100 Davisville Pier North Kingstown, R.I. 02852 U.S.A. Tel: (401) 295-2585 Telex: 325114 FAX: (401) 295-5825



Dr. Christopher Moore, Executive Director Mid Atlantic Fisheries Management Council 800 North State St. Suite 201 Dover, DE 19901

Re: Deep Sea Corals Amendment

Dr. Moore,

January 13, 2015

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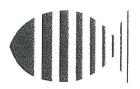
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F/V persistence
Releutless

Seafreeze Ltd.

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Sincerely, Kijle Goodwin Captain F/V Persistence

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Daniel moreland

(crew of F/v Persistence

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JAIVATORE CARFORA

Crew FIV Persistence

Seafreeze Ltd.

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Cass Martin Cass Martin Crew FN Persistence

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ANDREW G. TERRY

Dock Worker

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SINCERELY,
RYAN M. SCELSA (EMPLOYEE 10/08-PREJENT)
CREW MEIMBER: PERSISTENCE + RECENTLESS
FORKLIFT OPERATOR

STEVEDOR SUPERVISOR OFFICE CLERK

Seafreeze Ltd.

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RELENTLES

Sincerely,

100 Davisville Pier North Kingstown, R.I. 02852 U.S.A. Tel: (401) 295-2585 Telex: 325114 FAX: (401) 295-5825



Dr. Christopher Moore, Executive Director Mid Atlantic Fisheries Management Council 800 North State St. Suite 201 Dover, DE 19901

Re: Deep Sea Corals Amendment

Dr. Moore,

January 13, 2015

I am writing to express my deep concern about the possible implementation of the current Deep Sea Corals Amendment. We at Seafeeze Ltd. are entering our 29th year of participation in the Mid Atlantic Illex squid fishery with our vessels the F/V Relentless, F/V Persistence and F/V Prevail. We as a company have pioneered this fishery, developed it markets, and helped successfully manage healthy stock levels. Illex squid represents a large portion of our landings, and therefore revenue.

My job depends on the future successful management of this fishery and its fishing grounds. This Amendment proposes closing huge areas of our historic and current Illex fishing grounds, with little or no industry input, threatening irreversible loss to the Illex fishery. Much of the area that the Amendment proposes for closure is proved by the document itself to contain miniscule or no coral presence. Therefore, devastating economic impact is paired with little or no conservation value. The Council cannot disregard these facts.

A more equitable and practical approach to addressing these issues would be to allow industry professionals to help the Council develop Discrete Coral Zones that both protect known deep water corals while allowing the Illex fishery to continue to operate effectively. I support delaying the scheduled February Final Action until after an Advisory Panel meeting and the incorporation of necessary industry data. I support the No Action Alternatives 1A, 2A, 3A, 4A, 5A and 6A at this time. In the future, I would support a modified Sub-Alternative 3B-1 developed closely with industry members.

Sincerely.

Allen 1 day III-F/V RELENTLESS

Seafreeze Ltd.

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You Tom Marshall

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Dover, DE 19901

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DAVID E FIEDLER
STEDER
1ST MATE RELENTLESS

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Sincerely, Edward II Clarkel
Cook Deck Hand F/V Persistance.

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Sincerely, Crew of Flu Pelsisterce: Kyle Goodom, Sol Canford St., Sol Ctuford fr., Ed Clarke, Nily Builden Edward Clarke, Meritary Dos Sontos, Kevin Hillman, Breden Hindle Pogerio Lard, Cass Martin, Chris Mureckel, Muke Ross, Bride Stercey, Matt Ferry, Phil Ventura, Chris Weisersce

Seafreeze Ltd.

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Ruben Dubon
Deck Werker

Seafreeze Ltd.

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Dock Worker

Seafreeze Ltd.

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McColac Mreson Dock Worker

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office manager | Export Documentistion

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Sincerely,

flor Diene Hice Warder Boot Opensticks

North Kingstown, R.I. 02852 U.S.A. Tel: (401) 295-2585 Telex: 325114 FAX: (401) 295-5825 00 Davisville Pier

Dr. Christopher Moore, Executive Director

January 13, 2015

Mid Atlantic Fisheries Management Council

800 North State St. Suite 201

Dover, DF 19901

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Sincerely, Scara Turbild

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Гах Гром

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Sincerely.

Crew, Fru Relentless

Seafreeze Ltd.

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Jorda Wolf "
The Keleinthess Thank 160"

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Seafreeze Ltd.

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Sam Fusion Dock Worker

FAX: (401) 295-5825 North Kingstown, R.I. 02852 U.S.A. Tel: (401) 295-2585 Telex: 325114 100 Davisville Pier Seafreeze Ltd

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Meliosal Sanatria.

Administrative Assistant

Seafreeze Ltd.

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M Such

Seafreeze Ltd.

100 Davisville Pier North Kingstown, R.I. 02852 U.S.A. Tel: (401) 295-2585 Telex: 325114 FAX: (401) 295-5825



Dr. Christopher Moore, Executive Director
Mid Atlantic Fisheries Management Council
800 North State St. Suite 201
Dover, DE 19901

Re: Deep Sea Corals Amendment

Dr. Moore,

I am writing as an affected party under the Mid Atlantic Deep Sea Corals Amendment. I work for Seafreeze, the Nation's number one producer of Illex squid. Our vessels, the F/V Relentless, F/V Persistence and F/V Prevail not only employ crew to catch and process Illex on board, but they also employ numerous individuals shoreside to handle, sell and distribute the catch. In its present state, this Amendment threatens the very existence of a future Illex fishery. Almost every Alternative contained in this document would prevent Illex vessels from operating in the entirety of our fishing grounds, either now and/or in the future. Despite the Amendment's claim that "some degree of revenue loss is expected to be offset by effort shifts to non-restricted areas", this is impossible when the restricted areas would encompass virtually the whole fishery.

This Amendment is purportedly designed to protect deep sea corals, yet the proposed coral zones and the coral distribution/abundance data do not coincide. NOAA's DSCRTP records are outdated, ranging anywhere from 1874 to the 1960s to early 2000s. It is not reasonable to expect that coral presence is the same today as it was hundreds or even tens of years ago, considering ever changing ecological ocean conditions. The current data from the 2012-2013 Tow Cam surveys show less than 1% coral presence in areas shallower than 1050 meters, yet the proposed Coral Zones range anywhere from 200-500 meters. There is no reason for this Council to close productive fishing grounds to protect non-existent corals.

I cannot support any Council action that would be economically detrimental to the Illex fishery, and therefore myself, if there is not sufficient justification for so doing. I believe industry data, both economic and fishery related, need to be incorporated into this Amendment, since we have the most at stake. I support No Action Alternatives 1A, 2A, 3A, 4A, 5A and 6A. As a secondary choice, I support an industry modified Sub-alternative 3B-1, but only after an Advisory Panel meeting and extensive industry input can be obtained. Therefore, I also support delaying Final Action until this can be accomplished.

Sincerely,

Cherry M. Botton Accountant & Seafreeze Ltal

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RECETLESS

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Mula I Fly Relentless