

SUMMARY OF FISHERY ECOSYSTEM PLAN AND COMPREHENSIVE ECOSYSTEM AMENDMENT COMMENTS

Prepared by Roger Pugliese, SAFMC FEP and CEA Coordinator

I. Summary

The Council/NMFS solicited comments on the Fishery Ecosystem Plan and FEP Comprehensive Ecosystem Amendment in May 2008. The comment period ended on May 16, 2008. Five public hearings were held in May 2008; the table below outlines the attendees at each meeting. The Council received 18 written comments in the form of letters, faxes and emails. A table summarizing these comments follows the public hearing comments. This document presents a general overview of the comments received from commercial and recreational fishermen, government agencies, conservation organizations, and fishing organizations. It is not intended to provide a detailed report of all comment received.

Date	Location	Attendance/Comment
May 7, 2008	Key Largo, Florida	16/11
May 9, 2008	Cape Canaveral, Florida	15/9
May 12, 2008	Pooler, Georgia	9/2
May 13, 2008	Charleston, South Carolina	15/5
May 15, 2008	New Bern, North Carolina	14/3

II. Summary of Comments

New Bern, North Carolina

Jennifer McGroarty

Comment on CEA: Encourage local communities to have both short term and long term incentives for protecting the reefs. Support marine protected areas and to create a network of protected areas that support multiple ecosystems and breeding grounds with stakeholders included in its design and management. Include protection of watershed and near shore communities and treat reefs as a separate and independent ecosystem accounting for the local culture, historical uses, and political realities.

Marine Fish Conservation Network (Sera Harold Drevenak)

Comments on Fishery Ecosystem Plan (FEP) and CEA: Commend the council and the staff for finalizing the FEP inherent in ecosystem based management is an understanding of that ecosystem and now we have that in the FEP.

We now have all of the necessary tools to move forward with ecosystem based management. The FEP source document as the huge first step towards sustainable fisheries and ecosystem based management and not the end game of ecosystem based management.

Two basic components to that ecosystem based management that we strongly believe that the council should consider and move forward with 1) trophic interactions and food webs and forage fish and 2) time and area management.

Marine Fish Conservation Network (Sera Harold Drevenak)

Comments on the FEP and CEA: We believe that the HAPC designations are a triumph of ecosystem based management, conservation, sustainable fisheries. The Council brought NGOs, fishermen, managers, and technicians to the table and produced a result that we can all be very proud of and we commend the council and the staff for all of their hard work.

Oceana (Buffy Baumann)

Comments on the FEP and CEA:

We will be submitting written comments as well for the record, but while I'm here I just wanted to applaud the council's vision and the efforts along this ten year long, long road towards ecosystem based management. We strongly support the Coral HAPC Proposal and feel that there are some good alternatives on the table to balance protecting this deep water coral habitat along with preserving traditional fishing areas. We urge the council to adopt the preferred alternatives in June as we continue to move forward with the public participation process that will represent strongest protections for the deep water corals.

Charleston, South Carolina

South Carolina Coastal Conservation League (Nancy Vinson, Water Quality Director)

Comment on the CEA: The Conservation League is a non-profit public interest organization with more than 4,000 members dedicated to protecting the cultural and natural resources of the South Carolina coast. Support the amendment and encourage you all to adopt it. Support the protection of the fragile Deep Sea Coral Ecosystem and protect it from bottom trawling while allowing continued blue-water fishing and things

like that that wouldn't harm it and continue the existing uses. We think it really also represents an untapped resource for medical research. As you know, many of the cures for illnesses that we face today come from natural organism, and it's an incredible place to explore and learn about this Deep Sea Coral Ecosystem.

Angela Preston

Comments on CEA: It is very important to me that we keep the areas from Cape Lookout down to the Pourtales Terrace in Florida as pristine as they are. I hope that we've been able to get in on the proactive stance on this; because once it's damaged, it can't come back.

