

From: Jean Public <jeanpublic1@yahoo.com>

Sent: Monday, March 16, 2020 9:54 AM

To: Didden, Jason <jdidden@mafmc.org>; info@taxpayer.net; media@cagw.org; info@njtaxes.org; info@afphq.org

Subject: Fw: public comment on federal register all of their meetings from here on out should be on internet for next 6 months

all quotas on macheral, butterfish and squid should be cut by 50%. the commercial fish profiteers have too strong a hold on what you allow. you forget the fish are al owned by 330 million americans. also all your meetings should be immediately done by internet. this comment is for the public record please receipt. jean publiee jean public1@yahoo.com

March 26,2020

Dear council members:

I was the only boat in the late 80s and early 90s from NY that went Illex fishing. I fished multiple years and caught 100s of thousands or millions of pounds of Illex. I put 2 JVs together with boats from Montauk those boats only did the loligo part of the JV. I also did JVs for Illex with Danny Cohen. I lost that boat in a freak accident. I went to most of the meetings for the original qualifier for Illex and explained everything at the time. Joel McDonald was the NMFS legal counsel at the time. Joel and most of the council members assured me there was no problem with me qualifying but when I applied I was told I didn't qualify because there was no CPH at the time of the sinking to put the permit in so the permit became nonexistent. Shortly thereafter CPH was created. I watched multiple boats owners lie and falsify information to qualify claiming they caught enough illex in the loligo fishery, it was all lies but NMFS didn't care and allowed it. Lie and falsify landings and you qualify, tell the truth and you get punished.

Now we have the same thing going on with west coast boats that can carry ¼ to ½ a million pounds of Illex yet some of them will get in, one of them went last year with a permit that didn't fit the boat he landed in New Bedford. Another boat is using a permit with half the horsepower and is quite a bit longer than the permit, yet I had plenty of history at the time and abided by the rules and decisions and was kicked out. NMFS wants to ignore control dates to allow boats with no or little history into this fishery even allowing boats in after the scoping hearings and public comments were done.

I got bumped on herring along with 10 other boats to allow 1 west coast pollack boat in the fishery and 1 new build the Voyager in, just one of those boats would catch more than the 11 of us combined but that wasn't what NMFS wanted, big boats with companies that know how to play the game, just like Carlos.

In all these cases where I have participated legally and correctly I have been punished for not lying, playing by the rules, and changing criteria to allow people that didn't participate before a control date in. Where is the consistency in control dates some fisheries like the red crab fishery people get kicked out for after control date participation, squid fisheries you get rewarded for late participation and people that didn't qualify get a new category with a 5000 lb trip limit. Zero consistency.

Because the landings that I had and the games that NMFS has allowed to happen in this fishery I would like my permit rejection relooked at.

Thank You,

Mark S Phillips
F/V Illusion



Blue Harvest Fleet • Blue Harvest Marine Services • Blue Harvest Foods

2 April 2020

Dr. Chris Moore, Executive Director
Mid-Atlantic Fishery Management Council
800 North State Street, Suite 201
Dover, DE, 19901

Dear Dr. Moore:

Blue Harvest Fisheries is commenting on MSB Goals and *Illex* Permits per the directions in the public hearing draft document produced by the Mid-Atlantic Fishery Management Council.

Blue Harvest Fisheries is committed to producing healthy, high quality fish products from sustainable fisheries. Blue Harvest Fisheries is also committed to the long-term health of fishing communities, employing over 200 people in our harvest and processing facilities. A number of Blue Harvest Fisheries vessels are permitted in the squid fishery.

With respect to the public hearing document, Blue Harvest Fisheries supports the following alternatives:

6A - ALTERNATIVE SET A: TIME PERIODS FOR RE-QUALIFICATION

Alternative A1: No action/status quo.

6B – ALTERNATIVE SET B: THRESHOLDS FOR RE-QUALIFICATION

Alternative B1: No action/status quo.

6C - ALTERNATIVE SET C: PROVISIONS FOR TIERS AND/OR NON-REQUALIFYING PERMITS

Alternative C1: No action / status quo

The public hearing document includes the objectives of the MSB FMP, including “provide the greatest degree of freedom and flexibility to all harvesters consistent with the attainment of other objectives of this FMP.” Restricting use of current permits is not consistent with this objective.

1. The document also states “these issues are not completely solved by reducing permits in the *Illex* fishery. Solving the race to fish is generally very challenging with quota-based management unless individual quotas or effort controls are utilized.” Given that the current participants are causing the quota to be reached early, it seems that restricting permits will do very little to control the race to fish or early closure of the fishing season. Putting no restrictions on the current vessels that catch the vast majority of the quota seems like an allocation shift rather than a measure to reduce the race to fish or preventing early closure of the fishery.

To really work on the issues of racing to fish and early closure, it seems that the Council should direct the MSB Committee and Plan Development Team to develop measures that directly affect the factors causing the race to fish and early closures.

Limiting the ability of current permit holders to use their MSB permits in a commercially viable manner, through limiting catch, limits the ability of these permit holders to pursue their respective business plans. Additionally, limiting the ability of current permit holders to fully use their permits reduces the value of the permits to these fishermen.


ALTERNATIVE D3: CLARIFY REQUIREMENTS FOR DAILY CATCH REPORTING USING VMS

Blue Harvest Fisheries supports this alternative.

The Public Hearing Document states that “higher weekly landings make it more difficult to close the fishery near the quota”. Better, timely landings reporting is a major tool in matching the catch to the quota. Additionally, a landing limit as the quota is near, if used in conjunction with daily reporting, are positive steps to match catch to quota. Qualification limits on vessels does little to achieve the objective of not exceeding the quota.

Thank you for the opportunity to comment on this important issue. Please contact our company representatives if you have any questions.

Sincerely,



Gene Bergson
Executive VP, Fleet & Marine Services



ATLANTIC OFFSHORE LOBSTERMEN'S ASSOCIATION

Grant Moore, President
exec@offshorelobster.org

David Borden, Executive Director
dborden@offshorelobster.org

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April 10, 2020

Dr. Chris Moore
Executive Director
Mid-Atlantic Fishery Management Council

Dear Chris,

I'm writing as representative of the Atlantic Offshore Lobstermen's Association (AOLA) to provide comments toward the Council's *Illex* Permits Amendment. These comments are specific to gear conflict concerns with the offshore lobster/Jonah crab fleet.

Historically, with a limited number of vessels operating in both the *Illex* and offshore lobster/crab fleets there has been a high level of familiarity with each other's fishing practices and successful coordination of change over periods in the Southern New England Restricted Gear Areas. Conversely, in recent years Association members have reported increased conflict with the *Illex* fleet. Accordingly, AOLA coordinated meetings last fall to help captains resolve these new issues.

While I'm not in a position to comment specifically on the matrix of *Illex* permit alternatives presented in the public hearing document, I will note that alternatives that prevent crowding on the edge and limit the incentive to race for squid would be best suited to ameliorate recent gear conflict. Alternatively, options that support continued unrestricted reactivation of latent *Illex* permits may necessitate new area and time based bottom sharing regulations that would limit the flexible of both fleets to follow target species in a changing climate.

Finally, I encourage the Council to select a preferred alternative that disincentivizes ongoing legislative efforts to use the 1998 American Fisheries Act to approve additional movement of vessels from west coast to east coast fisheries. As I understand it, if these accommodations are granted by Congress there would be nothing to stop these vessels from purchasing permits and operating in east coast federal fisheries beyond MSB.

Thank you for the opportunity to comment,

Heidi Henninger
Program & Science Manager

Name: Richard Hoff

Email: [rick@dockstreetseafood.com](mailto:ricker@dockstreetseafood.com)

Comments: Attn: National Marine Fisheries Council

The Illex fishery is not over fished, the T.A.C. number was reached, and the fishery was shut down. This is the way it is supposed to work.

The arguments put forth at the public hearings were based solely on money and not on science.

The boats involved in the fishery had their biggest year ever. They made more money in less time. (Is this a bad thing?)

The people who are asking to have boats eliminated from the fishery using the argument of overfishing are the same people who are requesting to have the T.A.C. number increased because of the huge biomass we are seeing.

Is it better to let one boat catch six million pounds and employ 5 people or allow six boats to catch one million pounds each and employ 30 people?

At a time like this I don't think its prudent for any Federal Agency to be eliminating jobs.

The larger vessels will still land the majority of the Illex stock due to their ability to safely work rougher weather, pulling bigger nets, and a higher carrying capacity.

If we eliminate vessels from this fishery they are not going away. They will be displaced into other fisheries that might not have a stock assessment as strong as the Illex squid fishery.

There are approximately 28 permits with zero landings. If a concession must be made, eliminating these permits would reduce the possible latent fishing effort by 40%.

In conclusion, any vessel that has participated in the Illex Fishery from 1997-2019 should be allowed to continue fishing without a tier system. There is no biological reason for the current action, and it is in violation of National Standard 5 of the Magnuson Stevens Act.

Thank you for consideration in this matter.

Respectably Submitted,

Richard A. Hoff

o Dock St. Seafood,

o F/V Susan Marie II

o F/V Susan Marie

o F/V Atlantic Warrior

o F/V Nordic Viking

o Holly Beach Fisheries

Kyle Goodwin, captain of the F/V Persistence and co-manager of Seafreeze.

I would like to explain a little about freezing fish at sea and the effects that a short-term season has on at sea processors.

Although our hold capacity is large and the trips we land are some of the biggest, we are limited as to how fast we can fill the boats.

If everything goes according to plan and things work perfectly, including the fish cooperating, it's still a seven-day job to fill the boat.

Our freezing capacity for the Relentless and Persistence is around 110,000 pounds a day, never anymore. This is about the same as what a 90 foot boat can catch in a day.

Realistically, an Illex Fishery with 55 boats in a high abundance year, could be shut down in 4 weeks, give or take.

That kind of production would allow our boats to only land 3.5 trips – less than one third of our average landings historically.

I would also ask the council to take into consideration that our frozen at sea Illex is of the highest quality in the world and demands the highest prices.

We feel that this is the best use of the resource.

I approve the tiered compromise put forth by Hank Lackner and Meghan Lapp.

Kyle Goodwin, Captain of the F/V Persistence and co-manager of Seafreeze.

I have been listening the last few nights and would like to speak about the comments made regarding new fishing grounds being utilized by the Illex fleet.

There are no new fishing grounds being utilized by the Illex fleet.

Here are some historical facts:

While Captain of the F/V Persistence in 1988, my brother Glenn had his first 30 ton tow of Illex on the east side of Veatches canyon. This area is not new ground. The reason this so called “new fishing ground” is accessible to the current Illex fleet is because it was carved out specifically for the Seafreeze boats during negotiations to resolve a gear conflict in the early 1990’s.

The Seafreeze freezer trawlers have searched for Illex from the Haque Line to Cape Canaveral, Florida and many places in between. Of course, almost all of these places did not produce enough to be economically viable.

The word “history” in some ways, has taken on a negative connotation in this forum. Hopefully, in order to prevent the over capitalization of the Illex fishery the council can simply look at the history of almost every other fisher that has taken place on the east coast of the United State.

Why do we as managers and fisherman, the stewards of the resource, continually over capitalize fisheries, only to then try to rebuild them after they have failed?

Why have we not learned that when a fishery has worked with a certain amount of accessibility and catch capacity adding more of both, simply does not work.

This is a perfect opportunity to finally be ahead of the downward spiral.

I support the compromise put forth by Megan Lapp and Hank Lackner.

Thank you for this time to speak.

Kyle Goodwin, Captain of the F/V Persistence and co-manager of Seafreeze.

I am the numbers in the graphs and charts that document the history of the Illex Fishery.

Seafreeze has participated in the Illex Fishery every year since 1986. In the years when the number of boats were in the single digits, we were those single digits.

In years when there were no markets anywhere in the world for our Illex, we borrowed money to pay our employees and continued to fish, filling our cold storage knowing that without product, we would never get our Illex accepted in all the world markets.

Financing projects such as lengthening boats to add freezing capacity and cold storage additions, almost put us out of business more than once. We did not have groundfish or scallop permits to fall back on and we still do not. We were all in on Illex even when the boat price was only 17 cents for sea frozen, palletized, and delivered. We still went.

During low abundance years when it was quite obvious that loligo fishing would be more profitable, we still fished on Illex knowing that we didn't want to lose whatever market share we had.

Although some people may consider those low landing years a failure, we did not. We needed to catch Illex to prove we could be a reliable source.

Historic participants, otherwise known as forward thinkers, should have some protection from the Johnny-come-lately's of the world.

By unintentionally demonstrating what is possible to other members of the fishing industry, historical participants have shown the way with their own capital investment and hard work.

This can be truly frustrating.

The historical participants have proven over and over that they can efficiently and sustainably harvest the Illex resource.

The mistake could easily be made that the last 3 years of high abundance could be considered the new normal. I can assure everyone that this is not the case.

The 2013 control date was put into place to prevent over capitalization of Illex and should be used.

I support the compromise put forth by Megan Lapp and Hank Lackner.

To Mid- Atlantic counsel, thanks for your consideration: As I listened to the final webinar ,a lot of points were made I wanted to make. Though not all, I picked up on a few things and I would like to clarify. It seems that there are two camps vying for or making a claim for the illex fishery. While both are willing to count history as a criteria, as both feel zero catch permits should be excluded. They cannot agree on a control date. One party wants 2013, one party wants 2019. Are we looking for a compromise? In fisheries management compromise has rarely been applied, at least as far as it concerned me. You are either in or out!! Qualify or not!! Historical data has and will be the qualifying factor. The control date should mean something. Being posted in the Federal Register and re-affirmed in 2018 should mean something. That being said, under that 2013 control date most of the participants pushing for a 2019 control date are excluded entirely. Would get no landings. They are proposing a 90,000 lb trip limit for tier 2 permits. While the participants that are pushing for a control date of 2013 are offering a true compromise of 48,000 lbs. which is over half what they are asking for!! A true middle ground, i.e compromise. As they could get nothing! Fair, I think so. So lets look at the control date itself. Take out the fact that it was in the register, and re-affirmed. 2013 vs 2019 as the two main parties have made clear. If you compromise on the two dates you get 2016. Would that make both parties happy? No obviously, so one party is willing to go to 2018 as control date. Not exactly your classic middle ground compromise is it? Five years added and one year subtracted. That is why I feel the proposal put forth by Lunds, Seafreeze, and some independent stake holders bears up as fair under any criteria. This would go aways to helping historical boats with no other options get a little bit more time fishing, while still giving our fellow fisherman another avenue to make a living. Maybe not the boon they hoped for but fair. I also would like to hold my fellow 2013 control date believers feet to the fire. Maybe some pie in the sky hope. What would be the problem with a catch limit of your best trip ever, up to 2013. For tier 1 qualifiers. We want to freeze the footprint right? I understand business models have changed since 2013. Some permits have changed boats, some boats have gone rsw. Ok well rsw or refrigerated seawater allows quicker trips. Less expense in packaging, along with less crew. Cost effective and quicker trips to catch the best you ever caught!! Can you really argue that point? This takes into account any changes made after our beloved control date of 2013. Now I would like to say I have people on both sides of this. I respect and honor both sides as fellow fisherman and dockside companies. Many I consider friends. Just some of my thoughts and observations as we all struggle through this process. Throwing something on the wall, to see what sticks. Thanks for all of your consideration, Troy Sawyer
F/V DEBBIE SUE Co signed by Steve Roebuck F/V MARGARET HOLLEY ,KAREN SUE INC, Scott Smith
F/V SEAFARER

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April 16, 2020

Dr. Chris Moore, Executive Director
800 North State Street, Suite 20, Dover, DE 19901
Re: Illex Permits Amendment - By email: cmoore@mafmc.org

Dear Dr. Moore:

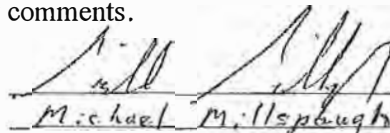
My name is Michael Millspaugh, I am an employee of Lund's Fisheries, a family-owned company producing seafood in Cape May, NJ since 1954. I have been employed by Lund's for almost two years and it is a terrific place to work. During summer, we have depended upon the Illex squid fishery since the early 1980's, exporting our first container of squid in 1985. Historically, we have taken part in the Illex fishery during the months of May through November although the fishery has closed in late summer during the last three years as many new vessels have entered the fishery, which has negatively impacted our ability to fish and keep employees working in the plant throughout the summer and into early fall. The company creates year-round jobs for people in a community where most of the employment is seasonal.

