Amendment 8 to the Atlantic Herring FMP

Amendment 8 Scoping Comments

Received after the Deadline

March/April 2015
Mr. Thomas A. Nies, Executive Director
New England Fishery Management Council
50 Water Street, Mill #2
Newburyport, MA 01950

Re: Atlantic Herring Amendment 8 Scoping comments

Dear Tom,

There is absolutely no denying the critical role that herring play as a forage source off the coast of New England—it is what drives all of our fisheries. Any fisherman can tell you this. While there are other forage species that are important, nothing will be able to fill the void if the herring stock were to crash.

And yet, this critical forage role is not even considered by the Council and NMFS when herring quotas are set. The Council should use Herring Amendment 8 to fix this deficiency. It should develop a control rule that explicitly recognizes and addresses the importance of having enough herring in the water for predators to eat and be healthy.

We have watched for well over a decade as pair trawlers have wrecked havoc on the Gulf of Maine and Georges Bank ecosystems. Despite what some will say, the herring resource is not nearly as healthy as it should be. The severe retrospective pattern that has now been seen in multiple herring assessments likely speaks to this fact, and it should give all managers cause for concern. A forage based control rule will help in addressing these problems.

I would also like to see the Council—when developing the forage control rule—to address the problem of localized depletion. It is not acceptable to ignore the negative impacts that are caused when this fleet moves in and pounds small areas until there is nothing left for predators to eat.

I would also urge the Council to explicitly analyze the value of all the fisheries that rely on having a healthy herring resource when developing the amendment. This number will dwarf the value of this species to the directed herring fishery.

Please do what is right and use Amendment 8 to make sure we have a healthy herring resource in the future.

Thanks for your time,
John Nichols
FV Sooner or Later
Tuna fisherman
I would also like to add that no other boats were allowed to set any kind of nets in the area because of the cod problem but yet the herring boats were allowed to drag their nets in the shallow waters in the bay. I was there to watch them last year and they scoop up everything even bottom fish that raise up off the bottom at night. This is not fair to all the other fishermen (gillnetters, draggers etc) who are forced to shut down because of by catch and the herring boats can catch and waste all they want.
Dear Mr. Tom,

Myself and almost every other fisherman in New England know how important herring is as a forage source. There is no species that is more critical to our ocean ecosystem and the many businesses and communities that rely upon it. But somehow, there is no formal or reliable consideration of this forage role in the herring management process. It is time for the Council to fix this glaring deficiency.

Since the late nineties, we have all seen the problems caused by the herring pair trawlers. These boats have wrecked havoc on the very foundation of the Gulf of Maine and Georges Bank. They have gone from one local area to the next, leaving only problems in their wake. And despite the cutbacks throughout every other fishery, somehow these boats have full access to pull their small mesh nets through critical areas like Jeffrey’s Ledge and Stellwagen Bank.

While it will not solve the problem completely, the Council can go a long ways towards restoring balance by putting a Control Rule in Amendment 8 that explicitly accounts for herring’s forage role. This rule should ensure that there is enough herring in the water to attract, hold, and nourish the predator stocks we all rely on. When developing the Amendment, the Council should include a full analysis on herring’s value to our region as a food source.

It is hard to believe that there is any debate about directly considering forage in the herring management process. Without a healthy herring resource all of our fisheries are doomed. Please use this Amendment as an opportunity to bring common sense into this process.

Thanks,

William French
Fv Betsy G

SFR Hydro Corporation
PO Box 699 Kingston NH 03848.
Sherie Goutier

From: Newman, Jon <jNewman@planesense.com>
Sent: Friday, May 01, 2015 1:40 PM
To: comments
Subject: Herring

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

Re: Atlantic Herring Amendment 8 Scoping

Dear Tom,

I am writing today to urge you and the Council to use Herring Amendment 8 to ensure that the role herring plays as a critical forage stock is considered when herring quotas are being set. For too long this has been ignored, and it is time to make a change.

Any fisherman can tell you that forage is the driver of all our important fisheries. Without enough bait, we will not have healthy fisheries. This is all the more important given the recent cuts to the cod fishery. Off New England, herring is the most important forage stock we have, and there is nothing that will fill the void if it is decimated.

Please take this opportunity to take a step forward and afford this important species more protection when you set quotas. It will go a long ways towards ensuring that all our other fisheries are able to prosper.

Thanks for your time

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

Re: Herring Amendment 8 Scoping

Dear Mr. Nies

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Since the late nineties, we have all seen the problems caused by the herring “midwater” trawlers. These boats have wreaked havoc on the very foundations of the Gulf of Maine and Georges Bank ecosystems. They have gone from one local area to the next, leaving only problems in their wake. And despite the cutbacks throughout almost every other fishery, somehow these boats have full access to pull their small mesh nets through critical areas like Jeffrey’s Ledge and Stellwagen Bank, targeting the species we need the most.

