

From: [Richard Gilmore](#)
To: [SAFMC Administrator](#)
Subject: Amendment 10, Shrimper access to the OHAPC
Date: Monday, September 9, 2024 11:55:26 PM

Dear Administrator,

I am commenting on what has been entitled Amendment 10, changing shrimp trawl access to the OHAPC off the east coast of Florida. I am a fish ecologist and ichthyologist who has conducted research on the east Florida continental shelf since 1972 including studies of the Oculina coral reefs and other reef formation, as well as open shelf waters using manned submarines, ROVs, scuba diving, mixed gas diving, photo transects, passive acoustic monitoring, trawls, dredges, traps and classical fishing gear (trolling and long-lines). This work has given me exceptional insight into this region's biological diversity and fisheries. No other continental shelf region within the United States contains the biological diversity surpassing that of the east Florida continental shelf from Palm Beach County north to Volusia county, north of Cape Canaveral. Many fish and invertebrate species living on the east Florida shelf occur as perennial reproducing populations only within this region of the United States. There are a variety of geological, climatic and oceanographic factors responsible for this great biodiversity that have been documented in the published literature for decades now (Gilmore 1995, Bulletin of Marine Science). I believe the SAFMC has not taken into account the ecosystem impacts that many of the human activities have on these unique ecosystems, including the extremely valuable Oculina coral reefs. How can a fishery management council that once prided itself in taking an ecosystem approach to fishery management ignore the long term effects of potential coral damage? I have seen the trawl damage to Oculina coral in person during manned submarine surveys conducted by the Harbor Branch Oceanographic Institution. It was catastrophic and would take decades to recover.

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