

Public Reporting

The South Atlantic Fishery Management Council

Public Comment Form



Meeting

December 2023 Council Meeting

Written public comment for this Council Meeting will be accepted from 11/17/2023 - 12/8/2023. More information about the meeting can be found here: <https://safmc.net/events/december-2023-council-meeting/>

Submit Date	Submitted By	Location	Affiliation	Comment
11/18/2023	First Name: Chris Last Name: McCaffity Email: freefish7@hotmail.com	City: Morehead City State: North Carolina	Commercial	<p>December 2023 SAFMC Meeting Public Comment</p> <p>In light of the fact that recreational landing assumptions have been wildly overestimated, I respectfully ask that the council rescind Amendment 35 and refrain from punishing fish, fishermen, and seafood consumers with overage paybacks next year resulting from the drastically reduced Gag Grouper quota. The early closure this year based on unreliable data should be punishment enough. This year's gag quota should be a prorated average of the quota in place for ten months and the reduced quota in place for two months when calculating potential overages.</p> <p>Please submit a formal request under the National Environmental Policy Act asking for offshore hatcheries as a mitigation measure to offset the negative impacts of offshore wind farms. These hatcheries should stock a variety of fish including mahi, cobia, snapper, and bass. Please also request that the base of windmills be designed as permanent artificial reef habitat that can be dismantled to a safe navigational depth when decommissioned.</p> <p>Please support a moratorium on farming fish in public waters. Public water aquaculture should be limited to stocking native seafood that can naturally reproduce.</p> <p>Finally, please stop requiring commercial fishermen to take young ladies as observers. If it is inappropriate for observers of different genders to share motel rooms, it is even more inappropriate to send those girls out for days on small boats with men they don't know.</p> <p>I am happy to answer any questions and/or provide more detail.</p> <p>Thank you, Chris McCaffity</p>

11/27/2023	<p>First Name: Jimmy Last Name: Hull Email: HULLSSEAFOOD@AOL.COM</p>	<p>City: Ormond Beach State: Florida</p>	<p>Commercial, For-Hire, Wholesale/Dealer /Retail</p>	<p>December 2023 Council meeting comment. Reliability of Commercial discard data The Reliability of Self-reported commercial trip discard data is certainly questionable. Commercial fishermen have many jobs to do and things to worry about while engaged in catching fish. When the bite is happening its often fast and furious. Documenting your discards accurately during the bite can only be done by a person not engaged in the fishing action. Estimating the discards after each bite is the only option for documentation with no verification. So even if the discard reporting rate was 100 percent you still have self-reported estimates. Under this methodology it will always be questionable. However, Scientist trust Observer data and use it with confidence. So other than Cameras on board vessels Observer data is the only accurate data. And it provides a check and balance on the commercial discard logbook data. Private Recreational permit The reliability of Private Recreational Effort, landings and discard data is certainly questionable. The private recreational fleet is currently unaccountable with unlimited participation. The first step in correcting this is requiring a private Recreational permit. Then you would at least have a known universe of participants. Your own SG AP has unanimously recommended you implement this permit for many years. MRIP methodology with the use of FES is unreliable and untrustworthy. Until your require a minimum of Private recreational permits The use of year-round vessel intercepts with fishery interviews along with citizen science voluntary reporting programs are the most accurate private recreational data available. Overview of SAFMC Actions to Address Overfishing of Red Snapper We have endured a mostly closed red Snapper fishery to harvest since 2009. The stock is still considered to be overfished and overfishing occurring. This is despite an all-time high record abundance and recruitment levels of red snapper. Dead discards from the Private recreational sector are driving this overfishing and overfished conclusion. The only way to improve the estimates driving this discard data is by implementing a private recreational SG permit. The