

Beaty, Julia

From: Moore, Christopher
Sent: Monday, November 30, 2015 3:34 PM
To: COUNCIL - Voting; CouncilNonVoting; TechStaff
Subject: FW: Forage fish

fyi

-----Original Message-----

From: Jeff Reichle [mailto:jreichle@lundsfish.com]
Sent: Monday, November 30, 2015 2:56 PM
To: Robins, Rick <richardbrobins@gmail.com>
Cc: Moore, Christopher <cmoore@mafmc.org>
Subject: Forage fish

Hi Rick

Haven't spoken in some time and I hope all is well with you.

I am very concerned with what seems like a blind rush forward to "protect" certain forage species.

Several of these species we target and catch to some extent, albeit not every year. In particular, and most important, is chub mackerel and to a lesser extent round herring and Spanish sardine. These species are only available to us under very particular ocean conditions. Let's say we catch these species during episodic events,,, conditions must be perfect to allow us to harvest. In addition there are VERY FEW BOATS that are able to harvest these species at all. First they need a lot of power (at least for chub mackerel), second they need RSW capability, third a factory to take them to that is capable of handling the product and last they have to be large enough to handle some volume as these are low priced species. Since, for the most part, these species are presently encountered mostly in the Mid Atlantic, my company is the one that will be the most affected by this issue.

While I have no problem with developing FMP's on these stocks, and protecting them during the process, I am concerned that there is a tendency to either completely shut us out of these fisheries, or to create a compromise, or time averaged quota while FMP's are established. I am also dismayed that we are even wasting time, energy and money on this when we lack so much information still on established fisheries like summer flounder, black sea bass, etc. More efforts focused on these fisheries would solve REAL problems that exist, instead of focusing on an issue that is not a problem to start with.

These fisheries are not available to us every season as a directed catch. If there is a situation where we can catch chubs we shouldn't be limited to an average over recent annual catches. We should at least be able to harvest to the maximum historical catch, until we can establish a scientifically based quota. In fisheries where we are not able to produce every year, that in itself helps to guarantee that we are not over harvesting.

Furthermore, several of these species are occasionally caught as bycatch , in the Squid (Loligo and Illex), butterfish and Atlantic Mackerel fisheries. The Council should be mindful of the fact that we could end up with a choke specie issue.

If the Council is not careful we will be creating more issues than we solve and creating economic harm to an already fragile industry.

I am also extremely disappointed in the lack of economic data available to the Councils. Living in an area that, at one time, had a thriving seafood industry, I am sure you are aware of where that industry is now Rick,,, virtually non-existent. When will the Council and NMFS take this issue seriously and develop real economic data that shows where our industry truly stands, and how few legs it has left to stand on? This is an urgent matter. The economic analysis that I have seen recently (NOAA Social Indicators Mapping Tool) is not timely, not accurate and frankly not worth the paper it's printed on.

I hope that the Council will take the time to truly investigate the realities, economics and potential social impacts of where they are heading on "forage" species and to make decisions based on science and not based on outside influences creating an issue that doesn't exist.

I have copied Chris Moore on this email and would like to ask that it be distributed to the Council for next week's meeting. Unfortunately I will not be able to be in Annapolis next week, but intend to be active on this issue, as it is important to my company.

As always, thank you for considering my concerns on this issue.

Best Regards,

Jeff Reichle
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Beaty, Julia

From: Moore, Christopher
Sent: Friday, December 04, 2015 7:35 PM
To: COUNCIL - Voting; CouncilNonVoting; Staff-MAF; NE_Reps
Subject: Fw: Forage Species protection in the Mid-Atlantic

fyi

From: Ross, Steve <rosss@uncw.edu>
Sent: Friday, December 4, 2015 5:43 PM
To: Robins, Rick; Moore, Christopher
Subject: Forage Species protection in the Mid-Atlantic

Dear Council Chair Robins and Executive Director Moore,

I am a Research Professor at UNC-Wilmington and have spent the last five years conducting research in the Mid-Atlantic area, as co-lead of the multidisciplinary team investigating canyon ecosystems. I am also involved with the Mid-Atlantic Council as a member of the Ecosystems and Planning AP. I have followed the efforts of the Mid-Atlantic Council to shift to ecosystem-based fisheries management and applaud your recognition that forage species (and their essential and unique roles in marine ecosystems) should be protected. If implemented with appropriate regulatory protections, your forage species amendment will help to protect the complex, but in some ways, vulnerable food web of the Northwest Atlantic Large Marine Ecosystem.

This amendment rightfully points out that one of the greatest historical flaws of our fisheries management process is that it allows fishing to happen before the science is in place to guide it. The amendment seeks to remedy this failure by focusing on protecting forage species from unregulated fishing. The life histories of most of the species on your list are not well understood, let alone their importance to or roles in the food web. Yet they are in some way all vulnerable to the impacts of fishing, climate change, and perhaps other human extractive uses, and are likely to become even more vulnerable in the future. Proactive protection of these poorly understood but elemental components is vital to ecosystem functioning.

I am pleased with the extensive list of species being considered for this amendment. I work on several of the species you include and can attest that there is limited scientific information for very many. I encourage the Council to be as inclusive as possible, and to allow for the addition of other species as they are discovered or move into the area, perhaps in response to climate variation. Some species may be the only food options for certain predators at various times. In other instances, prey redundancy can be a critical feature of ecosystem resilience and must be preserved to ensure overall ecosystem health. Protecting forage species from harvest until adequate science shows what level (if any) is sustainable, is scientifically sound and imperative.

Thank you for the great work the Council is doing to protect forage species and for the opportunity to comment. I look forward to continued involvement with you.

Signed,

Steve W. Ross
Research Professor
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From: Squarespace [<mailto:customer@customer.com>]

Sent: Monday, December 07, 2015 7:48 AM

To: Beaty, Julia <jbeaty@mafmc.org>

Subject: Form Submission - Unmanaged Forage

Comments: Forage fish must be protected from commercial fishing interests. I have fished Narragansett Bay for 60 years and continue to see the Striped Bass and menhaden fishery depleted.

Name: Allan Gadoury

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