

# CORRESPONDENCE



May 7, 2018

Matthew McKenzie, Ph.D.  
Chair Northeast Skate Complex Committee  
New England Fishery Management Council  
50 Water Street, Mill 2  
Newburyport, MA 01950

VIA EMAIL ONLY

Re: Comments to Northeast Skate Complex FMP

Dear Dr. McKenzie:

I am writing to you on behalf of the members of the Sustainable Fisheries Association (SFA) to urge the Northeast Skate Complex Committee of the New England Fishery Management Council (NEFMC), to maintain the current trip limits for winter skate in Season 1 and make adjustments only to Season 2.

It is the understanding of the SFA that the options currently being proposed by the skate PDT are reductions to the trip limits for BOTH the Season 1 and 2. (The trip limits are currently: 2,600lbs wing-weight from May 1 to August 31 (Season 1) and 4,100lbs wing-weight from September 1 to April 30 (Season 2)).

The PDT's recommendation to reduce Season 1 by 15% from 2,600lbs to 2,000lbs violates National Standard 1 of the Magnuson-Stevens Fishery Conservation and Management Act (MSA) which provides that conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery for the United States fishing industry. 16 USC §1851(a); 50 CFR §600.310(a).

Reducing the trip limit in Season 1 will make it impossible for the fishery to achieve optimum yield and prevent it from achieving the objectives of the Northeast Skate Complex Fishery Management Plan of the Season 1 quota, which are contrary to National Standards 1 of the MSA.

The fishery landed 91% and 90% of the Season 1 quota (FY 2016 and FY 2017 respectively) in the past two (2) fishing years (Season 1 quota is 57% of the wing TAL per Framework 3). See Skate Archives Wings

<https://www.greateratlantic.fisheries.noaa.gov/aps/monitoring/neskatecomplex.html>

Reducing the trip limits will unnecessarily harm fishermen who will be forced to leave 2.2million pounds of skate in the water. (See above landings of FY 2016 and FY 2017).

**Sustainable Fisheries Association, Inc.**  
678 State Road  
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The SFA meets demand in the supply chain for frozen skate by making business projections and contract commitments with the expectation that we will achieve optimum yield by landing the entire Season 1 quota. Buyers of frozen skate rely on the SFA to ship during the summer months. If the PDT's plan for Season 1 is approved, we predict that buyers will purchase skate from other parts of the world with low price points to meet their demand and we will suffer irreparable harm because the primary market for winter skate will be gone.

In closing, the SFA opposes any reduction to the Season 1 trip limit and is open to alternatives that seek to reduce the trip limits in Season 2.

Thank you for your consideration of and attention to this issue.

Sustainable Fisheries Association, Inc.

By

/s/

John F. Whiteside, Jr.

General Counsel

John@JWhiteside.com

Cc: J. Quinn, Ph.D. (*via email only*)  
F. Hogan, Ph.D. (*via email only*)

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Begin forwarded message:

**From:** "Greg DiDomenico" <[gregdi@voicenet.com](mailto:gregdi@voicenet.com)>  
**Date:** May 23, 2018 at 5:41:30 AM EDT  
**To:** "Fiona Hogan" <[fhogan@nefmc.org](mailto:fhogan@nefmc.org)>  
**Subject:** Framework 6 / Garden State Seafood Association  
**Reply-To:** <[gregdi@voicenet.com](mailto:gregdi@voicenet.com)>



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May 23, 2018

Mr. John Quinn, Chairman  
New England Fishery Management Council

**Comments: Framework 6 Skate Wing Possession Limits**

Mr. Chairman:

Please accept these comments on behalf of the Garden State Seafood Association (GSSA). The GSSA membership is comprised of commercial fishermen, vessel owners, seafood processors and associated businesses in the State of New Jersey. The skate fishery is very important to GSSA members throughout our entire state from Belford to Cape May. Many of our members actively participate in the skate and monkfish fisheries, including the processing and shipping of the product.

We offer support for the following alternatives and appreciate the opportunity to participate in the formulation of Framework 6.

fh 5/30/18



**Option 2: 1.2 Skate Wing Seasonal Quota Allocation- Change the seasonal allocation**

We make this recommendation in an effort to avoid triggering the 500 pound possession limit in Season 2. While we realize this could have an impact on Season 1 we believe that any change to the Season 1 allocation would be negated by the increase of quota as a result of the reduction of the uncertainty buffer.

**Option 3: 1.3 Skate Wing Possession Limit Alternatives**

**Alternative 2:**

We feel that reducing the limit to 2000 pounds in Season 1 and 3000 pounds in Season 2 should spread the catch out over the duration of the fishery. This option should also keep product available to the processors during the entire year and avoid regulatory discards and operational difficulties in the monkfish gillnet fishery.

Thank you for the opportunity to comment.

Gregory DiDomenico  
Executive Director  
Garden State Seafood Association