



Mid-Atlantic Fishery Management Council

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Michael P. Luisi, Chairman | P. Weston Townsend, Vice Chairman
Christopher M. Moore, Ph.D., Executive Director

January 18, 2023

Mr. Michael Pentony
Regional Administrator
National Marine Fisheries Service
Greater Atlantic Region
55 Great Republic Drive
Gloucester, MA 01930

Dear Mr. Pentony:

At the December 2022 Council meeting, the Council discussed NMFS' disapproval of most of the provisions in Amendment 22 to the Mackerel, Squid, and Butterfish (MSB) Fishery Management Plan (FMP) and passed the following motion:

That the Council request a more detailed explanation of the Amendment 22 decision relative to all 10 National Standards and MSB Amendment 20's approval (longfin squid permits) and what NMFS recommends for future Amendment development on fish hold provisions and consideration of historic participants with limited flexibility to pursue other fisheries.

The Council continues to believe that Amendment 22 effectively addressed the FMP's goals/objectives and complied with the National Standards. We also note that the disapproved *lllex* squid permit measures are substantially similar to the longfin squid permit measures contained in Amendment 20, which was approved by NMFS and implemented several years ago. Per the Council motion above, please provide additional detail regarding the National Standards as they relate to your disapproval, including an explanation of how the disapproved *lllex* permit measures in Amendment 22 differ from the longfin squid measures in Amendment 20.

Also, given that the capacity estimates in Amendment 22 indicate that a "race to fish" is likely to occur in the future when *lllex* availability/abundance is high, please provide recommendations on suitable measures to address the needs of those historic participants in the *lllex* fishery who have limited flexibility to pursue other fisheries. These could include fish hold upgrade limitations and/or other measures that you consider approvable.

Please contact me with any questions.

Sincerely,

Christopher M. Moore, Ph.D.
Executive Director, Mid-Atlantic Fishery Management Council

CC: M. Luisi, J. Didden, P. Hughes