



May 2, 2013

Ms. Kate Taylor  
Senior Fishery Management Plan Coordinator  
1050 N. Highland Street, Suite 200 A-N  
Arlington, VA 22201

**Re: Support for Proposed Addendum III, American Eel Management Plan**

Dear Ms. Taylor:

The Association to Preserve Cape Cod (APCC) strongly supports the proposed Addendum III to the Interstate Fishery Management Plan for American Eel.

APCC was founded in 1968 as a 501(c)(3) organization whose mission is to promote science-based policies and programs that foster preservation of Cape Cod's natural resources. We promote our goals through education, research, technical assistance, and advocacy. APCC is the largest environmental organization on Cape Cod with over 5,000 members from all 15 of the Cape's towns. Our efforts have led to landmark achievements in water resource protection, land preservation and smart growth, earning APCC the reputation as Cape Cod's most prominent and influential environmental advocacy group. APCC is also the host of the Cape Cod region of the Massachusetts Bays National Estuary Program which works to protect and restore coastal ecosystems of Cape Cod Bay and Massachusetts Bay. Please see our website at [www.apcc.org](http://www.apcc.org) for more information.

APCC has grave concerns about the present status of American eel populations in our waters. The 2012 Atlantic States Marine Fisheries Stock Assessment concluded that the American eel population is at historic low levels due to several sources of stress and mortality including but not limited to overharvesting. American eels play a key role in the coastal food web by providing food for many species of fish, birds and wildlife. Their decline spells trouble for the coastal food web which is already impacted by the collapse of other fisheries. APCC has been frustrated by the silo approach of fisheries management quotas which are orchestrated species by species and not by a more holistic ecosystem-based approach. We believe that Addendum III, especially in its focus on habitat improvement, is a small step in the right direction.

APCC and the Mass Bays Program have been working with local, state and federal resource managers to improve eel passage and restore habitat. Examples of recent and ongoing restoration projects that provide improved eel passage and habitat include Herring River, Harwich; Pilgrim Lake, Orleans; Stony Brook, Brewster; Cedar Lake, Falmouth; and Santuit Pond, Mashpee. Towns and their restoration partners have provided significant amounts of cash and labor to implement these restoration projects.

However, Cape Cod is now experiencing significant glass eel poaching in our streams. We are concerned that investments to restore eel habitat will be wasted due to unprecedented and largely unprosecuted eel poaching. Natural resource officers on the Cape have been working tirelessly to deter and catch eel poachers, but their resources are very limited. If the market for eels is shut down and dealers could not sell glass eels, eel populations might have a chance to recover. Because of the unique role of eels in the food web, APCC believes that such a closing will actually enhance our commercial fishery.

We urge the Commission to close the eel fishery for all East Coast states, aggressively enforce laws against poaching and implement significant conservation measures for all life stages of the American eel. We also urge the Commission to provide more funding for restoration of eel habitat and fish passage as well as enforcement. These actions are needed to help ensure that American eels do not disappear from our waters.

Sincerely,



Ed DeWitt  
Executive Director

cc: Brad Chase, Massachusetts Division of Marine Fisheries