only way to reduce dead discards from an unlimited participation fleet is to implement time or special closures to bottom fishing for private recreational fleet. This could reduce the estimated dead discards enough as to have a much higher harvest of red snapper for all sectors. Private Recreational participation and effort in Federal waters is unlimited and growing every year. Dead discarding of Red Snapper year round continues, Leading to overfishing by the private recreational sector. This has caused limited seasons for the Commercial sector as well as the charter for hire boats. I propose management in the form of a season, closures of bottom by time and space. I believe this is necessary and the only viable option/tool available to stop this overfishing. Private recreational fishers are not licensed/permitted by the Federal agency and there is no accountability with reporting of participation, effort, landings or discards. A closure of the private recreational sector to snapper grouper fishing by depth and or time could potentially reduce red snapper dead discards enough that an open season could be possible with much higher landings than present. Federally permitted Commercial and for hire vessels whose participation numbers are known and required to carry observers report effort, landings and discards would be excluded from this management change. And would continue to be accountable and fish under their current management rules of permitting and reporting. A closure of the private recreational sector to snapper grouper fishing by depth and or time could potentially reduce red snapper dead discards enough that an open season by depth or time could be possible with much higher landings than present. MSE modeling of proposed closures could determine what is necessary and what could be gained from this management. Factors to be included in the modeling evaluation. Barotrauma effects from different depths. Private recreational effort at depth. Private recreational effort by month. Private recreational effort by region. Most private recreational fishermen fish in good weather during the summer months of June, July and August. Barotrauma and dead discards are highest in depths greater than 90 feet of water. Council should recommend evaluating a closure of private recreational bottom fishing beyond 90 feet of water depth for 9 months between September thru May annually. This could provide enough reduction of Red Snapper discards that an open S/G season of 90 days at all depths for the Private Recreational sector would be possible during June, July and August annually. I believe that this would be well received by the private recreational sector if it would yield a longer red snapper season inside of 90 feet of water where red snapper are very abundant. And a 3-month open season at all depths during the summer months. I believe it is necessary to test this and other ideas through MSE modeling. Then the agency and council would have the information needed to make management decisions to end overfishing and closed seasons due to dead discards. Again, the federally permitted commercial charter for hire and head boats which are accountable and report their landings and effort would not be affected by any of this new management for the private recreational sector which has unlimited access no reporting and is unaccountable. The Council needs to address this overfishing now and stop the wasting of our valuable seafood resources to Dead discarding. Jimmy Hull</p>
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11/29/2023	<p>First Name: Sandra Last Name: Brooke Email: sbrooke1263@gmail.com</p>	<p>City: Crawfordville State: Florida</p>	Other	<p>Comments on Coral Amendment 10 to the Fishery Management Plan for Coral, Coral Reefs and Live Hard Bottom Habitat of the South Atlantic Region</p> <p>Sandra Brooke PhD. Coral Ecologist November 29, 2023</p> <p>Coral Amendment 10 proposes to establish a shrimp fishery access area along the eastern boundary of the Northern Extension of the Oculina Bank Habitat Area of Particular Concern (OHAPC). The purpose of the proposed action is to help achieve optimum yield in the rock shrimp fishery within the SAFMC region by allowing permit holders within the industry access to currently protected areas of the OHAPC.