

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Barber

6 February 2009

Mr. Robert Mahood
Executive Director
South Atlantic Fishery Management Council
4055 Faber Place, Suite 201
North Charleston, SC 29405

RE: Comprehensive Ecosystem-Based Amendment I

Dear Mr. Mahood,

On behalf of Environmental Defense Fund and its more than 30,000 members in the southeastern United States, we respectfully submit for your consideration these comments on the proposed Comprehensive Ecosystem-Based Amendment (CE-BA). Our staff submitted oral comments on the CE-BA during public hearings in Cocoa Beach this month and previously throughout the public input process for this amendment.

We commend the Council for its leadership in protecting the nearly 23,000 square miles of one of the largest continuous deepwater coral habitats in the world. We strongly support the Council's selection of all areas of this key habitat as a preferred alternative, especially for the establishment of the five deepwater coral Habitat Areas of Particular Concern (HAPCs), including the region's only documented deepwater methane seep. We also support the proposed alternative that would preclude bottom-disturbing fishing gears throughout these zones. These actions will protect this unique and pristine habitat and its associated species from destructive fishing practices, which have damaged similar reefs around the world, as well as most non-fishing threats, through the essential fish habitat elevation process.

The scientific community is only beginning to realize just how unusual these ancient and largely unexplored reefs are. A veritable wonderland of marine life, these reefs are among the most important areas in the world for marine species, and for exploration for biopharmaceuticals; indeed, new species are discovered every time the reefs are visited, and the importance in protecting them becomes more and more evident as research and exploration of these areas continues. This deepwater coral ecosystem is a national treasure and is worthy of this protection. We believe the Council's preferred alternatives together achieve this protection.

In addition, we commend the commercial fishermen who participate in the golden crab and royal red shrimp fisheries for their collaboration throughout the process, and

Mr. Robert Mahood

6 February 2009

Page 2

particularly with respect to the delineation of the HAPCs and the allowable gear zones within the HAPC area, which we also endorse. The preferred alternatives ensure that fishermen have access to fishing areas encompassing traditional fishing grounds, while avoiding other than de minimis fishing activity in areas in need of protection. We believe this sets an important example of co-management – consistent with the best available science – that can be replicated in other fisheries in the future.

In summary, we fully support creation of the proposed five deepwater coral HAPCs, as set forth in the preferred alternatives in the CE-BA. In light of the Fishery Ecosystem Plan, we also look forward to continuing our work with the Council in its ongoing efforts to transition from single-species to performance-based and ecosystem-based fisheries management.

Thank you for your consideration of our views on this important issue. Feel free to contact us at 919-881-2601 if you have any questions or wish to discuss any aspect of our recommendations.

Sincerely,

Daniel Whittle
Director of Southeast Oceans Program

Sarah Hagedorn
Ocean Scientist

Cc: Myra Brouwer, SAFMC Biologist



GULF OF MEXICO FISHERY MANAGEMENT COUNCIL

2203 N. Lois Avenue, Suite 1100 - Tampa, Florida 33607

(813) 348-1630 - FAX (813) 348-1711



e-mail: gulfcouncil@gulfcouncil.org Web: <http://www.gulfcouncil.org>

February 5, 2009

Mr. Bob Mahood
Executive Director
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Dear Mr. ^{Bob} Mahood:

At the January 26-29, 2009 meeting, the Gulf of Mexico Fishery Management Council (Council) considered the South Atlantic Fishery Management Council's request for approval of its Comprehensive Ecosystem-Based Amendment 1. Following discussion, the Gulf Council voted unanimously to approve this amendment.

If you need anything else or have any questions, please advise us. Best regards.

Sincerely,

Richard L. Leard, Ph.D.
Interim Executive Director

RLL:tk

c: Gulf Council
Gregg Waugh
Phil Steele
Steve Branstetter
Jack McGovern
Technical Staff

H:\A\MACKEREL\MahoodltrCompEcoAmendment-209.doc

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).

