

Summary of comment letters received

Two comment letters were received from the following people / organizations: Brian and Tracey Pearce and Maine Coast Fishermen's Association. Council staff spoke separately with Jamie Dopkin to receive his input as he was unable to attend the listening sessions.

Individual Fishing Quota (IFQ). One commenter did not support scoping or development of such a program as it would substantially change access to monkfish and skate fisheries. Another commenter thought IFQs present significant implementation challenges.

Suggestions for Changes in Effort Controls. Regarding skates, one commenter suggested adding flexibility to land over the skate possession limit to be able to clear out the nets.

Regarding monkfish, another person suggested adjusting Monkfish days-at-sea (DAS) allocation based on recent effort and participation because total Monkfish DAS allocation assumes all permit holders become active simultaneously, which is not reflective of the current fishery. Monkfish DAS allocation should be re-evaluated and re-allocated every five years to reflect any changes in participation and to allow new entrants to increase their Monkfish DAS allocation as they continue to fish for monkfish. He also suggested redistributing Monkfish DAS to active participants based on qualifications originally established and allowing Monkfish DAS leasing to improve flexibility and efficiency. Other recommendations specific to the Northern Monkfish Management Area included:

- For vessels using 12" mesh, create a monkfish-only fishery option and charge only Monkfish DAS and set a reasonable trip limit such as 1,500 lb per DAS
- For vessels using multiple mesh sizes or vessels that retain groundfish, charge one Monkfish DAS and one Category A Groundfish DAS consecutively.
- For vessels that retain groundfish on a Monkfish-only DAS trip, allow the flexibility for vessels to add a Category A Groundfish DAS.

One of the commenters recommended incremental changes in management based on demonstrated need and input previously provided by the Joint Monkfish and Skate Advisory Panel and Committee in 2025. Another commenter advised that any changes to fisheries management should recognize and account for the differences in fishing practices between the northern and southern monkfish management areas.

Latent Effort. One person recommended revoking Monkfish DAS from permit holders who have not participated in the monkfish fishery within a certain period. He strongly opposed leaving the fishery as is given there could be an influx or reactivation of fishing effort into the monkfish fishery, causing market disruptions.

Markets. It was noted that most skate landings are transported to international markets as fillets, while landings for domestic markets are limited as skates are challenging to handle, prepare for

market as fillets, and expensive to purchase a cutting machine to shred off the skate skins (costing between \$30-40,000). One person explained that he makes a popular skate cake (akin to crab cake) for his market shop and suggested making cutting machines available in ports.

Staff mentioned the new USDA Office of Seafood and other similar programs that may be able to help with marketing underutilized species such as skates and monkfish. One commenter explained that he has tried applying for several federal grants over the years, which was expensive, and that he would prefer to invest in his business directly. Overall, there was consensus that addressing market concerns is outside of the Council's scope.

Protected Resources. One commenter emphasized the need for an updated sturgeon assessment and suggested requiring pingers to be able to fish in the marine mammal closures west of Shinnecock.

Vessel Baseline Restrictions. One commenter agreed that increasing vessel size limits would help improve safety concerns, especially offshore and in the winter, though did not support allowance of increasing horsepower as this would result in an excess of catch.