



United States Department of the Interior

FISH AND WILDLIFE SERVICE

300 Westgate Center Drive
Hadley, MA 01035-9589



DEC -5 2012

Christopher M. Moore Ph.D.
Executive Director
Mid-Atlantic Fishery Management Council
800 N. State Street, Suite 201
Dover, Delaware 19901

Dear Dr. ^{Chris} Moore,

At the June, 2012 meeting, the Mid-Atlantic Fishery Management Council (MAFMC) voted to develop Amendment 15 to the Atlantic Mackerel, Squid, and Butterfish Fishery Management Plan (MSB FMP). This Amendment will consider adding river herrings (blueback herring and alewife) and shads (American and hickory shad) as MAFMC managed species under the existing MSB FMP or under a new plan. The Scoping Document recently developed by MAFMC describes the herring and shad management concerns as they relate to MSB fisheries; provides background on current and proposed management actions directed to those management concerns, and seeks comment on the process of developing Amendment 15. The U.S. Fish and Wildlife Service (Service) has reviewed the Scoping Document and submits the following comments for your consideration.

The Service supports the MAFMC moving forward with the development of draft Amendment 15 to include a thorough assessment of any proposed management alternatives and their associated impacts.

The Scoping Document notes that MAFMC action on Amendment 15 could result in herring and shad stocks being managed under the Magnuson-Stevens Act (MSA), which governs the conservation and management of fish species within federal waters. The Scoping Document also notes that the MAFMC could manage herring and shad through a new Fishery Management Plan specifically for these species, or by adding herrings and shads as stocks in the fishery under the current MSB FMP. Either of these alternatives would result in development of a plan that could comprehensively address management of river herring and shads under the Magnuson-Stevens Act, incorporating all of the required provisions of the Act, along with discretionary provisions that are needed. To date, no current or proposed management approach has taken such a comprehensive approach to management of the anadromous river herring and shad stocks.

Thank you for the opportunity to comment. We look forward to reviewing draft Amendment 15 and providing comments on the various alternatives it will contain.

Sincerely,

James G. Geiger, Ph.D.
Assistant Regional Director-Fisheries