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April 20, 2012

Chris Vonderweidt
Spiny Dogfish Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200A-N
Arlington, VA 22201

RE: Proposed Specs for the 2012 Spiny Dogfish Fishery

Dear Chris,

On behalf of the Georges Bank Cod Fixed Gear Sector, please accept these comments on the Commission's 2012 Spiny Dogfish Fishery Specifications. Fixed Gear Sector Members landed over 1.2 million pounds of spiny dogfish in FY2010 and more than 2 million pounds in FY2011.

The Fixed Gear Sector strongly urges the Commission to approve a 35.694 million pound commercial quota for FY2012. This quota is biologically and scientifically justified, and will add additional economic value to the multitude of fishing communities between Maine and North Carolina that rely on this healthy resource.

Implementing this commercial quota would align the Commission with the quota recommended by New England Fishery Management Council, the Mid-Atlantic Fishery Management Council, and the National Marine Fisheries Service. Furthermore, it would prevent a scenario of conflicting management implications if the state waters fishery is closed prior to that in federal waters.

According to the most recent stock assessment report, NMFS estimates the total biomass of spiny dogfish to be somewhere on the order of 1.2 **Billion** pounds. The difference between the Commission's proposed commercial quota and the NMFS' proposed commercial quota (5.694 million pounds) represents **less than one half of one percent of the total spiny dogfish biomass**. This difference in quota, while an insignificant portion of the spiny dogfish population, would add substantial value to dogfish-dependent communities along the Eastern Seaboard and will minimize regulatory conflicts between state and federal waters' management.

Thank you for your consideration of these comments, and the recognition of the importance of the spiny dogfish fishery to the Fixed Gear Sector fleet.

Sincerely,

Eric Brazer, Manager
Georges Bank Cod Fixed Gear Sector Inc.

John V. O'Shea, Executive Director
Atlantic States Marine Fisheries Commission
1050 N. Highland St., Suite 200 A-N
Arlington, VA 22201

January 5, 2012

Mr. O'Shea,

As active commercial fishermen who depend on the dogfish fishery and have been frustrated by the low harvest levels in recent years despite an abundance of spiny dogfish on our fishing grounds, we are very pleased to see that the Mid-Atlantic Fishery Management Council has increased the overall catch limit on this stock. While we feel this took far too long to get done, we welcome the opportunity to land more dogfish next year.

This fishery remains a crucial part of our fishing businesses and one of the last viable fisheries available for the small-boat fleet. We believe that dogfish management should have several priorities.

- To maximize sustainable harvest of dogfish, taking into account their role as predators on depleted groundfish stocks.
- To adjust daily trip limits to avoid early shutdowns of the commercial season and to maximize economic value of landed dogfish.

Given these priorities and the fact that the northern dogfish fishery has been closed before September 1st in each of the last two seasons (in spite of increasing quotas), **we believe that the daily trip limit should remain at 3000 lbs at least through the summer months.** This will allow the fishery to maximize the length of the season and avoid processor shut-downs. It will also ensure that there will be dogfish landings in the fall when the fresh-market yields the best price. If the fishery is not on track to fully harvest the available dogfish, then the Regional Administrator should have the authority to increase the trip limit on or after September 15th.

Thanks for your help with this and we hope you will consider our proposal.

Sincerely,

Harry Collingwood	FV Sandy C
Sam Lucarelli	FV Miss Madison
Luther Bates	FV Couch Potato
Ed Footer	FV No Name
Mike Anderson	FV Cricket
Kurt Martin	FV Time Bandit
Russel Cleary	FV Skip Jack
Scott Rushnak	FV Risky Business
Ben Morgan	FV Lobster Mobster
Mark Leach	FV Sea Holly
Mitch Clark	FV Sandra Lee

John Small	FV Gannet
Leon Long	FV Odyssey
Matt Linnell	FV Lori B
Tim Linnell	FV Perry's Pride II
Bob Eldridge	FV Unicorn
Willie Ligenza	FV Blue Jay
Peter Cole	P & B Shanty
Dave Meservey	FV Recluse
Bill Barabe	FV Laura Hope
Mike Abdow	FV Magic
Leo Maher	FV Talisman
John Linwell	FV Easy Money
Kenny Eldredge	FV Odyssey
Peter Taylor	FV Sea Hound
Bruce Kaminski	FV Never Enough
Kenny Tolley	FV Hunter
Andy Baler	Nantucket Fish Co.
John Tuttle	FV Cuda



Atlantic States Marine Fisheries Commission

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MEMORANDUM

April 26, 2012

TO: Spiny Dogfish and Coastal Sharks Management Board

FROM: Robert Beal, ISFMP Director *R&B*

SUBJECT: 2012/2013 Spiny Dogfish Preliminary Quotas

The 2012/2013 preliminary ASMFC spiny dogfish quotas, adjusted for overages and rollovers from the 2011/2012 fishing season, are listed in the table below. The Spiny Dogfish & Coastal Sharks Management Board has set the 2012/2013 coastwide quota at 30,000,000 pounds with Northern Region states (Maine – Connecticut) possession limits up to 3,000 pounds. States from New York – North Carolina are not bound by the 3,000 pound possession limit and may set limits to manage their state-shares as best meets their needs. States may open their fisheries on May 1, 2012, when the new fishing season begins. Fishermen should consult their local jurisdictions for state and federal dogfish regulations, prior to catching dogfish. Final 2012/2013 federal specifications were not published as of the release of this memo.

Addendum III to the Spiny Dogfish FMP allocates the annual quota, with 58% to states from Maine – Connecticut, 2.707% to NY, 7.644% to NJ, 0.896% to Delaware, 5.920% to Maryland, 10.795% to Virginia, and 14.036% to North Carolina; requires that overages are paid back the following fishing season by region or state; and allows for up to 5% of a region or state’s quota to be rolled over into the subsequent fishing season.

	2012/2013 % Allocation	2012/2013 Allocation (Pounds)	Adjustments for 2011/2012 Overages (-) and rollovers (+)	Preliminary 2012/2013 Quota (Pounds)
Northern Region (ME - CT)	58.00%	17,400,000	-1,359,053	16,040,947
NY	2.707%	812,100	+26,935	839,035
NJ	7.644%	2,293,200	-101,508	2,191,692
DE	0.896%	268,800	+3,915	272,715
MD	5.920%	1,776,000	+39,927	1,815,927
VA	10.795%	3,238,500	-88,435	3,150,065
NC	14.036%	4,210,800	+20,844	4,231,644

A combination of three landings sources were used to calculate the preliminary quotas. Landings in Maine – Virginia during May 1 – December 31, 2011 are from the ACCSP data warehouse. The data warehouse is considered the most accurate source of spiny dogfish landings but does not include audited landings past 2011. Landings in Maine – Virginia during January 1 – April 24, 2012 are from SAFIS dealer reports. North Carolina's landings are from a direct communication with North Carolina Department of Marine Fisheries staff.

These quotas may be adjusted as the 2011 landings are finalized and the 2012 data warehouse landings become available.

Please feel free to contact me, or Christopher Vonderweidt for assistance (703-842-0740; rbeal@asmfc.org or cvonderweidt@asmfc.org).

M12-33