I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.

I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.

I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
John Arahill

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Corey Bartlett

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).

I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.

I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.

I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Kini Bowers

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).

I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.

I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.

I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Capt. Jeff Brown

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Jimmy Burnside

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in

sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
John Carney

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Greg Clifford

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Trent Coleman

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).

I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.

I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.

I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Thomas Dohaney

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Brett Duncan

6 February 2009

Mr. Robert Mahood
Executive Director
South Atlantic Fishery Management Council
4055 Faber Place, Suite 201
North Charleston, SC 29405

RE: Comprehensive Ecosystem-Based Amendment I

Dear Mr. Mahood,

On behalf of Environmental Defense Fund and its more than 30,000 members in the southeastern United States, we respectfully submit for your consideration these comments on the proposed Comprehensive Ecosystem-Based Amendment (CE-BA). Our staff submitted oral comments on the CE-BA during public hearings in Cocoa Beach this month and previously throughout the public input process for this amendment.

We commend the Council for its leadership in protecting the nearly 23,000 square miles of one of the largest continuous deepwater coral habitats in the world. We strongly support the Council's selection of all areas of this key habitat as a preferred alternative, especially for the establishment of the five deepwater coral Habitat Areas of Particular Concern (HAPCs), including the region's only documented deepwater methane seep. We also support the proposed alternative that would preclude bottom-disturbing fishing gears throughout these zones. These actions will protect this unique and pristine habitat and its associated species from destructive fishing practices, which have damaged similar reefs around the world, as well as most non-fishing threats, through the essential fish habitat elevation process.

The scientific community is only beginning to realize just how unusual these ancient and largely unexplored reefs are. A veritable wonderland of marine life, these reefs are among the most important areas in the world for marine species, and for exploration for biopharmaceuticals; indeed, new species are discovered every time the reefs are visited, and the importance in protecting them becomes more and more evident as research and exploration of these areas continues. This deepwater coral ecosystem is a national treasure and is worthy of this protection. We believe the Council's preferred alternatives together achieve this protection.

In addition, we commend the commercial fishermen who participate in the golden crab and royal red shrimp fisheries for their collaboration throughout the process, and

Mr. Robert Mahood

6 February 2009

Page 2

particularly with respect to the delineation of the HAPCs and the allowable gear zones within the HAPC area, which we also endorse. The preferred alternatives ensure that fishermen have access to fishing areas encompassing traditional fishing grounds, while avoiding other than de minimis fishing activity in areas in need of protection. We believe this sets an important example of co-management – consistent with the best available science – that can be replicated in other fisheries in the future.

In summary, we fully support creation of the proposed five deepwater coral HAPCs, as set forth in the preferred alternatives in the CE-BA. In light of the Fishery Ecosystem Plan, we also look forward to continuing our work with the Council in its ongoing efforts to transition from single-species to performance-based and ecosystem-based fisheries management.

Thank you for your consideration of our views on this important issue. Feel free to contact us at 919-881-2601 if you have any questions or wish to discuss any aspect of our recommendations.

Sincerely,

Daniel Whittle
Director of Southeast Oceans Program

Sarah Hagedorn
Ocean Scientist

Cc: Myra Brouwer, SAFMC Biologist

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Walter Eismann

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Chuck Ellis

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Chip Gaines

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Clay Garalde

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).

I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.

I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.

I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Steve Gillespie

Joshua Giordano-Silliman
South Atlantic Sustainable Fishery
1170 N Shadow Dr
Mt Pleasant, SC 29464
hortfire@yahoo.com
February 4th, 2009

Dear SAFMC Representatives and Staff,

I would like to forward my written comments to you at this time for Comprehensive Ecosystem-Based amendment 1 and 2, Comprehensive Annual Catch Limit Amendment, and Amendment 18 to the Snapper Grouper Fishery Management plan.

