

CORRESPONDENCE



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
GREATER ATLANTIC REGIONAL FISHERIES OFFICE
55 Great Republic Drive
Gloucester, MA 01930

April 3, 2020

Bob Beal
Executive Director
Atlantic States Marine Fisheries Commission
1050 N. Highland Street, Suite 200 A-N
Arlington, VA 22201

Dear Bob:

Please accept these comments on draft Addendum III to Amendment 3 to the Interstate Fishery Management Plan (ISFMP) for Atlantic Herring. Complementary federal and state herring management is necessary to effectively manage this resource, particularly in light of the drastically lower herring catch limits. We appreciate recent efforts by both the Atlantic States Marine Fisheries Commission and the New England Fishery Management Council to increase collaboration, including creating a Herring Management Board so that there is formal participation for us and the Council in Commission decision-making. Efforts for increased engagement and coordination should continue. The Herring Board's role in ensuring consistency between the federal plan and the ISFMP is critical to the effectiveness of both plans. This consistency is also necessary to avoid adverse impacts to Federal permit holders resulting from Commission actions.

We are concerned that Addendum III options would disadvantage the Federal midwater trawl fleet. Quota Management (Section 3.1) Options 2 and 3 could result in all or a majority of Area 1A catch being allocated to the summer months. The Federal plan restricts access to midwater trawl vessels to Area 1A each year until after October 1 and, therefore, contemplates an October 1 through December 31 midwater trawl fishery in Area 1A. I understand the Commission's desire to go out for public comment with the full suite of measures to solicit the widest range of opinions, but these options potentially either significantly reduce or even eliminate the ability of midwater trawl vessels to harvest fish from Area 1A. The Board must address these concerns, ensure state and federal management remains consistent to the extent practicable, and minimize impacts to Federal permit holders as final management measures are selected.

Thank you for the opportunity to provide comments on Addendum III. Given the low herring catch limits expected in the foreseeable future, I remain committed to improving collaboration on this important resource. I strongly encourage the Herring Board to work closely with the Council to ensure Commission measures are consistent with federal measures. Please contact



Allison Murphy at (978) 281-9122, allison.murphy@noaa.gov, or Carrie Nordeen at (978) 281-9272, carrie.nordeen@noaa.gov if you have any questions.

Sincerely,



Michael Pentony
Regional Administrator

cc: Tom Nies, NEFMC Executive Director
Cheri Patterson, Atlantic Herring Board Chair
Kirby Rootes-Murdy, Commission Fishery Management Plan Coordinator