</p> <p>Rock shrimp are harvested using bottom trawls, which comprise heavy doors and chains that drag across the seafloor. Industrial bottom trawling is arguably the single greatest cause of physical damage to deep coral and sponge communities globally, reducing large tracts of complex reef habitat to rubble. Deep coral reefs develop slowly and are thousands of years old, so recovery from physical impact will take many years, if it happens at all. Rock shrimp trawling has caused extensive and well-documented damage to the Oculina Banks (Koenig 2001, Reed 2002, Koenig et al 2005, Reed et al. 2007), and despite restoration efforts, the reefs have not recovered (Brooke et al 2006, Harter et al 2019).</p> <p>In addition to the direct physical impact, the doors and chains of bottom trawl gear dragging along the seafloor cause sediment resuspension. The amount and type of sediment, it's persistence in the water column and its dispersal distance are dependent on a number of factors (e.g. grain size, current speed) that are specific to each location. Palanques et al. (2001) documented a 3-fold increase in the amount of suspended sediment that lasted for up to 5 days after trawling on a soft-sediment continental shelf in the Mediterranean. The OHAPC sediment is dominated by coral rubble and sand near the reefs but has a higher percentage of silt and clay further from the coral areas (Scanlon et al 1999). The smaller (silt and clay) particles remain in suspension longer than the heavier elements and therefore can be carried further from the source of disturbance (e.g. bottom tending fishing gear). The Gulf Stream drives the hydrodynamic regime in the OHAPC, creating strong currents that can potentially transport sediments significant distances. The prevailing current in the OHAPC is northerly, but current reversals are possible at depth (pers. obs.), and periodic gyres and upwelling events create significant cross-shelf flow (Smith 1983). These complex interactions create an unpredictable current regime within the OHAPC.</p> <p>Corals and other suspension or filter feeders have delicate feeding mechanisms that can become clogged by sediment, or in severe cases, sediments can bury deep reef communities and cause stress or mortality (Brooke et al 2009). Corals shed sediment by producing mucus which is energetically costly. In an area of repeated disturbance (such as a commercial trawling area), the chronic cost of removing sediment could impact community health and resilience. The early life history stages of many benthic invertebrates are planktonic and use fine cilia and appendages for feeding and swimming. If sediment load is high during spawning periods, larval cohorts may be compromised, which has a long-term effect on community resilience (Jones et al 2015).</p> <p>The proposed alternatives 2 and 3 would open historical rock shrimp fishing areas, which represent a very small percentage (1.8%) of past fishing activity (SAFMC Coral Amendment 10 Environmental Assessment report) and remove most of the slim buffer that currently exists between the high relief coral mounds and the OHAPC eastern boundary. Surface currents are frequently as fast as 2 meters/second (120 m/min) over the OHAPC. Cross-shelf bottom currents are weaker, but even at half this speed (1 m/s), and with the current boundaries in place, sediment from trawling could be transported to the mounds within minutes. Removing the boundaries exposes the corals to almost immediate sediment load from bottom trawling prosecuted along the edge of the proposed fishing access area. The high relief mounds do not simply stop at the base; they often have areas of low relief coral communities that gradually taper off into soft sediment. Detailed maps of this area would provide more information on low relief structures, but in their absence, these habitat boundaries are unknown. The existing OHAPC boundaries provide some measure of protection against physical impact and sedimentation. Given the strong unpredictable currents in the region, it is possible (or likely) that fishing gear will sometimes be carried off the planned trawling lines. If the buffer area is removed by the proposed amendment, trawl gear could impact the periphery of the coral mounds and damage low relief habitat. Since the VMS systems track the vessel, the fishing gear could intrude into the protected area boundary without alerting law enforcement. In summary, proposed Alternatives 2 and 3 both substantially increase the risk of direct and indirect damage to ecologically important habitat.