

To: Executive Director Chris Moore and MAFMC Members

Dear Mr. Moore and MAFMC Members,

The National Audubon Society is writing to strongly recommend that the MAFMC deny Lund's Fisheries **Atlantic Thread Herring Exempted Fisheries Permit Application**. The EFP is inconsistent with the purposes and need of the Council's Unmanaged Forage Omnibus Amendment.

First, the EFP calls for trip limits up to 100,000 pounds. This is nearly a 60-fold increase from the current possession limit, and at this size cannot be reasonably described as "experimental." The 6.6 million pound quota is over 13 times higher than the recent 5-year average of coastwide commercial and recreational landings combined. UFOA implementing regulations institute a 1,700 pound possession limit for all unmanaged forage species combined for the mid-Atlantic region.

Second, the EFP does not include information or strategies for helping the Council assess potential impacts to existing fisheries, fishing communities, and the marine ecosystem. Thread herring are consumed by many predators. Royal Terns, Laughing Gulls, Black Skimmers and many other seabirds consume thread herring. The EFP does not include a program to assess and evaluate bycatch with an independent observer trained in high-volume fisheries sampling. Concerns for river herring and shad bycatch in high-volume fisheries continue, and it is unknown how this new small-mesh, high-volume fishery may impact these severely-depleted species.

Overall, the EFP would undermine the Council's 2020-2024 Strategic Plan Ecosystem Goal to "support the ecologically sustainable utilization of living marine resources in a manner that maintains ecosystem productivity, structure, and function," with an objective to "support the maintenance of an adequate forage base to ensure ecosystem productivity, structure, and function."

Thank you, and please let me know if you have any questions.

Sincerely,

Anna Weinstein
Director, Marine Conservation
National Audubon Society
Protecting seabirds on the [west coast](#) and [around the nation](#)
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