



Clean Water. Healthy Habitats. Resilient Communities.

Connecticut River Conservancy

April 17, 2024

Dr. Cate O'Keefe
Executive Director
New England Fisheries Management Council
50 Water Street, Mill 2
Newburyport, MA 01950

Re: Comments on Amendment 10, Atlantic Herring Plan

Dear Dr. O'Keefe,

On behalf of the Connecticut River Conservancy (CRC), I thank you for the opportunity to submit these written comments regarding Amendment 10 of the Atlantic Herring Plan, in addition to our testimony delivered this evening. The Connecticut River Conservancy restores and advocates for clean water, healthy habitats, and resilient communities to support a diverse and thriving watershed. A 501(c)(3) non-profit organization since 1952, CRC has been a powerful force for positive environmental change throughout the entire Connecticut River watershed, from source to sea. We actively participate in efforts to restore diadromous fish to the Connecticut River basin by advocating for clean water, managing connectivity projects at dams, and partnering with the Connecticut River Migratory Fish Cooperative in field activities. We remove derelict dams, restore habitat, and monitor water quality throughout the watershed. We have invested significant time, money, and energy advocating for our stocks of American shad, alewife, and blueback herring. We know that healthy river ecosystems need abundant river herring populations. Their role as a forage species has been well-documented and is critically important to the watershed.

Parts of the Connecticut River and its tributaries were once black with river herring. After dams decimated their numbers prior to the 1950s, hard work and the investment of millions of dollars by public and private entities began to rebuild the stocks. In the 1960s, the Holyoke Dam Lift passed hundreds of blueback herring a year, but by 1985, over 630,000 blueback herring were passed. Then the Atlantic herring trawl fishery began and by 2006, the number of blueback herring plummeted to 21. In the face of ongoing impacts from the trawl fishery, those numbers have not continued their rebound, indeed, they have not even reached 10,000 to date.

Peer-reviewed scientific literature has demonstrated that the winter Atlantic herring fishery in Management Area 2 is intercepting a large number of our river herring before they can enter Long Island Sound and the Connecticut River to spawn. We at CRC have become impatient waiting for the implementation of known and effective steps to stop this ongoing degradation of the Connecticut River watershed.

We look to our northern neighbors in Maine, whose runs are strong due to the six-month time/area closure in Atlantic herring Management Area 1a. We request that similar protection for Connecticut River fish entering Long Island Sound be provided immediately. Amendment 10 must include a time/area closure of Area 2 similar to that in place in Area 1A. A time/area closure would ensure river herring and shad can avoid the nets on their way to our river.

We ask the New England Fisheries Management Council to adopt ecosystem-based management for southern New England waters that will allow Atlantic herring harvesters to fish in times and places that will still allow river herring and shad to return to our river to spawn and continue to rebuild these woefully depleted stocks.

I thank you again for the ability to submit these comments.

Sincerely yours,

A handwritten signature in blue ink that reads "Rebecca Todd". The signature is written in a cursive, flowing style.

Rebecca E. Todd
Executive Director