

July 12, 2010

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Bill Appleby
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Dear Colonel Feir and Director Appleby:

We appreciate the opportunity to review the draft of “An Adaptive Management Plan for Managing Alewife in the St. Croix River Watershed, Maine and New Brunswick.”

We are pleased that the International Joint Commission (IJC) and its International St. Croix River Watershed Board have deemed alewife restoration in the St. Croix basin to be a high priority. However, for the following reasons, we believe that the Fisheries Steering Committee’s draft Adaptive Management Plan is seriously flawed and will fail to achieve the ecological and economic benefits associated with a healthy population of this keystone species in the St. Croix River.

The draft plan drastically limits the scope and pace of alewife restoration in the St. Croix

This plan proposes that the St. Croix’s alewife population only be allowed to rebuild until a level of six alewives per acre is reached within the Grand Falls flowage and adjacent, interconnected waterbodies. However, there is no scientific justification to limit the initial alewife restoration to this level. The Atlantic States Marine Fisheries Commission and the Maine Department of Marine Resources generally require a level of 35 fish per acre to consider an alewife run to be capable of withstanding a sustainable harvest, while natural carrying capacities for alewives are generally significantly higher still.

We also believe that alewives should be allowed to increase at their natural rate, not an artificially imposed rate of 1.5 times the previous year’s population, within the Grand Falls flowage, Big Lake, Long Lake, and interconnected waterbodies.

The draft plan holds alewife restoration hostage to random fluctuations in smallmouth bass reproduction

The plan outlines a yearly scoring system that will determine the number of adult alewives allowed access to the watershed in a given year. The system depends on the population status of bass in five lakes (two study and three control). The plan states that: “Given that the bass index is expected to undergo natural variation, the framework has the potential to restrict, potentially severely, alewife population recovery if a few years of poor bass YOY [young of year] abundance occur by chance, even if alewife have no impact on the bass population” (P. 23). This makes no sense. Restoration could take decades longer than if alewives were allowed to recolonize the watershed at a natural rate; under the plan, it is plausible that alewife numbers will essentially be capped for decades, or even permanently, without a credible scientific basis for doing so.

Maine and New Brunswick are near the northern limit of where introduced smallmouth bass are able to survive. Although this species has proven adept at developing naturalized populations in a wide variety of environments outside of its natural range, the climate in our region is a challenge to bass, and the species

is highly susceptible to an array of natural and unnatural variables affecting its reproduction. As a result, it is highly likely that bass will have good recruitment years and poor recruitment years, depending on environmental and/or anthropogenic factors that have nothing to do with alewives. It is unscientific and unacceptable to hold the restoration of an important native species hostage to such unrelated factors.

The draft plan only allows alewives to return to about 30% of their ancestral habitat

The plan only allows access above Grand Falls and does not address allowing future access to the other areas of the watershed under IJC jurisdiction currently barred from alewife passage. The plan should address when and how the IJC will restore alewives to the rest of their habitat under its jurisdiction after the area above Grand Falls but below Spednic has reached full recovery.

In addition, we strongly object to the plan's language about possible "long term agreements" to block alewife restoration to Spednic Lake. Establishing long-term agreements that block a native species from boundary waters under the IJC's jurisdiction will harm the long-term interests of both the United States and Canada, and thus would not be consistent with the mission of the IJC.

The draft plan ignores the tremendous ecological and economic importance of alewives

Restoring Gulf of Maine and Bay of Fundy ground fisheries is of critical economic and ecological importance to both the US and Canada, but the adaptive management plan does not even mention the positive role a healthy St. Croix alewife population will have on groundfish. The plan clearly treats smallmouth bass as a more important resource than Gulf of Maine and Bay of Fundy fisheries stocks. Failure to recognize the commercial and ecological values associated with healthy alewife runs is not in the interests of either the U.S. or Canada in terms of environmental protection, the survival of regional commercial fisheries, and food security.

Conclusion

The IJC must consider the ramifications this plan may have for future natural resources management conflicts. The draft adaptive management plan places greater importance on smallmouth bass, a non-native sport fish, over a native species with high ecological value and regional and international importance as a food resource. It does so without scientific evidence that alewives harm smallmouth bass.


We urge the IJC to act forcefully in the interests of both the U.S. and Canada to restore the St. Croix alewife run to its natural state and not pursue the flawed strategy presented in the draft plan.

We appreciate your consideration of these comments.

Sincerely,



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