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Correspondence

Joan O'Leary

From: Lori Steele
Sent: Monday, March 17, 2014 2:43 PM
To: Joan O'Leary
Subject: FW:

From: Dean Clark [mailto:seaflycapecod@gmail.com]
Sent: Sunday, March 16, 2014 9:42 AM
To: Doug Grout
Cc: Lori Steele
Subject:

Doug,
At the upcoming mtg in Newport I encourage you to ban mid-water trawl gear until Amendment 5 measures are put in place. There are many reasons this needs to happen and I hope that you will insure that it does.
Thank you.
Dean Clark

March 31, 2014

Douglas Grout
Herring Committee Chairman
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950
douglas.grout@wildlife.nh.gov

Lori Steele
Herring Plan Coordinator
New England Fishery Management Council
50 Water Street, Mill 2
Newburyport, MA 01950
lsteele@nefmc.org

RE: Framework 4 to the Atlantic Herring FMP (dealer weighing requirements and measures to address net slippage)

Dear Mr. Grout and Ms. Steele:

I am writing on behalf of the Herring Alliance[1] regarding the catch weighing and slippage accountability measures proposed in Framework 4 to the Atlantic Herring Fishery Management Plan (FMP). The Herring Alliance has previously commented on the need for these reforms during the development of Amendment 5 to the Atlantic Herring FMP (Amendment 5).[2] While we were disappointed that these measures were disapproved in the partial approval of Amendment 5 by the National Oceanic and Atmospheric Administration's Fisheries Service (NOAA Fisheries), we are encouraged by the progress made by the Herring Oversight Committee (Committee) to pursue and develop proposed solutions that will restore catch weighing and slippage accountability requirements in as short a timeframe as possible. These disapprovals are easily addressed.

[1] The Herring Alliance includes 85 organizations representing nearly 2.5 million individuals. The Herring Alliance is concerned about the Atlantic coast's forage fish, such as Atlantic herring, river herring and shad, and the impacts of forage fish fisheries on the ecosystem through food web depletion and bycatch of non-target species.
[2] *See* June 4, 2012 Letter from Herring Alliance to NEFMC regarding Amendment 5 DEIS; June 21, 2013 Letter from Herring Alliance to NOAA Fisheries Regional Administrator John Bullard regarding Amendment 5 FEIS and Proposed Rule; September 16, 2013 Letter from Herring Alliance to NOAA Fisheries and NEFMC regarding Amendment 5 Partial Approval.

Specifically, we urge the Committee to support the following recommendations for consideration by the New England Fishery Management Council (Council) at its April 22-24 meeting in Mystic, Connecticut:

- Develop measures that apply an accountability measure(AM) to all slippage events by Category A and B limited access herring vessels for any of the three allowable exceptions (i.e., safety, mechanical failure, dogfish clogging the pump) to discourage the inappropriate use of these exceptions. Vessels slipping catch under any of the exceptions should be required to cease fishing and exit the area where the slippage event occurred for the duration of the trip. A released catch affidavit, while potentially useful, is not a sufficient AM. **Slippage Alternatives 2, 3, or 4.**
- Ensure that if slippage occurs for reasons other than the allowed exceptions noted above, the vessel must cease fishing and return to port, as an additional accountability measure. Such vessels should also be subject to any additional measures deemed appropriate by the NOAA Office of Law Enforcement for violating the existing fishery-wide prohibition on slippage. **Trip Termination Option B.**
- Clarify the existing prohibition on operational discarding by midwater trawl vessels operating in the groundfish closed areas (implemented March 17, 2014 under Amendment 5), and apply this measure, through Framework 4 to all areas of the fishery. **Operational Discards Option B.**
- Require VMS notification of slippage incidents to provide real-time communication to NOAA Fisheries to ensure the effectiveness and enforceability of management measures.
- Require that all catch in the Atlantic herring fishery be reported based on a standardized and verifiable weight. The Herring Alliance supports **Dealer Alternative 2A** (dealer/vessel cross-checking via SAFIS and Fish-on-Line), **Dealer Alternative 2B** (24 hour e-reporting), **Dealer Alternative 2C** (empty holds before sailing), **Dealer Alternative 4** (volumetric standardization) and **Dealer Alternative 3** (vessel-based third-party catch verification). Flexibility can still be retained for the industry (**Dealer Alternative 4),** while also requiring, or at least allowing for, verification of landed weights by a third-party (**Dealer Alternative 3).** In fact, we suggest that Dealer Alternative 4 could be modified to allow for those operations currently using scales or wishing to use scales, to continue to do so, provided provisions for scale certification is included.