Comprehensive Ecosystem-Based Amendment 1

Of the establishment of deep water coral habitats, I do support the creation of such. I am troubled by the wording of the prohibition of the use of anchor, grapple, and any other ground equipment use. I would think research vessels would have to use such equipment to conduct science, would they be excluded? Would commercial and recreational vessels be excluded from that clause in the event of foul weather or other duress?

Of subalternate 2-E of Action 1, I would strongly support the Establishment of the Blake Ridge Diapir Methane Seep CHAPC. This unique feature needs to be preserved and studied for future generations. There are no environmental or economical consequences to this nation by its preservation. There are lobby groups that want to potentially exploit this area for growing energy demand. Only under extreme circumstance, for which all foreign resources are depleted, would I consider the potential of harvesting energy from the seep, yet that should be so far into the future that our technologies have grown and changed and leads to the further preservation of Blake Ridge.

Of alternative 2 of Action 2, I support the creation of shrimp fishery access area. I do not support the requirement of a VMS. I do support the requirement for special endorsement.

Of alternate of 2 of Action 3, I would strongly support this alternative (2a-c). Positive impacts to the golden crab fishery will be made from the surrounding areas where fishing is prohibited. Golden Crab fisherman care and have respect for the fishery that they have created and sustained in the South Atlantic.

Of alternate of 1 of Action 4, I do not think vessel monitoring systems should be required on permitted vessels. The purpose of the VMS is to give location of the vessel to law enforcement,

it doesn't give data or other input. It would be a burdensome cost to the fisherman and law enforcement. Law enforcement agents would still need to make physical and visual contact of any offense charged; hence they would need to be in the CHAPC, not from land observing a screen. Routine inspection at sea leads to greater enforcement. This is why I support NO ACTION for action 4.

Comprehensive Ecosystem-Based Amendment 2

Sargassum Fishery Management Plan (FMP) I would like to address and submit information to the council about the current FMP and possible amendment to it for private scientific research. I have conducted limited research on Sargassum grass. My interest in Sargassum grass is associated to mineral nutrition of plants and photosynthetic organisms. It is the aluminum content of such biomass and its relations to other elements. Most land based plants are comprised of aluminum, for which no known physiological function is understood. The majority of the earth's crust is comprised of Aluminum-silica-oxide (Clay). For my model, sargassum grass is a component in understanding aluminum and its function within photosynthesis. The following table below shows some of my results. My collection of Sargassum grass is not intended to hurt any Essential Fish Habitat (EFH). Sargassum grass is essential for the growth and development of a strong triggerfish fishery, please note the pictures below.

Future sargassum grass research considerations of mine also consist of nutritional and pharmaceutical benefits for humans. How could I get a permit to conduct such research?

One final note to the Sargassum Fishery Management plan, there should be a prohibition clause to the careless destruction of Sargassum weedlines and sportfishing. I have witnessed countless careless individuals who decide to troll through the weed line, instead of along side of it. Extreme excitement and lack of experience leads to large destruction of weed lines and mats (EFH) throughout the South Atlantic. Can more awareness of the importance of Sargassum be raised through the SFMP?

The Color of Sustainability: Red, White, Blue, and Green

by: Joshua S. Giordano-Silliman

Naturalist, Charleston, South Carolina

What color does society traditionally associate with sustainability? I believe that people have come to the consensus that it is green or of a green/brown complex.

Yet this is where I disagree. In my opinion, the color of sustainability should stand as a symbol of responsible resource management, technological exploration, alternative energy use and development, mass reforestation, and the implementation of socially and ecologically balanced economic measures. True, this isn't a color description, but it is my perspective on what the definition of the color of sustainability should include. Through my eyes, it is a red, white, blue and green sustainability.

From fishing the estuaries close to land and beyond, gathering oysters in the winter from the banks, casting nets for shrimp in the fall, our blue ocean is an intrinsic part of my own view of sustainability. For there is plenty of bounty to be had, and every time I wander the vast openness of the sea I claim the gifts from these waters.