Our company supports the Historical Participants' Illex Tiered Permit System Compromise, using the Council's August 2, 2013 control date, which was reaffirmed by the Council prior to the start of the 2019 fishing year. This generous compromise by those who have consistently relied on this fishery would fully qualify 34 'Tier 1' permits even though only 14 vessels harvested more than 500,000 pounds of Illex in 2017, increasing to 19 in 2018 and 26 in 2019. With the early closure in 1998, only 25 boats landed this amount with just 23 active at that level of harvest in the early closure of the 2004 fishery. The compromise Tier 2 proposal puts another 14 boats into the fishery. It is important that the Council act to limit the number of participants in this fishery, before the 25 other Illex permits are also activated, potentially creating a one-month fishery.

Lund's Fisheries was the first company on this coast to invest in a factory and vessels to catch, process and sell large volumes of what were formerly considered underutilized fisheries, including Illex squid. Over the years, this investment has allowed Cape May to become the number one Illex-producing port on the East Coast and we have helped several historical, independent fishermen become successful in this fishery.

Community impacts have largely been ignored in managing fisheries on this coast and we encourage the Council to consider our historical dependence on this fishery, which will help to maintain the jobs that our plant and cold-storage workers, fishing crews, and truckers depend upon. In a community where there are few year-round jobs, employment in the Illex fishery helps to support local supermarkets and other fishing-related businesses like gear stores and fuel suppliers and supports our local housing market. I ask the Council to support the Tiered permit system compromise put forward by the historic participants in the Cape May Illex fishery. Thank you for considering my comments.

Signature / date
Name and address


Michael Millspaugh 4/16/20
121 West 4th Ave.

North Wood, NJ 08260

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April 20, 2020

Dr. Chris Moore, Executive Director
800 North State Street, Suite 20, Dover, DE 19901
Re: Illex Permits Amendment - By email: cmoore@mafmc.org

Dear Dr. Moore:

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Signature / date

Jose L. Maldonado 4/16/20

Name and address

1085 Hideaway Ct, Vld N.J.
Jose L. Maldonado

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Signature / date

Kristen Franklin 4/16/2020

Name and address

Kristen Franklin 667 yeGreate St.
Greenwich NJ 08323

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Signature / date

 4/16/20

Name and address

John Hruska 138 Reed's Beach rd
CAPE MAY COURTH HOUSE NJ 08210

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Signature / date

Wendy E. Rutledge

Name and address

Wendy Rutledge 175 5th Ave
Estell Manor NJ 08319

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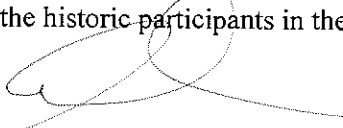
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Signature / date

Name and address



Andy Babore 211 Leaming ave. NLM, NJ 08204

LUND'S FISHERIES



Wild caught product of USA

Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 17, 2020

Dr. Chris Moore, Executive Director
800 North State Street, Suite 20, Dover, DE 19901
Re: Illex Permits Amendment - via email: cmoore@mafmc.org

Dear Dr. Moore:

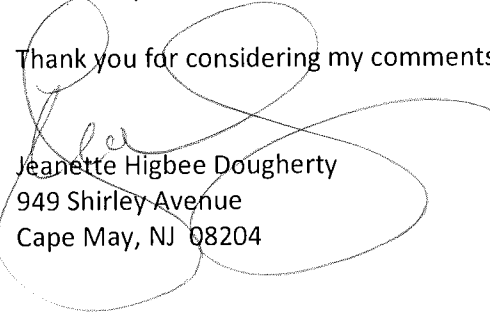
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Thank you for considering my comments,


Jeanette Higbee Dougherty
949 Shirley Avenue
Cape May, NJ 08204

LUND'S FISHERIES



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April 20, 2020

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800 North State Street, Suite 20, Dover, DE 19901
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Signature / date

Milton Gonzalez Oster

Name and address

N. PEARL ST 384 APT #2 Bridgeton

LUND'S FISHERIES



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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

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Signature / date

Victor Meoida

Name and address

186 Atlantic St BRIDGETON NJ

LUND'S FISHERIES



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Signature / date

Catalina Yayer

Name and address

156 Atlantic St Bridgeton

LUND'S FISHERIES



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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

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Signature / date

Claudia Teardillo Moreno 4-16-2020

Name and address

90 bank st Bridgeton NJ 08302

x

LUND'S FISHERIES



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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

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Signature / date

Gumersinda Lopez Lopez

Name and address

Gumersinda Lopez 137 Church St
Bridgeton NJ

LUND'S FISHERIES



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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

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Signature / date

Name and address

Rolfi Isidro 190 Walnut St Bridgeton NJ

LUND'S FISHERIES



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Signature / date

Vanessa Lopez Garcia

Name and address

37 Esprose Bridgeton NJ

LUND'S FISHERIES



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Signature / date Reynalda C. 04-16-2020

Name and address Reynalda Cuevas 468 South ave Bridgeton NJ 08302

LUND'S FISHERIES



Wild caught product of USA

Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

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Signature / date

 4/16/20

Name and address

172. Myrtle. St. Bridgeton NJ 08302

LUND'S FISHERIES



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Signature / date

 04-16-20

Name and address

Philadelphia 1220 Federal

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Signature / date

NORMA LÓPEZ 04-16-20

Name and address

236 BANK ST BRIDGETON 08302

LUND'S FISHERIES



Wild caught product of USA

Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

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800 North State Street, Suite 20, Dover, DE 19901
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Signature / date

Laura Espinoza 04/16/20

Name and address

236 Bank St. Bridgeton NJ 08302.

LUND'S FISHERIES



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Signature / date

Olivia Diaz 4-16-20

Name and address

Olivia Diaz
376 Pearl St
Bridgeton NJ 08302

LUND'S FISHERIES



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Signature / date

Romeo Choc 4/16/20

Name and address

1900 9th Philadelphia

LUND'S FISHERIES



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Signature / date

mateo coc sic

Name and address

La Chen 433 casa #1050

LUND'S FISHERIES



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Signature / date

Juan Carlos Garcia 04-16-20

Name and address

Juan Carlos Garcia 17205 10th Philadelphia

P.A. 19147

LUND'S FISHERIES



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Signature / date

Moises Rodrigo

Name and address

7 Mackean St. PA.

LUND'S FISHERIES



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Signature / date

Veronica Rodriguez

Name and address

OAKS # 107 Bridgeton 08302

LUND'S FISHERIES



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Signature / date

Jose Hector Raimundo Vasquez 4-16-20

Name and address

Philadelphia 718TS

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Signature / date

 04-16-20

Name and address

Wendy Velasquez 19 Cedar St Bridgerton NJ 08302

LUND'S FISHERIES



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Signature / date

Alfredo Mejia

Name and address

778

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Signature / date

MD

Name and address

Manuela Diaz

*87 Walnut st
Bridgeton NJ 08302*

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Signature / date

Alfredo Rodriguez

Name and address

433 - 1a churra 19148 MUSA

LUND'S FISHERIES



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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

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800 North State Street, Suite 20, Dover, DE 19901
Re: Illex Permits Amendment - By email: cmoore@mafmc.org

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Signature / date

ede 4/16/20

Name and address

eder Hernandez
87 Walnut St Bridgeton
NJ 08302

LUND'S FISHERIES



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Signature / date

Tulio cesar del Ramos

Name and address

Filadel Pq - 03 16- 19

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Signature / date

Stephanie Camero 04/16/2020

Name and address

Stephanie Camero 3 Holly Ave NJ 08302

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Signature / date

Adalberto - Telles 4/16/20

Name and address

1935 S 5. St PA

LUND'S FISHERIES



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Signature / date

Tracey Beron 04-16-2020

Name and address

Tracey 162 Pearl St. NJ 08302

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Signature / date

 04-16-20

Name and address

Hiroshi Roblero 509 East Commerce St.
Bridgeton N.J

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Signature / date

Name and address

Jose A. Baez *4/16/20*
Jose A. Baez *153 LAUREL ST BRADGEBTON*

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Carlos Andujar 4-16-20

Name and address

Carlos Andujar 111 Bortle Ave Vineland

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4/16/20

Name and address

Rodrigo Sanchez - 118 W Robert. wildwood nj.

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Signature / date

 4/16/20

Name and address

MARCO GONZALEZ 233- ATLANTIC ST. BRIDGE TOWN - NJ

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Signature / date

 4.1.16.20

Name and address

Flori Velazquez

Mario. 101. St. Bridgeton NJ.

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Signature / date

 04-16-2020

Name and address

Magda Perez 134 W Broad Blvd Jeton NJ

LUND'S FISHERIES



Wild caught product of USA

Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

Dr. Chris Moore, Executive Director
800 North State Street, Suite 20, Dover, DE 19901
Re: Illex Permits Amendment - By email: cmoore@mafinc.org

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Signature / date

 / 4/16/20

Name and address

ANTONIA BARREAL UTGOH
46-N. ST. GILES, BRIDGETON, NJ, 08302

LUND'S FISHERIES



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Signature / date

Tom Carsten 4/16/2020

Name and address

90 Magnolia Ave Bridgeton NJ 08302

**LUND'S
FISHERIES**



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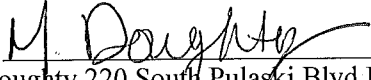
Since September 2018, I have been employed by Lund's Fisheries as the Human Resources Director. Lund's Fisheries, a family-owned company producing seafood in Cape May, NJ since 1954. Each year the Illex fishery creates jobs for our community and with this we are able to directly employ over 200 people within our community with year-round employment and truly take pride in being able to provide them with a stable career.

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Sincerely,  4/17/2020
Melissa Doughty 220 South Pulaski Blvd Little Egg Harbor, NJ 08087

LUND'S FISHERIES



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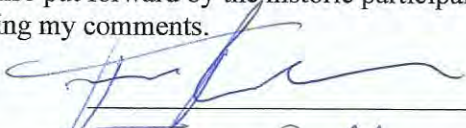
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Signature / date

 4/16/20

Name and address

Ricardo R. Marinquin 135 Penn Street
Bridgeton N.J.

My name is Fivonio I have been an Employee
at Lunds Fisheries for 8 years.

We depend a lot on the Illex Fishery as well
as other Fisheries to keep food on the
table for our families, Illex keeps us busy
in the summer months, we happy to see our
Fleet bring any amount of Illex Squid
they have been fishing for it for as long as
I can remember some year they didn't catch
much but still they fished for it.

Illex Squid provides jobs for everyone
not only us at the dock it goes
to our local tackle shops as well it
impacts people we don't even know,
now that there's fish around some
boats I never seen fishing for Illex
are doing it now, fisherman that
never depended on the Illex squid before.

Please help us keep our guys fishing
for it and reward them with better
quotas since they have been doing this
for years throw thin and thick,

Thank you - Fivonio Ruv.

LUND'S FISHERIES



Wild caught product of USA

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Signature / date

Name and address

Edward Brooks 232 Ridgewood Ave
Villas, NJ
08251

Edward Brooks
232 Ridgewood ave
Villas, NJ 08251
(609) 425-1793

April 16, 2020

Dear Dr. Moore,

My name is Edward Brooks. I have worked at Lund's Fisheries going on 35 years. Since the first day I started, we have unloaded illex squid every summer. It was always the same boats scratching along to try and make a living. Even when there was not much being caught or the market was not that good, the same guys were still fishing for them. I know in the past Lund's would still let the boats go fishing even when there were not sales for it just to keep the guys working. Now it seems that squid are plentiful, and markets are at their best, everyone wants to go fishing for them. If it were not for a few of the "old school" guys, there probably would not be strong markets now. For the past 35 years myself, my crew and numerous other people count on this season. I know that during the season it employs 100's of people, probably even thousands. From the boats and their crews, to the facility crew, salesman, packaging suppliers and their factory workers, truck drivers, fuel suppliers, etc. Now the quota is being caught in 6-7 weeks and people are being laid off because there is no work. What used to last into October now is closed in early August. I know at Lund's we strive to pack excellent quality product that we can be proud of and now there are boats putting up lesser quality, just to land pounds.

Thank you in advance.

Best Regards,

A handwritten signature in blue ink that reads "Edward Brooks". The signature is written in a cursive style with a large, sweeping initial "E".

LUND'S FISHERIES



Wild caught product of USA

Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

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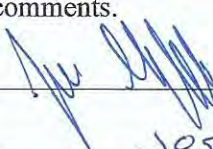
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Name and address

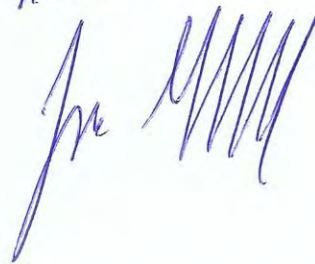
Joseph Gallagher
230 Franklin Ave
Villas NJ 08251

Dear Dr. Moore

4/16/20

I been working for Lunds since Oct. 2018. This is my full time job. I look forward to the Illex season cause it give me a chance to get overtime money to catch up on bills and put money to the side for the slow months. I hope my overtime continues cause it works for me and my family.

Thanks

A handwritten signature in blue ink, appearing to be "Joe M. M." with several vertical strokes at the end.

LUND'S FISHERIES



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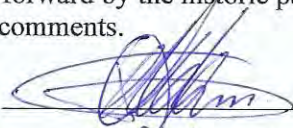
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Signature / date

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Name and address

Juan Rafael Salazar 116 Tomlin Ave. Villas, NJ

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Dear Dr. Moore:

I have been employed by Lund's Fisheries since April, 1993. Lund's Fisheries is a family-owned company producing seafood in Cape May, NJ since 1954. Over my 27 years here, I have seen how important the illex fishery is to creating jobs in the community. This goes beyond the approximate 150 people annually employed by Lunds in Cape May and by the cold store in Bridgeton, and the 80-90 fisherman working on their fishing vessels and extends to the entire supply chain.

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Signature / date

Kathleen Checchio 4-17-20

Name and address

Kathleen Checchio 122 Exton Rd Somers Point, N.J. 08244



2 State Street | PO Box 608
Narragansett, RI 02882

Dear Mid-Atlantic Council,

I am writing about the Illex Amendment.

I'd like to discuss a couple of issues that I see in the public hearing document that are listed as reasons to move forward with requalification that I do not agree with:

Race to fish. As long as a species is managed by a hard quota, then there will always be a race to fish. Racing to fish, or as it's often called "turn and burn" is not unique to this fishery and should not be used to justify whether further requalification is necessary or not.

Safety. Safety issues were another reason brought up to push for requalification. Like race to fish, safety concerns are not unique to this fishery, but is a concern shared by all fisheries.

Monitoring Difficulties. GARFO already has mechanisms to use to mitigate the problem of going over the quota. It would be unacceptable to use this as a reason to remove people from a fishery.

Business Disruptions. There will be a lot more hurt and far more business disruptions if people are removed and access is reduced because of this amendment. Everyone is benefiting from the new markets and better prices as a result of recent participation.

Bycatch. It's been stated throughout this process and noted in the public hearing document that bycatch is very low and is a non-issue in the illex fishery. In fact, there are no severely negative biological reasons for moving ahead with requalification.

Control Date. When the Council reaffirmed the control date in 2018, they were unaware of the new markets that recent participants had opened. We at the Town Dock spear headed a new market, the clean domestic Illex program in 2017 and the product has performed very well and is in high demand by our customer base nationwide. The product is highly valued by our customers who are looking for an alternative to a lesser quality foreign product. Removing participants would not only be damaging to the fishers but would hurt the customers that demand cleaned Illex squid.

It's also important to note that those ice boats that held Illex permits were unable to utilize them since no dealers/processors would take iced product, only RSW and frozen product. It wasn't until other dealers started accepting ice product that other vessels could utilize their permits. The current control date of 2013 does NOT consider the major changes that have occurred in this fishery recently and should not be considered as up to date. In order to fully consider recent participation 2019 needs to be considered in all parts of alternatives.



TOWNDOCK.COM
INFO@TOWNDOCK.COM
PH 401-789-2200 | FAX 401-782-4421



2 State Street | PO Box 608
Narragansett, RI 02882

There has been much talk about a “compromise” on the public hearing webinars. Please be aware that no one reached across the aisle to discuss the plan put forth by the historical participants. The plan that they offer is not a compromise. It does not accurately or fairly reflect the participation and efforts from recent participation and the Tier 2 trip limit is unacceptable. It has been stated over many Illex related calls that if a trip limit is set too low, it will not make Illex fishing profitable or possible and this includes the 47k pound trip limit.

