

Deep Sea Fishermen's Union of the Pacific

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Established 1912

December 2, 2014

Mr. Dan Hull, Chairman
North Pacific Fishery Management Council
605 West 4th Street, Suite 306
Anchorage, AK. 99501-2252

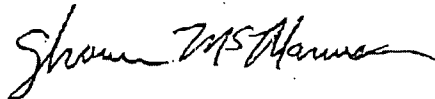
RE: December, 2014 NPFMC Meeting Agenda Item D-3 "Pribilof Canyon Corals"

Dear Chairman Hull:

On behalf of the Deep Sea Fishermen's Union (DSFU), I am writing to you today with extreme concerns regarding the Bering Sea Canyons discussion paper of April 2014. Much of the data gathered in the discussion papers has been extrapolated from trawl surveys resulting in "predicted coral abundance and presence using a statistical analysis of coral distributions". The words "*predicted*", "*statistical*" and "*probability*" are used countless times throughout the discussion paper when referencing coral existence. Since any future closures surrounding coral existence would more than likely be in perpetuity, the DSFU vehemently encourages the Council to base their decision(s) on direct observation of coral abundance rather than predicted abundance of corals.

Furthermore, the DSFU strongly encourages the Council to abide by National Standard 4 of the MSA when considering potential area closures.

Sincerely,



Shawn McManus
Vice President
Deep Sea Fishermen's Union