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MID-ATLANTIC FISHERY MANAGEMENT COUNCIL

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Christopher M. Moore, Ph.D.
Executive Director

September 16, 2010

John V. O'Shea, Executive Director
Atlantic States Marine Fisheries Commission
1444 Eye Street, N.W., Sixth Floor
Washington, D.C. 20005



Dear Vince:

This letter is written for two purposes: 1) to respond to comments and questions regarding Amendment 3 to the federal Spiny Dogfish Fishery Management Plan that were identified in a September 10, 2010 letter from the Commission's Spiny Dogfish and Coastal Shark Management Board, and 2) to express the Council's interest in being informed as soon as possible about future developments in the Commission's ISFMP for Spiny Dogfish.

The Council appreciates the support expressed in your letter for the overall goals of Amendment 3. Your letter indicated that the Board requested that the public draft of the amendment include an option that would remove seasonal allocation and establish an annual quota. Although the suite of alternatives for Amendment 3 has not been formally approved, the Council's Joint Spiny Dogfish Committee is reviewing alternatives that include the scenario you describe.

With regard to comments on the inclusion of limited access alternatives in the amendment, the Council recognizes that full exploration of limited entry options and impacts would be a time-consuming undertaking. As stated above, the management alternatives to be included in the amendment have not been formally approved. However, the Joint Spiny Dogfish Committee has the latitude to consider the viability of those issues in the scoping process. That committee is meeting at our October Council meeting, in part, to discuss the development of Amendment 3.

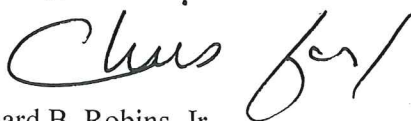
The Board also had a question about sex ratio within the spiny dogfish stock and its implications for stock productivity. The basis for the initial consideration of sex-specific management measures is the observation that the biomass of mature, male spiny dogfish is at record high level with virtually zero fishing mortality as compared to the lower biomass and higher fishing mortality of mature females. Interest has been expressed in exploring the development of a fishery that might directly harvest mature males. The effect of such a fishery on the males should be minimal, and it is likely that correcting the overabundance of mature male spiny dogfish would benefit the female portion of the stock by decreasing competition for shared resources.

The source for this information and other statements regarding sex ratio can be found the report of the 43rd SAW for Spiny Dogfish (see page 28 of the full Assessment Report). As to the Board's question about a 'balanced' sex ratio, the observed 2:1 (mature M:F) sex ratio from the 1980's is considered a likely candidate given that this ratio was observed prior to the development of the fishery that removed a large portion of the mature females.

Finally, the Council would very much appreciate any details the Board could convey with regard to its exploration of alternative quota allocation scenarios for Addendum 3. The Council shares the Board's interest in minimizing administrative conflicts between the federal and interstate plans and welcomes and supports the development of Addendum 3 to the ISFMP for Spiny Dogfish. Additional information regarding Addendum 3 and the expected timeline for development of the Addendum could help us in our planning process. The Council appreciates its history of working cooperatively with the Commission to successfully manage spiny dogfish and looks forward to continuing that successful partnership into the future.

Thanks again for the Commission's input on Amendment 3 and please let me know if you have any further questions or concerns.

Sincerely,

A handwritten signature in cursive script that reads "Chris for".

Richard B. Robins, Jr.

CC:

Pappalardo
Anderson
Munden