In order to fully consider recent participation and make Illex fishing possible and profitable for those that acquire a Tier 2 permit, I support the Illex Coalition’s suggestions, which are the following:

- 1) **Preferred:** No action; requalification of all 76 permits.
- 2) **Preferred Alternative:** Minimal action; full requalification of 51 active permits. This allows for requalification of all active permit holders with more than 50,000 pounds landed in any one year from 1997 to 2019. This essentially eliminates permits for the non-participants in the fishery in the time frame from 1997-2019.
- 3) **Acceptable Alternative:** Should the council insist on a tiered approach, we can support the following:
 - *Tier 1 Classification:* 500,000 pounds best year qualifier 1997-2013; or 1,000,000 pounds best year qualifier 2014-2019 (+/- 41 permits).
 - *Tier 2 Classification:* 100,000 pounds best year qualifier 1997-2019; 90,000 pound trip limit; no sub-quota (+/- 7 permits).
 - *Tier 3 Classification:* 50,000 pounds best year qualifier; 47,000 lb. trip limit; no sub-quota (+/- 3 permits).
 - *Incidental limit:* 10,000 pounds (+/- 25 permits).
 - No new fish-hold capacity limitation.

Sincerely,

Mike Roderick
Director of Purchasing and Fresh Sales



TOWNDOCK.COM
INFO@TOWNDOCK.COM
PH 401-789-2200 | FAX 401-782-4421

Mr. Didden,

Allow me to introduce myself. My name is Franky Pettolina. I am President of the Ocean City Marlin Club located in Ocean City, MD. We have approximately 800 members and host (7) offshore fishing tournaments during our summer season. I am also an Accredited Marine Surveyor and USCG licensed 100 GT Master. I have operated Pettolina Marine Surveying and Consulting LLC since 1996 (primarily surveying recreational and commercial fishing vessels), and I am partners with my father in Last Call Charters (a charter fishing business in service since 1983).

As you can probably surmise from my introduction, I have a vested interest in my local fisheries community. It has recently been brought to my attention that there is the potential for expansion and further regulatory measures in the commercial Illex Squid fishery. While I would never want to deny a fisherman the opportunity to earn a living, I am concerned that added pressure on this fishery would have detrimental consequences to both the recreational and the commercial sectors of our fishery. The areas being fished have a finite amount of space being utilized by an ever growing number of users. The way I think of it is that there are only so many slices of the pie and a limited number of seats at the table. The vessels that have partaken in this fishery historically have worked well among themselves, other commercial fishery interests, and the recreational fishermen. A huge influx of vessels into the Illex fishery may present a problem (think of my pie and seats at the table example). There is only so much ocean, and the Illex squid is an important part of the food chain as both forage and predator.

I would suggest that some means of allowing for the historic participants in the Illex fishery to be given priority in any considerations, and perhaps the newer participants be permitted a gradual or limited entry. This would prevent conflict with other commercial vessels and also limit the amount of vessel traffic/conflict between the commercial and recreational vessels.

Hopefully this would allow for a more pleasant "dining experience" for all of us at the table.

Respectfully,

Franky

Franky Pettolina AMS700
Pettolina Marine Surveying and Consulting LLC Ocean City, MD

LUND'S FISHERIES



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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

Dr. Chris Moore, Executive Director
800 North State Street, Suite 20, Dover, DE 19901
Re: Illex Permits Amendment - By email: cmoore@mefnc.org

Dear Dr. Moore:

I am an employee of Lund's Fisheries, a family-owned company producing seafood in Cape May, NJ since 1954. During summer, we have depended upon the Illex squid fishery since the early 1980's, exporting our first container of squid in 1985. Historically, we have taken part in the Illex fishery during the months of May through November although the fishery has closed in late summer during the last three years as many new vessels have entered the fishery, which has negatively impacted our ability to fish and keep employees working in the plant throughout the summer and into early fall.

Our company supports the Historical Participants' Illex Tiered Permit System Compromise, using the Council's August 2, 2013 control date, which was reaffirmed by the Council prior to the start of the 2019 fishing year. This generous compromise by those who have consistently relied on this fishery would fully qualify 34 'Tier 1' permits even though only 14 vessels harvested more than 500,000 pounds of Illex in 2017, increasing to 19 in 2018 and 26 in 2019. With the early closure in 1998, only 25 boats landed this amount with just 23 active at that level of harvest in the early closure of the 2004 fishery. The compromise Tier 2 proposal puts another 14 boats into the fishery. It is important that the Council act to limit the number of participants in this fishery, before the 25 other Illex permits are also activated, potentially creating a one-month fishery.

Lund's Fisheries was the first company on this coast to invest in a factory and vessels to catch, process and sell large volumes of what were formerly considered underutilized fisheries, including Illex squid. Over the years, this investment has allowed Cape May to become the number one Illex-producing port on the East Coast and we have helped several historical, independent fishermen become successful in this fishery.

Community impacts have largely been ignored in managing fisheries on this coast and we encourage the Council to consider our historical dependence on this fishery, which will help to maintain the jobs that our plant and cold-storage workers, fishing crews, and truckers depend upon. In a community where there are few year-round jobs, employment in the Illex fishery helps to support local supermarkets and other fishing-related businesses like gear stores and fuel suppliers and supports our local housing market. I ask the Council to support the Tiered permit system compromise put forward by the historic participants in the Cape May Illex fishery. Thank you for considering my comments.

Signature / date

Bryan Allen 4/17/2020

Name and address

Bryan Allen 8100 Atlantic Avenue, Wildwood Crest, NJ
08260

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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

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800 North State Street, Suite 20, Dover, DE 19901
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Signature / date

Carmen Adamczyk 4/16/20

Name and address

Carmen Adamczyk 632 Whispering Woods Ct.
Mays Landing, NJ 08330

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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

Dr. Chris Moore, Executive Director
800 North State Street, Suite 20, Dover, DE 19901
Re: Illex Permits Amendment - By email: cmoore@mafinc.org

Dear Dr. Moore:

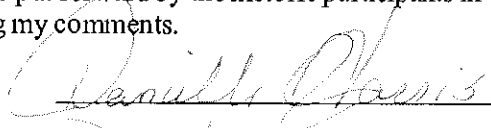
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Community impacts have largely been ignored in managing fisheries on this coast and we encourage the Council to consider our historical dependence on this fishery, which will help to maintain the jobs that our plant and cold-storage workers, fishing crews, and truckers depend upon. In a community where there are few year-round jobs, employment in the Illex fishery helps to support local supermarkets and other fishing-related businesses like gear stores and fuel suppliers and supports our local housing market. I ask the Council to support the Tiered permit system compromise put forward by the historic participants in the Cape May Illex fishery. Thank you for considering my comments.

Signature / date

 4.17.20

Name and address

Danielle Harris, 226 E. Cresse Ave.
Wildwood Crest, NJ
08260

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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 17, 2020

Dr. Chris Moore, Executive Director
800 North State Street, Suite 20, Dover, DE 19901
Re: Illex Permits Amendment - By email: cmoore@mafmc.org

Dear Dr. Moore:

My name is Andrew Maddalena and I'm the Export Manager at Lund's Fisheries. I started working for Lund's in 2018. Prior to that I worked with my father for 9 years where Lund's was one of our customers. He had been helping Lund's export squid since the 1980's. When I had the opportunity to work for Lund's I didn't hesitate. I always enjoyed working with them and they are a great family owned company with a strong history. Before I worked here, I didn't realize how many people were involved in the process. The fishing vessels and their crew, the production team that runs the plant to ensure quality, truckers, cold storages, and the front office. Now that I work here, I see how much our customers internationally rely on us for their Illex squid needs.

During summer, we have depended upon the Illex squid fishery since the early 1980's, exporting our first container of squid in 1985. Historically, we have taken part in the Illex fishery during the months of May through November although the fishery has closed in late summer during the last three years as many new vessels have entered the fishery, which has negatively impacted our ability to fish and keep employees working in the plant throughout the summer and into early fall.

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Lund's Fisheries was the first company on this coast to invest in a factory and vessels to catch, process and sell large volumes of what were formerly considered underutilized fisheries, including Illex squid. Over the years, this investment has allowed Cape May to become the number one Illex-producing port on the East Coast and we have helped several historical, independent fishermen become successful in this fishery.

Community impacts have largely been ignored in managing fisheries on this coast and we encourage the Council to consider our historical dependence on this fishery, which will help to maintain the jobs that our plant and cold-storage workers, fishing crews, and truckers depend upon. In a community where there are few year-round jobs, employment in the Illex fishery helps to support local supermarkets and other fishing-related businesses like gear stores and fuel suppliers and supports our local housing market. I ask the Council to support the Tiered permit

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system compromise put forward by the historic participants in the Cape May Illex fishery. Thank
you for considering my comments.

April 17th, 2020

Andrew Maddalena
406 W Hand Ave. #200
Wildwood, NJ 08260

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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

Dr. Chris Moore, Executive Director
800 North State Street, Suite 20, Dover, DE 19901
Re: Illex Permits Amendment - By email: cmoore@mafmc.org

Dear Dr. Moore:

I am an employee of Lund's Fisheries, a family-owned company producing seafood in Cape May, NJ since 1954. I work in the imports and exports department and have done so for only a few months. With the recent growth of our department, I fear if our historical annual landings of illex decrease, my position may be phased out. That fear is shared amongst many others in the company as well. I urge you to please consider everyone directly affected by the outcome of this decision and the impact this will have on the entire Cape May fishing community.

During summer, we have depended upon the Illex squid fishery since the early 1980's, exporting our first container of squid in 1985. Historically, we have taken part in the Illex fishery during the months of May through November although the fishery has closed in late summer during the last three years as many new vessels have entered the fishery, which has negatively impacted our ability to fish and keep employees working in the plant throughout the summer and into early fall.

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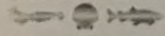
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Brianna Peter
70 Springers Mill Rd.
Cape May Court House, NJ 08210

4/17/2020

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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

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800 North State Street, Suite 20, Dover, DE 19901
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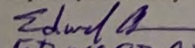
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EDWARD ADAMS
21 YRS.

206 Shunpike RD
C.M.C.H., NJ 08210
609-602-1403

LUND'S FISHERIES



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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries
April 20, 2020

Dr. Chris Moore, Executive Director
800 North State Street, Suite 20, Dover, DE 19901
Re: Illex Permits Amendment - By email: cmoore@mafmc.org

Dear Dr. Moore:


I am an employee of Lund's Fisheries Inc. A family-owned company that harvest and distribute seafood all over the World. I have worked in logistics for the Company for over 30 years. I fear if our annual landings of illex is decrease, some of our job may be in jeopardy including our kids and grandchildren. During the summer months, Lund's Fisheries has depended upon the Illex squid fishery since the early 1980's. For many years, the Illex fishery has employed Cape May boats, the Lund's plant and other independent fishermen operating in the Port of Cape May throughout the months of May through November. Over the last three years, however, with an increase in the number of boats coming into the fishery from other areas on the coast, the fishery has closed in late summer, which has negatively impacted our ability to continue to serve the company throughout the summer and into early fall and negatively affecting our business.

We are writing to join Lund's Fisheries in supporting the Historical Participants' Illex Tiered Permit System Compromise, using the Council's August 2, 2013 control date, which was reaffirmed by the Council prior to the start of the 2019 fishing year. This compromise, by those vessels and plants that have consistently relied on this fishery would fully qualify 34 'Tier 1' permits even though only 14 vessels harvested more than 500,000 pounds of Illex in 2017, increasing to 19 in 2018 and 26 in 2019. With the early closure in 1998, only 25 boats landed this amount with just 23 active at that level of harvest in the early closure of the 2004 fishery. The compromise Tier 2 proposal puts another 14 boats into the fishery. In the interest of our business' long-term success, we ask the Council to act to limit the number of participants in this fishery, before other Illex permits are also activated, potentially creating a one-month fishery.

Lund's Fisheries was the first company on this coast to invest in a factory and vessels to catch, process and sell large volumes of 'underutilized fisheries', including Illex squid, for U.S. and world markets that depend upon the highest quality products. The company's investments have helped several historical, independent fishermen become successful in this fishery and supported our business success at the same time.

We encourage the Council to consider the Port of Cape May's historical dependence on this fishery, which will help to maintain Cape May County and related New Jersey jobs. In a community where there are few year-round jobs, employment in the Illex fishery throughout the summer and fall months helps to support many other local businesses including ours. We ask the Council to support the Tiered permit system compromise put forward by the historic participants in the Cape May Illex fishery and other dependent ports. Thank you for the opportunity to comment.

Signature / date

 4/20/20

Name and address

John Olaniyan 112^s 9th st, Del-Haven, NJ
30 yrs 609-425-9024

LUND'S FISHERIES



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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

Dr. Chris Moore, Executive Director

800 North State Street, Suite 20, Dover, DE 19901

Re: Illex Permits Amendment - By email: cmoore@mafmc.org

Dear Dr. Moore:

Our company, First Choice Freezer, located in Vineland, New Jersey assists Lund's Fisheries with our warehousing and transportation services year-round. Our business has been supported by Lund's Fisheries' success since 2009. During the summer months, Lund's Fisheries has depended upon the Illex squid fishery since the early 1980's. For many years, the Illex fishery has employed Cape May boats, the Lund's plant and other independent fishermen operating in the Port of Cape May throughout the months of May through November. Over the last three years, however, with an increase in the number of boats coming into the fishery from other areas on the coast, the fishery has closed in late summer, which has negatively impacted our ability to continue to serve the company throughout the summer and into early fall and negatively affecting our business.

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Signature / date

Christopher Livan 4-20-20

Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

Dr. Chris Moore, Executive Director
800 North State Street, Suite 20, Dover, DE 19901
Re: Illex Permits Amendment - By email: cmoore@mafmc.org

Dear Dr. Moore:

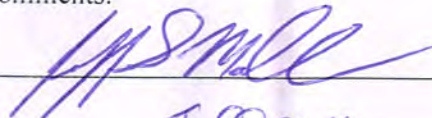
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Signature / date

 4/29/2020

Name and address

Jeff Miller
6443 Church St
Mays Landing NJ 08334

LUND'S FISHERIES



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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

Dr. Chris Moore, Executive Director

800 North State Street, Suite 20, Dover, DE 19901

Re: Illex Permits Amendment - By email: cmoore@mafmc.org

Dear Dr. Moore:

Our company, J.H., located in N.J., assists Lund's Fisheries with our ^{TRANSPORTATION} Y services year-round. Our business has been supported by Lund's Fisheries' success since 2018. During the summer months, Lund's Fisheries has depended upon the Illex squid fishery since the early 1980's. For many years, the Illex fishery has employed Cape May boats, the Lund's plant and other independent fishermen operating in the Port of Cape May throughout the months of May through November. Over the last three years, however, with an increase in the number of boats coming into the fishery from other areas on the coast, the fishery has closed in late summer, which has negatively impacted our ability to continue to serve the company throughout the summer and into early fall and negatively affecting our business.

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We encourage the Council to consider the Port of Cape May's historical dependence on this fishery, which will help to maintain Cape May County and related New Jersey jobs. In a community where there are few year-round jobs, employment in the Illex fishery throughout the summer and fall months helps to support many other local businesses including ours. We ask the Council to support the Tiered permit system compromise put forward by the historic participants in the Cape May Illex fishery and other dependent ports. Thank you for the opportunity to comment.

Signature / date

Joseph S. Honrychts 4-19-20

Name and address

JOSEPH S. HONRYCHTS
1672 STATE HIGHWAY 45
MULLICA HILL, N.J. 08062



Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

Dr. Chris Moore, Executive Director

800 North State Street, Suite 20, Dover, DE 19901

Re: Illex Permits Amendment - By email: cmoore@mafmc.org

Dear Dr. Moore:

Our company, Mission Movement Transport LLC, located in LINCOLN, DE assists Lund's Fisheries with our transporting services year-round. Our business has been supported by Lund's Fisheries' success since June of 2018. During the summer months, Lund's Fisheries has depended upon the Illex squid fishery since the early 1980's. For many years, the Illex fishery has employed Cape May boats, the Lund's plant and other independent fishermen operating in the Port of Cape May throughout the months of May through November. Over the last three years, however, with an increase in the number of boats coming into the fishery from other areas on the coast, the fishery has closed in late summer, which has negatively impacted our ability to continue to serve the company throughout the summer and into early fall and negatively affecting our business.

We are writing to join Lund's Fisheries in supporting the Historical Participants' Illex Tiered Permit System Compromise, using the Council's August 2, 2013 control date, which was reaffirmed by the Council prior to the start of the 2019 fishing year. This compromise, by those vessels and plants that have consistently relied on this fishery would fully qualify 34 'Tier 1' permits even though only 14 vessels harvested more than 500,000 pounds of Illex in 2017, increasing to 19 in 2018 and 26 in 2019. With the early closure in 1998, only 25 boats landed this amount with just 23 active at that level of harvest in the early closure of the 2004 fishery. The compromise Tier 2 proposal puts another 14 boats into the fishery. In the interest of our business' long-term success, we ask the Council to act to limit the number of participants in this fishery, before other Illex permits are also activated, potentially creating a one-month fishery.