</p> <p>One of the basic tenets of the Magnusen-Stevens Act is the precautionary principle, which seeks to prevent degradation of resources and facilitate their restoration. A review of best practices for managing fishery impacts to deep coral ecosystems highlighted protection of vulnerable habitat to bottom tending gear (Hourigan 2009). The OHAPC boundaries were expanded by the SAFMC in 2001, in consultation with stakeholder groups, to protect existing areas of Oculina habitat, which had been decimated elsewhere. Moving the fishing access areas to effectively abut the coral habitat violates the precautionary approach, and reverses existing protections, without significantly increasing economic benefit to the Rock Shrimp fishers.</p> <p>I ask that the Council consider accepting Alternative 1 (no action) of Coral Amendment 10, leaving the OHAPC protected area intact.</p> <p>References Brooke S, CC Koenig, AN Shepard (2006) Oculina Banks restoration project: description and preliminary assessment. Proc 57th Gulf and Caribbean Fisheries Institute 607-620</p> <p>Brooke S, M Holmes, CM Young (2009) Effects of sediment on two morphotypes of <i>Lophelia pertusa</i> from the Gulf of Mexico. Mar. Ecol. Prog. Ser. 390:137–14</p> <p>Harter, S, J Reed, S Farrington, F Drummond, A David (2019) South Atlantic MPAs and Oculina HAPC: Characterization of benthic habitat and biota. NOAA Ship Pisces Cruise 18-02. NOAA CIOERT Cruise Report, 318 pp. Harbor Branch Oceanographic Technical Report Number 188.</p> <p>Hourigan TF (2009) Managing fishery impacts on deep-water coral ecosystems of the USA: emerging best practices. Mar. Ecol. Prog. Ser. 397: 333-340</p> <p>Jones R, GF Ricardo, AP Negri (2015) Effects of sediments on the reproductive cycle of corals. Mar. Poll. Bull. 100: 13–33</p> <p>Koenig CC (2001) Oculina Banks: Habitat, Fish Populations, Restoration, and Enforcement. Report to the South Atlantic Fishery Management Council, December 2001</p> <p>Koenig CC, Shepard AN, Reed JK, Coleman FC, Brooke SD, Brusher J, Scanlon KM (2005) Habitat and fish populations in the deep-sea Oculina coral ecosystem of the western Atlantic Amer Fish Soc Sympos 41:795–805</p> <p>Palanques A, J Guillén, P Puig (2001) Impact of bottom trawling on water turbidity and muddy sediment of an unfished continental shelf. Limnol. Oceanogr. 46:1100–1110</p> <p>Reed JK (2002) Deep-water Oculina coral reefs of Florida: biology, impacts, and management. Hydrobiologia 43–55</p> <p>Reed J, CC Koenig, AN Shepard (2007) Impacts of bottom trawling on a deep-water Oculina coral ecosystem off Florida. Bull. Mar. Sci. 81(3): 481-496</p> <p>Roberts S, Hirschfield M (2004) Deep-sea corals: out of sight but no longer out of mind. Frontiers in Ecol. and Env. 2(3): 123-130</p>
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12/2/2023	First Name: Jimmy Last Name: Hull Email: HULLSSEAFOOD@AOL.COM	City: ORMOND BEACH State: Florida	Commercial, For-Hire, Wholesale/Dealer/Retail	<p>Council members Regulatory amendment 36</p> <p>BSB pots are an approved gear type in the SA SG fishery. Their are very few active Commercial fisherman using the gear. I use the gear in the winter months and it has been an important part of my portfolio of fisheries in the SA. The vertical line gear has lots of regulations and guidelines already in place. One very important requirement is that the vertical line gear must be tended/fished and brought back to shore at the end of trip.</p> <p>Recently I and other fisherman have been involved with the EFP on developing rope- less BSB pot gear solutions in an effort to remove BSB Pot vertical lines from the water column. This EFP work has been very successful and I have found a rope-less gear on demand type that works for me. There are still many ideas and options to be developed. Fisherman being able to continue using the gear is vital to further development of rope-less gear. This will have conservation benefits for marine mammals in every region.</p> <p>Additional ACTION. Please add rope-less gear to the current lines and buoy regulations for BSB pot gear. Draft Action 2. Revise transit stowage requirements for black sea bass pots with on- demand gear. I would recommend draft ALTERNATIVE 3 to require storage of buoys inside of pot and un-baited pot in transit thru MPA/SMZ. Please move this forward in the process. Thank You Jimmy Hull</p>
12/5/2023	First Name: John Last Name: Reed Email: johnkreed48@gmail.com	City: Fort Pierce State: Florida	Private Recreational, Non-Govt Org (NGO)	I have submitted my documents regarding the shrimpers and access to OHAPC to the administrator@safmc.net.