Oceana (Buffy Baumann, Fisheries Advocate)

Comments on CEA: Oceana is an organization that works on ocean conservation internationally and here in the U.S. Here in the southeast we have about 35,000 members, just to give you an idea of our standing here in this area. Thank the council and especially the staff for holding these hearings and appreciate the fact that you all have been pushing for this Comprehensive Ecosystem Amendment for I think we're coming up on ten years now. We appreciate that you all are trying to be proactive and get ahead of some of the potential issues of the ocean and protecting our deep water coral. What we do know is pretty amazing and we want to keep it protected and as pristine as possible. We feel that there are a lot of good alternatives out there that work to balance the deep water coral habitat as well as the few economic interests that are already out there and preserving the traditional fishing areas. We would like to see the council move forward in June with the most conservative and protective preferred alternatives before you go out to your second round of public hearings. With less than 1 percent of those VMS spots within the HAPC boundary we definitely want to see that boundary stay where it is.

Joshua Giordano Silliman

Comment on the CEA: He indicated full support of the amendment, however recommends removing the anchor and chain provisions. Unless about to go extinct, don't prohibit golden crab harvest. Father used to deepwater trawl destroys everything including coral.

Comment on FEP: Stop drilling in the earth to solve energy problems.

Recreational Fishing Alliance (Joey Prochazna, Z-man Fishing Products)

Comment on CEA: Recreational fishing from North Carolina through the Florida Keys produces over \$3.4 billion annually in economic output and supports 49,817 full-time equivalent jobs. The RFA supports Alternative 2 and Sub-alternatives 2A through 2E under this section. RFA supports prohibitions 1 through 4 under this section in order to protect deep water coral under the caveats that hook-and-line gear or fishermen are not restricted from these areas. Noting the potential damage that can ensue due to human activities, RFA encourages the South Atlantic Fishery Management Council to create a streamlined adaptive process which would allow ample public and industry input, but decrease the time necessary to protect deep water corals once identified.

Pooler, Georgia

Southern Shrimp Alliance (Richard Vendetti)

Comments on the Comprehensive Ecosystem Amendment (CEA): Comments are submitted by letter. They support establishment of CHAPCs but request slight movement of western boundary of the middle CHAPC.

Robbie Linton

Comments on CEA: Important to educate fishermen to show them what is being done to the environment. Education may be more effective than more regulations.

Key Largo, Florida

Bill Kelly

Comments on CEA: Provided comments addressing concern regarding the potential impact and degradation to deepwater corals, a thousand to 1,800 feet deep, by an increased number of recreational, charter/headboat, and commercial fishermen that are exploring the daytime sword fishery. It is the overwhelming consensus of opinion of top Captains that breakaway sinkers or weighting devices are no longer the norm. It's something that early on was tried in the night fishery, because they're basically fishing to depths less than 300 feet, but they found them very impractical in deepwater fishing. Most of the daylight sword fishing is taking place in a thousand to 2,500 feet of water and when you consider the cost of lead at twenty-five cents an ounce, we're looking at \$4.00 a pound and your average ten to fifteen-pound lead to go deep would cost you forty to sixty bucks.

Description of fishing method- Fishermen now use either the coat-hanger rigs made out of a poured concrete mix which break away and degrade into simple gravel and sand. The other method is to use tube socks filled with sand to the desired weight, with a light tie on the bottom which will rupture, dispersing nothing but sand in the water column and on the bottom. The procedure using these deep-drop rigs is the leader length is approximately a hundred to 150 feet long and it's from a three-way swivel, the weight portion is suspended on a fifty to a hundred-foot piece of monofilament and it's secured in a non-breakaway fashion. Once the rig is dropped down and bottom contact is made, it is then retrieved fifty to a hundred feet off the bottom, so as not to snag it, because then they would lose their entire rig and that is not the objective.

Organized Fishermen of Florida (Bruce Irwin, President of the Marathon Chapter)

Comments on the FEP: My understanding of ecosystem management is everything is supposed to be in balance. Regulations put on by the state for the no taking of jewfish, or goliath grouper, have put a burden on other species, because it's out of balance. I think that needs to be looked at heavily when they're making these laws about ecosystem management.

Golden Crab Fishermen Comments

Howard Rau

Bill Whipple

Randy Manchester

Chip Bethal

Robert Palma

Gary Graves

Comments on CEA: AP has provided updated alternatives for allowable gear areas and support requirement for use of VMS or electronic logbook in the fishery.

Summary of Recommendations: Detailed summary of Advisory Panel recommendations attached to Key Largo public hearing minutes.

Recommendation 1.