Lund's Fisheries was the first company on this coast to invest in a factory and vessels to catch, process and sell large volumes of 'underutilized fisheries', including Illex squid, for U.S. and world markets that depend upon the highest quality products. The company's investments have helped several historical, independent fishermen become successful in this fishery and supported our business success at the same time.

We encourage the Council to consider the Port of Cape May's historical dependence on this fishery, which will help to maintain Cape May County and related New Jersey jobs. In a community where there are few year-round jobs, employment in the Illex fishery throughout the summer and fall months helps to support many other local businesses including ours. We ask the Council to support the Tiered permit system compromise put forward by the historic participants in the Cape May Illex fishery and other dependent ports. Thank you for the opportunity to comment.

Signature / date: Tonyango Snead 4/20/20

Name and address: Mission Movement Transport LLC
8604 First Born Church Rd
Lincoln, De. 19960



F/V DARANA R

Capt. James A. Ruhle

Wanchese NC

FVDARANAR@aol.com

(252)423-0238

April 19, 2020

Mr. Moore,

I would like to take this opportunity to voicing my support for “Historical participants” proposed alternatives and the use of a utilization of tiers in the Illex amendment. The supported alternative for permit qualification of A4 (97-13) and B4 (500,000 lbs.) best year for tier 1. A3 (97-18 100,000lbs best year) for tier 2 with C3 (48,000 lbs. trip limit) and A3, (97-18 50,000 lbs. best year) for tier 3 with C2 (20,000 lbs. trip limit) as well as the fish hold measurements for tier 1 permits.

During my tenure as both serving on many Aps, as well as my 3 terms as a council member, The utilization of control dates was and is a crucial mechanism for determining the actual long term participants that are dependent on a given fishery from those that simply participate at what is basically an opportunistic level. If the council decides to deviate from what has always been a viable instrument, then in my opinion that goes against everything I believed in and stood for during my time at the table. One of the things about the MAFMC is that it has always had consistency. If the council chooses any option that would allow for anyone that only entered a fishery after the control dates to have full access it would be detrimental to any other amendment that utilizes control dates. The argument for recent participation has always been made, but in this case, we are not talking about 1-2 years after the control date is published but rather 5-6 years.

I have been involved with the Illex fishery since 1983 when we started to Americanize the fishery, During that time, I lost my access to many other fisheries due to my lack of involvement since I was participating in the Illex fishery every year in order to build a market both domestic and globally. The Illex market was not built overnight, it took well over 10 years before it had any stability. During those 10 years, I lost my opportunity for Scallop, Groundfish, and even Swordfish just to name a few. I only point this out to try and demonstrate what the actual historical participants had to sacrifice in order to establish the Illex fishery as a viable entity. In my eyes, someone that only participates in a fishery for a couple of years during times of peak market conditions is not a historical participant. A true historical participant is one that is involved in the fishery on a continuing basis season after season, regardless of price or productivity.

As I have stated before, currently the council has put us in a terrible position. As a fisherman, the last thing I want to do is tell someone that they cannot fish, but, the Illex fishery is at and has been at its full capacity since 1998. The argument that prior to 2018, the fishery only reached its TAC on 3 occasions is misleading. The reality is that if the market opportunities are there and the animals are accessible, less that 20 vessels have the capacity to fully prosecute the fishery. At the time of the 1998, 2004, and 2017 closures of the Illex



fishery the number of participants was 20 or below. The options above would allow for 34 tier 1 vessels. 14 more vessels than what has been proven to fully harvest the TAC. From the historical participants viewpoint, this is a compromise with the “Town Dock “proposal. The inclusion of these 14 vessels in tier 1 as well as 14 tier 2.

I support the option C3 of a 48,000 lbs. trip limit for tier 2 but can also support 55,000 lbs. as used in the Herring plan for consistency in high volume fisheries. I support alternative A3 (97-18 100,000 lbs. best year) as qualifying criteria for a Tier 2 permit and A3 C2 (97-18 50,000 lbs. with 20,000lbs trip limit) for tier 3. This will allow for recent participants to retain access to the fishery in a way that is still significant. From the start of the fishery in the early 1980s up to present, trips landed at or below 50,000 lbs. make up a significant portion of the overall yearly landings. This dispels the argument that t tier 2 trip limit of 48,000 lbs. is not equitable.

I support the Fish hold measurements for Tier 1 vessels but do not see the necessity for tier 2 vessels as they would be held to a trip limit regardless of hold capacity. This again is consistent with the Mackerel FMP. I am also in favor of the proposed incidental limit with longfin onboard (20,000 lbs. of Illex if 10,000 lbs. of Loligo are onboard)

As a participant in, I am well aware of the ongoing work of both the Industry funded and NEFSC Illex working groups on trying to improve the science behind Illex and possible quota increases during years of high availability but this process is likely to take some time before any quota increase will be achievable. I believe that through a frame workable action, any increase to Illex quota could be passed on to tier 2 permits via increased trip limits. (if quota increases 20%, then the tier 2 trip limit will increase by 20%)

Thank you.

Jim Ruhle



F/V DARANA R

Capt. Robert L. Ruhle

Wanchese NC

Robertptcapt@aol.com

(252)305-0960

April 19, 2020

Mr. Moore,

Regarding the current Illex amendment, I am in support of what is being called “Historical participants” proposed alternatives and the use of a tiered approach. The supported alternative for permit qualification of A4 (97-13) and B4 (500,000 lbs.) best year. I believe that it is imperative that the control date be used in this amendment as it was used in the previous capacity amendment for Loligo and it was re-affirmed by the council in 2018. Many people seem to forget that when we originally started the capacity amendment for Loligo, it was also to include Illex, but due to the many issues that arose with Loligo, it was dropped from the amendment in efforts to focus on those problems. As a member of the AP at that time, I agreed with removing Illex with the intent of addressing it at the completion of the Loligo amendment process. Unfortunately, that put it in line behind The Deep-Sea Coral, Unmanaged Forage, and Chub Mackerel amendments. Had we pursued this at the end of Loligo, the issue of recent participation in 2018-19 would not have arisen. I can in no way support allowing any vessel that did not fish during the 98-13 period a tier 1 full access permit. Vessels that entered the fishery in 2018-19 did so 5-6 years after the announcement of the control date, fully knowledgeable that this participation may not be eligible to qualify for full access if the council was to take action. Any vessel that only prosecuted the fishery in 2018-19 did so to capitalize on record prices and unprecedented availability. Entering a fishery for 1-2 years 5-6 years after the end of the control date is Not historical

participation nor do those vessels have any economic dependent on the fishery. Vessels that only fished in the last 2 years did so for financial gain and are speculating that the council will deviate from the process that has been the backbone of fishery management plans. The argument for allowing access to vessels that fail to qualify during a control date period has been broached every time a control date is used, sighting everything from limited number of vessels to enhanced market opportunities. In the case of Red crab, only 1 vessel was participating in the fishery that failed to meet landings requirements and subsequently that vessel is no longer eligible for that fishery. In the Monkfish plan, 5 permits were disqualified due to language changes in the plan, and were told “acceptations cannot be made even for a small number of vessels” It is my belief that if the council was to allow for recent participation to gain full access in this fishery, it would open the door for litigation in not only Loligo, but in every FMP that upheld a control date as a management tool from displaced participants.

I have supported a tiered approach since this action began. As a fisherman I in no way am seeking to take away someone’s right to fish, but we need to do it in a way that protects the historical participants that built and Americanized the fishery and markets over the past 40 yrs. The Tiered approach is a vehicle to do just that. It protects the vessels that



have participated and rely on the fishery for the longest period of time, while allowing newer participants to gain access to the fishery as a tier 2 with trip limits. This approach has worked well in the Mackerel and Herring fishery as well as in Loligo.

I am in favor of option C3 of a 48,000 lbs. trip limit for tier 2 but can also support 55,000 lbs. as used in the Herring plan for consistency in high volume fisheries. I support alternative A3 (97-18 100,000 lbs. best year) as qualifying criteria for a Tier 2 permit and A3 C2 (97-18 50,000 lbs. with 20,000lbs trip limit) for tier 3. This will allow for recent participants to retain access to the fishery in a way that is still significant. From the start of the fishery in the early 1980s up to present, trips landed at or below 50,000 lbs. make up a significant portion of the overall yearly landings. This dispels the argument that tier 2 trip limit of 48,000 lbs. is not equitable.

I am in favor of the Fish hold measurements for Tier 1 vessels but do not see the need for tier 2 vessels as they would be held to a trip limit regardless of hold capacity. This again is consistent with the Mackerel FMP. I am also in favor of the proposed incidental limit with longfin onboard (20,000 lbs. of Illex if 10,000 lbs. of Loligo are onboard)

As a participant in, I am well aware of the ongoing work of both the Industry funded and NEFSC Illex working groups on trying to improve the science behind Illex and possible quota increases, but this process is likely to take years before any significant quota increase will be released. I believe that with a frame workable action, any increase to Illex quota could be passed on to tier 2 permits via increased trip limits.

In closing, I would like to reiterate that up until 2018, less than 20 vessels participated in this fishery in any given year, but those vessels did catch the entirety of the quota and closed the fishery in 1998, 2004, and 2017. The option laid forth above would allow for 34 tier 1 permits, 14 more vessels or 70% increase in participants than what has historically utilized the fishery to the point of closure. This does not count the addition of the 14 proposed tier 2 permits.

During the Deep-Sea Coral amendment, one of the goals was to “Freeze the footprint” of fisheries that take place adjacent to these areas. During that time, it was 20 vessels. The Coral amendment succeeded in limiting the fishable areas to the Illex fleet as a way to mitigate any interactions with deep sea coral, but I do believe that the addition of 24 or more vessels in the same limited spatial area is counter intuitive to the goal of freezing the footprint.

Thank you for your time,

Sincerely,

Capt. Robert L. Ruhle



DARANA R Fishing Co.

Steven Ruhle

Hampton VA

Croakerking21@aol.com

(252)202-6778

April 19, 2020

Members of the council,

I would like to speak in favor of the “Historical participants” proposed set of alternatives and the tiered approach. Specifically, A4 (97-13) B4 (500,000 lbs. best year) as qualifying criteria for tier 1. A3 (97-18) C3 (100,000 lbs. best year) 48,000 lbs. trip limit for tier 2 and A3 (98-18) C2 (50,000 lbs. best year) 20,000 lbs. trip limit for tier 3. I support the Fish hold measuring requirements for tier 1 and the inclusion of an incidental limit of 20,000 lbs. of Illex if 10,000 lbs. of Loligo are onboard.

I have been involved in the Illex fishery in both the vessel and dealer aspects for over 30 years. I would like to point out that what has been stated as a new “ice product” market is not new. From 1983 until 2012 (the last year any Illex was landed in NC), every pound of Illex landed in North Carolina was an iced product. While many vessels made the switch to RSW or freezers in the early 1990s not every vessel could accommodate these types of conversions do to cost or safety concerns. The reason that no new “ice “vessels entered the fishery prior to 2018, was that it is labor intensive, has a high operating cost and it was not that profitable, but the market was always available. Even the RSW market did not see any significant increase in participation over the years. Our Family’s vessel landed the first RSW Illex in Hampton VA in 1987 and was responsible for the entirety of VA’s Illex landings from 1987 until 2011. In 24 years, no new vessels participated in the fishery or contributed to VA Illex landings in any significance RSW, iced or otherwise.

During my involvement in this fishery, at no time was there more than 20 vessels fishing during a season, but those 20 boats where enough to catch the TAC on 3 separate occasions. 1998,2003 and 2017. During years of high availability, 20 boats can utilize 100% of the quota in 3-4 months’ time. On years of high availability, generally the squid get larger over the course of the season, usually starting at around 90-100g in early June to 300g or more by mid to late August. If excess pressure is put on the fishery by increasing the number of vessels, the chances of the quota being caught mid-July is exceedingly high. In doing so, the actual number of animals required to reach the quota is significantly higher than it would be if the season were to stretch out over the later part of the summer. Simply put, it takes 2 150g squid to equal 1 300g squid weight wise. I am aware of the ongoing Illex working groups involvement in trying to improve the science on Illex, but as to date, we still do not have any more information as to what possible harm this may do to a cohort or to the stock as a whole.

Any vessel that would wait 5 or 6 years after a control date is published to enter a fishery is either doing so for financial gain or is banking that the council would vote the date stale and give them the ability to enter the fishery without having actually qualified to do so. Not long

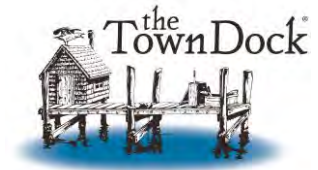


ago the Deep-Sea Coral Amendment was passed, this amendment was to minimize any potential impacts to existing and future deep-sea coral by “Freezing the footprint” of mobile gear fisheries that operate near or within these coral zones. Illex is one of the fisheries that is most impacted by this amendment. With the complete ban on fishing not only in the optimal coral habitat areas, but with the addition of buffer zones the fishable area in the mid-Atlantic was reduced by roughly 30%. The alternative above would increase the number of vessels from 20 to 34 tier 1 and another 14 tier 2. 105% increase in participating vessels fishing on 70% of Illex habitat fishable area could prove to be extremely problematic.

I hope that you will take all this in consideration.

Thank you

Steven Ruhle



2 State Street | PO Box 608
Narragansett, RI 02882

April 17, 2020

Mid-Atlantic Fisheries Management Council
800 North State Street, Suite 201
Dover, DE 19901

To whom it may concern,

I appreciate the opportunity to submit written comment regarding the proposed Illex amendment. As the Sr. Director of Quality Assurance and Product Development at The Town Dock, I receive direct customer feedback on our products as well as on opportunities for new products. The feedback from our domestic distribution of Illex has been overwhelmingly positive and we at The Town Dock see Illex as a growth vehicle for us to enter and create new domestic markets, and in doing so, to promote the US economy from catch to consumer.

In addition to US product being important to our customers, there is growing demand for sustainably sourced seafood. I am the Marine Stewardship Council (MSC) Chain of Custody representative for The Town Dock, and having full access to the MSC-certified Illex fishery, that the Town Dock helped to certify, is critical to The Town Dock business and customers we have today, as well as the business and customers we are developing for tomorrow.

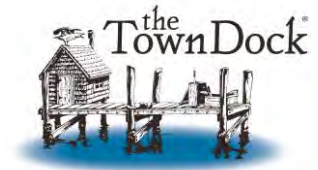
As such, I fully support the proposal put forth by the Illex Coalition, as detailed on the following page. I appreciate your consideration.

Respectfully,

Brianna Hughes, Ph.D.
Sr. Director, Quality Assurance & Product Development
bhughes@towndock.com
401-789-2200 x105



TOWNDOCK.COM
INFO@TOWNDOCK.COM
PH 401-789-2200 | FAX 401-782-4421



2 State Street | PO Box 608
Narragansett, RI 02882

Illex Coalition Proposal

- 1) **Preferred:** No action; requalification of all 76 permits.
- 2) **Preferred Alternative:** Minimal action; full requalification of 51 active permits. This allows for requalification of all active permit holders with more than 50,000 pounds landed in any one year from 1997 to 2019. This essentially eliminates permits for the non-participants in the fishery in the time frame from 1997-2019.
- 3) **Acceptable Alternative:** Should the council insist on a tiered approach, we can support the following:
 - *Tier 1 Classification:* 500,000 pounds best year qualifier 1997-2013; or 1,000,000 pounds best year qualifier 2014-2019 (+/- 41 permits).
 - *Tier 2 Classification:* 100,000 pounds best year qualifier 1997-2019; 90,000 pound trip limit; no sub-quota (+/- 7 permits).
 - *Tier 3 Classification:* 50,000 pounds best year qualifier; 47,000 lb. trip limit; no sub-quota (+/- 3 permits).
 - *Incidental limit:* 10,000 pounds (+/- 25 permits).
 - No new fish-hold capacity limitation.



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April 20, 2020

Dr. Chris Moore, Executive Director
800 North State Street, Suite 20, Dover, DE 19901
Re: Illex Permits Amendment - By email: cmoore@mafmc.org

Dear Dr. Moore:

I am an engineer at Lund's Fisheries in Cape May, NJ. In my role, I have seen Lund's invest millions into shoreside processing to support large scale illex landings. With less fishing, Lund's decades of investments will have been for naught. In addition to this, many of our plant employees' hours and season work will be cut short. A tiered permit system will allow us to amortize our investment and employ more personnel for longer.

