

From: [Lyons, Donald](#)
To: [Muffley, Brandon](#)
Cc: [Weinstein, Anna](#)
Subject: Thread Herring EFP Application
Date: Wednesday, September 1, 2021 4:16:49 PM
Attachments: [Grubel and Waldman 2009 DCCO feeding habits and pellet production.pdf](#)
[Forys and Hevesh 2017 Black Skimmer Chick Diets.pdf](#)
[Glass and Watts 2009 Osprey Diet Composition and Quality.pdf](#)

Hello Brandon,

I'm writing you today in regards to the upcoming Mid-Atlantic FMC SSC meeting. I'm a PhD seabird ecologist with the National Audubon Society and Oregon State University, with expertise in seabird trophic ecology and fisheries interactions.

I've been engaged with colleagues from Audubon and other NGOs around the Lund's Fisheries EFP Application to harvest thread herring. We have significant concerns about this EFP application process to date, and opening up a fishery without adequate preparation - i.e. without robust information on the population dynamics and ecosystem role of a previously untargeted forage fish.

In a quick literature search one can easily find data demonstrating that thread herring are a common seabird prey item throughout its range. The papers cited below show that multiple seabird species (Royal Terns, Laughing Gulls, Black Skimmers, Double-crested Cormorants and also Osprey) incorporate thread herring into their diets across a large portion of the Atlantic Coast (these citations range from New York to Florida). And although this portion of the Atlantic Coast does not have the extensive seabird diet datasets that exist elsewhere (e.g., for the Gulf of Maine), I imagine there are additional data out there to expand upon these studies if one were to look.

Grubel, C. and J. R. Waldman. 2009. Feeding habits and the effects of prey morphology on pellet production in Double-crested Cormorants, *Phalacrocorax auritus*. Section VIII:1-28 pp. In S.H. Fernald, D. Yozzo and H. Andreyko (eds.), Final Reports of the Tibor T. Polgar Fellowship Program, 2008. Hudson River Foundation.

Forys, E.A. and Hevesh, A.R., 2017. Investigating Black Skimmer chick diets using citizen science and digital photography. *Southeastern Naturalist*, 16(3), pp.317-325.

Van Deventer, M., 2007. Brevetoxins in marine birds: Evidence of trophic transfer and the role of prey fish as toxin vector. MS Thesis, University of South Florida. Available at <http://scholarcommons.usf.edu/etd/2392>

Glass, K.A. and Watts, B.D., 2009. Osprey diet composition and quality in high- and low-salinity areas of lower Chesapeake Bay. *Journal of Raptor Research*, 43(1), pp.27-36.

I'm not sure what aspects of the EFP application the SSC may cover next week, but I thought these citations and the data they include might be of interest to the committee. If I can answer any questions from the seabird perspective let me know, and thanks for considering the ecosystem role these fish play.

Best,

Don

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