Measures to Address Net Slippage and Operational Discards

The practice of slipping or dumping catch at sea is a long-recognized problem in the Atlantic herring fishery and a serious conservation concern, particularly due to the high-volume nature of the midwater trawl fleet and its demonstrated propensity for episodic and high-impact bycatch events. At-sea dumping of un-sampled catch has been demonstrated to be serious and widespread, affecting over 30% of observed hauls in the fishery in 2010 alone.[3] It has also been shown to undermine the validity of catch data and in most cases to be unnecessary and wasteful bycatch, in turn undermining conservation objectives of the FMP.[4] NOAA Fisheries has acknowledged that accurate catch composition records cannot be obtained for dumped catch, and

[3] *See* Am 5 DEIS at p. 414.

[4] *See* Am 5 DEIS at p. 415 (illustrating extent of catch not identified to species level due to dumping), and p. 419 (illustrating that most at-sea dumping is not necessary).

that issues such as stratification of catch in the cod-end or the strainer-like effect of the intake grates on the pumps used to transfer fish from the floating cod-end to the vessel limit the collection of accurate and complete catch data, and thus undermine attempts to assess the biological impacts of the fishery.[5] NOAA Fisheries further acknowledges that there are safe and operationally feasible ways to get all catch aboard for sampling.[6]

The herring industry maintains that there are several circumstances under which they should be allowed to dump catch at sea: mechanical failure, spiny dogfish clogging the pump, and safety concerns. The Herring Alliance recognizes the need for maintaining this limited set of exceptions to a prohibition on dumping, in order to ensure vessel and crew safety. However, it is important that an accountability system is adopted that will prevent the inappropriate use of the exceptions, such as a vessel claiming a safety reason to avoid bringing undesirable bycatch aboard the vessel so it can be recorded by an observer.

In its September 20, 2013 disapproval letter to the Council, NOAA Fisheries indicated that slippage measures "could be revised to be more similar to the sampling requirements in Groundfish Closed Area I (CA I), such that all vessels that slip catch have a consequence."[7] The Herring Alliance strongly supports this approach, and urges the Committee to submit to the Council a set of recommendations that honor the integrity of the CA I model. This approach has two key elements:

1. **Maintain the three-pronged approach that the Council adopted and submitted to NOAA Fisheries as part of Amendment 5 that deters slippage and ensures accountability.**

The approach that the Council adopted and submitted to NOAA Fisheries as part of Amendment 5 included three critical requirements: 1) a prohibition on slippage, 2) limited exceptions to ensure crew and vessel safety for safety, mechanical failure, or spiny dogfish catch, and 3) a system of accountability measures to limit inappropriate use of the exceptions.[8] In disapproving the slippage caps and trip termination, NOAA Fisheries cut out the third and crucial element of the Council's plan (i.e., accountability measures).

Consistent with the CA I rules, the Herring Alliance supports further development of the suite of options in Framework 4 that apply a consequence to all slippage (Slippage Alternatives 2-4 with Trip Termination Option B) and require vessels to either: (1) leave the statistical area (Slippage Alternative 2); (2) leave the herring management area (Slippage Alternative 3); or (3) move some distance away (Slippage Alternative 4). Our top priority is to maintain the integrity of the CA1 model which applies the accountability measures to all three exceptions and prohibits operational discards. If a slippage occurs due to one of the exceptions, vessels should be required to exit the area where the slippage event occurred and not fish in that area for the

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[5] *See* Final Rule entitled Fisheries of the Northeastern United States; Discard Provision for Herring Midwater Trawl Vessels Fishing in Groundfish Closed Area I, 75 Fed. Reg. 73979 (Nov. 30, 2010).
[6] Id.
[7] *See* November 30, 2013 Letter from NOAA Fisheries Regional Administrator John Bullard to NEFMC regarding Partial Approval of Amendment 5.
[8] *See* Final Rule Amendment 5, 79 Fed. Reg. 6786 (Feb. 13, 2014).

duration of that trip. If slippage occurs for any other reason, the vessel should be required to end the trip and return to port.

