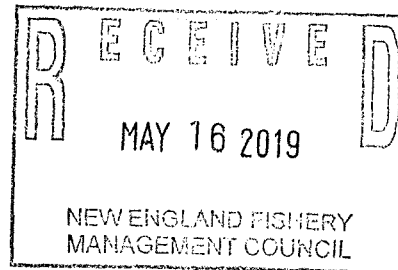


CORRESPONDENCE

May 13, 2019

John Quinn, Chairman
New England Fishery Management Council
50 Water St.
Newburyport, MA 01950



Re: Skate Limited Access Amendment

Dear Chairman Quinn,

As the Skate Committee refocuses its attention back to the Limited Access Skate Amendment we wanted to take a moment to request consideration for those vessels that interact and land skate caught while targeting other fisheries. We are concerned that the current discussion seems focused on those who "target" skates; with everyone else falling under a broad incidental category which we feel is an oversimplification of the various users of this resource.

Our members are vessels that land skates caught while targeting groundfish, fluke and other species. While the catch of skates may vary typically our members burn a groundfish DAS in order to land the higher landing limits for skates. While skates are caught while pursuing other stocks, the landing limits are greater than the incidental open access permit. It is unclear if we fall in the 'target' category currently being analyzed or the incidental? In reviewing the current documents for the limited amendment it remains unclear if the intent behind this action is to exclude activity like ours or if it is to exclude those that are utilizing the open access incidental permit for skates. There is an overly broad purpose and need, and no clear objectives to help us understand what exactly is trying to be accomplished. We realize this Amendment is in its beginning stages but we want to stress how important it is that we continue to have access to land skates caught while participating in other fisheries and that the limits allowed are not constrained to those of the open access incidental permit.

We are also concerned how and if decisions regarding limited access may result in the need to adopt accountability measures and sub-ACLs for the various fisheries that interact with the skate resource.

We look forward to participating in development of this amendment as it progresses.

XII Northeast Fishery Sector Inc Paula Lynch Paula Lynch, Manager
VIII Northeast Fishery Sector Inc Linda McCann Linda McCann, Manager
VI Northeast Fishery Sector Inc David Leveille David Leveille, Manger
II Northeast Fishery Sector Inc David Leveille David Leveille, Manger