With our slow spin of the planet among the mist of warm sun rays and the tug of our moon, this sustainability is put into motion. It is this blue that changes to a precipitous white and develops the green/brown complex, which leads to life, consciousness, and understanding.

I was fortunate enough at a young age to experience fishing offshore of my home. It was a sense of pride to have caught large quantities of fish for my family. It was completing a circle from growing a victory garden to harvesting from the sea. I have to thank my father for teaching me from the start. It was the first trip on the Carolina Clipper with my 'sea daddy' Captain Randolph Scott at the grand age of eight, that I first consciously realized the scope of human activities on a different scale. On the way back in from being approximately 40 miles offshore, I had to ask the first mate, Pete, out of curiosity, "What happens if all the electronic equipment goes out, how will we get back?" He joking said, "That's easy, we just look for the haze on the horizon in relation to the sun." Being young I didn't understand at first. So I sat back and watched the horizon. Slowly enough, it began and got bigger, the haze of Charleston. We were headed directly for it!

13.

Through the course of twenty-one years of watching for the haze on the way in from fishing, I have seen it change color, shape, and size. I know it isn't going away, but I know the smaller it is, the better off we all are.

Another experience at a young age taught me how the blue and green/brown complex interact. It was Hurricane Hugo on September 21st, 1989 that I endured a category 4 storm at ground zero. Around midnight the eye came ashore and we went outside to look. It was an eerie mist, with no wind blowing yet it could be heard from afar. I was ten years old. That storm destroyed some of the largest carbon sinks in my hometown. Our ordinances protected such beautiful trees from human-made destruction, yet it was the blue taking from the green, with plenty of white precipitation involved. Is this the preparation for the blue to take back the green?

The ocean has changed in the past. One could drive over one hundred miles inland out of Charleston and find sandhills and seashells, which once were by the sea shore. Some of my favorite bottom fishing spots offshore was once dry land. The ocean is a key player in the cycling of carbon on this planet. It is increasing in size to sink more carbon dioxide. I believe part of that is accelerated by humans and their evolved status within the tropic levels of consumption.

And like blue, red regulates and interacts with the green/brown complex within my color view of sustainability. Red represents fire and solar rays which are the physical, chemical, and energetic changes of life. From organic back to inorganic, either as bone meal or wood ash, fire is the element of energy release and purification. Fire use in ecological restoration projects have proven to be successful to regain plant species that were considered lost under fire suppression management regimes. Fire-red's interaction can reset the green/brown complex in the absence of blue or white. And after we see the resetting through fire can the solar ray red further augment and drive the green/brown complex. Solar ray red is the energy loader of carbon based life. From the red wave length, which ranges from 680 nm to 700 nm, the great bonds of blue are broken properly, the oxygen we breathe is made, and carbon dioxide is fixed into the building blocks of life, all in the name of photosynthesis.

Where does this leave white within the color model of sustainability? Simple: white is the physical transformation of blue. It is our rivers, streams, clouds and snow covered peaks. It can reflect and refract the solar red either into space or on to the surface. White and blue together make up the hydrologic cycle. If contained properly the white/blue will absorb energy and release it. However, there is a second hue of

14.

white that exists within my model of sustainability. The second hue of white tends to be intense and short lived, and has a direct energy interaction within the green/brown complex. For it is lighting; it is the origin of red fire and it converts atmospheric nitrogen to nitrate compounds. Once the nitrate bonds with free hydrogen, it is ready to use within the green/brown complex. Those nitrates (NO₃-) are the cornerstones of growth within the green/brown complex. Without nitrates, other useable nitrogenous forms, free oxygen and water, our carbon fixation becomes limited; the same could be said for the reverse of the reaction, decomposition.