The Plan Development Team (PDT) provided additional justification for applying the same accountability measure to all of the allowable exemptions in a new measure:

> The Herring PDT recommends adopting a rule that would apply the same consequences to all three allowable slippage events (safety, mechanical, dogfish), not a subset of allowable slippage events (dogfish and safety but not mechanical failure, for example), and not different rules for different events. This approach would help to reduce complexity and enhance compliance with any additional regulations that may be implemented.[9]

We expect to narrow our preference before the April Council meeting. It must be emphasized that a critical aspect of comprehensive slippage management is an accountability system that applies to all three exempted slippage events. Without adequate accountability, vessels will be able to continue to slip catch and simply attribute it to one of the exceptions for which no AM applies, undermining this action as well as the accuracy, completeness and reliability of catch and bycatch data collected by observers.

2. **Expand the prohibition on operational discards in the Groundfish Closed Areas to the entire fishery for midwater trawl vessels**

Framework 4 also seeks to clarify management measures that relate to operational discards (small amounts of fish remaining in the net at the conclusion of pumping operations) and other catch not brought on board the vessel for reasons other than slippage. The Herring Alliance fully supports clarifying these measures, while offering the following comments.

The Amendment 5 definition of "slippage" excludes operational discards, but the Amendment 5 regulations also prohibit operational discards on midwater trawl vessels fishing in year-round groundfish closed areas. The prohibition on operational discards currently in place in CA I should be extended to midwater trawl vessels operating in all areas of the fishery. All fish remaining in the net at the conclusion of pumping must be brought aboard for sampling and may only be dumped for one of the three exceptions. If this catch is dumped, vessels would be subject to the accountability measures (Slippage Alternatives 2, 3 or 4). Although the practice degrades tow-specific data, the Herring Alliance supports the application of the existing test tow language to operational discards that allows small amounts of fish to remain in the net at the end of pumping if the net is reset without releasing its contents and provides that all catch is available to the observer for sampling when the next tow is brought aboard.[10]

The Council must clarify that the accountability measures will apply to operational discards under Option B (which seems clear on Table 1, at p. 8 of the Discussion Document but

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[9] *See* March 6, 2014 Final Herring PDT Report at 6, available at: http://www.nefmc.org/herring/cte%20mtg%20docs/2014/140402-03/140306%20FINAL%20Herring%20PDT%20Report%20Glouctester.pdf.

[10] *See* 50 C.F.R. § 648.11 (m)(4) (ii).

less clear in other places). Catch not brought on board due to gear damage should fall under the "mechanical failure" exemption, and therefore would be subject to the accountability requirements. Fish that fall from the gear during gear retrieval and/or pumping operations may be reasonably exempted from consequence measures provided the amounts are minimal and documented and confirmed by the observer.

Data demonstrates that the current sampling provisions in CAI are both safe and operationally feasible.[11] As evidenced by their original approval and recent expansion to the other year-round groundfish closed areas, they are also fully approvable by NOAA Fisheries.[12] In addition, data in Amendment 5 showed that the CAI rules are highly effective at reducing dumping.[13] There is no reason not to replicate these rules for the entire fishery. Although recent data indicates that dumping events have increased in CAI in recent years (2012-2013),[14] new information also suggests that a lack of both industry compliance and NOAA Fisheries enforcement of the CAI rules may be the cause of the increased dumping, [15] rather than a flaw in the rule itself. NOAA Fisheries staff indicated, at the March 6, 2014 Herring PDT meeting, that there is a misconception among industry members, who think that if they slip a net for one of the three allowable exceptions there is no need to leave CAI and file a released catch affidavit. For regulations to be effective industry must commit to comply and NOAA Fisheries must enforce. It is also possible that this apparent change in industry behavior and compliance, manifesting in an increase in CAI slippage events, is a result of interactions with the 2010 haddock year class, thus effective compliance and enforcement is even more critical given that the groundfish industry was recently declared a disaster as a result of the economic consequences of failure to rebuild depleted groundfish populations.

Measures to address dealer weighing/reporting requirements

Current practices allow vessel captains to estimate the weight of the catch in their hold when they arrive at port. The catch is sold to the dealer and reported to NOAA Fisheries using this estimated weight, which may be based on as little as a Captain's "eyeballing" his fish.[16] This provides far too much opportunity for deliberate or accidental misreporting, and offers no opportunity for third-party observers, port samplers, or law enforcement personnel to verify that accurate and complete catch weights are being reported.