12/5/2023	First Name: Shari Last Name: Anker Email: sranker@mac.com	City: Port St. Lucie State: Florida	Non-Govt Org (NGO)	<p>It is our understanding that SAFMC is re-evaluating Amendment 10 that would allow bottom trawling for rock shrimp within the immediate vicinity of the deep water Oculina Coral Reef Bank. The original proposal was denied by NOAA in 2022. The Agenda item indicates exploration of the option to move forward with a new application. We are following any decisions made, one way or another.</p> <p>In 2022, the Conservation Alliance of St. Lucie County was heavily involved in opposing any bottom trawling in or in immediate proximity to this unique-in-the-world - and threatened - coral off of Florida's east coast. There were scientifically valid reasons that this area had been designated as a Habitat Area of Particular Concern, and they remain. We wish to re-submit three attachments that we sent to NOAA and the NMFS. It is our opinion that the concerns expressed in these documents have not changed: trawling will damage the proximal living corals, as well as inhibit any slow growing coral pups in their effort to regain their habitat. We also have grave concerns for loss of Essential Fish Habitat. These concerns are shared by local, statewide, and national organizations, as well as individuals who signed our petition.</p> <p>Thank you for your attention and consideration of our concerns.</p> <p>Sincerely, Shari Anker, President Conservation Alliance of St. Lucie County www.conservationallianceslc.org</p>
12/5/2023	First Name: Shari Last Name: Anker Email:	City: State: Florida	Non-Govt Org (NGO)	<p>It is our understanding that SAFMC is re-evaluating Amendment 10 that would allow bottom trawling for rock shrimp within the immediate vicinity of the deep water Oculina Coral Reef Bank. The original proposal was denied by NOAA in 2022.</p> <p>In 2022, the Conservation Alliance of St. Lucie County was heavily involved in opposing any bottom trawling in or in immediate proximity to this unique-in-the-world - and threatened - coral off of Florida's east coast. There were scientifically valid reasons that this area had been designated as a Habitat Area of Particular Concern, and they remain. We wish to re-submit three attachments that we sent to NOAA and the NMFS. It is our opinion that the concerns expressed in these documents have not changed: trawling will damage the proximal living corals, as well as inhibit any slow growing coral pups in their effort to regain their habitat. We also have grave concerns for loss of Essential Fish Habitat. These concerns are shared by local, statewide, and national organizations, as well as individuals who signed our petition.</p> <p>Thank you for your attention and consideration of our concerns.</p> <p>Sincerely, Shari Anker, President Conservation Alliance of St. Lucie County www.conservationallianceslc.org</p>

12/6/2023	First Name: Jeff Last Name: Oden Email: Slschrkwrwks@aol.com	City: Hatteras State: North Carolina	Commercial	<p>Thanks for the opportunity to speak and my comments will be broad. First, as a commercial fisherman for almost half a century, it's truly hard to watch how this council among others has made it a priority to hasten the gentrification of our nations working waterfronts, none however more so than the SA council. No other council has a 2/1 permit sanction without a sunset clause which has already far surpassed the original goal.....all the while allowing another industry with far greater capacity to more than fill that void.</p> <p>Of course i am speaking of the for hire industry, and industry that IF they can get a deposit for the day and anything weather wise short of a hurricane, they are out there. Since 1999, when our SG industry was pared down from 1100 permits to todays 500 or less, the for hire industry has been allowed to escalate from about the same number to well over 2300 at last count with no end in sight. The irony is, recently at the mahi wahoo a.p. certain members of the for hire a.p. had the audacity to point fingers at the PLL vessels and in particular council boats as being the problem on a fishery that industry accounts for about 7% of the quota when it can catch it's share. This year as of Nov 20th we as and industry were at about 11% of our total of 7% of the overall quota.....and yet industry at the most recent Mahi/wahoo AP was made out to be the problem. In that forum, they spoke of localized depletion to which i have a markedly different opinion of it. Localized depletion does not come from a longline. It comes from a charter vessel or a rec angler finding a school, catching his limit of (60 for hire), and then calling his buddy who in turn calls his buddy...and this happens up and down the coast.....until there is no school left. A longline simply potentially sets through that school and might if he is lucky catch 8 or ten out of it with hopes of interacting with another school further down the line. Longlines are simply an indication of relative abundance. They are not a catch all unlike some that want to make it out to be.... Sometimes it's just way easier to cast aspersions than it is to look in the mirror or actually know what you are talking about.