

#4



CAPE COD COMMERCIAL HOOK FISHERMEN'S ASSOCIATION, Inc.  
1566 Main Street  
Chatham, MA 02633  
508-945-2432 • 508-945-0981 (fax)  
www.ccchfa.org • contact@ccchfa.org

November 10, 2010

Paul Howard, Executive Director  
New England Fishery Management Council  
50 Water Street  
Newburyport, MA 01950



RE: Spiny Dogfish 2011 Specifications

Dear Paul,

We would like to take this opportunity to comment on the management of spiny dogfish and, specifically, on the recent Mid-Atlantic Fishery Management Council (MAFMC) recommendations for 2011 catch levels. As you know, following the prolonged and drastic reductions in the targeted commercial harvest of spiny dogfish, this stock is now robust and has been declared fully rebuilt.

In fact, recent management decisions and ecosystem changes have led to unprecedented spiny dogfish populations in New England, causing an ecological shift from an inshore ecosystem previously dominated by groundfish to one now dominated by dogfish. This change has had devastating impacts on both the marine ecosystem and the commercial groundfish fishery. The overwhelming abundance of dogfish has kept many small-boat groundfish fishermen from successfully targeting cod and has forced these fishermen off their traditional grounds and far offshore in attempts to target groundfish while avoiding unwanted dogfish bycatch.

Unfortunately, to date, neither the ecological or socioeconomic impacts of these changes have been fully considered during the process of establishing commercial harvest levels for spiny dogfish. Specifically, the MAFMC recommended 2011 commercial quotas that are well below what the most recent scientific information suggests the fishery could sustain. While we strongly support conservation-based harvest levels, the quota recommendation emphasizes the relatively small risk of increased harvest on the spawning stock biomass and largely ignoring the impacts of the spiny dogfish population on all other managed species.

For these reasons, we ask the New England Fishery Management Council to:

- Carefully evaluate the MAFMC recommendations and consider whether a higher 2011 spiny dogfish quota would better achieve management objectives.
- Recommit to addressing ecosystem impacts in setting future harvest levels for key predator and forage stocks.

Thank you for your consideration of this issue.

Tom Dempsey  
Policy Director