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[11] *See* Amendment 5 FEIS at page 588.
[12] *See* Final Rule Amendment 5, 79 Fed. Reg. 6786 (Feb. 13, 2014);*see also* Final Rule entitled Fisheries of the Northeastern United States; Discard Provision for Herring Midwater Trawl Vessels Fishing in Groundfish Closed Area I, 75 Fed. Reg. 73979 (Nov. 30, 2010).
[13] Amendment 5 FEIS at page 588 ("The sampling provisions implemented in Closed Area I appear to have been successful in reducing slippage events to date").
[14] *See* Framework 4 Draft Appendix II, Summary of Slippage Data: Observed Trips on Atlantic Herring Vessels 2010-2013, pp. 23-24, available at: http://www.nefmc.org/herring/cte%20mtg%20docs/2014/140402-03/Draft%20Appendix%20II%20Slippage%20Data%203%2026%2014.pdf.
[15] *See* DRAFT Framework 4 Discussion Document at p. 12, available at: http://www.nefmc.org/herring/cte%20mtg%20docs/2014/140402-03/140328%20Fw4%20Discussion%20Document%20April%20Meetings%20FINAL.pdf ;*see* also March 6, 2014 Final Herring PDT Report at p. 7.
[16] *See* 79 Fed. Reg. 8974 (volumetric estimates).

There is ample evidence that this status quo regime is inadequate. First, NOAA Fisheries itself acknowledges serious flaws, discrepancies, and loopholes in the existing mechanisms used to track catch and landings in the fishery.[17] Second, the fishery is prone to repeated and destructive quota overages.[18] As documented in the Environmental Assessment (EA) for the most recent 3-year specifications, the fishery has a recent history of frequent sub-ACL overages that negatively impact the fishery, and preliminary data indicate that the overall ACL was also exceeded in 2012.[19]

New measures should be developed in Framework 4 that would require all catch in the herring fishery to be reported based on a standardized and verifiable weight. Standardizing the methods by which dealers weigh all catch and requiring vessels to confirm the amount of fish landed will result in better overall estimates of catch and help ensure that catch limits are not exceeded. Accurate landings data will also aid in monitoring the river herring and shad mortality caps, and in achieving better catch and bycatch estimates of river herring and shad. Flexibility can be retained for the industry, while requiring, or at least allowing for, verification of landed weights by a third party.

Herring Alliance sees valuable and complimentary weighing and catch-tracking provisions in all of the measure proposed in Framework 4, and as such we support an "all-of-the-above" approach and recommend the Committee endorse all of the alternatives in the document. In the past, the Herring Alliance has supported an option that would allow dealer participation in SAFIS with vessel error-checking through Fish-On-Line.[20] We again support this additional cross-checking mechanism (Dealer Alternative 2A). We also support Dealer Alternative 2B (24-hour electronic reporting) because it will help facilitate more timely catch tracking, which is badly needed in the fishery. We support Dealer Alternative 2C (emptying fish holds prior to sailing) to promote consistency with ASMFC regulations.

We support Dealer Alternative 3 (third-party verification) because it meets the Amendment 5 objective of eliminating reliance on self-reporting. We submit that the problems identified by the Herring PDT (for instance, the contractual complications of any addition of post-trip duties for NOAA Fisheries observers) are solvable. For instance, the definition of the end of a trip could be slightly adjusted such that the brief time required to stick the tanks is included in the trip. Or, tanks could be sticked once the vessel enters sheltered waters in the harbor, but prior to landing. Also, other third parties besides observers could be deployed as additional landings weight verification vectors. Finally, the third-party landings verification

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[17] *See e.g.* Proposed Rule, Adjustments to 2014 sub-Annual Catch Limits, 78 Fed Reg 70009 (Nov. 22, 2013) ("Common dealer reporting issues were: Missing dealer reports, incorrect or missing VTR serial numbers, incorrect or missing vessel permit numbers, and incorrect dates. VTRs had similar errors. Common VTR reporting issues were: Missing VTRs, missing or incorrect dealer information, incorrect amounts of landed herring, incorrect dates, and missing or incorrect statistical area. The quality of herring landings data is affected by unresolved data errors.").

