



New England Fishery Management Council

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MEMORANDUM

DATE: November 14, 2008
TO: Council
FROM: Andrew Applegate
SUBJECT: Summary of written Amendment 3 comments

The following synopsis provides a summary of the more frequent and prominent comments on Draft Amendment 3 to the Northeast Skate Complex FMP.

1. Skate bait fishermen and bait wholesalers strongly support Alternative 4 with trimester or quarterly quotas. They believe that this alternative will provide a more consistent supply of bait, stabilize prices, and prevent development of derby-style fishing practices.
2. Skate bait fishermen and bait wholesalers unanimously support using the 1995-2006 period to allocate landings to the skate wing and bait fisheries, which is currently estimated to provide a 3,867 mt TAL. This option would be more conservative for overfished skate species since the allocation to a fishery that targets overfished winter skate would have a lower quota.
3. Skate bait fishermen and bait wholesalers do not support any alternative with possession limits calculated to achieve the TAL, because the possession limits would favor small vessels over large and prevent large vessels from landing large volumes of skates needed to supply the offshore lobster fishery.
4. Lower skate bait landings would impact not only the offshore lobster fishery, but would also impact the inshore lobster fishery since it would then compete with the offshore lobster fishery for herring bait.
5. Many skate bait fishermen and bait wholesalers commented that the EIS needs to fully address the impacts on not only the skate bait fishery, but also the lobster fishery.
6. Skate wing fishermen support Alternative 3B and do not support using additional time/area closures to reduce winter and thorny skate mortality, even though the Alternative 3B possession limits are lower than Alternatives 1B and 4. Many saw the time/area closures as an unnecessary complication and burden on fishermen and enforcement.

7. Nearly everyone supports reducing or eliminating the use of Multispecies Category B DAS to target skates, because they are being used to target overfished winter skate.
8. A few fishermen support No Action/Status Quo until more data can be collected and more analysis can be completed, even though No Action/Status Quo does not initiate rebuilding of smooth, thorny, or winter skates.
9. The EPA commented in favor of Alternative 2, Option 1 because it could have a relatively smaller effect on sea turtles.
10. The EPA gave the DEIS an LO-1 rating (“Lack of Objections – Adequate”), the highest rating possible, although “the environmental impacts of the different alternatives with regards to EFH are not developed . . . and do not provide a clear basis for choice among alternatives.”