



DELAWARE AUDUBON SOCIETY

Chapter of National Audubon
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October 1, 2006

Roy W. Miller, Fisheries Administrator
Division of Fish & Wildlife
Department of Natural Resources &
Environmental Control
89 Kings Highway
Dover, Delaware 19901

RE: Proposed Changes to Conch Minimum Size Limits and Commercial Conch Dredge Licenses Rules

Dear Mr. Miller:

Delaware Audubon was incorporated in Delaware as a non-profit organization in 1977. Delaware Audubon is a statewide chapter of the National Audubon Society and is dedicated to developing a better appreciation of our natural environment and working for species and habitat protection and conservation. Delaware Audubon consists of over 1,500 members throughout the state advocating on a wide range of environmental issues and sponsoring programs, field trips and school education. Our focus is on protection of the Delaware Bay and the Coastal Zone. We appreciate the opportunity to provide comments to your office on an issue of great importance to our organization and its members.

The Delaware Audubon Society offers the following comments on proposed changes to the Commercial Conch Dredge Licenses rules:

1. Delaware Audubon supports the proposal to increase the minimum size of knobbed whelks (knobbed conch) that may be harvested from five inches to six inches in one-quarter inch increments over a four-year period. There is evidence that this resource is showing signs over-exploitation. We believe even more aggressive measures should be taken to achieve greater conservation of spawning stock biomass.
2. Since horseshoe crabs are used as bait for conch fishing, a moratorium on horseshoe crab harvesting would also serve as a conservation measure to protect this fishery from over-exploitation.

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3. Delaware Audubon supports the proposal to cap for a period of five years the number of conch dredge licenses that the Department may issue to the number issued during the period 2003-2005. Even at the current number of permits issued by the Department there is evidence of excessive mortality and damage to this and other fisheries from dredging. We recommend the Department pursue additional measures to limit or restrict bottom-trawl dredging.

We appreciate the opportunity to comment on these proposed changes to the rules. We appreciate as well your efforts and those of the Fisheries Section staff to protect Delaware's natural resources.

Most sincerely,

Nicholas A. DiPasquale
Conservation Chair

pc: Delaware Audubon Board of Directors