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20 November 2012

Chris Moore, PH.D.
Executive Director
MAFMC
800 North State St.
Suite 201
Dover, DE 19901

Hand delivered at Public Hearing Warwick, RI

REF: Scoping Comments on MSB 15

Director Moore,

I am writing in Opposition to the proposal that would include RH/S in the MSB FMP. I would like the Council to consider the following basis for this position:

1) The fishery is already adequately managed by States.

Since 01 Jan 2012, ME, NH, MA, RI, NY, NJ, VA, NC, SC, GA, the Potomac and Delaware rivers and Delaware Bay already have approved or pending management plans in place. These management schemes need time to accomplish their intended goals. The addition of Federal management efforts by including RH/S in the MSB FMP is neither cost effective or prudent at this time.

2) ASMFC has already identified a minimum of 52 separate stocks for RH and 32 for shad. To add these 84 stocks to the MSB management plan will only overburden the management process (for MSB) for which adequate science is sorely lacking.

3) 54% of RH stocks do not have enough adequate data to determine any justification for Federal fishery management action. 65% of Shad stocks are already shown to be increasing or do not have enough adequate data to support Federal management action.

4) The addition of RH/S to the MSB FMP will have no jurisdiction on major factors effecting the biological and ecological components of the RH/S stock. Measures that are designed to cure hurdles to stock recovery such as Dams, habitat restoration, pollution abatement and other environmental factors are well beyond the scope and control of any FMP and would circumvent any efforts on the part of the fishery. The expense and economic hardship that will be incurred by industry does not justify any Council efforts.

In summary, to include the minimum of 84 separate river stocks (i.e. State Waters) of RH/S to the Federal FMP for MSB will cripple efforts for the entire management complex. The MSB FMP is severely hampered by the lack of credible scientific data. Including RH/S in the management plan for MSB will only cause an unneeded regression in the fishery as a whole.

Thank you for the opportunity to present my opposition to the proposed addition of River Herring/ Shad to the Fisheries Management Plan for Mackerel, Squid and Butterfish.

Kind regards,

Eric Reid
President
Deep Sea Fish of Rhode Island, Inc.
Narragansett, RI