My name is Mike Merrifield, current chair of the Deepwater Shrimp AP. I've been working with the coral/shrimp amendments since 2012.

This comment is in support of Coral 11/Shrimp 12 Amendment Preferred Alternative 2 to establish a Shrimp Fishery Access Area (SFAA) along the southeastern boundary of the OHAPC northern extension that was approved in Coral Amendment 10 in 2013. The attached page from the May 9, 2013 Deepwater Shrimp AP meeting illustrates the VMS points and vessel tracks that occurred in the area, the distance from the Oculina coral and where the OHAPC boundary exists.

This area is significant to the rock shrimp fishery as this is the start of the soft-substrate harvest area for rock shrimp. Starting at the beginning of the harvest area, rather than the further offshore, increases the harvest efficiency and overall catch level. This was presented to the council during the development of Coral Amendment 8. The council did not want to delay the amendment but agreed to correct the boundary in a later amendment. Coral 8 added over 900 square miles of CHAPC, 405.42 square miles to the Oculina CHAPC. The Deepwater Shrimp AP worked with the Coral AP to develop this area and were in agreement except for this narrow 22 square mile section of the OHAPC where the offshore rock shrimp fishery harvest starts and progresses eastward.

VMS has been required on all vessels fishing in the rock shrimp fishery since 2003. VMS points illustrate how the fishermen avoided Oculina coral before the northern OHAPC boundary was implemented in 2014.

Previous references by John Reed that rock shrimp vessels were mowing down Oculina coral are false. His reference to "goat trails" being created by towing chains along the bottom between 2 trawl doors is false, this is not even feasible. This shows the lack of understanding of how this fishery operates.

In the original Harbor Branch surveys of the *Oculina* Bank in 1975-77, there was more dead *Oculina* coral cover (31%) than live Oculina cover (19%). The only explanation for this data is that some force other than trawling has historically resulted in extensive *Oculina* die-off. John Reed wrote in his 2006 Report to the SAFMC Oculina Evaluation Team Workshop:

> **"The exact causes of the extensive areas of dead coral rubble on modern deep-water reefs, including *Oculina* and *Lophelia* is yet unknown. Extensive areas of dead coral on the *Oculina* reefs as well as *Lophelia* counterparts may be due to a combination of events including the natural evolution of the mound, along with degradation through bioerosion, hydrodynamic stress from currents, and in some regions from dredging and trawling and trawling activities by fishermen (and scientists)."** from pg. 14 & 15.
>
> **"Natural episodic coral die-off, such as occurs with the shallow water *Acropora* species, may be an unknown factor on the deep-water coral reefs. Other hypotheses may account for some of the dead *Oculina* reef area. One is that German submersibles were known to hide among high relief structures in this region during reconnaissance missions along eastern FL during WWII."** from page 16.
>
> **"Historical photographic records from the 1970's provide evidence of the status and health of reefs prior to heavy fishing and trawling activities of the 1980s and 1990s (see 5 published citations)."** from page 17.

The fact is, this is an extremely volatile environment impacted by numerous natural episodic events that impact the coral, along with numerous other anthropogenic causes such as the billions of gallons of gray water released every day by Dade, Broward and Palm Beach Counties (moratorium has been postponed due to litigation), cruise ship dumping and the Lake Okeechobee overflow discharges through St Lucie River into the Atlantic. The later event created a brown algae bloom that suffocated the bottom and

eliminated rock shrimp fishing south of the OHAPC for over 5 years and most likely had a devastating effect on the Oculina corals inside the closed area. This dead zone extends over 18 miles north on the OHAPC southern boundary and is growing.

The repetitive statements from the scientific and conservation communities that "the rock shrimp fishery is the primary cause of major habitat destruction in the Oculina HAPC" is false and misleads the public.

Regarding sedimentation, the standard rock shrimp fishing practice is to put the gear on the bottom a minimum of a half mile from the CHAPC boundary, work up to a quarter mile from the boundary and then turn away from the boundary to pick the gear up. This equates to a ¾ to 1 mile buffer at a minimum between where fishing occurs and where coral exists.

Surface currents run northward, followed by a east to west tide mid-water, followed by little to no current for 10% of the water depth on the bottom, approximately 30 feet.

Regarding SFAAs, if they are not consistent with the Coral FMP and possibly illegal as alleged by Tuesday 8-5-25 comments, Coral Amendment 8 must be thrown out as there were numerous SFAAs incorporated in the amendment.

Throughout this process it has amazed me how little is understood about the rock shrimp fishery and how it operates. This is a managed fishery with limited entry permits (no new permit to replace retired permits), VMS requirements, Turtle Extruder Devices (TEDs), Bycatch Reduction Devices (BRDs), specific transit requirements, observers, complete accounting of landed resources, and fisheries improvement participation (improved TED and BRD designs, doorless trawl, and more).

Coral scientists are experts on coral, rock shrimp fishermen are experts on the bottom and waters adjacent to the coral bottom. There is likely much more to be gained by working together than hard line territorialism. That's how I entered this process over 12 years ago with the first joint Coral and Deepwater Shrimp Aps meeting in Cape Canaveral, FL, the one where the minutes from the second half of the meeting were lost. Anna Martin, the staff biologist lead at the time, was pleasantly surprised at the meaningful and productive exchange of information that occurred.

My last point is in reference to EO Restoring American Seafood Competitiveness. Often, regulators do not understand the challenges of producing valuable, healthy, quality seafood to the American consumer. Their focus is on sustainability and enforcement which is absolutely vital for the long term health of the resource. This EO is asking the regulators to look for action that can be taken to assist the American Seafood harvesters compete with imported, primarily farmed seafood that pours into this country at prices often below the cost to produce. This is one of those actions. Food security is National security.

Attachment 2

Oculina CHAPC Proposed Northern Expansion

Southern End

Shrimp Trawl Tracks to VMS Comparison