

## *Maine Association of Charterboat Captains*

*www.mainechartercaptains.org*



### **The Maine Association of Charterboat Captains (MACC)**

would like to go on record with these three positions regarding the Public Information Document (PID) on Amendment 2 of the Shad and River Herring Management Plan:

1. MACC supports reducing commercial fishing mortality in the river herring fishery through option 1: **"Reduce Fishing Effort in Directed Fisheries for River Herring"**  
Though we support reducing river herring effort coast-wide, we urge that this be allowed to take place at the state level or possibly, at the individual distinct stock level. The wide variation in distinct stock abundances negates the ability to use a broad brush management approach. The PID hits on several issues about which our Association is very concerned. The issues include, but are not limited to: the lack of adequate landing data in both the river and the ocean intercept fisheries; the lack of credible information on predation mortality by species such as striped bass, bluefish and dogfish; and the lack of data on the extent of distinct stock mixing while river herring are at sea. These issues point out the importance of improved data collection in this fishery. They also speak to the reality that river herring, as with all forage species, need to be regulated through an ecosystem-based management regime.
2. MACC also wants to go on record supporting Option 1: **"The Status Quo"** for the recreational river herring fishery. We do, however; see a need for all states, including Maine, to collect better landings data on the recreational river herring fishery. We suggest that this be accomplished through existing data collection programs such as expansion and / or modification of the Marine Recreational Fishing Statistic Survey. We do not support a recreational license or permit to catch or to possess river herring.
3. Finally, we have these comments on actions in federal water pertaining to river herring:
  - a. Both the Public Information Document and the 2007 Fisheries Management Plan Review Document refer to the lack of and discrepancies in river herring ocean intercept data. One estimate puts the ocean intercept landings at as much as 30% of the total inshore harvest. There are also statements to the effect that there is very little data available on the ocean intercept bycatch of river herring in other targeted fisheries such as Atlantic herring and Atlantic mackerel. One account indicated such bycatch in the first 4 months of 2007 was 121,246 pounds. This is very concerning when compared to the entire year's bycatch statistics for 2005 at 41,458 pounds and 2006 at 50,681 pounds.
  - b. We urge that 100% of the Atlantic herring and Atlantic mackerel fleet be subjected to observer coverage to better identify all bycatch in this virtually unwatched fishery. These 100'-150' long ships towing 300' wide nets have the ability to wipe out entire distinct stocks of river herring in but a few tows. Any one of these ships with their enormous holds has the capacity to carry on board the entire annual 1.1 million pound river herring harvest of the state of Maine at one time.

*An all-volunteer non-profit organization committed to the promotion of guided recreational fishing and eco-tourism and dedicated to the principles of conservation, professionalism and stewardship*