[18] *See* Amendment 4 Final Rule, 76 Fed. Reg. 11373 (Mar. 2, 2011) (analysis showing that between 2001 and 2009, management area closure thresholds were exceeded on 8 of 36 occasions); *see also* NMFS quota monitoring reports, available at: http://www.nero.noaa.gov/ro/fso/reports/reports_frame.htm (showing that this trend has continued in recent years, with cascading overages in Management Area 1B of 138% (2010) and 156% (2012)).

[19] *See* EA for Framework Adjustment 2 and 2013-2015 Specifications at pp. 112-113, available at http://www.nero.noaa.gov/regs/2013/August/13herfw2ea.pdf.

[20] *See* June 4, 2012 Letter from Herring Alliance to NEFMC regarding Amendment 5 DEIS.

measures could be modified such that verification was required whenever possible, accounting for any difficulties encountered on any particular landing event.

Finally, we support Dealer Alternative 4 (volumetric standardization) because it will facilitate accuracy and verifiability of catch weights while maintaining industry flexibility. We suggest that this measure should be modified such that operators currently using actual scales or wishing to use scales would be allowed to do so, provided the scales were regularly inspected and certified.

We note that at an informal discussion among some members of the Herring Advisory Panel (AP) on February 13, 2014, there was considerable support for improvements in both standardization and verification of landings weights.[21] We understand that the lack of a quorum precluded any actual AP recommendations, and we support this decision, nevertheless the AP discussion on this topic is informative.

We thank the Committee for its efforts to develop Framework 4 and urge you to support a robust set of catching weighing and slippage accountability recommendations for the Council to consider when selecting final measures. Thank you for considering these comments.

Sincerely yours,

/s/ Erica Fuller
Erica Fuller
Earthjustice

On behalf of the Herring Alliance

[21] *See* February 13, 2014 Herring AP Report, Summary of Discussion at pp. 1-3, available at: http://www.nefmc.org/herring/cte%20mtg%20docs/2014/140402-03/herring_feb14_ap.pdf.

Herring Alliance Member List

Alewives Anonymous
Rochester, Massachusetts
www.plumblibrary.com/alewives.html

Blue Ocean Institute
Cold Spring Harbor, New York
www.blueocean.org

Buckeye Brook Coalition
Warwick, Rhode Island
www.buckeyebrook.org

Chesapeake Bay Foundation
Annapolis, Maryland
www.cbf.org

Connecticut River Watershed Council
Greenfield, Massachusetts
www.ctriver.org

Conservation Law Foundation
Boston, Massachusetts
www.clf.org

Delaware Audubon Society
Christiana, Delaware
www.delawareaudubon.org

Delaware River Fishermen's Association
Philadelphia, Pennsylvania
www.drfishermen.com

Delaware River Shad Fishermen's Association
Hellertown, Pennsylvania
www.drsfa.org

Earthjustice
Washington, DC
www.earthjustice.org

Eightmile River Wild & Scenic Coordinating Committee
Haddam, Connecticut
www.eightmileriver.org

Environmental Entrepreneurs (E2)
Boston, Massachusetts
www.e2.org

Environment America
Washington, DC
www.environmentamerica.org

Environment Connecticut
West Hartford, Connecticut
www.environmentconnecticut.org

Environment Maine
Portland, Maine
www.environmentmaine.org

Environment Massachusetts
Boston, Massachusetts
www.environmentmassachusetts.org

Environment New Hampshire
Concord, New Hampshire
www.environmentnewhampshire.org

Environment New Jersey
Trenton, New Jersey
www.environmentnewjersey.org

Environment New York
New York, New York
www.environmentnewyork.org

Environment North Carolina
Raleigh, North Carolina
www.environmentnorthcarolina.org

Environment Rhode Island
Providence, Rhode Island
www.environmentrhodeisland.org

Environment Virginia
Washington, DC
www.environmentvirginia.org

Farmington River Watershed Association
Simsbury, Connecticut
www.frwa.org

Float Fishermen of Virginia
Roanoke, Virginia
www.floatfishermen.org

Herring Alliance Member List

Friends of the Bay
Oyster, New York
www.friendsofthebay.org

Friends of Poquessing Watershed
Philadelphia, Pennsylvania
www.friendsofpoquessing.org

Friends of the Rappahannock
Fredericksburg, Virginia
www.riverfriends.org

Friends of the Rivers of Virginia
Roanoke, Virginia
www.forva.giving.officelive.com

