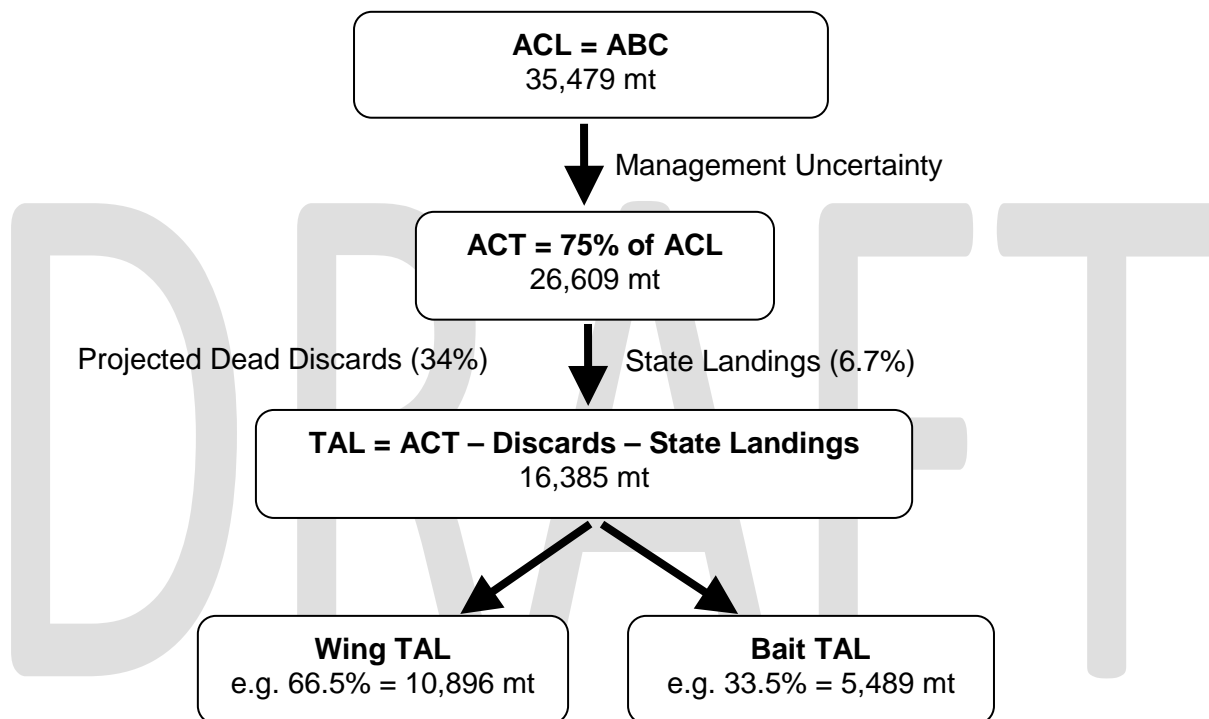


1.0 Alternatives Under Consideration

1.1 Updates to Annual Catch Limits

1.1.1 Option 1: No Action

The ACL parameters and limits would remain unchanged from the final ACL specifications for the 2014-2015 fishing years (see diagram below) in the final regulations for the specifications package and would incorporate no new scientific data and information.