Through my seven years of studying horticulture and working and observing this living rock we call 'Earth,' I've seen for myself how this large conscience web of life is constantly being created and re-created. At the center of the web is me, and like a fly that is greatly entangled, I am entrapped by my civil nature (which is not natural). To escape the entrapment, I have to become aware, conscience, and cautious of my actions within the web of life. It doesn't take "thinking outside of the box," it takes "making the box bigger." The bigger the box becomes the harder it is to deny that it exists and slowly everyone's consciousness becomes interlocked. The interlocking is a civic duty and a patriotic response to the world that assures that future generations will be safe and have bounties to claim like the previous generations.

In conclusion, I would urge others to step back for a moment and ask oneself, "What is my color of sustainability? Is green the most suitable color of sustainability? Where am I within the web of life versus a calculated carbon footprint that has a monetary tradeoff system? How do I make the box bigger? What can I do to spread my patriotism of sustainable life?" For me, this article is only the tip of my actions. It is one of the most important actions as it begins to make people think, and as a proud American, it couldn't be anything else then a Red, White, Blue, and Green sustainability.

Mr. Giordano-Silliman - an avid fisherman, horticulturalist and innovator - lives and observes nature in Charleston, South Carolina. (Hortfire@yahoo.com)



15.

Quote of the Month....

The Earth today may be at the brink of another step, Langmuir said. Complex life has evolved into intelligent life that dominates the planet — ecosystems, food webs, and energy flow — as no

species ever has before.

Whether the planet takes the next step or not may depend on us. If we recognize humanity is an integral part of the planet and begin working for a healthy Earth, then planetary evolution could move forward to some unknown future.

On the other hand, Langmuir said, if we continue to view the Earth as something that is separate, that we merely use, then the resulting practices could damage the environment enough to stall planetary evolution, even causing it to fall back to a level where it supports just microscopic life.

"The story of the Earth is our story. We are intimately connected [to the Earth] in every fiber of our being, in every breath we take. We're inseparable from the Earth," Langmuir said.

November 20-December 3, 2008 Harvard University Gazette/11



"What lies behind us and what lies before us are tiny matters compared to what lies within us."

- Emerson

16.

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Paul Golub

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
charles hancock

COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1

My name is Dave Heil and I have been fishing the waters off East Central Florida for approximately 40 years. I have watched the fish populations decline in the 70's and I have seen them rebound to the record levels they are at now. We are catching more fish than ever before at the present time.

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.

I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).

I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.

I disagree with the establishment of any shrimping areas.

Action 3. Create "Allowable Golden Crab Fishing Areas" within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create "Allowable Golden Crab Fishing Areas" within the proposed deepwater CHAPC boundaries.

I agree with this proposal.

Preferred Alternative 2. Create "Allowable Golden Crab Fishing Areas" in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.



Dave Heil, Winter Park, Florida

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Josh Huff

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Clark Lachcik

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
John Laskowitz

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Alfred C. Lee

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).

I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.

I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.

I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Scott Lerhrmann

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Lee Lindsay

COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Nanci Londeree

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).

I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.

I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.

I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Patrick J. Magrady

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
John Moscarillo

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
John Mountford VI

February 6, 2009

South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Re: Comprehensive Ecosystem-Based Amendment 1

Dear Council Members:

Coral reef habitats are among the most diverse ecosystems on earth, as well as the most threatened. Deep water coral reef habitat, however, has a better chance of persisting over the long-term due to the cooler temperatures at depth and more remote location from human influences. We applaud the scientists, agencies and institutions that have characterized the location, extent and ecology of these deep water coral reefs, making consideration of their protection possible.

The Nature Conservancy supports the Council's preferred alternatives for Actions 1 through 4 that are being considered under the Comprehensive Ecosystem-Based Amendment 1. If appropriately implemented, Comprehensive Ecosystem-Based Amendment 1 will protect the deepwater coral reefs identified as candidates for Habitat Areas of Particular Concern (HAPCs) from direct impacts associated with fishing. We believe the HAPC designation is necessary to avert the destruction of the fragile corals in this area which serve as the base of the ecosystem.