1. Develop a combined AP Management effort to redraw boundary lines.
2. Require VMS or electronic logbooks on golden crab vessels at no cost to fishermen except for monthly monitoring charges with one year “break-in” period. Explore use of pingers on traps.
3. Explore cooperative research to integrate logbook, VMS and other data to refine fishing operations and habitat characterizations.

Recommendation 2.

1. Southern zone: preserve traditional golden crab fishing grounds. Revised Alternative- see detailed summary for boundary modifications.
2. Middle zone: preserve traditional golden crab fishing grounds. Revised Alternative- see detailed summary for boundary modifications.
3. Northern zone: preserve traditional golden crab fishing grounds. Revised Alternative- see detailed summary for boundary modifications.
4. Northern zone where no traditional fishing: provide an allowable golden crab fishing area for existing permit holders not currently active in the fishery.
5. Require VMS or electronic logbooks on golden crab vessels at no cost to fishermen except for monthly monitoring charges with one year “break-in” period. Explore use of pingers on traps.
6. Explore cooperative research to integrate logbook, VMS and other data to refine fishing operations and habitat characterizations.

Recommendation 3. Same as Recommendation 2 except that the following portions of the CHAPC from 28 degrees latitude north are added to the “allowable golden crab fishing area”

1. Make the entire portion of the proposed CHAPC between 28 degrees and 29 degrees latitude and east of 79 degrees 30 minutes longitude “an allowable golden crab fishing area”.
2. Make the entire portion of the proposed CHAPC between 31 degrees and 31 degrees 23 minutes 28 seconds latitude “an allowable golden crab fishing area”.
3. In the extreme northern portion of the C-HAPC create a “C” shaped “allowable golden crab fishing area.

4. Require VMS or electronic logbooks on golden crab vessels at no cost to fishermen except for monthly monitoring charges with one year “break-in” period. Explore use of pingers on traps.
5. Explore cooperative research to integrate logbook, VMS and other data to refine fishing operations and habitat characterizations.

John Piva for Nuno Alemada

Comments on CEA: Concern over being put out of fishery just as it is coming together.

Organized Fishermen of Florida (Bruce Irwin, President of the Marathon Chapter)

Comments on the FEP: My understanding of ecosystem management is everything is supposed to be in balance. Regulations put on by the state for the no taking of jewfish, or goliath grouper, have put a burden on other species, because it’s out of balance. I think that needs to be looked at heavily when they’re making these laws about ecosystem management.

Oceana (German Mendez):

Comments on CEA: It’s important to try to give the most possible protection to these reefs, because they are, in essence, the place where the source of food and the fish and the crabs and the shrimp -- It’s where they are mostly created. If we protect those areas, then we can have the areas where the fishery can be developed and it will always be a resource that will be available. That’s why I see that this form of preserving the ecosystem and the bottom, it’s good, because it’s going to help more the fishing industry. We will have the resource for many years to come and also, it will provide the habitat that these animals need. The more we can protect it, the better.

Organized Fishermen of Florida (Jeff Cramer, State President)

Comment on the FEP: I’ve been a commercial fisherman my whole life and I can remember when I was young that there weren’t that many goliath grouper out there. Now, I’m hearing from commercial fishermen and recreational fishermen and spear fishermen, everyone, that the goliath grouper are out of control and there are people -- I’ve heard there are people already culling these fish because of their impacts on the spear fishermen and the recreational guy that’s got his coral heads that he dives and every one he goes to has a goliath grouper on it. I think something that would work would possibly be a tag system. I think that it would take the pressure off some of the other grouper species if you included that into the grouper aggregate bag limit. Obviously I think there should be some kind of a size limit, a maximum size or a minimum size or a slot limit even.

Tom Hill

Comments on the FEP: The ecosystem is partly to blame. I think we need to be taking a good hard look at everything, whether it’s the grouper snapper or the ecosystem, taking and looking at what affects another. Understand the impacts of predation (e.g., jewfish, amberjack, sharks) and other non-fishing issues (e.g., ocean outfalls, algae bloom). We’re focusing in on the wrong enemy. The enemy is not the recreational fishermen or the commercial fishermen.

