



Atlantic States Marine Fisheries Commission

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Douglas E. Grout (NH), Chair

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Robert E. Beal, Executive Director

Vision: Sustainably Managing Atlantic Coastal Fisheries

February 5, 2016

John Bullard
NOAA Fisheries Service
Greater Atlantic Regional Fisheries Office
55 Great Republic Drive
Gloucester, Massachusetts 01930-2276

John,

Dear ~~Mr. Bullard,~~

I am writing on behalf of the Atlantic States Marine Fisheries Commission's Spiny Dogfish Board (Board). The Board reviewed the revised 2015 stock assessment update which concludes the stock is not overfished and overfishing is not occurring. In addition, current estimates indicate the stock's biomass at 106% of the target. Based on this information, the Board requests an increase in the spiny dogfish commercial trip limit in federal waters to 6,000 pounds.

The Board approved a 2016 spiny dogfish commercial quota of 40,360,761 pounds which is consistent with the 2016 commercial quota recommended to NOAA Fisheries by the Mid-Atlantic and New England Fisheries Management Councils. Although this represents a 20% reduction in quota from 2015 to 2016, landings have been below 24 million pounds for the last two full fishing years.

In recent years, the Board has set state waters' commercial trip limit in the northern region (Maine through Connecticut), to complement trip limits in federal waters. The Board would like to continue this practice. However, the Board would also like to respond to the healthy stock status and recent underutilization of the quota. Therefore, ASMFC requests NOAA Fisheries adopt a 6,000 pound commercial trip limit in federal waters for the 2016-2018 fishing seasons. This new trip limit was a unanimous decision of all the member states on the Board, which includes states from both the Mid-Atlantic and New England regions. This request is a modest increase to the commercial trip limit in federal waters, which is currently set at 5,000 pounds.

The rationale for this request, as discussed at the Board meeting, is the following:

1. The fishery is currently (and has previously been) underutilizing the quota by a substantial amount—landings for the current fishing year lag behind the landings rate in the previous fishing year
2. A slight increase in the commercial trip limit will reduce regulatory discards, as required by the Magnuson-Stevens Fishery Conservation and Management Act
3. The change in commercial trip limits will promote economies of scale in the spiny dogfish fishery

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4. Higher commercial trip limits will encourage more participation in the fishery
5. The industry has requested any change in regulations to be phased in slowly and methodically in order to promote full market potential and avoid market disruptions

Thank you for your consideration to increase the commercial trip limit. We are committed to communicating and working together with both the Councils and NOAA on these important state and federal management issues. Please contact me with any questions.

Sincerely,



Robert E. Beal

cc: ASMFC Spiny Dogfish Board
Tom Nies (NEFMC)
Chris Moore (MAFMC)