



September, 28, 2023

Dr. Chris Moore, Executive Director, MAFMC & Council Members:

Thank you for the opportunity to include some additional information for Tuesday's discussion on the Illex hold measurement framework, on behalf of Lund's Fisheries, Cape May, NJ.

In June, we wrote that we supported the Council moving ahead with the framework as a first step in a 'freeze the footprint' approach to matching harvesting capacity to resource availability, and addressing and analyzing the capacity of the Illex fleet, through establishing Illex fish hold baselines, as the Council did in the mackerel fishery some time ago.

We are writing to ask that the Council approve Alternative 2a when taking final action next week. This alternative provides at several CPH Illex permit holders a hold measurement baseline option, striking an equitable balance of interests in our view.

In talking with Council members following the MSB Committee and AP meeting last week, we have been asked 'what happens to the Lund's permit if we go with Alternative 2b'?

In response; we would have no alternative other than to measure the hold of the next vessel that our Illex permit would go on, and our capacity to catch and carry Illex in the future, after many years in the fishery, could very likely be reduced depending on the size of immediately available vessels.

We would lose the ability to be able to match the hold capacity of the F/V Tremont, when our Illex permit is eventually transferred out of CPH, since the replacement vessel's upgrade potential would, otherwise, not include a hold capacity baseline; only the existing baselines for length and horsepower.

The Tremont was 115 feet in length. The same size as our Enterprise (117') and Retriever (126'), which were both measured for the mackerel fishery years ago, and at very little cost. Therefore, the hold capacity of the Illex permits, on those vessels, will match the mackerel hold measurement baseline of these boats and their individual hold capacity would be factored into the future capacity of the Illex fishery by Council and Agency staff.

We are simply trying to match and retain Tremont's hold capacity baseline on our Illex permit, when placed on a future vessel, as if that boat had previously been measured for the mackerel fishery.

Tremont sunk October 28, 2022 after we had the vessel's hold capacity measured by a marine surveyor, on October 23, 2019, in preparation of the approval of the Illex Permitting Amendment 22.

The suite of permits on Tremont, before she was lost, did not include a Tier 1 mackerel permit. If it did, that boat would have been previously measured under the mackerel regulations and we would not be seeking an exemption for our Illex permit today; in that case, Alternative 2b would not negatively affect our future business.

As the Council contemplates freezing the footprint of the Illex fishery, through a requirement to establish Illex permit fish hold baselines - which we strongly support - we want to clarify that we are attempting to preserve the Tremont's previously-measured fish hold baseline and protect the value of our investments in the fishery, and in that permit, which is now in CPH after the vessel's sinking, and as we move to a replacement vessel sometime in the future.

Thank you for consideration. We appreciate Council staff's dedication to helping all of us to resolve and clarify some of these issues. The memo for the MSC meeting, which you will review next week, provided a thoughtful option from our perspective (2a), which would maximize the value of our past investments, and future flexibility, as we continue our vessel and shoreside activities in the Illex fishery; a core part of our fishing opportunities in the Port of Cape May.

Greg DiDomenico

Jeff Kaelin