



April 17, 2024

Cate O'Keefe, PhD
Executive Director
New England Fishery Management Council
50 Water Street, Mill #2
Newburyport, MA 01950

Re: Atlantic Herring Amendment 10 Scoping Comments

Dear Dr. O'Keefe,

Thank you for the opportunity to provide comments on the development of Amendment 10 to the Fishery Management Plan (FMP) for Atlantic Herring. Specifically, we would like to address actions to enhance river herring (alewife and blueback herring) and shad (American shad and hickory shad) avoidance and other catch reduction measures to better support ongoing coastwide restoration efforts for those species.

The mission of Rivers Alliance is to protect all the waters of Connecticut: surface waters, aquifers, and wetlands. We promote and support good water policies statewide; we assist environmental groups, businesses, and individuals who seek to improve the quality of local waters.

River herring are important to the ecology of our inland rivers. They tie our ocean, rivers and lakes together, providing vital nutrients and forage needed to make healthy watersheds. They are also prey for osprey, eagles, great blue heron, and other fish eating birds as well as larger predator fish such as trout.

As waters in Connecticut face increasing challenges from climate change, further declines in biodiversity will severely impair our ability to adapt to and mitigate these challenges. **River herring populations are in serious trouble and we will lose the ecosystem services they provide.** The number of river herring that migrate up into our rivers has declined from 600,000 to mere double digits despite incredible progress and significant investment in improving connectivity through dam removals and installation of fish passage. Billions – if not trillions – of dollars have been invested in water quality improvements.

River herring population decline coincides with the harvesting of Atlantic herring from the waters off the eastern end of Long Island Sound by large trawlers. Therefore, **Rivers Alliance supports measures designed to end the by-catch of river herring. In particular, time/area closures for locations where Atlantic herring fisheries overlap with concentrations of shad and river herring in waters adjacent to Southern New England.**

We must act now to save river herring populations.

Thank you for this opportunity to provide input on potential management measures designed to address the catch of shad and river herring in the directed Atlantic herring fishery.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Alicea Charamut', with a stylized, cursive script.

Alicea Charamut
Executive Director