Cape Canaveral, Florida

Conservation Chair of Volusia-Flagler Sierra Club (Mr. Ross)

Comments on CEA: Support of banning these destructive fishing practices like longline and trawling and do as much marine conservation areas, restricted areas, to give the ecosystem a chance to recover.

Comment on FEP: I'm very concerned about global heating, the acidification of the oceans. I know you have a large problem on your plate and I hope you will listen to the scientists and have the political will to carry through and save what we can while we can.

Oceana (Darden Rice)

Comments on CEA: We are an international ocean protection organization and we interface with the regional fishery management councils because our organization works on protecting deepwater habitat. Thank the South Atlantic Fishery Management Council and the staff and realize that this undertaking of approaching a comprehensive, ecosystem-based management is a first step. Oceana does ask that the Council support taking the strongest management actions, alternatives for the deepwater coral protection. We'd like to recognize and, certainly, thank the good people who are affiliated with and work with the Golden Crab and the Deep Water Shrimp Fisheries and the APs. I think that we have some really good options and alternatives on the table, and these are options that balance the protection of the deepwater coral in the proposed coral HAPC boundaries with preserving the traditional fishing areas. We would like to see the Council adopt the strongest protections possible for this deepwater coral habitat. I think we've got a good boundary line there that – in respect to that fishery and we certainly recognize that the Golden Crab Fishery is probably one of the most sustainable fisheries that has worked very proactively with the Council and with scientists to lay out some good regulations to continue the way that they continue to fish within these coral HAPCs and those alternatives are listed in the Plan. It's good to see that the South Atlantic Fishery Management Council is looking at these proposed actions that will, in short, cover the largest pristine untouched deepwater coral systems in the world and this is something that certainly puts the South Atlantic Fishery Management Council, I think, really leaps and bounds ahead in terms of leadership.

Central Port Offshore (David Heil)

Comments on CEA: We would oppose any changes to the regulations in regards to the closure of areas off the Port Canaveral area. We do not believe these are warranted. The fishing pressure in regards to recreational fishery out there is so miniscule at this point, anyways, in the depths you're talking about, that there would be little to no impact in regards to the recreational. Commercial is a different matter, of course, when you have somebody dragging nets or dropping longlines across the coral that's one thing, but as far as recreational impacts in the depths of water you're talking about we have no impact at all on that coral out there as far as this area. I don't even know of anybody that, actually, recreational fishes out there. The deepest that most people you can get out here is probably about 600 foot and I understand that the coral depths that you're talking about are much substantially deeper than that. Thank you.

Recreational Fishing Alliance (David Huber, Florida Chairman).

Comments on the FEP: Represents our membership (2,000 members in the State of Florida and over 50,000 members, nationwide) which includes individual anglers, boat builders, fishing tackle manufacturers, party and charter boat businesses, bait and tackle retailers, marinas and many other businesses and fishing communities.

Collectively, recreational fishing in the South Atlantic produces over \$3.4 billion annually in economic output and supports 49,817 full-time equivalent jobs.

Habitat is essential in order for many of the important recreational fisheries to be productive. RFA supports Alternative 2 and Sub-Alternatives 2A through 2E under the section. Furthermore, RFA supports Prohibitions 1 through 4 under the section in order to protect deepwater corals under the caveat that hook and line gear or fishermen are not restricted from these areas. Noting the potential damage that can ensue from human activities, RFA encourages the South Atlantic Fishery Management Council to create a streamlined, adaptive process which would allow public and industry input but decrease the time necessary to protect deepwater corals once identified.

Environmental Defense Fund

Habitat Advisory Panel Chairman (Douglas Neil Rader)

Comments on the CEA and FEP: As the Chair of your Habitat and Environmental Protection Advisory Panel reiterating recommendations from that panel to you that you have received before related to both the Fishery Ecosystem Plan and the Comprehensive Amendment which would implement it; and then second – and I'll make clear where the two things start and stop – and then as the second hat I'll be commenting on behalf of the Environmental Defense Fund members nationally and in the U.S. Southeast and I'll make clear where those two sets of comments bridge.