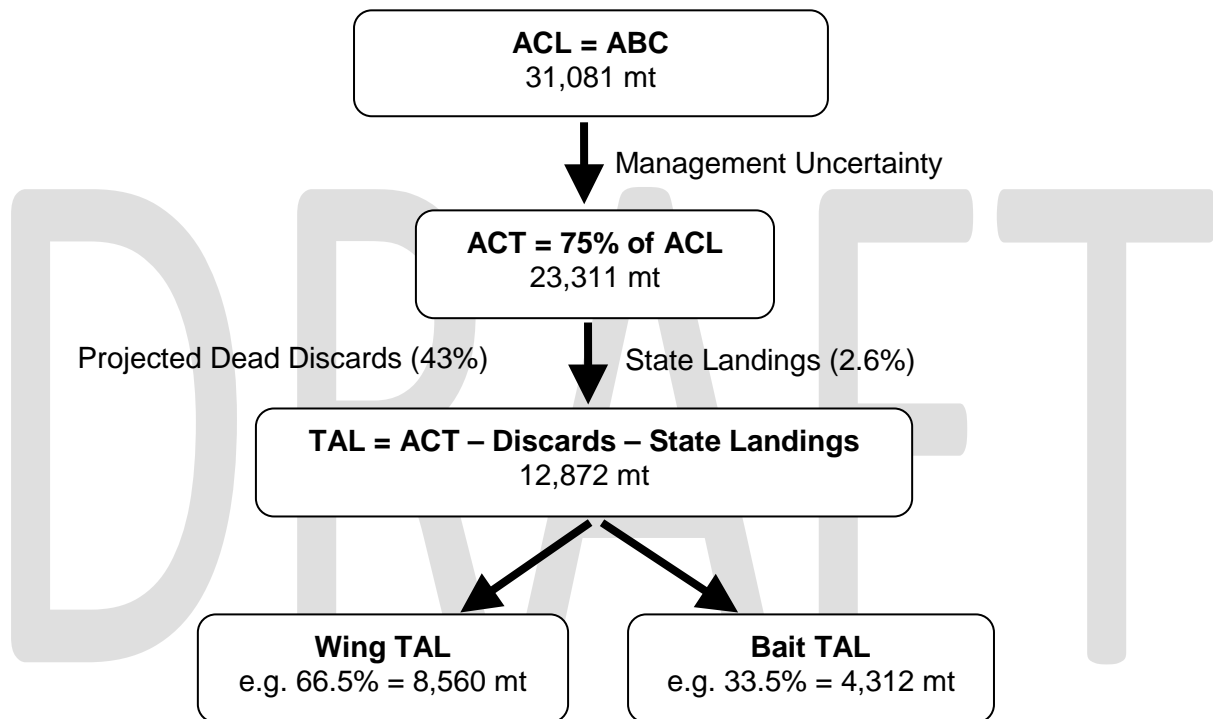


Rationale: The No Action alternative would not incorporate the best available science in terms of updated survey biomass indices and discard mortality rate estimates. The ACL would be maintained at a higher level than the revised data would allow. The No Action would be inconsistent with the Act, with the FMP's optimum yield (Section **Error! Reference source not found.**), and with the Information Quality Act (Section **Error! Reference source not found.**).

1.1.2 Option 2: Revised Annual Catch Limit Specifications

ABC and ACL specifications are derived from the median catch/biomass exploitation ratio for time series up to 2014 and the three year average stratified mean biomass for skates, using the 2013-2015 spring survey data for little skate and the 2012-2014 fall survey data for the other managed skate species. For skates, the Council set the ACL to be equal to the ABC. TALs are set according to Amendment 3 procedures that assume that future discards would be equivalent to the average rate from the most recent three years (2012-2014); state landings would approximate to 2.6% of the total landings, which represents the latest 3 year average of state landings.

The ABC/ACL specifications would be adjusted to be consistent with new scientific information and the approved ACL framework procedures in Amendment 3. The aggregate skate ABC/ACL would decrease to **31,081** mt. The ACL is a limit that would trigger AMs if catches exceed this amount. The ACT would likewise decrease to **23,311** mt. After deducting amounts for projected dead discards (based on the average 2012-2014 discard rate), the TAL would decrease to **12,872** mt. The proportion of dead discards in the catch increased to **43%**, primarily due to an increase in overall skate discards. The incorporation of revised discard mortality rates in scallop dredge gear for winter (34%) and little (48%) skate slightly reduced the historic catch and affected the catch/biomass medians; it also slightly reduced the amount of discards attributed to dead discards for this gear type.



Rationale: This alternative would make the specifications (catch and landings limits) consistent with the procedures approved in Amendment 3 and with new science that has been analyzed by the Skate PDT and peer reviewed by the SSC. Framework 3 is not intended to develop alternative ACL calculation methodologies; instead it enacts the existing methodology in the FMP. The SSC reviewed the revised catch/biomass medians and those used in the previous specifications package and approved the use of the revised medians as they were consistent with previous decisions by the SSC to incorporate the best available science for discard mortality rate estimates. According to the Amendment 3 procedures, it would allow the fishery to achieve optimum yield, nearly all derived from catches of little and winter skates. This alternative meets the requirements to prevent overfishing. Biomass of little and winter skates have decreased from the 2011-2013 (and 2010-2012) period used in FW2, and contribute the majority of landings in the skate bait and skate wing fisheries, respectively.

1.2 Skate Wing Possession Limit Alternatives

1.2.1 Option 1: No Action

The No Action alternative would maintain the Framework Adjustment 1 skate wing possession limits. These limits begin with a **2,600 lbs.** possession limit from May 1 to Aug 31 and then increase to **4,100 lbs.** possession limit from Sep 1 to Apr 30, or until the 85% TAL trigger has been met and it appears that without adjustment the fishery would exceed the annual TAL. This alternative would not alter the 85% trigger for the incidental trip limit.

Rationale for alternative: In FY2014 the wing fishery achieved 97.3% of its TAL, maintaining the current trip limits would allow the fishery to maximize its ability to achieve the TAL.

1.2.2 Option 2: Revised Skate Wing Possession Limit

The seasonal skate wing possession limit for May 1 to Aug 31 would decrease to **1,500 lbs.** The seasonal skate wing possession limit for Sep 1 to Apr 30 would likewise decrease to **2,400 lbs.** This alternative would not alter the 85% trigger for the incidental trip limit.

Rationale for alternative: This is a more conservative choice with a greater chance that the skate wing fishery will remain open for the entire fishing year. Fishermen and processors have indicated that keeping the fishery open for the entire fishing year creates economic stability, retains important foreign markets, and reduces discards. FW1 possession limit analysis associates these lower limits with a smaller TAL; lower trip limits may unnecessarily restrict the fishery.

