

Regarding Coral Amendment 11/Shrimp Amendment 12, I am requesting the council to choose Alternative 2 as the preferred. These are the boundary coordinates formulated by rock shrimp fishermen and staff (Roger) in response to the coordinates in Alternative 3 to provide additional buffer between the Oculina and fishing activity. This would restore a historic, economically important area to the rock shrimp fishery along the southeastern boundary of the northern OHAPC expansion established in Coral Amendment 8 back in 2013. This was a known point of contention when it was approved and the rock shrimp industry was told it would be addressed in a future amendment. We have vetted, re-vetted, approved, rejected, ground-truthed and reapproved this amendment over the last 8 years.

Putting a Shrimp Fishery Access Area in a Coral HAPC is counter intuitive. I didn't understand it when Roger and Greg created them in Coral Amendment 8. Why didn't we just change the boundary to separate coral area from fishing area? Coral Amendment 8 included multiple Royal Red Shrimp FAA within the very large Stetson-Miami Terrace CHAPC. This area also had to incorporate FAAs for the Golden Crab Fishery. This is not a new or inconsistent concept and is necessary when large areas are placed under management without meticulous scrutiny and collaboration between interests AND when new research or technology improves our understanding of an area or our ability to protect certain areas.

In this case, a mistake was made when the eastern boundary of the OHAPC was set right through historical, highly productive rock shrimp fishery area. The VMS points recorded from 2003 to 2011, depicted in the attached chart, show 2 things: 1) the boundary was placed right in the middle of very productive and important rock shrimp fishery area, 2) the rock shrimp fishery was already avoiding the Oculina bottom even before it became a HAPC. The rock shrimp fishery has been operating in this area for over 60 years.

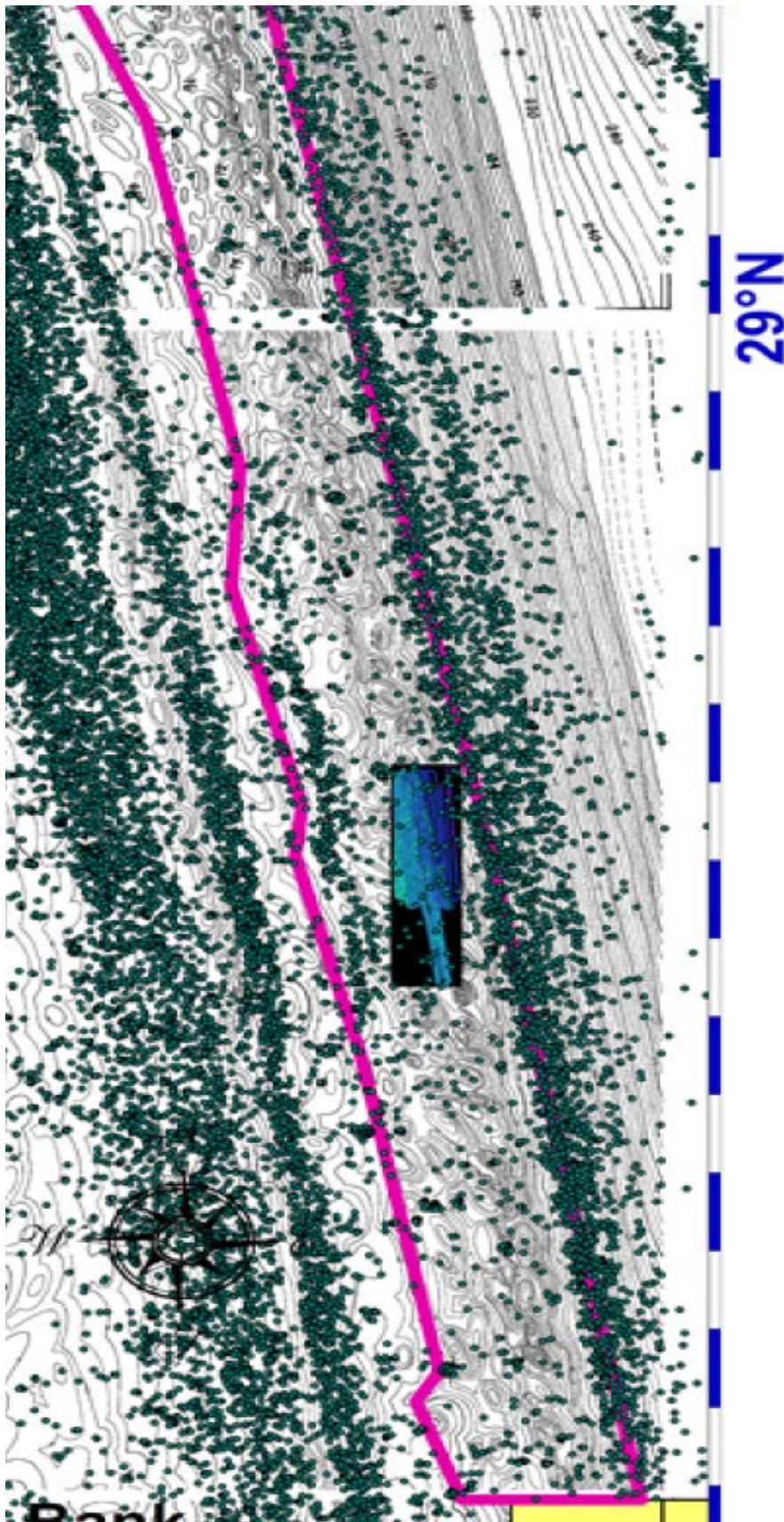
I would argue that the BSIA regarding where the hard bottom is and where the soft-substrate bottom is, can be obtained from the people that have been working the area for decades. Why is their knowledge disregarded as anecdotal? We should be working together more collaboratively like we did in the first joint Coral/Deepwater Shrimp AP meeting in October 2012.

The Oculina coral habitat is important to the rock shrimp fishery because it is thought to be the nursery grounds. The rock shrimp fishery has explained numerous times how the gear is deployed and used in this area to ensure there is adequate buffer to prevent negative impacts. There is adequate buffer between Oculina structure and the proposed boundary in addition to the self-imposed buffer for margin of error. Sediment suspension from rock shrimp fishing activity cannot be compared to dredging activity.

Regarding the economic value of the proposed SFAA in Option 2, you cannot put an economic value on a VMS point, count the number of points in an area and magically know the economic value of a given area. It's not that simple. For an analogy, if a herd of cattle are grazing in a field next to a forest and you want to round up the herd, you wouldn't start in the middle of the herd. You might round up half the herd while the rest of the herd took refuge in the forest.

I want to thank the council for addressing this Amendment again. This is not about concession or compromise or creating new fishing area in a CHAPC, this is about correction, restoring the fishery, jobs, food supply, food security. Please choose Option 2 as the preferred option again and hopefully we can get this approved.

Rock Shrimp Vessel Fishing VMS Points Plotted Over
the Southern Half of the OHAPC Northern Expansion Boundary



The pink line represents the border of the Coral Amendment 8 Oculina HAPC northern extension.

The black points represent VMS pings from rock shrimp vessels. Concentrated point clusters indicate frequent trawl activity. Scattered points are non-working transit activity.

Bathymetric lines indicate slope flat bottom versus vertical structure bottom.

The southern half of the southeastern border of the OHAPC cuts through the middle of historic rock shrimp trawling area. This is soft substrate bottom with no