Comments as Chair of your Habitat and Environmental Protection Advisory Panel

The work of that panel does constitute the best available science related to that kind of habitat information. So on behalf of that AP I want to endorse full protection for the entire zone, as previously recommended in the proposal, that constitutes all of alternatives to with adequate protection given to both fishing and non-fishing threats as the essential fish habitat doctrine allows and that also is consistent with the action taken in by the Council in December of 2004 to move forward to protect all known deepwater coral sites in the U.S. and Southeast. In addition to that though, new information from members of the advisory panels suggests that there might be and probably are – is an additional zone in the north, in the high probability zone that we identified for you in December last, that also contains deepwater corals. Steve Ross sent that information just recently to us and I'm transmitting it onto staff. So just for the record the prediction that we made that additional sites would be found in that high probability zone is coming true. The Advisory Panels, neither Habitat nor Coral, have reviewed any of the other alternatives from the Golden Crab nor Royal Red Shrimp industries and I will make sure that they go out for comment during the public process so that you can get the benefit back of your habitat experts in making that happen. So that's the end of my comments on the instruments as Chair of the Habitat and Environmental Protection Advisory Panel.

Comments as Principal Ocean Scientist with Environmental Defense

Reiterate our strong support for all of the alternatives developed through the advisory panel process and contained in the Fishery Ecosystem Plan, including the policies and programs to protect essential fish habitat against fishing and non-fishing activities, including the policy statements that are laid out, therein. Reiterate our organization's very strong support for protecting these world class, vulnerable, deepwater reefs against both fishing and non-fishing threats. We've talked about it in some ways ad nauseam, but animals 1,000 years old, coral mounds up to a million years old recording an irreplaceable and unique record of changing seas and changing climate is simply not something to be taken lightly. So precaution must be used in protecting these against all kinds of activities.

I personally have met with members of both the Golden Crab and Royal Red Shrimping fleets at the Jekyll Island meeting and I do believe that both of those activities can be continued in economically viable ways but shaved such that their impact on these irreplaceable resources is eliminated or minimized. And specifically, with respect to the Royal Red Shrimp fleet, the boundary between high value corals and fishing activities is very sharp and that the proposed movement of the boundary to the east would, in fact, of any of the distances proposed, would, in fact, expose high-value, ancient corals to destruction by piecemeal nibbling, by the existing fleet but also to exposure to loss from new and developing fisheries in that area and to new and developing non-fishing activities in that area. So the corals are where they are and we simply can't and won't support the movement to the east of the western boundary in order to accommodate enforcement protocols.

Now, where there are areas where bottom disturbing activities are traditional – where we've gotten it wrong, basically, on the western side then we/I, and I'm sure the advisory panels but I haven't asked them, are willing to look at resolving those issues and we are going to try to do that. But the way the alternatives are currently stated, we won't and can't support any of them. And I don't feel like I'm out on a limb anticipating that neither one of the Advisory Panels, Habitat and Coral Advisory Panels would support that.

Second, with respect to the Golden Crab fleet, we do believe that it's possible to accommodate the level of effort in that particular industry without having significant damage to these important and fragile corals, yet the fishing zones as are currently laid out as alternatives within the Plan and the Comprehensive Amendment don't fully accomplish that. So we concur in theory with the notion of creating allowable Golden Crab gear activity areas within the HAPC continent with protecting, especially, the high-profile corals there and believe that a refinement of the alternatives may bring us to consensus on what that might look like.

Support the alternatives related to 100 percent VMS coverage on the Golden Crab fleet. In addition, support the consideration, either through this amendment or a subsequent Golden Crab amendment, of a capping on either effort or yield within this limited access fishery that does not now exist.

Considering the rapidly developing recreational deep drop fishery, recommend we not move forward at this time to prohibit those activities but instead to come to understand them better and, in fact, to begin building a foundation for managing those things.

At this point, aside from wreckfish – the commercial wreckfishery – wreckfish fishery, the other species aren't managed so barrellfish is not in any fishery management unit, potbellied rosefish is not, etcetera. So the potential exists for new fisheries developing, either commercial or recreational, that would threaten these habitats. It is an appropriate time to figure out now how to get ready to deal with those.

Gregg DeBrango:

Comments on the CEA: I spent a lot of years in the wreck grounds from anywhere from 1,200 foot of water to what, 2,400, 2,500 foot. I did the Golden Crab industry. I actually fished in those areas, the Habitats of Particular Concern. I don't have any problem with closing an area down like that. Look at the bank we got down here, the one that's been closed now, you know, the Oculina, that's a positive success story. Why can't we go in and create more reefs, create more spots. Let's grow our fish. We want to talk aquaculture.