Gateway Striper Club
Maspeth, New York

Great Egg Harbor National Scenic and Recreational River Council
Newtonville, New Jersey
www.gehwa.org/river.html

Greater Boston Trout Unlimited
Boston, Massachusetts
www.gbtu.org

Greenpeace
Washington, DC
www.greenpeace.org

Green Valleys Watershed Assn
Pottstown, Pennsylvania
www.greenvalleys.org

Hackensack Riverkeeper
Hackensack, New Jersey
www.hackensackriverkeeper.org

Hudson River Fishermen's Association
Ridgefield Park, New Jersey
www.hrfanj.org

Ipswich River Watershed Association
Ipswich, Massachusetts
www.ipswichriver.org

Huntington-Oyster Bay Audubon Society
Hungtington, New York
www.huntingtonaudubon.org

Island Institute
Rockland, Maine
www.islandinstitute.org

James River Association
Richmond, Virginia
www.jamesriverassociation.org

Jones River Watershed Association
Kingston, Massachusetts
www.jonesriver.org

Juniata Valley Audubon
Hollidaysburg, Pennsylvania
www.jvas.org

Long Island Chapter of Trout Unlimited
Long Island, New York
www.longislandtu.org

Lowell Parks & Conservation Trust
Lowell, Massachusetts
www.lowelllandtrust.org

Massachusetts Baykeeper
Watertown, Massachusetts
www.massbaykeeper.org

Midshore Riverkeeper Conservancy
Easton, Maryland
www.midshoreriverkeeper.org

Mystic River Watershed Association
Arlington, Massachusetts
www.mysticriver.org

National Audubon Society
Washington, DC
www.audubon.org

Natural Resources Defense Council
Washington, DC
www.nrdc.org

Herring Alliance Member List

Neponset River Watershed Association
Canton, Massachusetts
www.neponset.org

Neuse Riverkeeper Foundation
New Bern, North Carolina
www.neuseriver.org

New England Coastal Wildlife Alliance
Middleboro, Massachusetts
www.necwa.org

North Fork Environmental Council
Mattituck, New York
www.nfec1.org

North and South River Watershed Association
Norwell, Massachusetts
www.nsrwa.org

NY/NJ Baykeeper
Keyport, New Jersey
www.nynjbaykeeper.org

Oceana
Washington, DC
www.oceana.org

Ocean River Institute
Cambridge, Massachusetts
www.oceanriver.org

Operation SPLASH
Freeport, New York
www.operationsplash.org

Pamlico-Tar River Foundation
Washington, North Carolina
www.ptrf.org

Parker River Clean Water Association
Byfield, Massachusetts
www.businessevision.info/parker_river

Peconic Baykeeper
Quogue, New York
www.peconicbaykeeper.org

PennEnvironment
Philadelphia, Pennsylvania
www.pennenvironment.org

Pennsylvania Org. for Watersheds and Rivers
Harrisburg, Pennsylvania
www.pawatersheds.org

The Pew Charitable Trusts
Washington, DC
www.pewenvironment.org

Red Lily Pond Project Assn, Inc.
Craigville, Massachusetts
www.craigville.org

Riverkeeper
Ossining, New York
www.riverkeeper.org

Rivers Alliance of Connecticut
Litchfield, Connecticut
www.riversalliance.org

Save the Sound
New Haven, Connecticut
www.ctenvironment.org/save-the-sound

Seatuck Environmental Association
Islip, New York
www.seatuck.org

Shark Angels
New York, New York
www.sharkangels.org

Shenandoah Riverkeeper
Washington, DC
www.shenandoahriverkeeper.org

South River Federation
Edgewater, Maryland
www.southriverfederation.net

Spruill Farm Conservation Project
Roper, North Carolina
www.spruillfarm.org

Herring Alliance Member List

Tookany/Tacony-Frankford Watershed Partnership
Philadelphia, Pennsylvania
www.ttfwatershed.org

West and Rhode Riverkeeper
Shady Side, Maryland
www.westrhoderiverkeeper.org

Waterkeepers Carolina
Washington, North Carolina
www.waterkeeperscarolina.org

Waterkeepers Chesapeake
Washington, DC
www.waterkeeperschesapeake.org

Watershed Action Alliance of Southeastern Massachusetts
Plymouth, MA
www.watershedaction.org

Wild Oceans
Leesburg, Virginia
www.savethefish.org