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June 21, 2016

Via email to the Gulf of Mexico Fishery Management Council: gulfcouncil@gulfcouncil.org

Kevin Anson, Chair Gulf of Mexico Fishery Management Council 2203 N. Lois Avenue, Suite 1100 Tampa, FL 33607

RE: Oceana's Written Comment on the Deep Sea Coral Research and Technology Program

Dear Chairman Anson:

Deep-sea coral communities have been discovered throughout the United States on continental shelves and slopes, canyons and sea mounts in depths ranging from 150 to 10,000 feet. These coral communities are particularly vulnerable to damage caused by bottom-tending fishing gear – especially trawls, as well as energy exploration, deployment of cables and pipelines and other human activities that disturb the ocean floor. Once damaged, they take decades or even centuries to recover since most deep-sea corals grow extremely slowly. Deep-sea corals play a crucial role in the ecosystem by providing habitat for numerous fish and invertebrate species, including commercially important grouper, snapper and shrimp.

For more than a decade, Oceana has worked to identify and conserve deep-sea corals in many places throughout the United States. In 2009, following a change in the Magnuson –Stevens Fishery Conservation and Management Act, NOAA, in consultation with the Regional Fishery Management Councils, developed the Deep Sea Coral Research and Technology Program1 and a national strategy to conserve deep-sea corals. This national strategy gave the Councils additional authority to conserve deep-sea corals by managing fishing impacts and addressing other threats to these deep water ecosystems. This program will 'freeze the footprint' of current fishing and protect other areas with known deep-sea corals.

Oceana encourages the Council to work with the Deep Sea Coral Research and Technology Program to learn more about this strategy and how it can be implemented in the Gulf region. This precautionary approach has been used by the Mid-Atlantic Fishery Management Council with good results and we are hopeful that the GOM Council will soon follow suit. If implemented correctly, the Deep Sea Coral Research and Technology Program can conserve deep-sea coral communities with minimal impact on current fishing.

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¹ NOAA Habitat Conservation website. *available at*: http://www.habitat.noaa.gov/protection/corals/deepseacorals.html

Oceana is committed to work with the Council to protect deep-sea coral communities. They are not only valuable to our wondrous ocean landscape but provide vital habitat to the fish and other ocean life that comprise the very essence of our fisheries.

We appreciate the opportunity to provide input and thank you for your time. We will continue to be engaged in this process moving forward.

Sincerely,

Alison Johnson

Southeast Campaign Manager

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Oceana, Inc.

Oceana is the largest international advocacy organization focused solely on ocean conservation. We run science-based campaigns and seek to win policy victories that can restore ocean biodiversity and ensure that the oceans are abundant and can feed hundreds of millions of people. Oceana victories have already helped to create policies that could increase fish populations in its countries by as much as 40 percent and that have protected more than 1 million square miles of ocean. We have campaign offices in the countries that control close to 40 percent of the world's wild fish catch, including in North, South and Central America, Asia, and Europe. To learn more, please visit www.oceana.org.