14,417 mt before identifying a lower alternative. Under the assessment's 5,283 mt fixed-gear assumption, 14,417 mt would leave approximately 9,134 mt for the U.S. mobile fleet, equal to the domestic ACL already specified through 2027. The SSC also should consider a phased path with annual review. This request accepts the assessment, does not ask the SSC to tolerate overfishing, and provides a scientifically reviewable path to preserve a minimally functioning domestic herring fishery.

8. SEPARATE COUNCIL AND NMFS ACTION ON MANAGEMENT-AREA ALLOCATIONS.

The four sub-ACL percentages have remained unchanged since 2013. NEFSA asks the Council and NMFS to review each area's quota, catch, and percentage utilization for the most recent three to five completed fishing years, supplemented by 2026 year-to-date information and relevant access constraints. If the record shows persistent nonuse, the 2027 shares could be redistributed based on recent catch history and demonstrated availability, without increasing the stock-wide ACL or compromising individual stock components. If ordinary rulemaking cannot be completed in time, the Council should seek appropriate emergency or interim NMFS authority for an in-season transfer of demonstrably unused quota. This is a Council and NMFS request, not an SSC function.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Bonnie Brady', with a stylized flourish extending from the end.

Bonnie Brady
Policy Director
New England Fishermen's Stewardship Association

Swan's Island Fisherman's Cooperative
P.O. Box 116, 15 Morse's Hill Road
Swan's Island, ME 04685
Phone: (207) 526-4327 | Fax: (207) 526-4554
Email: sifishcoop@gmail.com

To Whom It May Concern,

I am writing on behalf of the Board of Directors of the Swan's Island Fishermen's Cooperative and the many fishermen, businesses, and families who rely on us. We appreciate the opportunity to provide comments regarding the Atlantic herring assessment and its effects on our communities.

Management decisions should recognize that reductions in domestic herring availability increase the lobster industry's dependence on imported bait. As local supplies become more limited, fishermen are forced to rely on bait sourced from outside the United States, often at higher costs and with greater uncertainty in availability and transportation. For island communities like Swan's Island, these challenges are even more pronounced. Because we depend on ferry transportation and have limited access to suppliers, obtaining fresh bait is already more difficult and less reliable than it is for many mainland fishing communities. Increased reliance on imported bait only compounds these challenges, making our fishing businesses more vulnerable to transportation delays, supply chain disruptions, and rising costs.

As a cooperative that purchases, stores, and distributes bait to our members and other fishermen, we see firsthand how reductions in herring availability ripple through the entire supply chain. This growing dependence on imported bait weakens the resilience of Maine's fishing industry, shifts economic benefits away from domestic harvesters and coastal communities, and places an even greater burden on working waterfronts that are already operating under significant constraints. Maintaining a sustainable domestic Atlantic herring fishery is not only important for resource conservation but also for preserving a reliable, affordable bait supply that supports the long-term viability of Maine's lobster industry and the island communities that depend on it.

Fishery management depends not only on rigorous science but also on transparent acknowledgment of uncertainty and thoughtful consideration of the fishing communities and businesses that rely on this resource. We respectfully encourage the committee to carefully consider the economic and operational impacts that changes in herring availability have on Maine's lobster industry, particularly for remote island communities that have fewer alternatives and face unique logistical challenges. Decisions with consequences of this magnitude deserve careful consideration of both the scientific record and the livelihoods they affect.

Thank you for your attention to these concerns,

Sincerely,

Dorothy LeMoine
Manager, Swan's Island Fisherman's Cooperative
Maine Commercial Lobster License Holder