Our company supports the Historical Participants' Illex Tiered Permit System Compromise, using the Council's August 2, 2013 control date, which was reaffirmed by the Council prior to the start of the 2019 fishing year. This generous compromise by those who have consistently relied on this fishery would fully qualify 34 'Tier 1' permits even though only 14 vessels harvested more than 500,000 pounds of Illex in 2017, increasing to 19 in 2018 and 26 in 2019. With the early closure in 1998, only 25 boats landed this amount with just 23 active at that level of harvest in the early closure of the 2004 fishery. The compromise Tier 2 proposal puts another 14 boats into the fishery. It is important that the Council act to limit the number of participants in this fishery, before the 25 other Illex permits are also activated, potentially creating a one-month fishery.

Lund's Fisheries was the first company on this coast to invest in a factory and vessels to catch, process and sell large volumes of what were formerly considered underutilized fisheries, including Illex squid. Over the years, this investment has allowed Cape May to become the number one Illex-producing port on the East Coast and we have helped several historical, independent fishermen become successful in this fishery.

Community impacts have largely been ignored in managing fisheries on this coast and we encourage the Council to consider our historical dependence on this fishery, which will help to maintain the jobs that our plant and cold-storage workers, fishing crews, and truckers depend upon. In a community where there are few year-round jobs, employment in the Illex fishery helps to support local supermarkets and other fishing-related businesses like gear stores and fuel suppliers and supports our local housing market. I ask the Council to support the Tiered permit system compromise put forward by the historic participants in the Cape May Illex fishery. Thank you for considering my comments.

Thank you,

Cole Griffin
406 W Hand Ave
Unit 200
Wildwood, NJ 08260

LUND'S FISHERIES



Wild caught product of USA

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800 North State Street, Suite 20, Dover, DE 19901
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Dear Dr. Moore:

I am an employee of Lund's Fisheries, a family-owned company producing seafood in Cape May, NJ since 1954. During summer, we have depended upon the Illex squid fishery since the early 1980's, exporting our first container of squid in 1985. Historically, we have taken part in the Illex fishery during the months of May through November although the fishery has closed in late summer during the last three years as many new vessels have entered the fishery, which has negatively impacted our ability to fish and keep employees working in the plant throughout the summer and into early fall.

Our company supports the Historical Participants' Illex Tiered Permit System Compromise, using the Council's August 2, 2013 control date, which was reaffirmed by the Council prior to the start of the 2019 fishing year. This generous compromise by those who have consistently relied on this fishery would fully qualify 34 'Tier 1' permits even though only 14 vessels harvested more than 500,000 pounds of Illex in 2017, increasing to 19 in 2018 and 26 in 2019. With the early closure in 1998, only 25 boats landed this amount with just 23 active at that level of harvest in the early closure of the 2004 fishery. The compromise Tier 2 proposal puts another 14 boats into the fishery. It is important that the Council act to limit the number of participants in this fishery, before the 25 other Illex permits are also activated, potentially creating a one-month fishery.

Lund's Fisheries was the first company on this coast to invest in a factory and vessels to catch, process and sell large volumes of what were formerly considered underutilized fisheries, including Illex squid. Over the years, this investment has allowed Cape May to become the number one Illex-producing port on the East Coast and we have helped several historical, independent fishermen become successful in this fishery.

Community impacts have largely been ignored in managing fisheries on this coast and we encourage the Council to consider our historical dependence on this fishery, which will help to maintain the jobs that our plant and cold-storage workers, fishing crews, and truckers depend upon. In a community where there are few year-round jobs, employment in the Illex fishery helps to support local supermarkets and other fishing-related businesses like gear stores and fuel suppliers and supports our local housing market. I ask the Council to support the Tiered permit system compromise put forward by the historic participants in the Cape May Illex fishery. Thank you for considering my comments.

Signature / date

John Palmisano

Name and address

John Palmisano 6521 Mill Road

My name is John Palmisano, I have been an employee at Lunds Fishery for over 2 yrs. I look forward to all the over time we can get in the summer because I, like many people, have a family to support.

please take this in consideration because it impacts a lot of jobs

Thank you

John

LUND'S FISHERIES



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April 20, 2020

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800 North State Street, Suite 20, Dover, DE 19901
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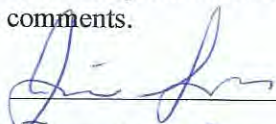
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Community impacts have largely been ignored in managing fisheries on this coast and we encourage the Council to consider our historical dependence on this fishery, which will help to maintain the jobs that our plant and cold-storage workers, fishing crews, and truckers depend upon. In a community where there are few year-round jobs, employment in the Illex fishery helps to support local supermarkets and other fishing-related businesses like gear stores and fuel suppliers and supports our local housing market. I ask the Council to support the Tiered permit system compromise put forward by the historic participants in the Cape May Illex fishery. Thank you for considering my comments.

Signature / date

 07-18-20

Name and address

Jessica Greenwood 550 Shunpike Rd
Cape May Court House
NJ 08210

I been at Lund's 25 years

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Lund's Fisheries was the first company on this coast to invest in a factory and vessels to catch, process and sell large volumes of what were formerly considered underutilized fisheries, including Illex squid. Over the years, this investment has allowed Cape May to become the number one Illex-producing port on the East Coast and we have helped several historical, independent fishermen become successful in this fishery.

Community impacts have largely been ignored in managing fisheries on this coast and we encourage the Council to consider our historical dependence on this fishery, which will help to maintain the jobs that our plant and cold-storage workers, fishing crews, and truckers depend upon. In a community where there are few year-round jobs, employment in the Illex fishery helps to support local supermarkets and other fishing-related businesses like gear stores and fuel suppliers and supports our local housing market. I ask the Council to support the Tiered permit system compromise put forward by the historic participants in the Cape May Illex fishery. Thank you for considering my comments.

Signature / date

Robert A. Feliz

5/19/20

Name and address

LUND'S FISHERIES



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Our company supports the Historical Participants' Illex Tiered Permit System Compromise, using the Council's August 2, 2013 control date, which was reaffirmed by the Council prior to the start of the 2019 fishing year. This generous compromise by those who have consistently relied on this fishery would fully qualify 34 'Tier 1' permits even though only 14 vessels harvested more than 500,000 pounds of Illex in 2017, increasing to 19 in 2018 and 26 in 2019. With the early closure in 1998, only 25 boats landed this amount with just 23 active at that level of harvest in the early closure of the 2004 fishery. The compromise Tier 2 proposal puts another 14 boats into the fishery. It is important that the Council act to limit the number of participants in this fishery, before the 25 other Illex permits are also activated, potentially creating a one-month fishery.

Lund's Fisheries was the first company on this coast to invest in a factory and vessels to catch, process and sell large volumes of what were formerly considered underutilized fisheries, including Illex squid. Over the years, this investment has allowed Cape May to become the number one Illex-producing port on the East Coast and we have helped several historical, independent fishermen become successful in this fishery.

Community impacts have largely been ignored in managing fisheries on this coast and we encourage the Council to consider our historical dependence on this fishery, which will help to maintain the jobs that our plant and cold-storage workers, fishing crews, and truckers depend upon. In a community where there are few year-round jobs, employment in the Illex fishery helps to support local supermarkets and other fishing-related businesses like gear stores and fuel suppliers and supports our local housing market. I ask the Council to support the Tiered permit system compromise put forward by the historic participants in the Cape May Illex fishery. Thank you for considering my comments.

Signature / date

Ingrid Minaya 4-19-20

Name and address

LUND'S FISHERIES



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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

Dr. Chris Moore, Executive Director
800 North State Street, Suite 20, Dover, DE 19901
Re: Illex Permits Amendment - By email: cmoore@mafmc.org

Dear Dr. Moore:

I am an employee of Lund's Fisheries, a family-owned company producing seafood in Cape May, NJ since 1954. During summer, we have depended upon the Illex squid fishery since the early 1980's, exporting our first container of squid in 1985. Historically, we have taken part in the Illex fishery during the months of May through November although the fishery has closed in late summer during the last three years as many new vessels have entered the fishery, which has negatively impacted our ability to fish and keep employees working in the plant throughout the summer and into early fall.

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Signature / date

 4/19/2020

Name and address



Dear Dr. Moore:

I been with Lunds for one year.
I need a longer Flex season to
provide for my family

Wesley King

LUND'S FISHERIES



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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

Dr. Chris Moore, Executive Director
800 North State Street, Suite 20, Dover, DE 19901
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Our company supports the Historical Participants' Illex Tiered Permit System Compromise, using the Council's August 2, 2013 control date, which was reaffirmed by the Council prior to the start of the 2019 fishing year. This generous compromise by those who have consistently relied on this fishery would fully qualify 34 'Tier 1' permits even though only 14 vessels harvested more than 500,000 pounds of Illex in 2017, increasing to 19 in 2018 and 26 in 2019. With the early closure in 1998, only 25 boats landed this amount with just 23 active at that level of harvest in the early closure of the 2004 fishery. The compromise Tier 2 proposal puts another 14 boats into the fishery. It is important that the Council act to limit the number of participants in this fishery, before the 25 other Illex permits are also activated, potentially creating a one-month fishery.

Lund's Fisheries was the first company on this coast to invest in a factory and vessels to catch, process and sell large volumes of what were formerly considered underutilized fisheries, including Illex squid. Over the years, this investment has allowed Cape May to become the number one Illex-producing port on the East Coast and we have helped several historical, independent fishermen become successful in this fishery.

Community impacts have largely been ignored in managing fisheries on this coast and we encourage the Council to consider our historical dependence on this fishery, which will help to maintain the jobs that our plant and cold-storage workers, fishing crews, and truckers depend upon. In a community where there are few year-round jobs, employment in the Illex fishery helps to support local supermarkets and other fishing-related businesses like gear stores and fuel suppliers and supports our local housing market. I ask the Council to support the Tiered permit system compromise put forward by the historic participants in the Cape May Illex fishery. Thank you for considering my comments.

Signature / date

 4/19/2020

Name and address

Brigido Sanchez

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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

Dr. Chris Moore, Executive Director

800 North State Street, Suite 20, Dover, DE 19901

Re: Illex Permits Amendment - By email: cmoore@mafmc.org

Dear Dr. Moore:

Our company, Lineage Logistics, PFS LLC, located in Westfield, MA 01085 assists Lund's Fisheries with our Cold Storage services year-round. Our business has been supported by Lund's Fisheries' success since 2019. During the summer months, Lund's Fisheries has depended upon the Illex squid fishery since the early 1980's. For many years, the Illex fishery has employed Cape May boats, the Lund's plant and other independent fishermen operating in the Port of Cape May throughout the months of May through November. Over the last three years, however, with an increase in the number of boats coming into the fishery from other areas on the coast, the fishery has closed in late summer, which has negatively impacted our ability to continue to serve the company throughout the summer and into early fall and negatively affecting our business.

We are writing to join Lund's Fisheries in supporting the Historical Participants' Illex Tiered Permit System Compromise, using the Council's August 2, 2013 control date, which was reaffirmed by the Council prior to the start of the 2019 fishing year. This compromise, by those vessels and plants that have consistently relied on this fishery would fully qualify 34 'Tier 1' permits even though only 14 vessels harvested more than 500,000 pounds of Illex in 2017, increasing to 19 in 2018 and 26 in 2019. With the early closure in 1998, only 25 boats landed this amount with just 23 active at that level of harvest in the early closure of the 2004 fishery. The compromise Tier 2 proposal puts another 14 boats into the fishery. In the interest of our business' long-term success, we ask the Council to act to limit the number of participants in this fishery, before other Illex permits are also activated, potentially creating a one-month fishery.

Lund's Fisheries was the first company on this coast to invest in a factory and vessels to catch, process and sell large volumes of 'underutilized fisheries', including Illex squid, for U.S. and world markets that depend upon the highest quality products. The company's investments have helped several historical, independent fishermen become successful in this fishery and supported our business success at the same time.

We encourage the Council to consider the Port of Cape May's historical dependence on this fishery, which will help to maintain Cape May County and related New Jersey jobs. In a community where there are few year-round jobs, employment in the Illex fishery throughout the summer and fall months helps to support many other local businesses including ours. We ask the Council to support the Tiered permit system compromise put forward by the historic participants in the Cape May Illex fishery and other dependent ports. Thank you for the opportunity to comment.

Signature / date

 4.20.20

Name and address

JASON ADAMS SALES MANAGER

Lineage Logistics, PFS LLC.
45 Campanelli Drive
Westfield MA 01085

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April 20, 2020

Dr. Chris Moore, Executive Director
800 North State Street, Suite 20, Dover, DE 19901
Re: Illex Permits Amendment - By email: cmoore@mafmc.org

Dear Dr. Moore:

Since November of 2017, I have been employed by Lund's Fisheries, a family-owned company producing seafood in Cape May, NJ since 1954. Each year the Illex fishery creates jobs for our community which in turn allows Lunds to create and provide employment to over 200 people. I am one of those 200. While I work in the office and not on a fishing vessel my job starts as soon as the illex is unloaded from the vessels. I have to say that being hired to work here in a community that is so difficult to find steady work has been a blessing. Most of my work is Illex related. Without it I never would have been hired.

During summer, we have depended upon the Illex squid fishery since the early 1980's, exporting our first container of squid in 1985. Historically, we have taken part in the Illex fishery during the months of May through November although the fishery has closed in late summer during the last three years as many new vessels have entered the fishery, which has negatively impacted our ability to fish and keep employees working in the plant throughout the summer and into early fall.

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Community impacts have largely been ignored in managing fisheries on this coast and we encourage the Council to consider our historical dependence on this fishery, which will help to maintain the jobs that our plant and cold-storage workers, fishing crews, and truckers depend upon. In a community where there are few year-round jobs, employment in the Illex fishery helps to support local supermarkets and other fishing-related businesses like gear stores and fuel suppliers and supports our local housing market. I ask the Council to support the Tiered permit system compromise put forward by the historic participants in the Cape May Illex fishery. Thank you for considering my comments.

Signature / date

Dan Cini 4.20.20

Name and address

Damian Cortina 604 N route 9 unit A
Cape May Court house, NJ 08210

To whom it may concern,

My name is Hank Lackner, F/V Jason & Danielle, homeported in Montauk NY.. I am an independent owner/operator and a historical participant in the illex squid fishery. I would like to start off by saying I am 100% in favor of the Historical participants COMPROMISE.. it will be handed in as group letter on which you will find my endorsement..

When reading my comments, I hope council members are asking themselves what should a healthy Illex squid fishery look like? what are you comfortable with? is it a set number of boats left standing? The proposal brought forth by the historical participants is good and FAIR. Under this COMPROMISE no one loses access unless they have caught zero. Tier 1 vessels will be given respect and credit for helping develop the fishery.

I am going to submit my comments in the form of questions and answers, very similar to Garfos way they describe current on goings in different fisheries.. I hope this is a format you are accustomed to.

1. Why is the use of the CONTROL DATE important to historical participants and should the council remain CONSISTENT with their decision making process?

Every management plan prior to this illex squid amendment the control has had significant importance. In fact vessels history, has always been the foundation for FMP decisions.. never before has so much emphasis been placed on landings after the control..

The council took a vote and determined that the control date was not stale and reaffirmed the control date putting industry on notice of possible future action.. That being said, any landings after the reaffirmation were purely speculative and should not be looked at in the same manner as those prior .. it should be noted the council used the 2013 control date for loligo squid! (Be CONSISTENT)

2. In the time frame leading up to this amendment what actions has the council implemented and what was each ones goals?

In the 8 years prior to this amendment the council has passed a chubb mackeral amendment, a deep sea coral amendment, a forage fish amendment as well as the passing of the monument areas.. The goals of these actions was to freeze industries footprint as well as limit capacity out on the continental shelf.. I ask the council to remain CONSISTENT.

3. Why has the fleet only achieved OY twice prior to 2017?

That answer is quite simple to the historical participants. The number of boats does not determine pounds landed. Illex squid is a species caught around the world, and prices are set outside the USA. The reasons OY was is not always achieved are two fold. First, plain and simple.. The squid do not always show up.. Our new participants, who claim the ocean is overflowing with squid are caught up in a 3 year phenomena. There have been plenty of years of very low abundance.

Second, price dictates catch. In times of glut around the world, prices drop dramatically. US vessels simply cannot afford to work at a loss.. IT just isnt economically feasible. Processors also see markets shrink.

It is a safe assumption that if the historical fleet had 2017-2019 prices and availability throughout the time series OY would have been achieved most years.

4. Why are tiers a good fit for the Illex squid fishery?

Tiers have been used as a management tool by the council for quite some time.. It started way back when, in the tile fishery. It is used in the herring fishery, mackeral and Most importantly LOLIGO SQUID.. industry needs this council to be CONSISTENT

5. Is the historical fleet already overcapitalized?

The answer is a resounding YES! 2017 highlights the fact.. In 2017 11 vessel caught 95% of the TAC. In fact it was the fastest closure in the time series.. 2018 and 19 closures came earlier due to speculative and opportunistic landings from LATENT permits... This new effort resulted in HISTORICAL PARTICIPANTS BEING TIED UP FOR MONTHS..