Joe Penovich (Sunrise Marina Grill's Restaurant and Obsession Charters)

Comments on the CEA: Use common sense where it comes to the deepwater corals and there's some great scientists, they've dedicated their life to their work. There's certain times of the year that our fish are not in shore. They're out there in that 200 to 240 foot of bottom fishing and it's pretty important that we're out there fishing. You've also got a problem with the closed bank and the Oculina off Sebastian Inlet. Again, to the best of my knowledge and from just hearing talk amongst fishermen, all that's been created down there is a great place for poachers to exist because there's no enforcement capability and so you've shut the fishery off to honest people and you've created a fishery habitat for those who would poach.

Laurilee Thompson (Dixie Crossroads Seafood Restaurant)

Comments on CEA: Support the ecosystem plans and the comprehensive amendments. Support modest relocation of the western boundary for the proposed Stetson Reefs, Savannah and East Florida Lithotherms and the Miami Terrace Habitat Area of Particular Concern eastward to achieve the following objectives and that's to insure that all traditional Royal Red Shrimp fishing areas that are documented by National Marine Fisheries Vessel Monitoring System data remain outside the Habitat Area of Particular Concern boundaries and to prevent innocent behavior, such as the vessel being disabled, from being unduly prosecuted and penalized when the disabled Royal Red fishing vessel drifts eastward from the fishing grounds and into the Habitat Area of Particular Concern. See the penalties either eliminated or substantially reduced for owners and operators of the disabled Royal Red Shrimp fishing vessels that do drift into the Habitat Area of Particular Concern. And as I said before, it's physically impossible for a shrimper to fish in the deepwater coral habitat and I was looking at the alternatives that were suggested by the deepwater Coral Advisory Panel and any of them would suit me. Alternative 4A, 4B, 4C, 4D, they would all adequately accommodate the needs of the fisheries and I'm

looking at the comments, the economic social and administrative effects and all of them say that they would eliminate the minimal impact to the fishery but would, potentially, allow fishing on known high relief deepwater habitat. That fishing is simply not going to occur. It's just economically impossible. The fishermen don't want to risk losing their nets by dragging in the coral and it's dangerous for them to be there.

100-Fathom Fishing Club. (Mark Saberholm)

Comments on the CEA: In the case of the proposed deepwater HAPCs where the traditional methods of recreational deep dropping will not be restricted, the 100-Fathom Fishing Club is in favor of protecting these delicate bottom habitats against destructive bottom trawling and bottom long-lining. However, if there are any recreational restrictions being proposed, then we are opposed to any HAPCs in deepwaters at this time.

Date Received

100 Fathom Fishing Club Mark Sagerholm Delaware Chicken Farm and Seafood	25-Apr-08 14-May-08	Support CHAPC if applicable to bottom longlining and shrimp trawling. Do not prohibit recreational deep dropping. Any action should not reduce the availability of golden crab. Supports creation of the "Bruce Heezen National Monument" for conservation of deep-sea corals.	
Dr. Bob George			
Capt. Bill Kelly, Capt. Bric Peebles, Capt. Jimbo Thomas, Capt. Bouncer Smith	6-May-08	Describes methods of deep dropping for daytime swordfish fishery.	Lead is not now being used. Cast cement, bags of sand or pebbles are being dropped to bottom, retrieved and breaks away during fight.
Sherylanne T. McCoy, Cape Canaveral Shrimp Company	8-May-08	Shift the western boundary of the proposed HAPC eastward to ensure all traditional royal red shrimping areas documented by NMFS VMS data remain outside the HAPC boundaries	Establish a buffer zone to give disabled vessels maneuvering room in the case of equipment failure or weather conditions. Penalties should be eliminated for disabled vessels that drift into the HACP areas. A procedure should be set up for disabled vessels to notify NMFS of their situation and avoid potential prosecution resulting in monetary fines and permit sanctions
Mike Merrifield, Cape Canaveral Shrimp Company	16-May	Use the VMS track data and to add a relatively small buffer zone to accommodate for slight strays off course and emergency maneuvers in the event of equipment failures and or weather conditions. For the most part this follows the proposed western boundary of the HAPC but deviates into the proposed area around West Palm to Cape Canaveral. Support Alternative Number 2 as listed in the CEA Public Hearing Document. Agreement with John Reed concerning the meter limit for the distribution of the coral.	
Woody Moore, Deepwater Shrimp AP Member and full time royal red shrimp fisherman	16-May-08		Council consider provisions to enter the closed area under emergency situations. I do not support the proposal by the Deep Water Shrimp Panel.
Oceana/Reed, Ross, Andrews, Andrus, Auster, Borseth, Cairns, Cordes, Correa, De Mol, Etnoyer, Garcia, Hall-Spencer, Jonsson, Khunz, Lavaley, Lundalv, Messing, Pikitch, Hellberg, Hill, Jamieson, Quattrini, Risk, Roberts, Ruggeberg, Shepard, Shester, Shirley, Sinclair, Tissot, Kitahara, Watling	16-May-08	Support establishment of HAPCs and prohibition of use of habitat damaging gear (e.g., deepwater trawling)	
Michael S. Diascro / Rustic Inn	14-May-08	Now use 375,000 lbs of golden crab annually. Understand need to regulate but do not result in economic loss to local fishermen, businesses and families	

