

January 31, 2015

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

Submitted electronically

Re: Deep Sea Corals Amendment Comments

Dear Dr. Moore,

Roughly 80 miles offshore of our most populous coastline, where the continental shelf drops off to the pitch-black abyss of the deep Atlantic Ocean, vivid and fragile cold-water corals – some the size of small trees and taking centuries to grow – take hold on the walls and floors of a series of submarine canyons and the nearby continental slope. These coral communities form the foundation of deep-sea ecosystems, providing food, spawning habitat, and shelter for an array of invertebrate and fish species, and helping to fuel biodiversity hotspots in the canyons and along the shelf break.

Together, we represent 34 ocean conservation groups, coastal businesses, and scientists and thank you and the rest of the Mid-Atlantic Fishery Management Council for your efforts to protect our region's ecologically valuable deep-sea corals and the marine life they support. This is the moment to act – limited fishing currently occurs in these generally rugged and deep areas. Extremely slow-growing with lifespans in the hundreds – even thousands – of years, deep-sea corals are highly vulnerable to fishing gear interactions. The Deep Sea Corals Amendment offers us an unprecedented opportunity to protect the deep-sea corals, anemones, and sponges, and the valuable hard, structured bottom habitat these organisms grow on, from long-term damage. Deep-sea corals protection would benefit the health of the broader marine ecosystem and the fisheries that rely on it, as well as other economic and social interests, like biotechnological innovation.

We urge you to adopt the strongest conservation measures possible in the Deep Sea Corals Amendment, and support alternatives that would:

- Prohibit all bottom-tending fishing gear (Alternative 4B) from all of the canyon and inter-canyon areas that have been identified by the Council's technical team as discrete coral protection zones based on the National Oceanic and Atmospheric Administration (NOAA) coral habitat model and slope criteria (Alternative 3B). Our groups also recommend that the Council and NOAA include an analysis of the potential impacts of mid-water trawl gear, which has been

shown to contact the ocean bottom, in the Environmental Assessment that will be developed for this action.

- Prohibit bottom-tending gear (Alternative 2B) from a broad coral protection zone with the landward boundary at the 200 meter depth contour (Alternative 1B) in order to protect corals outside of the discrete zones. Any gear exemptions should not extend beyond those currently proposed as alternatives in the public hearing document – for red crab and tilefish – and should seek to limit and reduce harmful impacts from such gear over time.
- Require the use of electronic vessel monitoring systems aboard fishing vessels (Alternative 6B) to help ensure the plan is effectively implemented on the water.

Again, we congratulate the Council on developing one of the most exciting and precedent-setting marine habitat protection initiatives in the country. Our groups appreciate this opportunity to offer our support for alternatives that will protect the region’s deep-sea corals and the marine life they support for future generations.

Sincerely,

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