Due to the ecological value of these deepwater coral areas and their vulnerability to energy production and distribution activities, we would also like the council to consider future additional designations to enhance protection, scientific understanding and appropriate use. The National Marine Sanctuary program has a history of appropriate management of ecologically important marine areas and designation of the deepwater coral HAPCs as national marine sanctuaries would confer an additional measure of protection to these unique and highly vulnerable systems.

We appreciate the opportunity to comment on this issue.

Sincerely,



Douglas T. Shaw, Ph.D.
Director of Science and Conservation
Florida Chapter



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Ocean Service
Office of National Marine Sanctuaries
Southeast Atlantic, Gulf of Mexico and Caribbean Region
33 East Quay Rd
Key West, FL 33040
(305) 809-4670 Voice (305) 293-5011 Fax

February 3, 2009


South Atlantic Fishery Management Council Office
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Dear Council Staff,

These comments are offered on the Fishery Ecosystem Plan and the Comprehensive Ecosystem-based Amendment 1.

- The Office of National Marine Sanctuaries applauds the efforts of the SAFMC to protect fragile deepwater coral habitat and its associated species. These areas are essential fish habitat and similar areas have been damaged by fisheries in other parts of the world. The **FISHERY ECOSYSTEM PLAN** and the **COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1** are important steps to protect habitats and species that support fisheries, and Amendment 1 is a proactive fisheries management plan to protect and conserve deep coral habitats not currently impacted by fishing in the south Atlantic region, but which have been shown to be extremely productive yet vulnerable elsewhere.
- Establishment of deepwater coral Habitat Areas of Particular Concern, as outlined in Amendment 1 [ACTIONS 1-4, (preferred) Alternative 2 and its sub-alternatives], will prevent destructive fishing practices, reduce bycatch, enhance management and allow for important research on these poorly-known habitats while they are relatively pristine.
- In the future, it may prove advantageous to further protect these productive yet fragile habitats. One way to do so is by incorporating them into the National Marine Sanctuary System. These sensitive habitats face a number of potential threats from non-fishing activities that could be addressed through NOAA's authorities under the National Marine Sanctuaries Act. While doing this now may not be the highest priority for NOAA, it could become essential in the face of more imminent threats.

Sincerely,



Billy D. Causey, Regional Director
Southeast Region
Office of National Marine Sanctuaries

Flower Garden Banks
National Marine Sanctuary
4700 Avenue U, Bldg 216
Galveston, TX 77551

Florida Keys
National Marine Sanctuary
33 East Quay Road
Key West, FL 33040

Gray's Reef
National Marine Sanctuary
10 Ocean Science Circle
Savannah, GA 31411

**** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ****

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).

I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.

I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.

I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Wayne Newberry

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).

I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.

I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.

I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Don Newhauser

Chairman Harris, Council and Council Staff,

Ocean Conservancy strongly supports the Council's Action 1 of the Comprehensive Ecosystem-Based Amendment 1 (CE-BA 1), and commends the Council for advancing comprehensive protection for deep water coral areas in the South Atlantic. Designation of the proposed Coral Habitat Areas of Particular Concern will help protect what may be the largest contiguous area of deepwater coral and hard bottom ecosystems in the world, as well as their associated species. This added protection will provide a significant step to allow for research necessary to better document the ecology of these important, but poorly understood, ecosystems.

Although CE-BA 1 will better protect these sensitive habitat areas from damaging fishing gear and anchoring by fishing vessels, it would not address potential impacts from other deep sea activities, such as anchoring by non-fishing vessels, oil and gas exploration and development, construction of LNG pipelines, and placement of fiber optic cables. Consequently, Ocean Conservancy urges the Council to consider strategies for incorporating these areas into the National Marine Sanctuary (NMS) system, which provides opportunities for additional protection from non-fishing related activities.

Thank you for considering our comments, and we look forward to working with you on these important issues.

