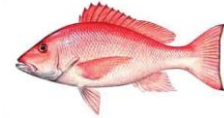
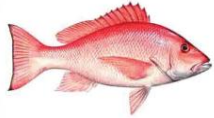


SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

Tuesday November 13, 2012

Regard to: Proposed Coral Amendment 7 Oculina Habitat Area of Concern (OHAPC) Expansion North

To: South Atlantic Fishery Management Council (SAFMC),

The Southeastern Fisheries Association (SFA) East Coast Fisheries Section (ECFS) appreciates the opportunity to submit the following comments to the SAFMC about proposed actions with Coral Amendment 7 to expand northward the current OHAPC.

SFA ECFS opposes any proposed expansion north of the Oculina HAPC at this time.

The first reason is there are not sufficient ground-truthing north of the present OHAPC, indicating Oculina reef development that warrants the northern expansion option. Live and/or hard bottom is not the same as live Oculina coral.

The second reason is the Snapper Grouper (SG) AP has not met with the Coral AP (CAP) as SFA ECFS recommended during the past two SAFMC meetings. The CAP did meet with the SAFMC Deep Water Shrimp AP (DWSAP) and some members from the Habitat AP (HAP) on October 18, 2012 in Cape Canaveral, Florida. That meeting produced alternatives which may mitigate unexpected consequences from previous alternatives affecting transit and historical shrimping areas. Any new Oculina coral information needs vetting by all of the APs that have interests in mitigating negative effects.

A third compelling reason to SG fishermen are alternatives that go inshore of 50 to 70 meters in depth (164 feet to 229 feet) with regions for western boundary choices and then seaward to 100 to 110 meters in depth (328 feet to 360 feet) on the east side that would forbid anchoring on historical fishing areas. In particular the Big Ledge (also known as the 28 fathom ledge) and the Steeples found in 220 feet to 300 feet of depth at the base of these high relief natural structures that are found in those proposed regions. There are also several wrecks that are commonly fished in those depths for over 50 years.

About 20 miles to the north of the main body of Steeples is an area of bottom nearly 20 miles in size known as the Roll down where snowy grouper, blueline tilefish, red porgy, vermilion snapper, red snapper and shallow water groupers are found in large concentrations. The Roll down is mostly low relief hard bottom from 220 feet out to 300 feet of depth.

All of these regions could be affected by the proposed OHAPC expansion and such an action may not be warranted at all in our opinion. More research is required before an arbitrary decision is made by the SAFMC and the National Marine Fisheries Service (NMFS) causing more economic impacts to fishing communities. With the NMFS facing budget constraints we are wondering when the ground-truthing can be accomplished correctly.

These legitimate concerns need to be vetted during a joint meeting of the CAP, HAP, DWSAP and SGAP as soon as possible. SAFMC staff has mentioned to the SFA ECFS consultant they may organize such a meeting during early to mid-2013.

Thank you for considering the SFA ECFS comments and we look forward to developing solutions to these problem issues.

Jimmy Hull, Chairman

SFA ECFS

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