



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 01930-2276

OCT 17 2014

E.F. "Terry" Stockwell III, Chairman
New England Fishery Management Council
50 Water St.
Newburyport, MA 01950

Dear Terry:

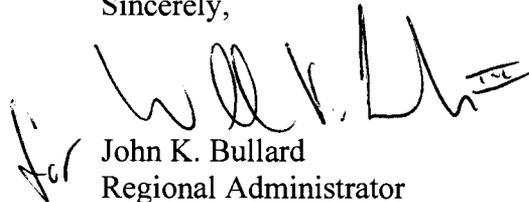
I want to acknowledge the hard work of the Council to address critical issues related to the Atlantic Herring Fishery Management Plan (FMP). However, I believe that the Council must fully address two additional issues, and I hope the Council will consider these as priorities for 2015.

First, we urge the Council to finalize its consideration of whether or not to add river herring and shad as stocks in the Herring FMP. Council staff is working on this issue and plans to complete a white paper for Council discussion at the upcoming November meeting. As you know, the Mid-Atlantic Fishery Management Council decided in October 2013 not to add river herring and shad as stocks in a Federal FMP at that time and to consider the issue again in three years. However, the New England Council still needs to complete its consideration of the issue and clearly document the rationale for whatever decision it makes.

Second, we urge the Council to further consider Atlantic herring's role as forage in the ecosystem as it develops a herring ABC control rule for 2016 and beyond. We fully support the Council's further consideration of forage-based ABC control rules in the upcoming 2016-2018 herring specifications. Council staff indicated to my staff that the Council's risk policy, if adopted, could provide guidelines for consideration of forage-based ABC control rules. We support this approach, but caution that the extent of management changes you can adopt via the specifications is limited. If the specifications cannot allow for a complete evaluation of the harvest policies associated with herring's role as forage in the ecosystem, I recommend that the Council initiate an amendment to the FMP in 2015 to fully consider this issue.

We can discuss these recommendations at the Northeast Region Coordinating Council meeting and November Council meeting. We look forward to working with the Council to address these important herring management issues.

Sincerely,


John K. Bullard
Regional Administrator

Cc: Thomas A. Nies, Executive Director, New England Fishery Management Council
Dr. Christopher M. Moore, Executive Director, Mid-Atlantic Fishery Management Council