Sincerely,

Elizabeth Fetherston
Southeast Fish Program Manager
Telephone: 727.369.6615
Facsimile: 727.895.8652
E-mail: efetherston@oceanconservancy.org

449 Central Avenue
Suite 200
St. Petersburg, FL 33701
www.oceanconservancy.org

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).

I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.

I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.

I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Jeff Page

**** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ****

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).

I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.

I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.

I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Karl Pappas

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Steve Quincy

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).

I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.

I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.

I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Paul Ramirez

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).

I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.

I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.

I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Kevin S. Reynolds



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
Gray's Reef National Marine Sanctuary
10 Ocean Science Circle
Savannah, Georgia 31411

5 February 2009

Mr. C. Duane Harris
Chairman
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Dear Mr. Harris:

Thank you and the South Atlantic Fishery Management Council for the opportunity to comment on management plans and amendments dealing with ecosystem management for sustainable fisheries.

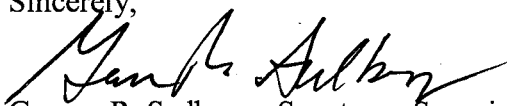
The Office of National Marine Sanctuaries applauds the efforts of the SAFMC to protect fragile deepwater coral habitat and its associated species. These areas are essential fish habitat and similar areas have been damaged by fisheries in other parts of the world. The **FISHERY ECOSYSTEM PLAN** and the **COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1** are important steps to protect habitats and species that support fisheries, and Amendment 1 is a proactive fisheries management plan to protect and conserve deep coral habitats not currently impacted by fishing in the south Atlantic region, but which have been shown to be extremely productive yet vulnerable elsewhere.

Establishment of deepwater coral Habitat Areas of Particular Concern, as outlined in Amendment 1 (ACTION 1, Preferred Alternative 2 and its sub-alternatives), will prevent destructive fishing practices, reduce bycatch, enhance management and allow for important research on these poorly-known habitats while they are relatively pristine. This proactive measure would help manage a productive ecosystem for sustainable use.

In the future, it may prove advantageous to further protect these productive yet fragile habitats. One way to do so is by incorporating them into the National Marine Sanctuary System. These sensitive habitats face a number of potential threats from non-fishing activities that could be addressed through NOAA's authorities under the National Marine Sanctuaries Act. While doing this now may not be the highest priority for NOAA, it could become essential in the face of more imminent threats.

Thank you again for this opportunity to comment. If I can be of assistance in further development or implementation of management to protect coral habitats of the South Atlantic Bight, please contact me.

Sincerely,


George R. Sedberry, Sanctuary Superintendent



*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).

I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.

I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.

I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Mel Waters

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a ?Shrimp Fishery Access Area? (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.
I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Joe West

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. This is mandated by National Standard 9. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a "Shrimp Fishery Access Area" (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).

I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.

I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create ?Allowable Golden Crab Fishing Areas? within the proposed deepwater CHAPC boundaries.

I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c

I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.

I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.

I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction

I agree with this alternative.

Sincerely,
Tery Winn



World Wildlife Fund
Florida Program
32 Mutiny Place
Key Largo, FL 33037

Direct Phone:(305) 853-0975
Alessandra.Score@wwfus.org

www.worldwildlife.org/florida

February 6, 2009

Dear South Atlantic Fishery Management Council:

World Wildlife Fund (WWF) applauds supports the efforts of the Council to protect deepwater coral habitat and species. These areas not only provide essential fish habitat but provide necessary refugia and corridors of areas in which corals will be able to migrate and adapt with increasing climate change stressors. The **FISHERY ECOSYSTEM PLAN** and the **COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1** are important steps to protect habitats and species that support fisheries, and Amendment 1 is a proactive fisheries management plan to protect and conserve deep coral habitats and prevent destructive fishing practices, reduce bycatch, enhance management and allow for important research on these poorly-known habitats.

