

Skate Amendment 3
Written Scoping Comments
June 1, 2007

iFrom: chuck etzel [mailto:chucketzel@yahoo.com]
Sent: Thursday, April 12, 2007 8:47 PM
To: Joan O'Leary
Subject: skate amendment 3 comment

To whom it may concern,

Trawls must be designed to avoid flatfish, skates ,and monkfish while vessels and fishing on non das for other species. Raised footropes seem like an easy way to allow species that stay low on the bottom to pass between the net and footrope.

Attention:
Ms Patricia A. Kurkul
Reg. Administrator
NMFS

Dear Ms Kurkul:

There are three points I would like to stress in consideration of a workable plan:

1. Incorporate the Skate Management Plan with upcoming Amendment 16 (ground fish) Plan.
2. Cut the winter skate fishery catch quotas by 50% to address the overfishing.
3. It is a fact that boats are using "A" days to catch bait skates (little skates). The boats will fish in "1 for 1" areas first. There will be very little fishing pressure in the "2 for 1" areas. It is virtually a protected zone for yellowtail, flounder, cod, little and winter skates.

Thank you for your consideration of the above.

Regards,
Robert Westcott
Skate Advisor
Capt. F/V Ocean State

May 31, 2007

Patricia A. Kurkul, Regional Administrator
National Marine Fisheries Service
One Blackburn Drive
Gloucester, MA 01930



Dear Ms. Kurkul:

On behalf of the Ocean Conservancy, we appreciate this opportunity to comment on the scoping document for Amendment 3 to the fishery management plan (FMP) for Northwest Atlantic skates.

As you know, the Ocean Conservancy was closely involved in the development of a skate management plan and pressed hard for a precautionary approach to management of these slow growing species, including stringent restrictions on their catch and mandatory requirements for species-specific data collection. We are therefore deeply dismayed to learn that four years after management began, data has not been reported as planned and the conservation status for these species looks no better and in many cases worse. Specifically, we are deeply disappointed that:

- Thorny skates have not increased and remain overfished despite a prohibition on landings;
- Winter skate biomass has declined by nearly 50% since FMP implementation;
- Little skates are likely to become overfished and experience overfishing in the near future;
- Smooth skates, taken primarily as bycatch, have not increased and are near the overfished threshold, despite decreases in groundfish fishing effort;
- Poor identification and insufficient monitoring continue to hamper collection of sorely needed species-specific data on skate catches;
- Discards have significantly exceeded landings, yet discard mortality remains unknown;
- Potential for bycatch reduction using gear modification is viewed as "limited"; and
- Scientists are still unable to project rebuilding scenarios.

We firmly agree with the conclusion that broad scale reductions in skate mortality are needed and offer our strongest support for Skate Plan Development Team (PDT) recommendations, including:

- Immediate action to reduce mortality of winter and little skates;
- Development of a rebuilding schedule for winter and thorny skates, consistent with the Magnuson-Stevens Act (MSA) and National Standard guidelines;
- Substantial reductions in skate discards;
- Annual monitoring of skate biomass including comparison with biomass rebuilding trajectories;
- Prompt, periodic adjustments in fishing effort or allowable catch as dictated by analysis;
- An adaptive management approach in order to ensure rebuilding;
- Emphasis on mortality reductions and increased size selection to allow rebuilding of older, mature skates;
- Establishment of annual catch limits and accountability measures, as mandated by the MSA.

With regard to measures outlined in the Council's scoping document, we favor:

- Hard limits on Total Allowable Catch (TAC) as a complement to Days at Sea restrictions;
- Substantial reduction of the wing possession limit;
- Establishment of a stringent bait fishery possession limit;
- Closure of bottom trawling and dredging areas that comprise 75% of the exploitable biomass distribution for protected skates;
- Thorough exploration of potential gear modifications to reduce skate catch in various fisheries; and
- Limits on skate catch by exempted fisheries.

We also urge fishery managers to consider:

- Prohibition on landings of winter skate; and
- Further incentives and/or penalties to ensure collection of species specific data.

We take this opportunity to remind you that skates are among the most biologically vulnerable species within the New England Council's purview. As evidenced by the deteriorating status of most species under existing management measures, skates require an especially cautious management approach. We urge the Council and the National Marine Fisheries Service to develop and implement meaningful and substantial improvements to the Skate FMP before further damage is done.

Thank you for this opportunity to express our views.

Sincerely,

Sonja Fordham
Director, Shark Conservation Program

John Williamson
Regional Fish Conservation Program Manager