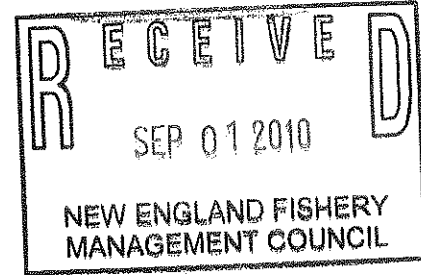


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September 1, 2010

Paul Howard, Executive Director
 New England Fishery Management Council
 50 Water Street
 Newburyport, MA 01950

RE: 2010 Skate trip limits

Dear Paul,

I am writing to you today concerning the recent closure of the targeted skate wing fishery, the foreseeable impacts of this action on other fisheries and how the Council could address it.

As you know, earlier this month, the skate wing fishery was estimated to have achieved 80% of the total allowable landings (TAL), and this triggered the Regional Office of the National Marine Fisheries Service to reduce the trip limit for skate wings from 5,000 lbs to 500 lbs. This action effectively closed the targeted wing fishery for the remainder of the 2010 fishing year and will have substantial negative impacts on this and other economically vital fisheries. For instance, without the opportunity to augment trip profits by landing a substantial volume of skate wings, the winter monkfish fishery is unlikely to be the much-needed success that it has been in recent years.

These lost fishing opportunities would be unfortunate enough if they were based on the best available information regarding the total catch of skates in all New England fisheries in 2010. However, the skate discard estimates used to calculate the TAL of the targeted skate fishery do not account for the substantial changes in the groundfish fishery due to sector management and do not reflect the expanded information available from the increased observer coverage of the groundfish fleet. It is, therefore, very likely that these recent cuts in the skate fishery are not required to preserve the health of the skate resource.

The Council could address this problem by requesting that the Regional Administrator:

- Quickly analyze and re-estimate skate discards in the groundfish fishery based on the most recent available information from FY 2010
- Adjust the wing fishery's trip limit to ensure that a higher proportion of the 2010 ACL is landed

Given the transition in the groundfish fishery and the relatively low groundfish allocations for 2010, all fishing opportunities are critical to New England's fishermen and coastal communities. We simply cannot afford to allow outdated information to eliminate fishing jobs and businesses by turning valuable landings into discards.

Thank you for your consideration of this issue.

Tom Dempsey
 Policy Director

Cc: John Pappalordo, Terry Stockwell

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