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Sent: Tuesday, June 8, 2021 1:17 PM

To: Beaty, Julia <jbeaty@mafmc.org>; Muffley, Brandon <bmuffley@mafmc.org>; Nowalsky, Adam <captadam@karenannii.com>

Cc: Fote, Tom <tfote@jcaa.org>; Pentony, Mike <Michael.Pentony@noaa.gov>; tothjohn@verizon.net

Subject: Emergency action: REQUEST for denial of Lund's Seafood seeking to open up a new fishery on Atlantic Thread Herring

Dear MAFMC:

We ask that the Mid-Atlantic Fishery Management Council recommend to GARFO that the EFP application be denied

As the Forage fish committee chairman at the Jersey Coast Anglers Association (JCAA) I request that you deny this application applied for by Lunds Seafood, Cape May NJ

This is important to our organization's members on several fronts:

This fish falls under the Unmanaged forage fish act that we all voted into place just a few years back (Unmanaged Forage Omnibus Amendment (UFOA))

The purpose of the UFOA is to prohibit the development of new and expansion of existing directed commercial fisheries on unmanaged forage species

This would be the first step in the process towards opening up the fishery

Thread herring are an inshore species that our key gamefish feed upon

These are small fish, less than 6" or so long that require a small mesh purse seine. Bycatch and interaction with other species would increase (picture attached)

Current removals from the ecosystem average 18,476 pounds annually, Lunds is requesting 6.6 million pounds (13 times higher than the current allowance)

At this time along our coastline, prey switching is already occurring as other forage fish are depleted (Alewife & Blueback herring are a good example) Removing these fish has a high probability of negatively affecting recreational fishing and the ecosystem

The Exempted Fishing Permit (EFP) that Lunds is applying for:

Does not include a program to evaluate bycatch with an independent observer trained in high-volume fisheries sampling.

Does not include confirmed scientific evidence on whether the distribution of this species is shifting or expanding and whether there is a coastwide population increase that could potentially support the EFP's proposals.

Does not include a program to assess or protect predator-prey interactions.

Is inconsistent with Atlantic thread herring's ecological significance in the larger Atlantic Ocean Ecosystem.

Thank you for your consideration,
Paul

Capt. Paul Eidman

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www.reeltherapy.com
www.menhadendefenders.org
www.anglersconservationnetwork.org
www.anglersforoffshorewind.org

Attachment:

