

June 27, 2022

To: [www.regulations.gov](http://www.regulations.gov)

Re: NOAA-NMFS-2021-0126  
Coral\_Amendment10\_Nov21\_508  
Public Comment

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This letter serves as public comment by the Conservation Alliance of St. Lucie County to NOAA concerning the proposed Coral Amendment 10 referenced above.

The Conservation Alliance was founded in 1972, with the mission “to protect the water, soil, air, native flora and fauna upon which all earth’s creatures depend upon for survival.” During these 50 years, we have been involved in protective efforts for ecosystems, habitats, and species on land and in our rivers and in the Atlantic Ocean off our coast. We were the catalyst for the creation of two state park preserves in our county. We strongly believe in the utility of defining and placing into protective conservation status those areas, whether they be in land or in our waters, that are of high ecological value.

The Oculina Coral Reef Habitat Area of Particular Concern (OHAPC) could not be of more significant ecological import to our proximal marine habitat in the Atlantic Ocean as well as the Indian River Lagoon (IRL). The 181-mile-long lagoon is designated as an Estuary of National Significance, and has species interconnectivity with Oculina via several inlets from the Atlantic to the IRL.

We expect that NOAA is aware of the historical context of our times: humanity is facing unprecedented environmental challenges worldwide, though locally experienced. One of the most threatened ecosystems is the coral reef. Already the world has lost 50% of our coral reefs, with another 40% threatened to die in the next 20-40 years. The latest Intergovernmental Panel of Climate Change Report points to the state of Florida as being a leader in the record decline and morbidity of coral reefs.

The Oculina Bank begins off our county’s coast in Fort Pierce and extends northward to St. Augustine. In the 1970s it was our very own local scientists (like Prof John Reed of Florida Atlantic University Harbor Branch Oceanographic Institute) who discovered the existence of what can only be described as a natural

wonder, a gushing font of marine and estuarine ecological productivity that is unique-in-the-world. (Another local scientist, ichthyologist R. Grant Gilmore, PhD, helped to document fish biodiversity as well as the connectivity to IRL over several decades.) These very slow growing corals are now understood to be thousands of years old.

Coral reefs are in trouble worldwide due to a number of concurring environmental stressors, including climate change, warming waters, acidification, and land-sourced pollution. Already by the 1970s and 1980s the Oculina Bank had already suffered mightily, losing 90% to the destructive bottom trawling method used by the rock shrimp industry. If not for the establishment of the OHAPC, we expect that virtually none of this habitat would remain, and it could not provide any of the ecological productivity and services so important to our way of life here in Florida.

Oculina corals serve as a keystone species, in that the colonies evolve to host thousands of diverse animals. This emergent biodiverse ecosystem, consisting of several types of habitats, serves as the structural foundation for the food chain for numerous animals such as mollusks, crustaceans, over 70 species of fish, fished both recreationally and commercially. A foot-long coral colony can host up to 2,000 animals.

Oculina is a multi-functional habitat providing critically important ecological services: spawning and breeding grounds, nursery, and protective areas for fish and a variety of other species at various life stages. OHAPC has provided opportunity for rare or threatened species such as black sea bass and speckled hinds to begin recovery from overfishing and other harm that caused population declines.

Conversely, the bottom rock shrimp trawling has been shown to be highly destructive to Oculina Bank, due to not only what is in effect a clear cutting of the ancient coral and even any new larvae that are trying to grow, but also to their by-catch of numerous fish species. Amendment 10's proposed easing of trawling in near proximity and perhaps inside OHAPC cannot guarantee that Oculina will be protected. Sediment plumes arising from the trawling can smother live coral – even at some distance from the trawling activity. Additionally, the imprecision of the placement of the trawling equipment makes it quite certain that infringement into the boundaries of OHAPC is assured, especially in light of ocean currents.

