



October 15, 2019

Mr. Michael Pentony, Regional Administrator
National Marine Fisheries Service
55 Great Republic Drive
Gloucester, MA 01930

Re: Comments on Herring Amendment 8
Atlantic Herring Fishery Management Plan
Magnuson-Stevens Fisheries Conservation and Management Act
Federal Register 84 FR 43573

Dear Mr. Pentony:

On behalf of the Association to Preserve Cape Cod (APCC), I am pleased to submit this letter strongly supporting the proposed Magnuson-Stevens Fisheries Conservation and Management Act Provisions: Fisheries of the Northeastern United States: Amendment 8 (“Herring Amendment 8”).

APCC is a 501(c)3 nonprofit environmental education and advocacy organization founded in 1968 to promote policies and programs to preserve, protect and restore the natural resource of Cape Cod, Massachusetts. Representing all 15 towns on the Cape, APCC’s goals include protection of groundwater, surface water, and wetland resources; preservation of open space; promotion of responsible, planned growth; and the achievement of an environmental ethic (www.apcc.org). To achieve these goals, we provide technical assistance, outreach, advocacy and facilitation. APCC has emerged as the Cape’s environmental leader, earning a reputation for science-based policies to protect the Cape’s valuable natural resources.

Since 2007, APCC has organized, trained and maintained a volunteer river herring count program to collect data on herring run size during the annual spawning migration. The count program provides valuable data to local, state and federal fisheries managers to support herring management, protection and restoration, and to build public support for protection of herring and their habitat. Our partners include towns on Cape Cod, the Massachusetts Division of Marine Fisheries, NOAA’s Restoration Center, the Massachusetts Bays National Estuary Program, many organizations and over 200 volunteers.

As of this year, 18 runs on Cape Cod were monitored through APCC’s count program. Our data show that the majority of these runs are experiencing declining run size compared to past years, indicating that protection and restoration measures for herring are desperately needed.

Herring are a keystone species in Cape Cod’s coastal ecosystem. They are a critical component of the food web that includes many commercially and recreationally important finfish species, migratory birds, marine mammals and other wildlife. Without herring, the fish and wildlife that depend on them for food would be severely impacted and the health of the Cape’s coastal ecosystem would be imperiled.

Amendment 8 provides an acceptable biological catch control rule for herring that accounts for

herring's role in the ecosystem and prohibits midwater trawling in inshore federal waters, including a 20-mile buffer off the east-facing coast of Cape Cod. Amendment 8 follows up on the recommendations of the New England Fishery Management Council approved in fall 2018. APCC strongly supported those recommendations, and we strongly support their implementation through approval of Amendment 8.

We urge the National Marine Fisheries Service to implement Amendment 8 as soon as possible and to have the regulations in place for the upcoming fishing season and before the spring herring migration.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Andrew Gottlieb', with a long horizontal flourish extending to the right.

Andrew Gottlieb
Executive Director

AG/jm/dk