</p> <p>. Coincidentally, of the three AP's that met prior to the upcoming council meeting in Beaufort, the only one that will not be recommending to the council a limited entry on the for hire industry was the Mahi/wahoo committee. The SG and Mackerel a.p. conversely voted unanimously to recommend to the council to move forward with that measure. The fact is, they need to not only enact the previous control date retroactively, they also need to add the 2/1 to rationalize that industry back to a realistic number. And most in that industry would AGREE!</p> <p>And of course the for hire impact on the SG fishery within this councils jurisdiction is no less impactful. With mahi being in their present state of decline, it was a natural progression for these vessels to find alternate avenues. And with that deposit in their pockets and the uncertainties inherent in the commercial fishing industry out the window...they make the most of it to the detriment of the few of us left along the working waterfronts. I am sure we would be a whole lot more effective at catching our ACL's if we had a sponsor before we left the dock. Take for instance snowy grouper. With a rec. ACL of 1668 fish, and a season that has been 4 months for as long as i can remember, along with that 2300 for hire permits that i previously mentioned....is it any wonder this council wants to impact the commercial industry with a 43 % reduction via A51. And of course that leaves out the millions of rec. anglers on the SE coast that chose to wet a line..... Try dividing 2300 permits into and ACL of 1668 fish ignoring those anglers i just mentioned.....oh and please don't forget the four month season. Please tell me how that works Mr. Strelchek?.</p> <p>Another example is blueline tilefish, a supposed 50/50 fishery that has been allowed to be exceeded recreationally 8 out of the last nine years with no payback. This year it has exceeded it's ACL by over 100% and counting. That was really nothing compared to the year they went over 336 %. How about it Andy, would we commercially get a season next year if we had gone over our ACL by 100%? Or since they went over by 100%, does that mean that the commercial guys get to double their measly 300 lb. trip limit to 600 lbs. this year on a 50/50 fishery? Furthermore, never mind that this fishery has been described by both recreational and commercial a.p. members as simply a bycatch fishery of snowy south of the 35. 15 latitude . How does that work Andy? Recreationally the snowy ACL is something like 13.000 lbs and the blueline is something like 110.000 lbs.. Yet blueline are essentially described as bycatch of the snowy fishery? And both have been getting a four month season. So now that A51 has been finalized with a two month season, and blueline will get a four month season the council is going to PRETEND to have rectified the problem? How do you say DISCARDS? Or then again are they?</p> <p>And then of course, we have RS, a fishery that has been declared overfished for two decades of no fault of our own commercially. I take particular pleasure in being a plaintiff in the pending lawsuit that this council keeps kicking the can down the road on. The sport fishing industry instead of just swallowing the medicine and coming off of a little bottom to placate the agency, instead prefers to "KEEP THROWING THE DEAD ONES BACK UNTIL THEY GET THICK ENOUGH TO KEEP AGAIN". 20 years has taught them nothing! This has left the commercial industry with a minuscule trip limit and cost it over 25 million dollars over two decades since we are being forced to pay for their discards. The bottom line is nobody wants to lose bottom, but i can tell you that the abundance of RS has made fishing certain areas a lost cause anyway at least where i live. All one can ask is where is the Coastal "CON"servaion Association when u really need em.....?</p> <p>And then of course we have a council that turns a blind eye towards recreational king mackerel tournaments to the detriment of industry that finds itself impacted when rec/ commercialized tournaments essentially entice rec. participants to dump recreational caught fish on commercial markets and quota's, (usually on Monday thereby impacting the market throughout the week)meanwhile wholly ignoring the same protocol from both the CG mandated safety of participants and the consuming public (HACCP), not to mention the reporting required from every commercially permitted individual. In fact there is a 17 day king mackerel tournament starting on Dec 1st thru the 17th in conjunction with a \$50.000.00 Bluefin tournament going on as this council meets. I doubt you can find out the charity that is supposed to be the benefactor..... because after all thats privileged info. If they want to be charitable, perhaps they need to donate it back to the very industry whose markets they are crashing.