

To: South Atlantic Fishery Management and NOAA Fisheries
From: Shari Anker, President,
Conservation Alliance of St. Lucie County, Fort Pierce, FL
Re: Amendment 10 to allow trawling within the Oculina Bank Habitat Area of
Particular Concern
Date: August 14, 2021

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 to 40 years.

Coral reefs are impacted by a number of concurring environmental stressors. Climate change is associated with increased acidification and warming waters that then cause increase morbidity of corals. Also, land-sourced pollution, like storm-water runoff, is another factor in the destruction of corals.

Based on hard evidence, we are forced into a time of transition, whether we like it or not. The question is whether we will respond to the crises striving to protect the remaining ecosystems still functioning or whether we will continue business as usual and thereby accelerate the degradation and destruction of these life-supporting and biodiversity supporting ecosystems.

The proposal by 12 rock shrimp trawlers to fish within the protected Oculina Bank Habitat of Particular Concern (OHAPC), is an example of an industry clinging to unsustainable methods of fishing for shrimp: it will increase the direct and proximal destruction of this unique-in-the world coral reef ecosystem. Adding in the already existing environmental stressors the coral reefs here (and around the world) and we could see the unintended expansion of degradation and destruction growing within the OHAPC. In a non-linear world of ecosystem function one additional change/ variable can become the straw that breaks the camel's back.

Why risk that? As is the case with this ocean Habitat Area of Particular Concern and other conservation/preservation designations for our waters and our lands, please understand that scientists, environmentalists, civic and government organizations, students, and other citizens have put in a lot of blood, sweat, and tears to make sure that unique and ecologically vital areas be protected in perpetuity. Their motivations arise from protecting the ecosystems with their important (and free!) ecological services but also to offer to our children and grandchildren the wonders of the natural living world as it has evolved over millennia.

For example, as very small "baby" Oculina coral colonies establish themselves on coral rubble found in the OHAPC overtime they become a keystone species, in that the colonies evolve to host thousands of diverse animals. This emergent biodiverse ecosystem serves as the catalyst that will create the food chain for numerous larger animals such as mollusks, crustaceans, fish like the gag grouper, snowy grouper and

red snapper, etc. The baby *Oculina* coral colonies cannot survive nor provide any ecosystem structure and function and therefore its productivity if trawling on the coral rubble is allowed.

The fishing industry is only one of many industries that must re-examine its business model and historical means of collecting or harvesting its product during times of mounting ecological crises. It is time for openness to change, and change that is truly sustainable. (See James Oppenborn's comments.)

We ask that the South Atlantic Fishery Management and NOAA fisheries act to deny the shrimp industry's request. By doing so, you are honoring the intent of the preserved status of OHAPC but indeed the legacy of this first-of-its-kind Marine Protected Area (MPA) in the U.S.

If you do not so act, the "protected" designations are in effect meaningless. If so, we can expect this decision to open the way for more intrusions into MPAs, and other protected areas.

Instead, by acting to retain and honor OHAPC's protected status, you acknowledge that the OHAPC houses an incredible – and irreplaceable – coral reef system rich in biodiversity and that its fragility demands even greater and guaranteed protection; we can not afford additional - and unnecessary - destruction caused by bottom trawlers in times of overlapping ecological crises.

There is no doubt that, like our ecologies, certain agricultural industries are in distress. That is not a coincidence. Rather than deny the root causes of the distress (like severe drought, for example, caused by climate change) it is better to squarely face the context of our times and adapt. We ask that South Atlantic Fishery Management begin that adaptation process and deny unsustainable fishing practices within its purview, like the rock shrimp trawling in or near OHAPC.

Thank you for your consideration of our perspective.

Conservation Alliance of St. Lucie County
P.O. Box 12515
Fort Pierce, FL 34979
<http://www.conservationallianceslc.org>
slcconservationalliance@gmail.com