The central Atlantic coast off of eastern Florida has been recognized as a fishermen's paradise since the early 1900s, and earned the distinction of hosting the most biodiverse estuaries in the U.S. in the mid-to-late 20<sup>th</sup> century. Interconnection between the IRL and the Atlantic is a significant contributing factor to that high biodiversity. This distinction is threatened by numerous environmental stressors, but we note here that in allowing the degradation and further demise of OHAPC the loss to our fisheries can well rise to serious and substantive harm. As Dr. Gilmore has bluntly stated: no habitat, no fish.

Locally, we are an active and engaged conservation community, which is reflected in newspaper coverage of the new threat to Oculina posed by the movement of EO 113921 through the regulatory system.

[www.tcpalm.com/story/news/local/indian-river-lagoon/2021/06/18/safmc-votes-florida-rock-shrimp-trawlers-protected-oculina-bank-coral-reef-fort-pierce-st-augustine/7716213002/](http://www.tcpalm.com/story/news/local/indian-river-lagoon/2021/06/18/safmc-votes-florida-rock-shrimp-trawlers-protected-oculina-bank-coral-reef-fort-pierce-st-augustine/7716213002/)

[www.tcpalm.com/story/news/local/indian-river-lagoon/2021/06/15/would-rock-shrimp-trawlers-damage-protected-oculina-bank-coral-reef-noaa-fisheries-harbor-branch/7688063002/](http://www.tcpalm.com/story/news/local/indian-river-lagoon/2021/06/15/would-rock-shrimp-trawlers-damage-protected-oculina-bank-coral-reef-noaa-fisheries-harbor-branch/7688063002/)

[www.tcpalm.com/story/sports/fishing-boating/2021/09/24/can-rock-shrimp-fishing-trawlers-and-oculina-bank-coral-reef-coexist-st-augustine-to-fort-pierce/8381361002/](http://www.tcpalm.com/story/sports/fishing-boating/2021/09/24/can-rock-shrimp-fishing-trawlers-and-oculina-bank-coral-reef-coexist-st-augustine-to-fort-pierce/8381361002/)

[www.tcpalm.com/story/news/local/florida/2021/09/16/florida-shrimp-boats-gain-more-access-historical-trawling-areas-fishing-coral/8320489002/](http://www.tcpalm.com/story/news/local/florida/2021/09/16/florida-shrimp-boats-gain-more-access-historical-trawling-areas-fishing-coral/8320489002/)

<https://archive.tcpalm.com/opinion/john-reed-the-oculina-outlook-isnt-all-bad-ep-404590526-349132901.html/>

We implore NOAA to carefully examine the extensive comments and scientific research by our local marine scientists, like Prof. John Reed and R. Grant Gilmore, PhD. We also urge NOAA to acknowledge that its decision is of national consequence, which is the reason we partnered with the Marine Conservation Institute. Under separate cover you will receive a copy of the petition that we posted that has garnered 3050 signatures, 520 of which are from Floridians, all asking that NOAA protects OHAPC and denies Amendment 10.

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NOAA's decision will either honor the purpose of establishing Marine Protected Areas by maintaining OHAPC's current status, or if not, any protected area anywhere could be opened up due to business or political whims having nothing to do with true science-based conservation. The latter decision will be contrary to local, state, national, and international efforts to address the biodiversity and climate change crises. The Biden Administration's 30X30 Initiative is one far-reaching example here.

The bottom line is that the thin margin of error that exists for our ecosystems during this time of overlapping and mounting ecological crises is no time to further risk any well-functioning, highly productive, legacy ecosystems like that of the Oculina Bank. In a non-linear world of ecosystem function, one additional

change/variable can become the straw that breaks the camel's back. Bluntly, bottom trawling for rock shrimp is an unsustainable fishing practice and must be fully restricted from encroachment onto OHAPC, directly or indirectly. This ecosystem requires the protection offered by OHAPC status.

In the strongest possible terms, we urge NOAA to deny Amendment 10 to open a SFAA, which allows trawling by shrimp fishers within the current boundaries of OHAPC. Our preference is that NOAA instead accept Alternative 1 (No Action) of the proposed Amendment 10.

Thank you for your careful consideration.