

From: [Meghan Lapp](mailto:atlanticconservation@noaa.gov)
To: atlanticconservation@noaa.gov
Subject: National Monuments Written Comment
Date: Tuesday, September 15, 2015 9:05:21 PM

On behalf of Seafreeze Ltd, I would like to make the following comments:

Seafreeze Ltd, based in Davisville RI, is the East Coast's largest producer of illex squid, mackerel and butterfish. We are also one of the East Coast's largest producers of loligo squid. We own and operate two freezer trawlers that spend one quarter to one third of any given year fishing in the canyon areas proposed as National Monuments. In some years it is an even greater percentage. We have been steadily fishing these areas for squid, mackerel and butterfish for 30 years. Our company supports 95 employees both on our vessels and on land. The United States cannot afford to lose jobs in the tough economic times in which we live. These 95 jobs depend on fishing access to these areas which we have historically and currently fished.

Attached is a chart showing fishing activity and fishing vessel transit in the areas proposed for closure. This data has been compiled from the electronic charts of various vessels in various fisheries in New England. It is by no means inclusive of all activity, but it serves to make it very clear that significant fishing activity occurs in the New England canyon regions.

Unfortunately, due to the lack of advance notice of NOAA's intention to consider the National Monument proposals, and the deadline of September 15 for comments, we were unable to download fishing activity information from our own vessels; they have been out to sea. Closing the New England canyon fishing areas without any economic assessment as to their importance to fishing

vessels and businesses would be inappropriate.

As recently as this June, the Mid Atlantic Fishery Management Council completed its Deep Sea Coral Amendment, designed to protect the deep sea canyons of the Mid Atlantic. It was a deliberative process that included science, stakeholder input, extensive analysis, and collaboration. Seafreeze was actively involved in this process, and it is the process any such deep sea canyon protection should follow. An executive order would circumvent this important and legislatively designed process.

We therefore request that executive designation as a National Monument not be considered. Rather, all such fishery management actions should be developed through the Fishery Management Council process as Congressionally directed by the Magnuson Stevens Act.

Sincerely,
Meghan Lapp

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