



United States Department of the Interior



FISH AND WILDLIFE SERVICE

300 Westgate Center Drive
Hadley, MA 01035-9589

MAR 20 2013

In Reply Refer To:
FWS/R5/ES-HC/054018

The Honorable Lana Pollack, United States Chair
International Joint Commission
2000 L Street NW, Suite 615
Washington, DC 20440

The Honorable Joseph Comuzzi, Canadian Chair
International Joint Commission
234 Laurier Avenue W., 22nd Floor
Ottawa, ON K1P 6K6

Dear Commissioners:

The U.S. Fish and Wildlife Service (Service) is a Federal trustee for diadromous and interjurisdictional fish, migratory birds, and endangered species. The Service has a long history with fisheries issues in the St. Croix River watershed, including our involvement, since 1993, on the *ad hoc* St. Croix River Fisheries Steering Committee (Committee).

We write at this time to reiterate: (1) Our understanding of the best available science pertaining to river access in the St. Croix River watershed and sea-run alewife (alewife); (2) our commitment to securing unfettered access for alewife in the St. Croix River watershed; and, (3) our position that the International Joint Commission (IJC) should not finalize or implement the document prepared by the Committee titled: "Proposal for Public Discussion: An Adaptive Plan for Managing Alewife in the St. Croix River Watershed, Maine and New Brunswick" (Plan) as written.

The best available science, noted in the Plan, indicates that alewife have no negative impacts on overall water quality, zooplankton communities, or recreational fisheries such as smallmouth bass. To the contrary, published scientific literature and experience demonstrate that alewife provide abundant forage for freshwater bass species in approximately 70 of Maine's watersheds including the Kennebec, Sebasticook, Damariscotta, Penobscot, and Orland Rivers. Environmental factors, such as lake level, temperature, and habitat availability, have been shown to directly influence and control smallmouth bass survival.

Our 2010 letter to IJC (enclosed) explains that the Service does not support the Plan as written, even though we were involved in its initial development. The Plan fails to provide the

appropriate watershed-scale approach to restoration as initial limitations were established that restricted the Plan's scope to areas below Spednic Lake and West Grand Lake and, also, to the maintenance of smallmouth bass fisheries at current or higher levels. Given these limitations, the Plan does not meet the original stated goals for alewife restoration.

The best opportunity to restore a healthy population of alewife to the St. Croix River will come from providing the species full access to all freshwater spawning habitats. Alewife are an important food source for a multitude of fish and wildlife species in freshwater and at sea. As such, they are a keystone in the ecosystems they occupy. Moreover, they are culturally and economically important in the United States and Canada. For these reasons, reestablishing indigenous alewife in the St. Croix River, and other watersheds in the Gulf of Maine, is a high priority for our agency.

Restored alewife, throughout the St. Croix River watershed, have the potential to be the largest run in the Gulf of Maine. Based on calculations by the Maine Department of Marine Resources (MDMR), the St. Croix River has the highest potential (22,660,000) to produce alewife of any watershed in Maine – 1.5 times more than the Penobscot (14,561,000) and twice the Kennebec (11,143,000).

We are available to further clarify our perspective on the best available science and the restoration strategy that the Service believes will have the best chance to fully restore alewife in the St. Croix River watershed and the larger Gulf of Maine. If you have any questions, please contact Paul R. Phifer, Ph.D., Assistant Regional Director of Ecological Services, at 413-253-8698, or by electronic mail at paul_phifer@fws.gov.

Sincerely,



Wendi Weber
Regional Director

Enclosures

Letter dated January 31, 2008, Service to MDMR
Letter dated July 19, 2010, Service to IJC-International St. Croix River Watershed Board
Letter dated December 19, 2012, Service to Passamaquoddy Tribe (Pleasant Point Reservation and Indian Township Reservation)