6. Could a fleet of 70 vessels on the edge do harm to the illex stock?

The answer is YES. Think about these numbers..Our current illex fleet ,in its entirety represents 80,000 horse power and has a fish hold capacity in excess of 18,000,000 million pounds..do not take these numbers lightly..

This fleet could WIPE out an entire cohort of squid!!!

When thinking about 70 boats and the unknowns is the council going against its own RISK POLICY? i believe it is..70 boats that fished last year represent "uncharted waters". we do not know the impacts this huge fleet had on the stock. Is the council comfortable with this. I believe the council needs to be CONSISTENT and manage this fishery with caution.

The council should also consider the impacts the 'NEW FLEET' is having on areas that have always been looked at as sanctuaries by historical participants.. Is removing squid from both the southern component as well the Northern component simultaneously causing harm?

It should be noted the lack of FLEXIBILITY a huge fleet creates out on the edge may result in higher bycatch numbers in the future.. Please remember,the historical participants have always been way offshore out of most peoples eyes and have had the freedom to move about and avoid non targeted species

7. Should the work being done by the illex working group play a role in your decisions?

That answer is no .I would like to go on record and say we do not know the outcome of that work.So for comments made by certain parts of industry that the ocean is overflowing with squid is quite a bold statement Remember the data from the working group has not been peer reviewed..Taking action on something we think the group is going to produce is foolish.

8.is the current proposal put forth by historical participants a COMPROMISE?

It should be noted historical; participants are the ones making all the compromise and concessions.. No credit is being given to the historical fleet.

If this amendment were carried out like other FMPs there would be 15 boats in tier1>> Historical participants are making a concession to LOWER QUALIFIERS and agree to 34 full time permits.

Those who caught a few squid in 2017 and 2018 would be given access at close to the median landing level presented by the council TIER2 BOATS WILL HAVE ACCESS..they will not be shut out .This is a compromise and concession.THEY DONT RELY OR DEPEND on illex squid..Their history shows this.

New entrants are asking for a tier 2 landing level that is actually in excess of what many of them can hold(leading me to believe they plan on modifying their vessels) They in fact will be operating at full capacity.

In closing,

Historical participants have generally worked until mid October..Each of the last 3 years we have been tied up in mid August and joined the ranks of the unemployed.The new speculative entrants have gone back to scallops or some other fishery. It should also be noted that each year the early closers are leaving the largest and most valuable squid in the ocean to die!!

Thank You,

Hank Lackner



April 20, 2020

Dr. Chris Moore, Executive Director
800 North State Street, Suite 20, Dover, DE 19901
Re: Illex Permits Amendment – By email: cmoore@mafmc.org

Dear Dr. Moore:

Lund's Fisheries was established in 1954 and is a family owned and operated, vertically integrated seafood company. Like many multi-generational fishing businesses in our community, I represent the third generation and have been actively working at Lund's Fisheries in sales, production and management roles since 1994.

Lund's Fisheries currently employs 150 people annually between our Cape May and Bridgeton, New Jersey locations and another 80-90 fishermen on our fleet of fishing vessels. We also work with a number of independent fishermen who rely upon us to purchase their harvest and, together, develop markets for local seafood products as they become available.

Our operations and employees have continued to work through the COVID-19 Pandemic to supply customers around the world with quality seafood product and by no means should we use this as reason to slow or stall this process.

Lund's Fisheries began producing Illex in the early 1980's, exported our first container of Illex in 1985. We have been actively fishing Illex every summer since



then. When I started working for my father in 1994, we had Illex inventory dating back to 1992. For years we struggled to hold and finance inventory for 12-24 months attempting to develop markets while allowing vessels to continue fishing, supporting their investments and our investments with state-of-the-art shoreside infrastructure so that we can deliver the highest quality products to our customers.

Historical vessels and processors have worked tirelessly to create sales channels for Illex while competing with other countries harvesting up to 10-15 times more squid than the USA (i.e. Argentine, 200-300,000 mts or Japan 150-200,000 mts annually) in any one given year. For the past 35 years, Lund's Fisheries and dedicated vessels who deliver to us have often overlooked alternate opportunities that may have made more financial sense and fished Illex May through October. The combination of failing international squid fisheries, a trade war with China, and two industry members taking the initiative to certify our Illex fishery under the MSC label has recently highlighted the US Illex industry and generated new interest from all over the world. Domestically, food service and retailers have been keen to buy product of the USA and avoid product processed in China or other countries. These economic drivers, developed over a long period of time when the rewards were less than they are today, are the main reason we are dealing with an abundance of new participation in the Illex fishery today.



Like Mackerel, Herring, and many other fisheries, the race to fish has always existed and the Councils have historically taken action to closely match fishing capacity to quota to minimize negative effects on individuals and fishing communities. Looking back over the years, the opportunity for us to produce more quota or volume in any one year has been available but the cost of fuel, the cost to maintain cold storage space to store product for extended periods, historically low market prices and availability dictated otherwise. Over the years, vessels delivering to Lund's would work on landing limits, based on their hold capacity. We implemented landing limits to maintain quality, allow more boats to participate, regulate our production based on market demand, and allow squid to grow to more marketable sizes. Limits ensured vessels could off-load daily and maintain the freshest and highest quality product, which allowed us to access a variety of markets and successfully compete against other world fisheries that primarily fish with jigs (hooks) and freeze their catch very quickly, at sea. While our efforts to limit harvest often meant sacrificing landings, developing markets that would accept trawl-caught Illex was always the most important goal for the historical participants landing at our facility.

In 2018 that all changed when an idle pelagic plant in New Bedford, built to freeze Mackerel and Herring in the early 2000's, began freezing Illex. This is when the true race to fish fishery began with Illex. Vessels with little to no history and nothing more than a net and a load of ice, a practice we stopped 30 years ago due

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to quality concerns, were scrambling to create landings. There were no new markets created; ice vessels began filling a market that was supplied by historical participants years prior. An “anything goes” approach was adopted amongst industry participants, limits were ignored, and the focus was to catch as much as you can, as fast as you can, at any cost. This speculative approach has and will continue to undermine 30 years of effort building markets for US Illex as permit holders try to justify their dependence and qualify permits with only recent catches, unless the Council acts to utilize the control date, as was agreed to by the Council before the 2019 fishing year began.

For years, Lund’s suppliers were independent owner and operators. As those owners became frustrated with regulation, dealt with economic hardships or had no family to pass their vessels and permits to, Lund’s began building its fleet to make sure we could continue to supply our shoreside infrastructure. These vessels were primarily built in the 70’s and 80’s. As commented on by several others in this amendment process, it is very difficult to find replacement vessels and extremely expensive to build new. For these reasons, over a number of years, we have rebuilt many of our vessels from the keel up. We have spent millions of dollars maintaining these vessels and, more importantly, provided safe platforms for our captains and crews to participate in multiple fisheries, specifically Illex during the summer and fall months.



Lund's has continually re-invested in shoreside infrastructure to match harvest capacities of independent owners and Lund's fleet. Between the mid 1980's and today Lund's has been through 4 freezer plant conversions with costs exceeding 20 million dollars and transformed its factory to produce high volumes of Mackerel, Herring, Menhaden, Scallops and Illex. In 2018 and 2019, our most recent conversion, cost 4 million dollars. An installation of second-generation automated packing equipment allows us handle, weigh, produce and freeze fish faster. Today I can proudly say we operate the largest freezing facility on the eastern seaboard. This investment was not based on greed but on pride in producing higher quality product, allowing dedicated vessels to maximize their fishing potential and supplying domestic and international markets the level of quality they demand.

Unfortunately, as a group we are divided. Those who have activated their permits in the past couple years, rented processing space and have no capital investments in this fishery cannot fairly claim dependency or reliance on the Illex fishery. Global market shortages and trade wars are driving demand and a mysteriously abundant resource is driving this train. With more than 30 years history in this fishery we have never seen the resource so healthy for this stretch of time. There is no scientific evidence of why but there is evidence it will not continue, based upon our past experience. This is clearly an anomaly that has been seen in other squid fisheries around the world time and time again. If the US Illex resource and



global market conditions were similar in 1997 through 2016 we would not be in this position, Council members should ask themselves why were these vessels not fishing prior to 2013? The answer is clear. Supply and demand has always driven catch, effort and investments in fisheries. If the council takes no action or provides recent participants full access to an already mature fishery, I promise you we will be back dealing with other issues that historical participants have done a great job managing on their own. For example, this fishery takes place in a very narrow band along the continental shelf. Any loss of fishing areas due to user conflicts has the potential to stop this fishery in its tracks.

Council members have a decision to make. The historical participants and communities involved in the Illex fishery have laid out the facts. Catch history, vessel and shoreside investments, true dependency. Numbers do not lie. I kindly ask that council members use facts and not feelings to make their decision.

Lund's Fisheries supports the following Tiered options:

- Tier 1: Qualifying period of Alternative A4, 1997-2013 with a qualifying threshold of B5, 500,000 pound in a vessel's best year during the qualifying time frame. No trip limit. This would qualify 34 permits.
 - In 2017, 7 historical participants landed nearly 49% of the quota in Cape May.
 - In 2018, 10 historical participants landed more than 50% of the quota in Cape May.



- This alternative protects historical participants who have been truly dependent on this fishery.
- Tier 2: Qualifying period of Alternative A3, 1997-2018 with a qualifying threshold of B3, 100,000 pound in a vessel's best year during the qualifying time frame. Alternative C3, 48,000 pound trip limit. 14 permits into Tier 2.
 - This allows access to historic and recent participation.
 - Offers vessels that do not have landings prior to the control date flexibility to maintain access and participate in the fishery.
- Tier 3: Qualifying period of Alternative A3, 1997-2018. Qualifying threshold of 50,000 pounds in any one year. Alternative C2, 20,000 pound trip limit. 2 permits into Tier 3.
- Incidental Permits, with a trip limit of 10,000 pounds.

Fish Hold Measurements: Alternative D2, require volumetric fish hold measurement for the Tier 1 and Tier 2 limited access permits.

- Fish Hold measurements would be consistent with the council's approach in the Mackerel FMP and will freeze the fishery footprint.
- Hold measurements are an insignificant cost if participants are invested into this fishery. You can have your hold measure for \$500 to \$1000 depending on travel requirements.

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In addition, and consistent with the Council's action in the Loligo amendment, we ask that an Incidental Limit of 20,000 pounds be provided to Tier 1 permit holders when retaining 10,000 pounds or more of longfin squid, after the Illex fishery has been closed.

Thank you for considering my comments. We look forward to the Council moving this amendment in June and avoiding additional overcapitalization of the Illex Squid fishery.

Respectfully,

Wayne Reichle

President

Lund's Fisheries, Inc.

997 Ocean Drive

Cape May, New Jersey 08204

wreichle@lundsfish.com

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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

Dr. Chris Moore, Executive Director
800 North State Street, Suite 20, Dover, DE 19901
Re: Illex Permits Amendment - By email: cmoore@mafmc.org

Dear Dr. Moore:

I am an employee of Lund's Fisheries, a family-owned company producing seafood in Cape May, NJ since 1954. I have worked for Lund's for 10+ years in the finance department. I am a product of the local community and Lund's provided me with a great opportunity to remain close to home while growing my professional career. From my position I am able to see very clearly how Lund's provides opportunities to many other individuals (and their families) and has resounding economic impacts locally and beyond. These individuals include dedicated plant workers, fishermen, truck drivers, cold storage workers, and many others providing support to the operation. All of these individuals depend on Lund's to continue to thrive and grow. Lund's has made continued investment throughout the years to protect the future of those who rely on it. One such example being substantial investment in the Illex fishery as it relates to investment in vessel upkeep, plant conversions & renovations, and processing equipment.

During summer, we have depended upon the Illex squid fishery since the early 1980's, exporting our first container of squid in 1985. Historically, we have taken part in the Illex fishery during the months of May through November although the fishery has closed in late summer during the last three years as many new vessels have entered the fishery, which has negatively impacted our ability to fish and keep employees working in the plant throughout the summer and into early fall.

Our company supports the Historical Participants' Illex Tiered Permit System Compromise, using the Council's August 2, 2013 control date, which was reaffirmed by the Council prior to the start of the 2019 fishing year. This generous compromise by those who have consistently relied on this fishery would fully qualify 34 'Tier 1' permits even though only 14 vessels harvested more than 500,000 pounds of Illex in 2017, increasing to 19 in 2018 and 26 in 2019. With the early closure in 1998, only 25 boats landed this amount with just 23 active at that level of harvest in the early closure of the 2004 fishery. The compromise Tier 2 proposal puts another 14 boats into the fishery. It is important that the Council act to limit the number of participants in this fishery, before the 25 other Illex permits are also activated, potentially creating a one-month fishery.

Lund's Fisheries was the first company on this coast to invest in a factory and vessels to catch, process and sell large volumes of what were formerly considered underutilized fisheries, including Illex squid. Over the years, this investment has allowed Cape May to become the number one Illex-producing port on the East Coast and we have helped several historical, independent fishermen become successful in this fishery.

Community impacts have largely been ignored in managing fisheries on this coast and we encourage the Council to consider our historical dependence on this fishery, which will help to maintain the jobs that our plant and cold-storage workers, fishing crews, and truckers depend upon. In a community where there are few year-round jobs, employment in the Illex fishery helps to support local supermarkets and other fishing-related businesses like gear stores and fuel suppliers and supports our local housing market. I ask the Council to support the Tiered permit system compromise put forward by the historic participants in the Cape May Illex fishery. Thank you for considering my comments.

Signature / date

Name and address: Matt Viall
402 Mystic Ter
Cape May, NJ 08204

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April 20, 2020

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Re: Illex Permits Amendment - By email: cmoore@mafmc.org

Dear Dr. Moore:

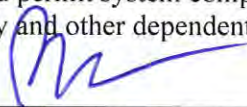
Our company, Diversified Insurance Industries, Inc, located in Hunt Valley, Maryland, assists Lund's Fisheries with our risk management services year-round. Our business has been supported by Lund's Fisheries' success since 1995. During the summer months, Lund's Fisheries has depended upon the Illex squid fishery since the early 1980's. For many years, the Illex fishery has employed Cape May boats, the Lund's plant and other independent fishermen operating in the Port of Cape May throughout the months of May through November. Over the last three years, however, with an increase in the number of boats coming into the fishery from other areas on the coast, the fishery has closed in late summer, which has negatively impacted our ability to continue to serve the company throughout the summer and into early fall and negatively affecting our business.

We are writing to join Lund's Fisheries in supporting the Historical Participants' Illex Tiered Permit System Compromise, using the Council's August 2, 2013 control date, which was reaffirmed by the Council prior to the start of the 2019 fishing year. This compromise, by those vessels and plants that have consistently relied on this fishery would fully qualify 34 'Tier 1' permits even though only 14 vessels harvested more than 500,000 pounds of Illex in 2017, increasing to 19 in 2018 and 26 in 2019. With the early closure in 1998, only 25 boats landed this amount with just 23 active at that level of harvest in the early closure of the 2004 fishery. The compromise Tier 2 proposal puts another 14 boats into the fishery. In the interest of our business' long-term success, we ask the Council to act to limit the number of participants in this fishery, before other Illex permits are also activated, potentially creating a one-month fishery.

Lund's Fisheries was the first company on this coast to invest in a factory and vessels to catch, process and sell large volumes of 'underutilized fisheries', including Illex squid, for U.S. and world markets that depend upon the highest quality products. The company's investments have helped several historical, independent fishermen become successful in this fishery and supported our business success at the same time.

We encourage the Council to consider the Port of Cape May's historical dependence on this fishery, which will help to maintain Cape May County and related New Jersey jobs. In a community where there are few year-round jobs, employment in the Illex fishery throughout the summer and fall months helps to support many other local businesses including ours. We ask the Council to support the Tiered permit system compromise put forward by the historic participants in the Cape May Illex fishery and other dependent ports. Thank you for the opportunity to comment.

Signature / date

 4/20/2020 Name and
address: Robert F Bruns, Vice President, Diversified Insurance Industries, Inc. 307 International Circle,
Suite 610, Hunt Valley MD, 21030

LUND'S FISHERIES



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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

Dr. Chris Moore, Executive Director

800 North State Street, Suite 20, Dover, DE 19901

Re: Illex Permits Amendment - By email: cmoore@mafmc.org

Dear Dr. Moore:

Our company, MTC Logistics, located in New Castle, DE assists Lund's Fisheries with our warehousing services year-round. Our business has been supported by Lund's Fisheries' success since 2007. During the summer months, Lund's Fisheries has depended upon the Illex squid fishery since the early 1980's. For many years, the Illex fishery has employed Cape May boats, the Lund's plant and other independent fishermen operating in the Port of Cape May throughout the months of May through November. Over the last three years, however, with an increase in the number of boats coming into the fishery from other areas on the coast, the fishery has closed in late summer, which has negatively impacted our ability to continue to serve the company throughout the summer and into early fall and negatively affecting our business.