While it will not solve the problem completely, the Council can go a long ways towards restoring balance by developing a Control Rule in Amendment 8 that explicitly accounts for herring’s forage role. This rule should ensure that there is enough herring in the water to attract, hold, and nourish the predator stocks we all rely on. When developing the Amendment, the Council should also include a full analysis on herring’s value to our region as a food source in the water.

It is hard to believe that there is a need for any debate about directly considering forage in the herring management process. Without a healthy herring resource all of our fisheries are doomed. Please use this Amendment as an opportunity to bring common sense into this process.

Thank you,
Captain Gary Cannell
Captain Gary & Karen Cannell
TUNA HUNTER FISHING CHARTERS
captain@tunahunter.com
978-407-1351 captain
978-546-7992 land
http://www.tunahunter.com
Please call us at 978-407-1351
as we are at sea fishing this time of year!
Dear Tom,

I am writing today, along with many others, to urge you and the Council to use Herring Amendment 8 to ensure that the role herring plays as a critical forage stock is considered when herring quotas are being set. For too long this has been ignored, and it is time to make a change.

Please take this opportunity to take a step forward and afford this important species more protection when you set quotas. It will go a long ways towards ensuring that all our other fisheries are able to prosper.

Thank you,

Steve Morley
PO Box 1648
Portsmouth, NH 03802-1648

April 29, 2015

Re: Herring Amendment 8 Scoping

Dear Mr. Nies:

I am writing in support of developing a Control Rule in Amendment 8 that addresses herring's role as a forage fish.

I currently serve on the Atlantic Highly Migratory Species Advisory Panel for National Marine Fisheries as well as the Herring Advisory Panel for Atlantic States Marine Fisheries Commission.

In my experience as a recreational and commercial fisherman, when the large herring boats come to an area, they leaving little to no bait fish for the many other species that prey on them: tuna, bluefish, striped bass, cod, haddock, whales, seals, seabirds etc.

I have fished tuna bites, where tuna, whales and seabirds are around for days feeding on schools of herring. As soon as the large herring boats come into the area, they clean it out. The tuna, whales and birds disappear quickly as do the fishermen.

I, like so many of the other commercial and recreational fishermen, believe there needs to be an allocation in the quota to insure that enough herring are left in the Gulf of Maine and George's Bank to breed, attract and hold the predators that feed and depend on them.

If you have any questions for me or would like to speak about this further, I can be reached at (603) 548-5267 or sjoyce@comcast.net. Thank you.

Respectfully,
Shawn Joyce
April 22, 2015

RE: Atlantic Herring Amendment 8 Scoping Comments

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

Dear Mr. Nies:

Thank you for taking the opportunity to invite the public to comment on this important matter for the Northeast’s marine ecosystem. As an avid marine conservation advocate I support the decision of the New England Fishery Management Council (NEFMC) to explicitly account for Atlantic herring’s unique role as a forage fish in the ecosystem when setting catch limits. Herring is a valuable public resource. I commend the council for regarding this determination as an ecosystem issue and engaging experts in ecosystem-based fisheries management.

Although the NEFMC initiated Amendment 8, it is not simply a New England issue. During annual migrations, Atlantic herring journey as far south as North Carolina and as far north as Nova Scotia. Herring has always been an important part of the marine food web throughout its range, but it has become even more vital with the decline of other forage species such as river herring, shad, mackerel, and menhaden. Recent scientific research supports leaving enough forage fish such as herring in the ocean to support not only their own population, but also viable populations of other species that depend on them. Many herring predators are depleted, and keeping enough herring in the ocean would improve the chances of recovery for cod, tuna, whales, and seabirds. I urge the NEFMC to consider alternatives for Amendment 8 that are based on this latest scientific guidance for managing forage fish.

In addition to the ecological value of herring predators, there is tremendous economic worth in commercial and recreational fishing for tuna, cod, and striped bass, as well as whale and seabird watching in the Northeast. The NEFMC should consider, and quantify to the best of its ability, this economic value and recognize that it is dependent on abundant Atlantic herring during particular times of the year and in specific places in the ocean. Many predators are migratory, following prey and finding suitable habitat for mating, nesting, and growing. Amendment 8 should include alternatives that explicitly aim to keep Atlantic herring present in sufficient quantities when and where they are needed most by predators. Amendment 8 should also include options that curtail fishing incrementally as the Atlantic herring population declines and that stop all fishing for herring below a minimum population level.

Thank you again for embarking on a long-term, ecologically based harvest policy for the Atlantic herring fishery. This is a significant step toward developing ecosystem-based fisheries management, which is a stated goal of both the NEFMC and of the National Oceanic and Atmospheric Administration’s Fisheries Service. I look forward to seeing the draft of the amendment with a full range of alternatives when the council releases it for public comment.

