



December 5, 2023

Chris Moore, Ph.D., Executive Director and Wes Townsend, Chair
Mid-Atlantic Fishery Management Council
800 N State Street, Suite 201,
Dover, DE 19901 (sent via email)

Subject: Comments and Letter of Support to include “River Herring and Shad Bycatch Avoidance Modeling/Research” and “Developing a River Herring and Shad run data portal” in the 2024 Implementation Plan Proposed Action Numbers 30 and 31 for River Herring and Shad.

Dear Director Moore, Chairman Townsend and Members of the Council:

The Buckeye Brook Coalition was formed to protect, preserve, and restore Buckeye Brook, its watershed, the blue back herring and alewives who annually migrate from the ocean to the Buckeye Brook where they annually spawn in our local waters.

The Buckeye Brook Coalition is a 501(c)(3) non-profit corporation, a Rhode Island State Designated Local Watershed Council under R.I. General Laws 46-26-8 et seq. and is governed by a board of directors, officers, bylaws, and statute.

Our Southern New England river herring migration runs have experienced significant declines in 2022 and 2023 and ocean stocks need to be better managed.

Bycatch reduction can be achieved by updating marine fisheries policies which are key to achieving goals for species sustainability. Your council’s role is extremely important.

The Buckeye Brook Coalition strongly supports and requests that the Council’s 2024 Implementation Plan include:

- 1) River Herring and Shad Bycatch Prediction and Avoidance Modeling/Research;
- 2) Developing Plans for a River Herring and Shad run “data portal” project.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Zarum", with a stylized flourish at the end.

Michael Zarum, President and Chair
Buckeye Brook Coalition
email: located@rcn.com

AKORN ENVIRONMENTAL CONSULTING, LLC • BLUE PLANET STRATEGIES • BUCKEYE
BROOK COALITION • CONSERVATION LAW FOUNDATION • DELAWARE RIVER SHAD
FISHERMEN'S ASSOCIATION • FRIENDS OF THE MOSHASSUCK • HERRING PONDS
WATERSHED ASSOCIATION • IPSWICH RIVER WATERSHED ASSOCIATION •
MATTAWOMAN WATERSHED SOCIETY • AUDUBON MID-ATLANTIC • NEPONSET RIVER
WATERSHED ASSOCIATION • NORTH AND SOUTH RIVERS WATERSHED ASSOCIATION •
OPERATION SPLASH • RED LILY POND PROJECT ASSOCIATION, INC. • RIVERKEEPER,
INC. • SAVE THE SOUND/ LONG ISLAND SOUNDKEEPER • SEATUCK ENVIRONMENTAL
ASSOCIATION • WILD OCEANS

December 7, 2023

Dr. Chris Moore, Executive Director
Wes Townsend, Council Chairman
Mid-Atlantic Fishery Management Council
800 N State Street, Suite 201, Dover, DE 19901

Dear Dr. Moore, Mr. Townsend and Mid-Atlantic Fishery Management Council members,

We strongly support the inclusion of “Exploration of a modeling approach for shad and river herring bycatch avoidance approaches” in the 2024 Implementation Plan. We appreciate that this proposed action was carried forward from the Council’s October meeting, and urge the Council to include this priority in its final action at its December meeting.

A bycatch avoidance model and program is critically needed in order to effectively minimize river herring and shad bycatch in the Atlantic mackerel fishery as the fishery rebuilds. Beginning work now while mackerel catches are low will allow the program to develop as catches ramp up, safeguarding river herring and shad populations as high-volume mackerel trips resume. This is critical because as you are aware, Southern New England river herring runs in particular experienced a significant documented downturn in 2022, a trend that continued into 2023. The drop in numbers of returning river herring was unexpected considering the ongoing efforts of state agencies, watershed organizations and volunteer groups to restore access to spawning habitat.

Incidental catch of river herring and shad in commercial fisheries continues to be a significant contributor to fishing mortality. In their 2022 research paper published in the Canadian Journal of Fisheries and Aquatic Sciences, Reid et al.¹ provide evidence that fisheries bycatch is disproportionately affecting river herring populations in the southern New England and Mid-Atlantic regions. They advise that “ongoing evaluation of spatial and temporal distributions of river herring populations and their contributions to fisheries bycatch will be important for adaptive management policies and for preserving the viability and genetic diversity of river herring populations as environmental conditions change.”

¹ Reid, K. et al. 2023. Spatial and temporal genetic stock composition of river herring bycatch in southern New England Atlantic herring and mackerel fisheries. *Can. J. Fish. Aquat. Sci.* 80: 360–374 (2023)

The Reid paper was followed by the publication of “Developing a sub-seasonal ecological forecast to reduce fisheries bycatch in the Northeast U.S.” by Roberts et al,² which informed the Council’s River Herring and Shad Committee recommendation to include the exploration of bycatch avoidance models in the 2024 Implementation Plan.³ The researchers developed a river herring bycatch forecast for the Northeast region that identifies areas and times of high bycatch risk in midwater trawl fisheries targeting Atlantic herring and Atlantic mackerel that can be further developed as a proactive tool to decrease bycatch. Because the midwater trawl fleet targets both Atlantic herring and Atlantic mackerel, often on the same trip, collaboration between the New England and Mid-Atlantic Councils is essential for effective bycatch reduction strategies, and should be integrated into the work plan for this initiative.

To rebuild imperiled runs, river herring and shad schools must be protected in the times and places where they are most vulnerable to at-sea catch. The cultural, socio-economic and ecological importance of river herring and shad to the Greater Atlantic region’s fishing communities cannot be overstated and is a driving force behind the strong regional partnerships forged to restore spawning habitat. The Mid-Atlantic Council’s role in minimizing bycatch is an essential component of restoration efforts.

Thank you,

Aaron Kornbluth
Akorn Environmental Consulting, LLC

Don Williams
Herring Ponds Watershed Association

Roger Fleming
Blue Planet Strategies

Neil Shea
Ipswich River Watershed Association

Michael D. Zarum
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Jim Brown, ASLA
Audubon Mid-Atlantic

Dave Carl
Delaware River Shad Fishermen’s
Association

Ian Cooke
Neponset River Watershed Association

Greg Gerritt
Friends of the Moshussuck

² K.E. Roberts, J.E.F. Stepanuk, H. Kim, L.H. Thorne, C. Chong-Montenegro, J.A. Nye, Developing a subseasonal ecological forecast to reduce fisheries bycatch in the Northeast U.S., *Progress in Oceanography*, Volume 213, 2023,103021,ISSN 0079-6611, <https://doi.org/10.1016/j.pocean.2023.103021>.

³ https://www.mafmc.org/s/Tab10_RH-S.pdf

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