</p> <p>Also on this front these tournaments target the very breeders the species future depends on. It's typical of this council to ignore it as the fishery trends downward ...after all there are still a few industry boats out there they can blame it all on.</p> <p>Finally four or five years ago when this council got a new RA a few of us actually thought there was hope on the horizon. But since we have watched as our numbers continue to dwindle along with our infrastructure to the point where we can't even catch our ACL's anymore due to either another sectors excesses or being denied a feasible trip limit (snowy), plus have watched the rec. community be allowed to completely ignore their ACL's year in and year out without payback, it has become painfully obvious that the council process is fractured from the bottom up. The simple truth is this council is both incapable and unwilling to do it's job and that essentially rest with one person. Mr Strelchek, see ya in court!?</p> <p>jeff oden</p>
12/6/2023	First Name: Dewey Last Name: Hemilright Email: fvtarbaby@embarqmail.com	City: WANCHESE State: North Carolina	Commercial	YES

12/7/2023	<p>First Name: Richard Last Name: Gilmore Email: rggilmorej@gmail.com</p>	<p>City: Vero Beach State: Florida</p>	Other	<p>December 6, 2023</p> <p>To: Administrator@safmc.net Re: SAFMC Meeting, Dec 2023 Habitat and Ecosystem Report Guidance for Resubmission of Amendment 10 NOAA-NMFS-2021-0126; Coral_Amendment10_Nov21_508 Public Comment - R. Grant Gilmore, Ph.D.</p> <p>From: R. Grant Gilmore, Jr., Ph.D. Research Scientist Estuarine, Coastal and Ocean Science, Inc. 5920 First Street SW Vero Beach, FL 32968 Email: rggilmorej@gmail.com</p> <p>I am commenting on NOAA-NMFS-2021-0126, Coral Amendment 10 that is a proposal to allow Rock Shrimp, <i>Sicyonia brevirostris</i>, fishery trawling in the proximity of the Oculina Habitat Area of Particular Concern (OHAPC) and reefs that reside outside the OHAPC off the Florida east coast.</p> <p>I have spent over 50 years studying the fish, fisheries and fish habitats in the Southeastern United States and Florida as a research scientist in fish ecology and life histories, first with the Harbor Branch Oceanographic Institution (HBOI; 1971-1999), then at the Kennedy Space Center (NASA, NOAA & Dynamac Corp., 1999-2004), finally with Estuarine, Coastal and Ocean Science Inc. and collaborators (incl. HBOI, NOAA, USFWS, ACE, SAFMC, FFWCC; 2004-present).</p> <p>My studies included manned submersible (JSL-I & II, Clelia), remotely operated vehicles (ROVs: CORD, Hysub, Super Phantom) observations/collections, traps, hook and line, dredges, various trawls, and bottom grabs.</p> <p>My research and that of my colleagues has produced the following conclusions:</p> <ul style="list-style-type: none"> - We know that the extensive and once robust East Florida Oculina Coral Reef is unique to this region of the world and is the largest coral reef structure on the East Florida continental shelf. As such it supports the greatest biodiversity of aquatic organisms off East Florida and is a national and global asset. - We know the Oculina Coral reef forms structural habitat that supported important regional fisheries, notably the spawning of Gag, <i>Mycteroperca microlepis</i>, Scamp, <i>M. phenax</i>, Speckled Hind, <i>Epinephelus drummondhayi</i>, Red Porgy, <i>Pagrus pagrus</i>, Black Seabass, <i>Centropristis striata</i>, and Blue Angelfish, <i>Holocanthus bermudensis</i>. It was also a social roundeovous and feeding site for Warsaw Grouper, <i>Hyporthodus nigrilus</i>, Snowy Grouper, <i>H. niveatus</i>, Greater Amberjack, <i>Seriota dumerili</i>, Almaco Jack, <i>S. rivoliana</i>, Little Tuny, <i>Euthynnus alletteratus</i> and Scalloped Hammerhead Sharks, <i>Sphyrna lewini</i>. - We now know that these fisheries and fish populations, including Rock Shrimp, are vulnerable to habitat loss as well as fishing pressure. - We know that shrimp trawlers have damaged fragile Oculina coral and have created acres of coral rubble throughout much of the OHAPC, thus eliminating much of this unique and productive habitat. <p>What is the South Atlantic Fishery Management Council (SAFMC) responsibility? Years ago I sat as an advisor to the SAFMC grouper-snapper committee. It was my understanding that the SAFMC was to insure that regional fisheries remained viable and that a multi-species "ecosystem" approach in fishery management actually benefits all regional fisheries as they are truly interdependent. Even Rock Shrimp fisheries benefit from restoration of Oculina Coral "ecosystems".</p> <p>Like the Oculina Coral, the Rock Shrimp fishery is basically unique to East Florida waters and associated with the viability of east Florida continental shelf and Oculina Coral ecosystems. So why would the SAFMC want to allow a trawl fishery that has been documented in causing destruction of unique coralline habitats and biological diversity (past, present and future fisheries) this regional ecosystem supports?</p> <p>Why endanger an extremely fragile habitat that supports an equally fragile Rock Shrimp, Grouper-Snapper fishery?</p>
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