Sincerely,

[Signature]

Printed Name: Nandini Srinivasan
Address: 11 Cutters Bluff, Weston, MA 02493
April 22, 2015

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New England Fishery Management Council
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Sincerely,

[Signature]

Printed Name: Celeste Calderon
Address: P.O. Box 21095
Rancho Santa Fe, CA 92037
April 22, 2015

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

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Sincerely,

Printed Name: Cecelia E Pless
Address: 1228 Glen View Rd
Birmingham AL 35222
April 22, 2015

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

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Sincerely,

[Signature]

Printed Name: Caroline Hobbs
Address: 815 N Broadway
Saratoga Springs, NY
April 22, 2015

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New England Fishery Management Council
50 Water St., Mill #2
Newburyport, MA 01950

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Sincerely,

[Signature]

Printed Name: Spencer Nelson
Address: 16 Water St.
Newmarket, NH 03857
April 22, 2015

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

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Sincerely,

[Signature]

Printed Name: Henry C Mackay
Address: 504 Yale Ave, Terrace Park OH 45174
April 22, 2015

RE: Atlantic Herring Amendment 8 Scoping Comments

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

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Sincerely,

[Signature]

Printed Name: Colleen Sullivan
Address: 815 N Broadway, Swaraaga Springs, NY 12804
April 22, 2015

RE: Thank you for protecting the Pacific’s forage fish!

Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, #101
Portland, OR 97220

Dear Chair Lowman and Council Members,

Thank you for your progressive and thoughtful leadership in protecting unmanaged forage fish in the California Current Ecosystem of the Pacific Ocean. Thank you for working so diligently with citizens, researchers, and NGOs, and taking the time to consider their conservation perspectives.

This landmark decision recognizes the ecological importance of forage fish to seabirds, marine mammals, and the bigger fish that many of us love to catch and eat. The Council’s action also marks an impressive paradigm shift from traditional management of ocean fishing to a more comprehensive, ecosystem-based approach. It reflects the principle that responsible management requires asking questions before a fishery begins, rather than after.

Despite the fact that I live on the east coast, I am proud of this accomplishment, achieved with the help of thousands of citizens who voiced their support over the past several years. Collectively we recognize that the long-term health of our Pacific Ocean and its resources depends on alignment and collaboration along the entire West Coast. I hope that the Council’s action on forage fish paves the way for West Coast states to develop and fully implement their own forage fish management plans for state waters. We hope to see the same leadership and ecosystem based management on the east coast of the United States, with our forage fish populations in the Atlantic Ocean.

Again, thank you for your leadership on forage fish protections. The ocean is the common heritage of humankind, and enjoyed and respected by all citizens, regardless of our state or country of residence.

Sincerely,

Charles Lovejoy

Printed Name:

Address: 160 Concord Drive
Madison, CT 06443
April 22, 2015

RE: Atlantic Herring Amendment 8 Scoping Comments

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

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Although the NEFMC initiated Amendment 8, it is not simply a New England issue. During annual migrations, Atlantic herring journey as far south as North Carolina and as far north as Nova Scotia. Herring has always been an important part of the marine food web throughout its range, but it has become even more vital with the decline of other forage species such as river herring, shad, mackerel, and menhaden. Recent scientific research supports leaving enough forage fish such as herring in the ocean to support not only their own population, but also viable populations of other species that depend on them. Many herring predators are depleted, and keeping enough herring in the ocean would improve the chances of recovery for cod, tuna, whales, and seabirds. I urge the NEFMC to consider alternatives for Amendment 8 that are based on this latest scientific guidance for managing forage fish.

In addition to the ecological value of herring predators, there is tremendous economic worth in commercial and recreational fishing for tuna, cod, and striped bass, as well as whale and seabird watching in the Northeast. The NEFMC should consider, and quantify to the best of its ability, this economic value and recognize that it is dependent on abundant Atlantic herring during particular times of the year and in specific places in the ocean. Many predators are migratory, following prey and finding suitable habitat for mating, nesting, and growing. **Amendment 8 should include alternatives that explicitly aim to keep Atlantic herring present in sufficient quantities when and where they are needed most by predators. Amendment 8 should also include options that curtail fishing incrementally as the Atlantic herring population declines and that stop all fishing for herring below a minimum population level.**

Thank you again for embarking on a long-term, ecologically based harvest policy for the Atlantic herring fishery. This is a significant step toward developing ecosystem-based fisheries management, which is a stated goal of both the NEFMC and of the National Oceanic and Atmospheric Administration’s Fisheries Service. I look forward to seeing the draft of the amendment with a full range of alternatives when the council releases it for public comment.

Sincerely,

[Signature]

Printed Name: Tyler Burke
Address: 602 Monroe Street
Hoboken, NJ 07030
April 22, 2015

RE: Atlantic Herring Amendment 8 Scoping Comments

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

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[Signature]

Printed Name: Nick Hallman
Address: 11360 SW 60th Ave
Miami, FL
April 22, 2015

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New England Fishery Management Council
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Newburyport, MA 01950

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Sincerely,

[Signature]

Printed Name: Juliana O’Brien
Address: 60 Greenfield Ave
            Saratoga Springs, NY 12866
April 22, 2015

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New England Fishery Management Council
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Newburyport, MA 01950

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[Signature]

Printed Name: Laura Mindlin
Address: 60 Greenfield Ave
Saratoga Springs, NY 12866