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## Sustainable Fisheries Association, Inc.

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January 13, 2014

Thomas A. Nies  
Executive Director  
New England Fishery Management Council  
50 Water Street, Mill 2  
Newburyport, MA 01950



Re: Comments for Council consideration  
Draft Framework Adjustment 2 to the  
Northeast Skate Complex FMP Draft Management Measures

Dear Tom:

The Sustainable Fisheries Association respectfully submits the following comments for consideration at the upcoming Joint Skate Advisory Panel and Oversight Committee meeting scheduled for January 15, 2014 regarding the Draft Framework Adjustment 2 to the Northeast Skate Complex FMP Draft Management Measures.

The members of the Sustainable Fisheries Association respectfully suggest the following be added:

1. Increase the daily possession limits for fishing years 2014 and 2015 as follows: from 2,600 pounds to 3,500 pounds from May 1 to August 31; and from 4,200 pounds to 5,500 pounds from September 1 to April 30. We make this suggestion in order to allow the fishery to achieve the proposed total allowable landings (TAL) keeping current fishing effort as a constant.
2. Increase the daily possession limits when 80% of the TAL has not been landed by February 21<sup>st</sup>, so that effective March 1<sup>st</sup> the daily possession limit would be automatically increased to 8,000 pounds until the TAL is reached.
3. That any and all unused amount of the TAL in a given fishing year be automatically rolled-over to the next fishing year.
4. Eliminate the skate wing TAL trigger of 85% and close the fishery when the 100% of the TAL has been reached. It is impossible for the fishery to achieve optimum yield consistent

cc - Council, FA (1/16)

with National Standard 1 of the Magnuson-Stevens Fishery Conservation and Management Act with the current 85% trigger because the fishery is effectively closed when the daily possession limit is reduced to 500 pounds. For example, if the TAL is 24,021,568 pounds, the automatic trigger engages when the TAL reaches 20,418,332 pounds, leaving 3,603,235 pounds – only a small portion of which will be landed. It is unrealistic to believe that fishermen will make 7,206 trips with the 500 pound trip limits, so millions of pounds are left unharvested. The 85% automatic trigger is a needless reduction to the TAL that should be eliminated.

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

Regards,  
Sustainable Fisheries Association, Inc.

By 

John F. Whiteside, Jr.  
General Counsel

Cc: J. Bullard  
S. Rauch