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ASSOCIATED FISHERIES OF MAINE

PO Box 287, South Berwick, ME 03908

207-384-4854

April 1, 2009

Mr. John Pappalardo, Chair
New England Fishery Management Council
50 Water Street
Newburyport, MA 01950



Dear John:

I write, on behalf of our membership, to provide comments on Skate Amendment 3.

We endorse the Skate Committee's recommendation to apply the measures of alternative 3B to the wing fishery and the measures of alternative 4 to the bait fishery. In crafting this recommendation, the Committee has developed an alternative that is responsive to industry's comments and preferences while meeting the biological objectives of the plan.

However, as participants in the wing fishery, we are concerned that the proposed possession limit for vessels fishing under a scallop, multispecies or monkfish DAS is the same amount regardless of the length of the trip. This recommendation for a uniform possession limit for all trips, irrespective of length, differs from the current possession limit which does differentiate between trips of less than 24 hours and greater than 24 hours (10,000 lbs/wings vs. 20,000 lbs/wings).

We believe that the current regulations appropriately acknowledge the different bycatch rates between day and multi-day trips and reflect the different economic needs of day and multi-day trips.

We therefore request that the Council modify the proposed possession limit in the wing fishery to allow for a larger possession limit for trips greater than 24 hours.

As always, we appreciate your consideration of our views.

Sincerely,

M. Raymond

Maggie Raymond

Associated Fisheries of Maine is a trade association of fishing and fishing dependent businesses. Membership includes harvesters, processors, fuel/gear/ice dealers, marine insurers and lenders, and other public and private individuals and businesses with an interest in commercial fishing.

CC AJA 4/1/09