January 11, 2011

Dear Mr. Goethel and Skate Committee Members,

As members of the Pt. Judith fleet and Northeast Fishery Sector V who participate in a targeted bait fishery for little skate, we write to ask you to consider a change to the bait skate Letter of Authorization, which currently has a zero possession limit of skate wings for vessels fishing under the LOA. This results in wasteful discarding of winter skate that may be caught while targeting little skate. An allotment of one-third of the daily possession limit of the skate wing fishery would be fair and appropriate. We are not targeting the skate wing fishery while bait fishing. Allowing us to keep one-third of the daily possession limit would defray our increasing fuel costs, and not put further pressure upon the skate wing fishery.

We also wish to notify you of an exploratory effort to develop an exempted fishery for the bait skate fishery that would relieve vessels in the exempted fishery from the sector monitoring requirements and assumed discard rates. The high volume landings of this fishery result in disproportionately high discards based on the application of the sector's assumed discard rate. Typically, vessels prosecuting this fishery have small groundfish allocations and are forced to purchase fish to cover discards—an untenable proposition in a low-value fishery such as this. With low groundfish bycatch and increasing demand in the bait market, we believe this fishery would be a good candidate for an exempted fishery.

We are currently working with the Northeast Fishery Science Center, Northeast Regional Office staff and other researchers to develop a proposal of limited season and geographic range based on at-sea monitoring coverage from the sector vessels who participate in this fishery. At this time, this process is still in formative stages but we intend to keep the Council and Skate Committee informed as the proposal is developed and would welcome your feedback if you have thoughts or concerns.

Thank you for your consideration of, and attention to, these issues.

Robert Westcott, Skate Advisor, F/V Ocean State Rodman Sykes, F/V Virginia Marise Charles Brayton, F/V Kelsi and Morgan