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6919 Portwest Drive, Suite 100 | Houston, Texas 77024

p 713.626.4234 | f 713.626.5852 | www.JoinCCA.org

August 12, 2025

John Carmichael
Executive Director
SAFMC
4055 Faber Place Drive
Suite 201
N. Charleston, SC 29405

Re: Comments on Coral Amendment 11 / Shrimp Amendment 12

Dear Director Carmichel,

Coastal Conservation Association (CCA) is the largest grassroots marine resource conservation organization of its kind in the country, with more than 130,000 members on all three coasts. We appreciate the opportunity to provide comment on Coral Amendment 11 / Shrimp Amendment 12, and specifically on the long-running debate over the opening of the eastern edge of the northern Oculina Bank to shrimp trawling.

The Oculina Bank, located off Florida's east coast, is home to slow-growing *Oculina varicosa* coral and was first protected in 1984 after decades of bottom fishing and trawling in the 1970s and '80s devastated this unique reef. NOAA and the South Atlantic Fishery Management Council (SAFMC) designated the area a Habitat Area of Particular Concern (HAPC) in 1984, later expanding protection in 1994 and again in 2000 and 2014.

Nevertheless, in March 2025 the Council began working on Coral Amendment 11 / Shrimp Amendment 12, which reconsiders shrimping access in a "buffer strip" along the eastern edge of the HAPC despite concerns that bottom trawling in the vicinity will stir up sediments that could smother the coral and undo decades of recovery. Obviously, the closer the trawls are to the reef itself, the greater the impacts are likely to be. While it may be argued by some that the current buffer zone of roughly 20 miles is excessive, the drastic reductions being proposed are far more indefensible. To allow shrimping and associated silt plumes from the trawls within 400 yards of the protected area is virtually guaranteed to produce negative impacts. Common sense would dictate a more cautious approach to study the behavior of these extensive trawl plumes in that area before cementing in a drastic regulatory change. Alternatives for a 10- or even 5-mile buffer zone seem warranted.

A sizeable buffer zone is also necessitated by the uncertain nature of enforcement efforts. Much effort has gone into requiring shrimp vessels to have VMS units on board, but there are huge questions as to what is done with that information and who is monitoring it. NOAA Fisheries is notorious for its difficulties in housing and accessing information for even simple applications like permits and licenses. It is unclear how efficiently robust data streams from shrimp boat

VMS units are handled. Given the vast amount of information coming in and NOAA's recent posture of deferring even routine fisheries management responsibilities due to personnel and resource budget reductions, it is highly unlikely that monitoring efforts will be up to the task. Given the long existence of this protected zone, its unique sensitivity and the uncertainty of monitoring efforts, penalties should therefore be robust in the event that a violation is detected.

We also believe the concerns voiced by the South Atlantic Fishery Management Council's Coral Advisory Panel chaired by Jocelyn Karazsia are extremely relevant:

- *Sediment resuspension from trawl doors and chains, with fine particles (silt and clay) remaining suspended for days and transported by Gulf Stream currents, causing sublethal stress to corals through mucus production and feeding-impairment in early life stages*
- *Evidence of three-fold increases in suspended sediment for up to five days after trawling, based on Mediterranean analogs, and observations of downstream clogging of coral feeding structures*
- *The narrow margin (1.8% buffer) between existing trawl activity and the eastern Oculina Habitat Area of Particular Concern (OHAPC) boundary, suggesting that continued fishing under current regulations risks further buffer erosion.*

In response to these concerns, the Council took the following actions, among others:

- *Commissioned an additional sediment-monitoring study, to be completed within 18 months, to quantify suspended load under regional current regimes before any further boundary revisions.*
- *Committed to revisit the buffer once new sediment data are available, with a Council motion to schedule a public workshop within one year on deep coral resilience.*

Both of these responses to the concerns raised by the AP are constructed such that the barn door will possibly be closed, but only long after the horse has escaped. It would make far more sense to complete the sediment-monitoring study and review new sediment data *before* revisions are made to the buffer zone, particularly since the impacts to slow-growing coral could be profound and require centuries to repair. Furthermore, to our knowledge the Council has not responded to comments made by John Reed, Principal Investigator for the Robertson Coral Reef Research & Conservation Program of Harbor Branch Oceanographic Institute, regarding evidence of east-to-west currents in the area of Oculina Banks. Reducing the eastern buffer zone to a mere 400 yards in conjunction with an east-west current is a recipe for disaster. We implore the Council to thoroughly investigate those reports before redrawing the eastern buffer zone.

It is important to note here that shrimp trawling is among the most notoriously destructive commercial fishing practices allowed today. NOAA's own data indicate that to catch one pound of shrimp roughly seven pounds of bycatch is discarded dead, leading to hundreds of millions of pounds of dead sea life dumped every year back into America's oceans. Just recently NOAA was promulgating a Secretarial Amendment seeking to close a large section of Florida's east coast to all bottom fishing to reduce bycatch mortality on a robust population of red snapper.

John Carmichael

August 12, 2025

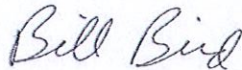
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For the fishing public, it is difficult to reconcile the motivations behind that action with those behind this proposal, which seeks to expose even more of the ocean floor to some of the highest levels of indiscriminate bycatch mortality, directly adjacent to a unique coral habitat that has been designated a Habitat Area of Particular Concern and which will very likely result in that area being negatively impacted by siltation from the trawls. In the Gulf and South Atlantic, shrimp trawls are a significant source of juvenile red snapper mortality.

Finally, it must be pointed out that rock shrimp are infamously unpredictable and cannot be located with any degree of certainty. There is nothing magical about this particular sliver of ocean bottom, no guarantees that rock shrimp will be encountered there at any given time any more than any other area. The unpredictable nature of the fishery necessitates long, random tows in the hopes of finding rock shrimp. It is difficult to believe that opening this particular sliver of ocean adjacent to a unique coral environment will result in a fundamental change in the economics and dynamics of this fishery.

In this case, the benefits of this action do not outweigh the risks. Furthermore, in the event that, as suspected, prevailing currents on the bottom do indeed push silt from near-vicinity trawls onto the reef and cause existential damage, there is little expectation that NOAA would be willing or able to react in a timely manner to correct its course. Given the unique characteristics of the area, allowing shrimping activities around the Oculina Bank risks irreversible damage of a vulnerable ecosystem that is showing signs of recovery. Prioritizing short-term economic gains for a single fishery over the long-term ecological well-being of the Oculina Bank is ill-advised.

Regards,

A handwritten signature in cursive script that reads "Bill Bird".

Bill Bird, Chairman
CCA National Government Relations Committee