WWF would support that these areas be protected, conserved and managed through the National Marine Sanctuaries Act and the National Marine Sanctuary System. This would provide the necessary marine managed areas corridors for protection of species and habitats as well as protection from activities resulting in the alteration of the seafloor as that is not permitted in National Marine Sanctuaries and is not covered under the Magnuson-Steven Act.

Thank-you for allowing me to comment on this important issue.

Sincerely,

Alessandra Score, Florida Program Marine Conservation Specialist

*** COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 1 COMMENTS ***

I encourage the SAFMC to adopt management options that will ensure the continued availability of the resource. The SAFMC's continued ignoring of the destructive fishing techniques of the commercial fishing industry must be stopped and these issues must be addressed. Ignoring these issues prevents effective management of the resources. I encourage the following measures be adopted prior to any additional limitations on the recreational landings.

Prohibit all shrimping inside of 60 fathoms. The statistics and options as set forth in the scoping documents ignore the fact that the major cause of juvenile fish mortality is shrimping. The rebuilding of the stock must begin with the elimination of shrimping inside of 60 fathoms. Juvenile fish must be allowed to mature and not end up as bycatch floating on the surface behind a shrimp boat. The destruction of the habitat caused by the shrimp trawls being drug repeatedly across the coral further damages the habitat for the fish to mature.

Action 1. Amend the Coral, Coral Reefs, and Live/Hardbottom Habitat FMP to establish Deepwater Coral Habitat Areas of Particular Concern (CHAPCs).

Alternative 1. No action. Do not establish deepwater CHAPCs.
I agree with this proposal.

Preferred Alternative 2. Establish deepwater CHAPCs in the areas described in sub-alternatives 2a-2e:

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Action 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I disagree with the establishment of the CHAPs as set forth in any of the sub-alternatives, if any CHAPs are established they should not exclude any recreational activities.

Alternative 1. No Action. Do not create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries.

I agree with alternative, I support the exclusion of shrimping from all coastal areas.

Preferred Alternative 2. Create a Shrimp Fishery Access Area (SFAA) within the proposed Stetson Reefs, Savannah and East Florida Lithoherms, and Miami Terrace (Stetson-Miami Terrace) CHAPC boundaries where fishing with a shrimp trawl and/or

shrimp possession is allowed by any vessel holding a rock shrimp limited access endorsement and equipped with an approved vessel monitoring system (VMS).
I disagree with the establishment of any shrimping areas.

Alternative 3. Move the west boundary of the proposed CHAPC 6 nautical miles to the east between the following points: (a) 30 degrees 16 minutes 35.354 seconds N and (b) 26 degrees 12 minutes 56.273 seconds N.
I disagree with the establishment of any shrimping areas.

Action 3. Create Allowable Golden Crab Fishing Areas within the proposed Stetson Reefs, Savannah and East Florida Lithohermes, and Miami Terrace (Stetson-Miami Terrace) CHAPC and Pourtales Terrace CHAPC boundaries.

Alternative 1. No Action. Do not create Allowable Golden Crab Fishing Areas within the proposed deepwater CHAPC boundaries.
I agree with this proposal.

Preferred Alternative 2. Create Allowable Golden Crab Fishing Areas in the following areas as described in sub-alternatives 2a-2c I do not disagree with this proposal as long as it does not impact recreational fishing.

Action 4: Amend the Golden Crab FMP to Require Vessel Monitoring.

Preferred Alternative 1. No action. Do not require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit.
I disagree with this alternative.

Alternative 2. Require use of an approved vessel monitoring system (VMS) by any vessel with a limited access golden crab permit and approved crustacean traps fishing for golden crab within designated areas in the Stetson-Miami Terrace CHAPC and Pourtales Terrace CHAPC where fishing has occurred historically and does not impact deepwater coral habitats.
I agree with this alternative.

Alternative 3. Require use of an approved vessel monitoring system (VMS) by any vessel fishing with a limited access golden crab permit in the South Atlantic Council's area of jurisdiction I agree with this alternative.

Sincerely,
Michael Travis