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Signature / date

Daniel Barch 4/20/2020

Name and address

Daniel Barch, GM
MTC Logistics
2 Duck View Dr.
New Castle, DE 19720

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Signature / date

D. Smith 4-20-20

Name and address

*Darica Smith, MTC Logistics
2 Dock View Dr.
New Castle, DE*

19720

LUND'S FISHERIES



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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

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800 North State Street, Suite 20, Dover, DE 19901

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Signature / date

Judy New 4/20/2020

Name and address

JUDY NEW
MTC Logistics
2 Dock View Dr
New Castle DE 19720

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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 20, 2020

Dr. Chris Moore, Executive Director
800 North State Street, Suite 20, Dover, DE 19901
Re: Illex Permits Amendment - By email: cmoore@mafmc.org

Dear Dr. Moore:

I am an employee in the Quality Assurance and Compliance Department of Lund's Fisheries, a family-owned company producing seafood in Cape May, NJ since 1954. During summer, we have depended upon the Illex squid fishery since the early 1980's, exporting our first container of squid in 1985. Historically, we have taken part in the Illex fishery during the months of May through November although the fishery has closed in late summer during the last three years as many new vessels have entered the fishery, which has negatively impacted our ability to fish and keep employees working in the plant throughout the summer and into early fall.

Our company supports the Historical Participants' Illex Tiered Permit System Compromise, using the Council's August 2, 2013 control date, which was reaffirmed by the Council prior to the start of the 2019 fishing year. This generous compromise by those who have consistently relied on this fishery would fully qualify 34 'Tier 1' permits even though only 14 vessels harvested more than 500,000 pounds of Illex in 2017, increasing to 19 in 2018 and 26 in 2019. With the early closure in 1998, only 25 boats landed this amount with just 23 active at that level of harvest in the early closure of the 2004 fishery. The compromise Tier 2 proposal puts another 14 boats into the fishery. It is important that the Council act to limit the number of participants in this fishery, before the 25 other Illex permits are also activated, potentially creating a one-month fishery.

Lund's Fisheries was the first company on this coast to invest in a factory and vessels to catch, process and sell large volumes of what were formerly considered underutilized fisheries, including Illex squid. Over the years, this investment has allowed Cape May to become the number one Illex-producing port on the East Coast and we have helped several historical, independent fishermen become successful in this fishery.

Community impacts have largely been ignored in managing fisheries on this coast and we encourage the Council to consider our historical dependence on this fishery, which will help to maintain the jobs that our plant and cold-storage workers, fishing crews, and truckers depend upon. In a community where there are few year-round jobs, employment in the Illex fishery helps to support local supermarkets and other fishing-related businesses like gear stores and fuel suppliers and supports our local housing market. I ask the Council to support the Tiered permit system compromise put forward by the historic participants in the Cape May Illex fishery. Thank you for considering my comments.

Signature / date

 4/20/20

Name and address

Marty Martinez
2454 Cedar Street, Millville, NJ 08332

LUND'S FISHERIES



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Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

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Signature / date

Name and address

 4/20/20
Jay Scholtzberger 260 School House Dr L11111111 NJ 08221

Dr. Moore,

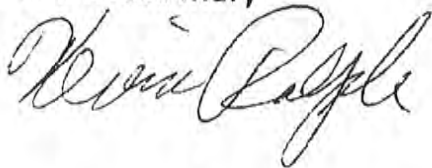
I hear that the Illex Amendment is still moving forward. I am still in support status quo and from what I've heard so far there are no valid reasons for eliminating or restricting industry within in this fishery. I've also heard that there is a good chance that the Council will move forward with some sort of action other than status quo. I will support the Town Dock's alternative that rightfully includes recent participation and their dependence and activity in the fishery. I support the 1997-2019 time frame for ALL tiers.

Our permit was an investment and the possibility of losing our permit through requalification would have a negative impact on my vessel and crew. Is no one ever to buy a Limited Access permit now for fear they will once again be removed? Is no one ever to buy a permit for a fishery that has a control date attached to it for fear that it will be taken away from them? That is not a sustainable way to run a business. Once you qualify for limited access, you shouldn't have to worry that it will one day be taken way. Our permit qualified once and we shouldn't have to worry about losing it or losing the access we currently have in this fishery. Where does it end?

This is nothing more than a fishery grab for those wanting to reduce competition and to take away the opportunities from others that they themselves have taken.

Thank you,

Kevin Ralph
FV Rebecca Mary



Dear Mid-Atlantic Council,

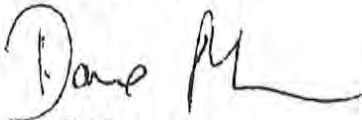
I am an active participant in the Illex fishery and have an Illex permit that has already been through requalification. Fishermen shouldn't have to worry that they will be removed from a fishery at some point once we have a permit, especially one that has already qualified through limited access.

Further restricting access to this small limited access fishery will do nothing but harm fishing communities. We have already been closed out of groundfish and now heavily rely on the Mid-Atlantic managed species. As fishermen it's important that we have the flexibility to switch from fishery to fishery as different species come and go, this is how we remain in business. Although I'm not in favor of tiers and would rather status quo, I will support the Town Dock's alternative. It allows recent participants to qualify for a Tier 1 permit and if you don't qualify for a Tier 1, the Tier 2 permit trip limit is large enough that we can still make fishing for Illex possible and profitable, unlike the other industry alternative with a trip limit of 48k.

I hear that there is an effort to raise the Illex quota again. Why are we looking to remove permits and restrict access for some members of the fishery when are looking at raising the quota? We also raised the quota last year. If the quota was raised last year and there is an effort to do the same this year this year, why is the Council moving forward with removing access There is enough squid to go around.

Thank you,

Dave Monahan



FV Determination

Wild Oceans • Conservation Law Foundation

April 20, 2020

Dr. Chris Moore, Executive Director
Mid-Atlantic Fishery Management Council
800 North State St., Suite 201
Dover, DE 19901

RE: MSB Goals and *Illex* Permits

Dear Dr. Moore,

Wild Oceans and Conservation Law Foundation commend the Mid-Atlantic Fishery Management Council for its continued work to advance ecosystem-based fishery management as outlined in the Council's Ecosystem Approach to Fisheries Management (EAFM) Guidance Document. The EAFM Guidance Document highlights the need to conserve forage species that play a critical ecological role in supporting both directed fisheries and fisheries for dependent predators. As a whole, the complex of species governed by the Mackerel, Squid and Butterfish Fishery Management Plan (MSB FMP) contributes significantly to the overall forage base within the Greater Atlantic region. **Therefore, we support adopting the "Unified Goals and Objectives," as presented in the *MSB FMP Goals/Objectives and Illex Permits Amendment Public Hearing Document*, to facilitate putting EAFM priorities into practice.**

Unified Goals and Objectives

Goal 1: Maintain sustainable MSB stocks.

Objective 1.1: Prevent overfishing and maintain sustainable biomass levels that achieve optimum yield in the MSB fisheries.

Objective 1.2: Consider and, to the extent practicable, account for the roles of MSB species/fisheries in the ecosystem.

Goal 2: Acknowledging the difficulty in quantifying all costs and benefits, achieve the greatest overall net benefit to the Nation, balancing the needs and priorities of different user groups and effects of management on fishing communities.

Objective 2.1: Provide the greatest degree of freedom and flexibility to harvesters and processors (including shoreside infrastructure) of MSB resources consistent with attainment of the other objectives of this FMP, including minimizing additional restrictions.

Objective 2.2: Allow opportunities for commercial and recreational MSB fishing, considering the opportunistic nature of the fisheries, changes in availability that

may result from changes in climate and other factors, and the need for operational flexibility.

Objective 2.3: Consider and strive to balance the social and economic needs of various sectors of the MSB fisheries (commercial including shoreside infrastructure and recreational) as well as other fisheries or concerns that may be ecologically linked to MSB fisheries.

Objective 2.4: Investigate opportunities to access international/shared resources of MSB species.

Goal 3: Support science, monitoring, and data collection to enhance effective management of MSB fisheries.

Objective 3.1: Improve data collection to better understand the status of MSB stocks, the role of MSB species in the ecosystem, and the biological, ecological, and socioeconomic impacts of management measures, including impacts to other fisheries.

Objective 3.2: Promote opportunities for industry collaboration on research.

Objective 3.3: Encourage research that may lead to practicable opportunities to further reduce bycatch in the MSB fisheries.

As described in Public Hearing Document (p.7), the existing MSB FMP goals and objectives have remain unchanged since 1981, even though significant milestones have been achieved, through reauthorizations of the Magnuson-Stevens Act and through the Mid-Atlantic Council’s visioning, strategic planning and EAFM initiatives, to broaden fisheries management beyond a “single-species” approach in order to conserve the ecosystems on which our fisheries depend. Arguably, the current suite of MSB FMP objectives is single-species in nature and is not in accord with the MSA definition of Optimum Yield and accompanying National Standard 1 Guidelines,^{1,2} the Mid-Atlantic Council’s EAFM policies, or with the ecosystem goals and objectives of the Council’s 2020-2024 Strategic Plan.

¹ The amount of fish which will provide the greatest overall benefit to the Nation, particularly with respect to food production and recreational opportunities, and taking into account the protection of marine ecosystems; is prescribed as such on the basis of the maximum sustainable yield from the fishery, as reduced by any relevant economic, social, or ecological factor; and in the case of an overfished fishery, provides for rebuilding to a level consistent with producing the maximum sustainable yield in such fishery. See, 16 U.S.C §1802(33).

² Protection of marine ecosystems includes “maintaining adequate forage for all components of the marine ecosystem.” See, 50 CFR §600.310(e)(3).

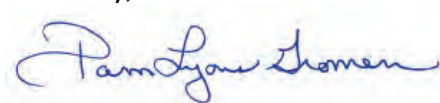
The National Standards General Guidelines explain the importance of up-to-date and clearly-worded FMP objectives:

How objectives are defined is important to the management process. Objectives should address the problems of a particular fishery. The objectives should be clearly stated, practicably attainable, framed in terms of definable events and measurable benefits, and based upon a comprehensive rather than a fragmentary approach to the problems addressed. An FMP should make a clear distinction between objectives and the management measures chosen to achieve them. The objectives of each FMP provide the context within which the Secretary will judge the consistency of an FMP's conservation and management measures with the national standards. (50 CFR § 600.305 (b) (3))

Considering the above guidance that calls for “clearly-stated, practically attainable” objectives, we remain concerned that new ecologically-relevant objectives (Objectives 1.2, 2.3 and 3.1) are somewhat nebulous and may be difficult to interpret when developing a fishery management action. Adding and maintaining an “Ecological Role” section for each of the managed species within the FMP and/or explicitly linking the goals and objectives to EAFM policies and Strategic Plan goals and objectives would serve to clarify these new FMP objectives and better articulate the Council’s intentions.

Wild Oceans and Conservation Law Foundation reiterate our support for adopting the “Unified Goals and Objectives,” recognizing that the proposed changes stem from the Council’s 2014-2018 Strategic Plan strategy (11.2) to “review and update FMP objectives as appropriate to ensure that they remain specific, relevant, and measurable.” We appreciate the Mid-Atlantic Fishery Management Council’s commitment to following through with its strategic plan priorities, and we look forward to continued collaboration to advance ecosystem-based approaches.

Sincerely,



Pam Lyons Gromen
Executive Director
Wild Oceans



Erica Fuller
Senior Attorney
Conservation Law Foundation

FISHING VESSEL ENTERPRISES INC

985 OCEAN DRIVE
CAPE MAY, NJ 08204

Chris Moore, Ph.D., Executive Director
Mid-Atlantic Fishery Management Council
800 North State Street, Suite 201
Dover, DE 19901

April 20,2020

Re: Comments on the MSB FMP Goals and Illex Permits Amendment

Dear Mid- Atlantic Council Members,

I am Sam Martin, Chief Operating Officer for Fishing Vessel Enterprises Inc. in Cape May NJ, who owns several Illex permits.

We support that **no action** should be taken at this time based upon the proposal and information in the public hearing document.

We would support the **requalifying of all active permit through 2019 by removing all permits that have not participated in the fishery in the past** (removing the zeros). This will protect the current participants from seeing a significant dilution if the quota is to be raised soon. The zeros have never built any value to the fishery. We have permits that would fall into this category.

This proposed amendment and/or action is solely based upon an increased economic derivative by certain historical participants in the Illex fishery. It was these participants that brought this proposal to the council and started a process in where the council will be deciding who gets cut out of a sustainably and financially robust fishery. That is a difficult precedent to set. Rarely if ever has an amendment been brought to reduce the capacity of the fishery when there is no biological reasoning to do so. That is why National Standards have been set in MSA to prevent it.

It has nothing to do with the sustainability of the fishery itself and nowhere truly identifies what a reduction in harvest capacity would achieve to increase yield, efficiency, or sustainability in the fishery.

Among other points we believe that the current proposals of eliminating participants goes against the proposed Goals and Objectives for the fishery. Below I specifically name two instances.

Goal 2 –

Objective 2.1 Looks to create a goal of giving the greatest degree of flexibility to harvesters.

The reduction in capacity of the harvest fleet has trickle down effects to those shoreside processors that these objectives note as well. With this proposed amendment there will be a reduction in shoreside entity infrastructure that will create **oligopsony power** among those processors that are remaining. **This type of power has been acknowledged to be a negative effect in other Mid Atlantic fisheries.** A reduction in current fleet capacity, which has built the market to what it is today would be contradictive to these goals and objectives.

Objective 2.2 States that a unified goal would be to allow opportunities for commercial MSB fishing considering the opportunistic nature of the fisheries, changes in the fishery and needs for operational flexibility.

This council was asked to look at the capacity in this fishery because the recent participants were viewed as being opportunistic in nature and the decades old participants felt this was an infringement on ability to remain as viable companies. **The Illex fishery is opportunistic in nature and has been managed**

successfully that way for those many decades. Numerous groups and persons from the scientific community one being the Manderson Report of the Illex summit of Nov 2019, hold that there are no biologic issues with the fishery and the current participants have little or no impact of the sustainability of the fishery. These summit conclusions were a result of the information from the current participants of the Illex fishery, those of the past that started this amendment and those of the present. This leads to the clear conclusion that the current fishery dynamic is what is creating the highest yields in the fishery today. It also proves that there are numerous unknown positive opportunities yet to come for all current participants in the fishery. So, this amendment would be counteractive to these goals and objectives.

Seeded within the document itself are instances wherein safety at sea could be enhanced by reducing capacity. This is false information. The only way it would reduce it would be by reducing actual vessels from the fishery. The safety risks will be the same for the current participants. Use of a trip limit would help but that is not proposed in all sections of the proposed tier system. A tier system proposed is identified to only limit the harvest volume not to reduce safety risks otherwise the trip limit would be across all tiers.

Also seeded within the amendment is an indication that the current participants have caused the quota to be caught early. This is a relative term. December 31 on each year is the end date. It is clear the quota has been caught **earlier** than it has in other years. This in no way has diminished the value to any one participant. The ex-vessel value of the fishery is up, and abundance is up. The reality of this is positive. The decades old participants that worked 60-90 days more than they have in the past couple of years have also seen record gross revenues. Revenues for the Illex fishery alone for some vessels that are said to be “dependent” on Illex are higher than those of some of the most successful fisheries on the east coast. There is no one vessel that participates in the Illex fishery that fishes that alone and nothing else, they have other fisheries they go to throughout the year. The term “dependent” is relative as all fisherman are dependent on any opportunity that make present itself in an active sustainable fishery. There is no Illex participant that is solely reliant on Illex.

In conclusion, any vessel **that has participated in the Illex fishery from 1997-2019 should be allowed to continue fishing without a tier system.** There is no biological or scientific evidence to support the proposed action, and it is a violation of National Standard 5 in the Magnuson Stevens Act stating that no action should be taken purely on economic factors. **The control date of 2013 should not be taken into consideration** as it is stale and **has not been looked at until it was seen that private sector financial profitability could be enhanced by the enforcement of it.** The control date should not be used.