1.2.3 Option 3: Revised Skate Wing Possession Limit

This alternative would raise the trip limit to 5,000 lbs, which would be constant throughout the fishing year. This alternative is likely to shut the fishery down before the end of the fishing year as there is no seasonality to the trip limits, which was designed to reduce the likelihood that the incidental trip limit would be triggered. This alternative would not alter the 85% trigger for the incidental trip limit.

Rationale: This alternative was selected in order to provide a reasonable range of alternatives for analysis as required by NEPA. The possession limit included in this alternative was originally implemented under Amendment 3 to the Northeast Skate FMP. This possession limit was derived by a possession limit analysis conducted for Amendment 3 and was considered to be an appropriate possession limit to include for this analysis.

1.3 Bait Possession Limit Alternatives

1.3.1 Option 1: No Action

This alternative would maintain the skate bait possession limit at 25,000 lbs. Vessels that obtain a Skate Bait Letter of Authorization from the NMFS Regional Office would be able to retain up to 25,000 lbs. of whole skates provided that they comply with related rules and size limits.

Rationale: This alternative is included to meet MSA requirements. Skate bait possession limits must be specified in addition to the skate wing possession limits.

1.3.2 Option 2: Revised Skate Bait Possession Limit

This alternative would reduce the skate bait possession limit to **20,000 lbs.** Vessels that obtain a Skate Bait Letter of Authorization from the NMFS Regional Office would be able to retain up to 20,000 lbs. of whole skates provided that they comply with related rules and size limits.

Rationale: This alternative was selected in order to provide a reasonable range of alternatives for analysis as required by NEPA. The possession limit included in this alternative was originally implemented under Amendment 3 to the Northeast Skate FMP and was modified in FW1. It was considered to be an appropriate possession limit to include for this analysis as the bait fishery had previously operated under this possession limit.

1.4 Wing Seasonal Management Alternatives

1.4.1 Option 1: No Action

The No Action alternative would maintain the seasonal structure established in Framework Adjustment 1 for skate wing possession limits. The fishing year would remain divided into two seasons: season 1 (May 1 to Aug 31) and season 2 (Sep 1 to Apr 30). This alternative would not alter the 85% trigger for the incidental trip limit.

Rationale for alternative: In FY2012 (NEED TO UPDATE WHEN HAVE 2014 DATA), skate landings were highest in the first 2 months of the fishing year when under the lower season 1 wing possession limit as established in FW1.

1.4.2 Option 2: Revised Skate Wing Possession Limit

This alternative would create seasonal TALs for the wing fishery consistent with the existing seasonal skate wing possession limits. The first season would be allocated XX % of the annual TAL (representing XX,XXX in 2016 and 2017) for May 1 to August 31. Once 85% of the allocated TAL is reached between May 1 and August 31, the incidental possession limit of 500 lbs would be implemented. Any unused portion of the TAL would be rolled over into the latter part of the fishing year. The seasonal skate wing possession limit for May 1 to Aug 31 would remain at **2,600** lbs. The second season would be allocated XX% of the annual TAL (representing XX,XXX in 2016 and 2017) for September 1 to April 30. Once 85% of the allocated TAL is reached between September 1 and April 30, the Regional Administrator would have the discretion to implement the incidental possession limit if the fishery is projected to exceed the TAL. The seasonal skate wing possession limit for Sep 1 to Apr 30 would remain at **4,100** lbs.

Rationale for alternative: This alternative would help mitigate impacts on industry from a change in specifications, while allowing the fishery to remain open for the entire fishing year. Fishermen and processors have indicated that keeping the fishery open for the entire fishing year creates economic stability, retains important foreign markets, and reduces discards. This would also be less likely to impact fishing operations in other fisheries.

1.4.3 Option 3: Revised Skate Wing Possession Limit

This alternative would create seasonal TALs for the wing fishery. The first season would be allocated XX % of the annual TAL (representing XX,XXX in 2016 and 2017) for May 1 to July 31. The seasonal skate wing possession limit for May 1 to July 31 would remain at **2,600** lbs. Once 85% of the allocated TAL is reached between May 1 and July 31, the incidental possession limit of 500 lbs would be implemented. Any unused portion of the TAL would be rolled over into the latter part of the fishing year. Between August 1 and September 15, the incidental possession limit of 500 lbs would be implemented, regardless of whether the in-season trigger point had been reached. The remainder of the fishing year (September 16 – April 30) would be allocated XX% of the annual TAL (representing XX,XXX in 2016 and 2017). Once

85% of the allocated TAL is reached between September 1 and April 30, the Regional Administrator would have the discretion to implement the incidental possession limit if the fishery is projected to exceed the TAL. The seasonal skate wing possession limit for September 16 to April 30 would remain at **4,100** lbs.

Rationale for alternative: This alternative would help mitigate impacts on industry from a change in specifications, while allowing the fishery to remain open for the entire fishing year. Fishermen and processors have indicated that keeping the fishery open for the entire fishing year creates economic stability, retains important foreign markets, and reduces discards. This would also be less likely to impact fishing operations in other fisheries.

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