John Williams / Southern Shrimp Alliance	<p>6-May-08 SSA support the protection of deepwater corals and that the designation of HAPCs is the correct management tool to accomplish this objective. We greatly appreciate this reasonable and appropriate objective. accommodate traditional fisheries in the area including the royal red shrimp fishery.</p>
	<p>Recommendation 1: The western boundary of the proposed Stetson Reefs, Savannah & East Florida Lithotherms, and Miami Terrace HAPC should be revised and shifted eastward to achieve the following objectives: 1) to ensure that all traditional royal red shrimp fishing areas documented by NMFS VMS data remain outside the HAPC boundaries; and 2) to prevent innocent behavior from being unduly prosecuted and penalized when a disabled royal red shrimp fishing vessel drifts eastward from the fishing grounds into the HAPC.</p>
	<p>Recommendation 2: Penalties should be eliminated or substantially reduced for the owners and operators of disabled royal red shrimp fishing vessels that drift into a HAPC. Penalties for such innocent behavior should be limited to monetary fines and not include any permit sanctions, if applicable. A schedule of reduced penalties could be tiered to reflect repeat incursions, and could include a mechanism for disabled vessels to notify NMFS in order to confirm their status and avoid prosecution.</p>
Marilyn Solorzano / Deepwater Shrimp AP Member	<p>15-May-08 We were able to show that the western boundary cuts into some of our most productive trawlable bottom, where there is NO coral. We preferred amendment would STRONGLY encourage the council to SHIFT the western boundary of the proposed Savannah & Red Fishery, to the point of Non- East Florida Lithotherm HAPC East so that the royal red fishery remains in operation, eastward existence.</p>
	<p>SHIFT from the WESTERN BOUNDARY TO THE EAST, NO less than 6 miles eastward. As we have shown, we may not trawl this far into the area, but we do need this in the event of an emergency and we become adrift, or have mechanical problems, an injury occurs, our gear becomes entangled in itself which happens during haul-up and rig setting and we are pushed into the closed area, due to the strong Gulf Stream Currents.</p>
Captain Joel Spellmeyer	<p>15-May-08 Move the West Boundary of the HAPC proposed Savannah and East Florida Lithotherm, Eastward, 6 miles or more. If this proposal remains as is, it will be devastating to the royal red fishery. In order to keep this fishery in tact and operable, I urge you to move the boundary eastward so that the area we have trawled for many years is not encompassed by the HAPC.</p>
Lee Vogelsong	<p>15-May-08 Move the western boundary of the HAPC Savannah & East Florida Lithotherm EAST by at least 6 miles. Without moving the boundary to the east, much of the valuable trawl bottom will be lost.</p>
Jean Nam Cape Canaveral Shrimp Co.	<p>8-May-08 Spend our time and federal monies looking for more efficient methods of producing seafood product which would seemingly be productive for commerce and the environment Find balance regarding, commerce, security, and the environment. Furthermore it is essential we develop policy that is "living document" so making change is always possible.</p>
Mathis	<p>8-May-08 Work to regulate Oil Companies.</p>