As stated above, one compromise that our company would be willing to make, it would be to eliminate permits with ZERO landings. **This is a compromise and action that every participant and regulator can agree on and defend.** This will affect our company by losing access with a few permits. To our company that is a sacrifice we would be willing to make to protect the permits that have accessed the fishery at any point in the past. Eliminating the ZEROS will protect the future dilution of the quota and take out the unknowns of increasing capacity by an increase on quota in the years to come. **This will keep the fishery stable in the future, as it is in the present, with its current participation through 2019.**

Regards,

Sam Martin

Fishing Vessel Enterprises Inc.

April 20, 2020

Addressed to The Mid-Atlantic Fishery Management Council:

I am writing as an employee of The Town Dock, a former offshore illex fisherman, and a member of the commercial fishing community for the last 12 years.

I have attended meetings, webinars, conference calls and have been involved with this illex amendment process now for over a year.

As the Assistant Director of Purchasing and Fresh Sales for The Town Dock, I can tell you we have invested an enormous amount of time, money, equipment and research into developing a purchasing stream and sales market for illex squid. We have customers from Los Angeles to Chicago to New York and everywhere else in between now depending on inventory from us.

Restricting or eliminating our access to this fishery will be felt by hundreds of businesses, customers, vendors and the *thousands* of staff members employed by all of the above.

To say activity before the stale 2013 control date is the most accurate representation of this fishery makes no sense. The development of a new market, time, money and effort invested into its success as well as the customer demand it created in the last 6-7 years absolutely has to be taken into consideration. Using 2013 does not consider the major changes that have occurred with Town Dock's businesses nor others.

Everyone involved in this fishery has been profiting and there are no biological issues with this stock. We cannot let changes be driven by economics and greed. We have updated science that needs to be presented to the Council and public before we decide to cut people, boats and businesses out of this fishery.

I support the written and verbal comments regarding illex permit requalification submitted to The Mid Atlantic Council from the following companies:

- The Town Dock
- Atlantic Capes Fisheries
- NORPEL
- KSJ Seafood
- Gabby G Fisheries

FV Susan Rose unloads with us at Town Dock and it is essential that fishing year 2019 be included or that boat will be cut out of the Illex Fishery with major investment losses.

I can support the following:

- 1) no action to be taken and the requalification of all 76 permits.
- 2) If action has to be taken, I support the following:
 - Minimal action with full requalification of 51 active permits. This allows for requalification of all active permit holders with more than 50,000 pounds landed in one year from 1997 to 2019. This essentially eliminates permits for the non-participants in the fishery in the time frame from 1997 – 2019.
 - Acceptable Alternative: Should the council insist on a tiered approach, we can support the following:
 - *Tier 1 Classification:* 500,000 pounds best year qualifier 1997-2013; or 1,000,000 pounds best year qualifier 2014-2019 (+/- 41 permits).
 - *Tier 2 Classification:* 100,000 pounds best year qualifier 1997-2019; 90,000 pound trip limit; no sub-quota (+/- 7 permits).
 - *Tier 3 Classification:* 50,000 pounds best year qualifier; 47,000 lb. trip limit; no sub-quota (+/- 3 permits).
 - *Incidental limit:* 10,000 pounds (+/- 25 permits).
 - No new fish-hold capacity limitation.

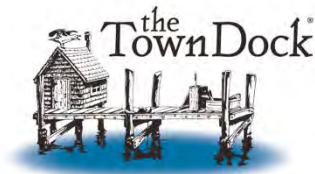
Sincerely,

Ryan Scelsa

Asst. Director of Purchasing & Fresh Sales

The Town Dock, Point Judith, RI

The Town Dock
Point Judith, RI





2 State Street | PO Box 608
Narragansett, RI 02882

Dear Mid-Atlantic Council,

I am writing to express concern over the Illex Amendment and provide support for the position proposed by The Town Dock.

The number of permit holders now utilizing their permits is largely due to an expanded use of the fish where the product is now able to be processed into a desired product in the marketplace. Without the market, there was less demand for the product which made it less attractive for fisherman to harvest. Now that there is demand for the product, it is unfair to eliminate some of those who paid for the permit and could see their permit lose its value.

Additionally, with the additional demand for the product, there are many additional good jobs created across multiple states both on fishing boats, in the processing plants and sales teams.

With the reduction of so many opportunities for fisherman to make a profitable living, it seems unfair and unwise to reduce this opportunity.

Sincerely,

Bill Toegemann
Controller



TOWNDOCK.COM
INFO@TOWNDOCK.COM
PH 401-789-2200 | FAX 401-782-4421



2 State Street | PO Box 608
Narragansett, RI 02882

Dear Mid-Atlantic Council,

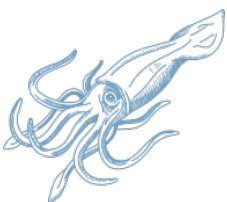
I am writing about the Illex Amendment.

I have seen how recent participation in the Illex fishery has affected both domestic and export markets. This was almost entirely an export fishery before we got involved and expanded to new markets. This product is in high demand with our US customers and provides them with an alternative option to lower quality foreign product. We can now rely less on foreign-sourced squid for cleaned product for the US market. This cleaned Illex product supports the fishery and bolsters price beyond what an export-only market could do. Increased competition for product to support all existing markets, many of which are more profitable than previously seen, is providing support for prices throughout the supply chain limiting any concerns of profit erosion and reduced efficiency potentially caused by racing to fish. Because of the new markets and new uses we have opened; we are able to utilize product from all types of vessels. The increased participation in the fishery and new markets opened are benefiting the fishery, fishing communities and the Nation overall.

I do not believe the data indicates the need to impose further limitations to fishery access at this time.

I am in support of the Illex Coalition's suggestions below:

- 1) **Preferred:** No action; requalification of all 76 permits.
- 2) **Preferred Alternative:** Minimal action; full requalification of 51 active permits. This allows for requalification of all active permit holders with more than 50,000 pounds landed in any one year from 1997 to 2019. This essentially eliminates permits for the non-participants in the fishery in the time frame from 1997-2019.
- 3) **Acceptable Alternative:** Should the council insist on a tiered approach, we can support the following:
 - *Tier 1 Classification:* 500,000 pounds best year qualifier 1997-2013; or 1,000,000 pounds best year qualifier 2014-2019 (+/- 41 permits).
 - *Tier 2 Classification:* 100,000 pounds best year qualifier 1997-2019; 90,000 pound trip limit; no sub-quota (+/- 7 permits).



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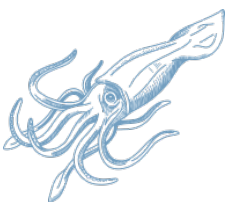
2 State Street | PO Box 608
Narragansett, RI 02882

- *Tier 3 Classification:* 50,000 pounds best year qualifier; 47,000 lb. trip limit; no sub-quota (+/- 3 permits).
- *Incidental limit:* 10,000 pounds (+/- 25 permits).
- No new fish-hold capacity limitation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Melissa Chace', written in a cursive style.

Melissa Chace
Director of International Purchasing & Sales, The Town Dock



TOWNDOCK.COM
INFO@TOWNDOCK.COM
PH 401-789-2200 | FAX 401-782-4421

My name is Bill Miller. I started fishing in 1973. At the time, illex fishing was a vision of Warren Lund. Most fishermen did not even know about illex squid, caught in the depths of 100 fathoms or deeper. Warren started a small market for iced illex, we got \$.05 per pound at the time. It was kept some of the Cape May boats busy in the summer months, putting less pressure on ground fishing to the East. Jeff Reichle started working at Lund's Fisheries around that time. He was a regular employee, culling fish on the belt and lumping boats. Warren saw potential in Jeff and moved him up in the company. Warren and Jeff had the same vision. Warren built a 140 foot freezer boat named the Atlantic Prince. The Goodwin family also built freezer boats. All for the underutilized fish illex, and mackerel.

Warren retired and sold a small company to Jeff. Jeff, with a lot of vision and a lot of courage, made Lunds what it is today with tons of investment and blood, sweat, and tears and 40 years of works. Jeff and the Goodwins developed markets were non-existent. The Axelson Family also made huge investments in the illex fishery. It also changed the way we fish offshore. It developed new styles and nets (thank you Captain Harry) – millionaire (big mesh) nets. As well as new door designs, and net sounding equipment.

Cape May fishermen have invested hugely in the illex fisheries for 40 years. I have tremendous respect for the pioneers of the illex fisheries for all of their efforts, and the continued efforts of Jeff and Wayne Reichle, the Goodwins, and the Axelson families.

I support the following:

- Tier 1 – Qualifying A4 1997 – 2013
- Tier 2 – Qualifying A3 1997 – 2018
- Tier 3 – Qualifying A3 1997 – 2018

Thank you,

Captain Bill Miller
Eva Marie
Cape May, New Jersey

April 20, 2020

Dr. Christopher M. Moore. Executive Director
Mid-Atlantic Fishery Management Council
800 North State Street, Suite 201, Dover, DE 19901 – by email: cmoore@mafmc.org

Re: Illex Permits Amendment

Dear Dr. Moore:

Our families operate two vessels that regularly work on the edge of the Continental Shelf, between Carteret and Washington Canyons, where the summer Illex fishery historically takes place. One vessel, the 75 foot longline vessel Captain Bob, and the other, a 75 foot offshore lobster vessel, Two Dukes, have worked in this area successfully with the historic squid fishing fleet for many years. The longtime participants in this fishery know us and know where our gear is set and work with us to avoid it.

We are writing, following our January 28 letter to you, to again ask the Council to use the August 2, 2013 control date, reaffirmed by the Council in 2018, to requalify historic fishing vessels working in the Illex squid fishery and reduce latent effort in the fishery. Newer participants in the fishery should not have the same access to the limited Illex fishery that boats who have worked in this fishery historically have earned through their effort and investment. The Council has used control dates consistently in allocating limited commercial quotas, with the goal of matching fishing capacity of the available resource, since the beginning of the federal fishery management process and should also do so with this amendment.

Within the last two or three years, as the Illex fishery has become more valuable with long-term participants working to build new markets, vessels new to the fishery have operated in the vicinity of our gear with little regard to sharing a narrow band of the ocean. We are very concerned that additional boats in the fishery will lead to gear conflicts in our fixed gear fisheries, without the Council acting to reasonably provide continued access to the fishery in the future. We are concerned about the Captains of these new vessels not understanding the nature of and extent of our longline and lobster fisheries in the western portion of the Illex's range, as those who have been in the fishery over a long period of time do.

We support the Historical Participants' Illex Tiered Permit System Compromise. This fair compromise, by those who have consistently relied on this fishery for many years, would fully qualify 34 'Tier 1' permits even though only 14 vessels harvested more than 500,000 pounds of Illex in 2017, increasing to just 19 in 2018 and 26 in 2019. With the early closure in 1998, 25 boats landed this amount with just 23 with that level of catch leading to the early closure of the 2004 fishery. The Historical Participant's Compromise Tier 2 proposal keeps another 14 boats in the fishery. It is important that the Council act consistently in June to limit the number of participants in this fishery, before another 25 latent Illex permits are also activated, potentially creating a one-month fishery, with additional negative effects on our fishing communities in New Jersey.

Thank you for considering our comments. Please contact us for more information.

Robbie and Eric Bucaw
Captain Eric, Inc., Sea Isle City, NJ 08243
609-231-4450 / rbsword3@comcast.net



Managing the Needs of our Customers Through our Commitment to Sustainable Fisheries

April 17, 2020

Dr. Chris Moore, Executive Director
800 North State Street, Suite 20, Dover, DE 19901
Re: Illex Permits Amendment - By email: cmoore@mafmc.org

Dear Dr. Moore:

My name is Kathleen Brooks, I have been employed by Lund's Fisheries for 30 years. It is a wonderful place to work, a family-owned company producing seafood in Cape May, NJ since 1954. The company creates year-round jobs for people in a community where most of the employment is seasonal.

During summer, we have depended upon the Illex squid fishery since the early 1980's, exporting our first container of squid in 1985. Historically, we have taken part in the Illex fishery during the months of May through November although the fishery has closed in late summer during the last three years as many new vessels have entered the fishery, which has negatively impacted our ability to fish and keep employees working in the plant throughout the summer and into early fall.

Our company supports the Historical Participants' Illex Tiered Permit System Compromise, using the Council's August 2, 2013 control date, which was reaffirmed by the Council prior to the start of the 2019 fishing year. This generous compromise by those who have consistently relied on this fishery would fully qualify 34 'Tier 1' permits even though only 14 vessels harvested more than 500,000 pounds of Illex in 2017, increasing to 19 in 2018 and 26 in 2019. With the early closure in 1998, only 25 boats landed this amount with just 23 active at that level of harvest in the early closure of the 2004 fishery. The compromise Tier 2 proposal puts another 14 boats into the fishery. It is important that the Council act to limit the number of participants in this fishery, before the 25 other Illex permits are also activated, potentially creating a one-month fishery.

Lund's Fisheries was the first company on this coast to invest in a factory and vessels to catch, process and sell large volumes of what were formerly considered underutilized fisheries, including Illex squid. Over the years, this investment has allowed Cape May to become the number one Illex-producing port on the East Coast and we have helped several historical, independent fishermen become successful in this fishery.

Community impacts have largely been ignored in managing fisheries on this coast and we encourage the Council to consider our historical dependence on this fishery, which will help to maintain the jobs that our plant and cold-storage workers, fishing crews, and truckers depend upon. In a community where there are few year-round jobs, employment in the Illex fishery helps to support local supermarkets and other fishing-related businesses like gear stores and fuel suppliers and supports our local housing market. I ask the Council to support the Tiered permit system compromise put forward by the historic participants in the Cape May Illex fishery. Thank you for considering my comments.

Signature / date

Name and address

Kathleen Brooks 3520 Bayshore Rd. N. Cape May NJ 082045

From: Una.Patrick Quinn <una.pg@hotmail.com>
Sent: Monday, April 20, 2020 12:39 PM
To: Moore, Christopher
Subject: Illex

Dear Chris,

I'm Captain F.V. Retriever which has been in Illex fisheries since 1998.

I'm writing this letter in response to the upcoming amendments. I support the tiered system proposal that was put forward by the historical participants. I've been in the fishery business for the last 30 years. I have witnessed multiple over capitalisations. I was involved in both the New England multi species and herring & mackeral fisheries which are both allowed by NMFS to be overcapitalised.

Thanks,

Patrick Quinn



Monday, April 20, 2020

Dr. Chris Moore
Executive Director
Mid-Atlantic Fishery Management Council

RE: MSC Goals and Illex Permits

Dear Dr. Moore,

Thank you for the opportunity to publicly comment regarding the proposed *Illex* squid permitting amendment to the Mackerel, Squid, Butterfish Fishery Management Plan.

I would first like to take this opportunity to introduce myself and my connection to the *Illex* squid fishery. My name is Tom Tierney and I work for Northern Pelagic Group, LLC- NORPEL in New Bedford, MA as the Quality Manager. Over the past several years, NORPEL has become reliant on the *Illex* squid fishery. During the summer months, NORPEL catches, freezes, processes, stores and distributes *Illex* squid. Without *Illex* squid, most of the employees at NORPEL would be laid off, as this is an essential component to our business.

NORPEL employees nearly 100 of the brightest, hardworking and passionate residents of the South Coast of Massachusetts. Further we support local businesses and shoreside services such as trucking companies, gear manufacturers, packaging suppliers, ice houses and so many more.

By removing more participants from the *Illex* squid fishery, I am fearful that many of the fishing vessels who currently provide squid to NORPEL will lose their permits. This will have significantly negative impacts on NORPEL and the community of New Bedford. Maintaining geographic flexibility and maximizing the number of fishing vessels in the *Illex* squid fleet is absolutely vital.

Considering the above, I support the following proposal:

- 1) **Preferred:** No action; requalification of all 76 permits.
- 2) **Preferred Alternative:** Minimal action; full requalification of 51 active permits. This allows for requalification of all active permit holders with more than 50,000 pounds landed in any one year from 1997 to 2019. This essentially eliminates permits for the non-participants in the fishery in the time frame from 1997-2019.
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- *Tier 3 Classification:* 50,000 pounds best year qualifier; 47,000 lb. trip limit; no sub-quota (+/- 3 permits).
- *Incidental limit:* 10,000 lbs. (+/- 25 permits).
- No new fish-hold capacity limitation.

I urge the council to consider the motives behind a requalification amendment, which seeks to remove current active participants from a healthy fishery that supports vessels, shoreside industries and communities from Massachusetts to South Carolina. *Illex* squid is a public resource that vessels should be allowed to pursue in order to provide the greatest net benefit to the nation and not hoarded by a few entities.

Once again, I thank you for the opportunity to comment on this situation.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Tierney". The signature is stylized and cursive.

Tom Tierney
Northern Pelagic Group, LLC - NORPEL