



October 28, 2011

Eric C. Schwaab
Assistant Administrator for Fisheries
National Oceanic and Atmospheric Administration
1315 East-West Highway, Building 3
Silver Spring, MD 20910

Subject: Consider river herring for ESA protection

Dear Assistant Administrator Schwaab:

On behalf of the Mystic River Watershed Association (MyRWA), I write in support of the petition filed by the Natural Resources Defense Council (NRDC) to list the alewife and blueback herring as threatened species under the Endangered Species Act (ESA). MyRWA is a grassroots organization dedicated to the protection and restoration of the Mystic River, its tributaries, and related natural resources throughout the watershed's 22 communities. MyRWA is deeply concerned about the current status of alewife and blueback herring, collectively known as river herring, which have historically been one of the most important components of the forage base in our watershed. We request that the National Marine Fisheries Service (NMFS) make a positive 90-day determination that NRDC's petition demonstrates that listing the two species may be warranted. The agency should then move forward as quickly as possible to conduct a full scientific review of the petition and the requested ESA listings.

Declining river herring populations in the Mystic River watershed and throughout our region has been well documented. River herring once spawned in virtually every river and stream along the Atlantic coast. With spawning populations frequently reaching into the millions, river herring have nurtured our ecosystems as key prey species for countless animals, both marine and freshwater. Until relatively recently, these river herring populations also supported a substantial fishery. From 1950 to 1970, the Atlantic coastal catch averaged over 50 million pounds per year.

Unfortunately, centuries of overfishing, dam construction, water pollution, global warming, and other harms have cut the annual pulses of river herring down to a relative trickle today. Coastwide harvest has averaged just over one million pounds over the last decade, a plunge of 98 percent from the 1950-70 average. In rivers where millions once swam, returning river herring number in the thousands, or even hundreds.

NRDC's petition exhaustively detailed the ongoing threats to the alewife and the blueback herring and why they should be listed under the ESA. In sum, these two unique species need the protections provided by the ESA if they are to survive. For example, even though NMFS' own Office of Protected Species has listed these two populations as "Species of Concern," neither NMFS nor any other fishery managers have put measures in place to reduce or limit the significant number of river herring killed in federal waters, a substantial cause of mortality to both species. If listed, both of these unique species would be better protected against excessive fishing mortality in ocean fisheries, as well as against water pollution, dams and other harms.

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MyRWA, as well as many other organizations and agencies within our watershed, are actively engaged in dramatically improving existing habitat for spawning alewives and bluebacks. We respectfully request that NMFS help reverse our river herring's calamitous decline by making a positive 90-day determination and then conducting a full status review as expeditiously as possible.

Sincerely,

A handwritten signature in dark ink, appearing to read 'EkOngKar Singh Khalsa', with a long horizontal flourish extending to the right.

EkOngKar Singh Khalsa
Executive Director
Mystic River Watershed Association