Mystic River Watershed Association
your community • your watershed

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

Dear Mr. Quinn and Mr. Nies,

The Mystic River Watershed Association (MyRWA) is a non-profit organization dedicated to the preservation and enhancement of the ecology of the Mystic River Watershed, which flows into Boston Harbor. MyRWA, as well as many other organizations and agencies within our watershed, are actively engaged in efforts to dramatically improve our habitat for spawning alewives and bluebacks because of the vital and foundational role river herring play in our ecosystem.

With the support of our Massachusetts Division of Marine Fisheries, the Massachusetts Department of Conservation and Recreation, the Massachusetts Water Resources Authority (MWRA) and thousands of volunteers, MyRWA has been directly addressing freshwater impediments that have been cited as playing a part in the great decline of river herring over the last six decades—dams, pollution and predation.

- In 2015, MWRA completed a several-year project substantially reducing the volume of combined sewage overflows (CSOs) discharged to Alewife Brook during heavy rainstorms. Also, MWRA constructed a 3.4-acre stormwater wetland to filter environmental contaminants before they enter the Little River, which flows into Alewife Brook.
- MyRWA has been working for several years to eliminate the water chestnut, which is an invasive species that deprives our herring of dissolved oxygen. Last year alone, over 800 volunteers removed water chestnut plants from the Mystic River.
- MyRWA right now is engaged in a Total Maximum Daily Load (TMDL) study in order to address phosphorous pollution throughout our watershed.
- Because striped bass cannot pass through the fish ladder at our Upper Mystic Lake dam, river herring predation in our watershed has been reduced.
- Our river herring's final obstacle, the Center Falls Dam on the Aberjona River, has been removed as a fish ladder was completed December 2016.
- Thanks to dozens of volunteers, we completed last year our 6th annual count of river herring at the fish ladder within the Upper Mystic Lake dam. Our sampling's count was 62,562 herring, which gives us an estimated run of 448,060 fish. This is greater than a twofold increase over the first year's count of river herring!
- This spring with the assistance of our Division of Marine Fisheries we are installing a video camera at the Upper Mystic Lake dam's fish ladder. Now we will be able to count our river herring passing through the ladder at night as well as during the day.

Our population increase gives direct evidence on how our restoration efforts for river herring can have a major impact. We urge the NEFMC to protect our river herring where they school in the ocean.

For financial reasons onboard monitoring of all midwater trawlers has not been put in place to document and reduce river herring bycatch and slippage. Therefore, the only path forward towards the protection of our depleted river herring population, while in the ocean, is to restrict midwater trawling where river herring school. The proposed year-round "no midwater trawling zone" that extends 50 miles from the coastal states of Massachusetts (including the back of Cape Cod), Rhode Island and Connecticut is necessary to protect and restore our river herring population. Additionally, the seasonal closure of Herring Management Area 1A, (waters off eastern Massachusetts, New Hampshire and Maine) should be extended for the full year.

These measures need to be done for the following reasons:

- A 2016 study states, "bycatch in the marine fisheries, particularly the southern New England Atlantic herring fishery, may be a contributing factor in the persistent depression of population abundances observed for the most depleted river herring generic stocks."[1] Within its genetic study of alewife bycatch, scientists found that between the northern New England, the southern New England and mid-Atlantic genetic stocks of alewife; the southern New England stock had the highest total proportion (67%) of alewife bycatch. As southern New England areas have indeed reported serious population declines, the midwater trawling within this region should be restricted.
- River herring bycatch occurs mostly within the region of the 50-mile coastal buffer zone and Herring Management Area 1A.[2]
- NOAA's scientists assessed the climate vulnerability of fish and invertebrate species in the Northeast region and concluded that the overall vulnerability for both alewife and blueback herring is "very high."[3] This is the time to rebuild the population, not to allow more river herring to be killed.
- Midwater trawling where river herring school directly undermines the hard-fought progress that the Mystic River Watershed Association and other watershed stewards up and down the New England coast have made to restore our river herring population.

We respectfully request that the NEFMC assist us and do its part by creating a "no midwater trawling zone" that extends 50 miles from the coastal states of Massachusetts (including the back of Cape Cod), Rhode Island and Connecticut. Herring Management Area 1A should be included in this ban as well.

Sincerely,

Patrick Herron, Executive Director
Mystic River Watershed Association

[1]Hasselman, et.al. 2016. Genetic stock composition of marine bycatch reveals disproportional impacts on depleted river herring genetic stocks. Canadian Journal of Fisheries and Aquatics Science. 73: 1–13.

[2]Cournance, et al, 2013. Spatial and temporal patterns of anadromous alosine bycatch in the US Atlantic herring fishery. Fiheries Research 141:88-94

[3]https://www.st.nmfs.noaa.gov/ecosystems/climate/northeast-fish-and-shellfish-climate-vulnerability/inde