June 12, 2025

SAFMC Public Comment

Re: Response to Oculina Habitat of Particular Concern (OHAPC) Proposed Coral Amendment 11 and Shrimp Amendment 12

From: Shari Anker, President

Conservation Alliance of St. Lucie County, Florida

This letter serves as public comment by the Conservation Alliance of St. Lucie County concerning the proposed Amendments referenced above. We appreciate your time in reviewing our comments, especially since we have included two earlier letters regarding Amendment 10, which is the predecessor of Amendment 11 and Amendment 12.

We include both these letters to explain that our opinions have not changed, and provide new members with some historical context that we have been and will continue to pay attention and do what we can to further the protection of this unique-in-the-world coral habitat. We urge SAFMC in the strongest possible terms to deny requests to open up OHAPC to trawling, and choose Alternative 1 (no action) to retain the prohibitions against trawling.

Indeed, the science remains solid and convincing. We urge you to review the decades of research that Prof John Reed, and his colleagues, that establishes clear and irrevocable harm from trawling. Reed has submitted numerous public comments and research to you repeatedly.

Here is a comment previously submitted by world-renowned oceanographer, Sylvia Earle.

> ***The science is clear. The economics are clear. The ethical and moral mandates are clear. What remains of the intact Florida Oculina reef system and the associated damaged areas, if left alone—and protected from fishing, especially trawling, will yield enduring benefits now and forever. Giving a few shrimpers a green light to trawl these ancient systems into oblivion will destroy what could be an ongoing source of life and livelihoods in exchange for a few bucks for a few people and then it will be over.***

Sylvia Earle, former chief scientist for NOAA, head of Mission Blue and Explorer-in-Residence for National Geographic.

Now, however, the state of the argument has profoundly changed. With the June 7, 2025 release of the documentary, "Ocean with David Attenborough" the beloved British naturalist and broadcaster, has produced incredible footage of the violent destruction of bottom trawling. The film was released in time for this month's World Oceans Day and the U.N. Ocean Conference in Nice. https://apnews.com/article/ocean-film-attenborough-climate-848a65883fc1ec2601550d3cbfb0e36a

Only 2.7% of the world's oceans are protected from harmful industrial activity. We have an opportunity right here in our own backyard to safeguard this rare and absolutely critical coral habitat and its ecosystem, and join with others around the globe who are working towards the goal of protecting 30% of the ocean.

Take an hour and watch this program and ask yourself: is this the kind of future you want for your children? Are you OK with what is an Armageddon of life in our ocean? Know that out of sight out of mind is no longer applicable.

Prof Reed was ahead of the curve, and spent countless hours over decades to create the OHAPC to prevent this horrible destruction. His research was visually covered in our local PBS's series "Our Changing Seas," which also asks the question: how can we protect this marvel of nature? It also shows the effects in real time of trawling. https://www.changingseas.tv/season-1/103/

Our earlier letters follow here:

June 27, 2022 (Letter #!)

To: www.regulations.gov

Re: NOAA-NMFS-2021-0126
Coral_Amendment10_Nov21_508
Public Comment

From: Shari R. Anker, President

Conservation Alliance of St. Lucie County
P.O. Box 12515
Fort Pierce, FL 34979
slcconservationalliance@gmail.com

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 20th 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/

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/

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.
Comment Tracking Number: l4x-7rg8-s78w

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 directly. 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.

To: South Atlantic Fishery Management and NOAA Fisheries From: Shari Anker, President (Letter #2)

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 it’s 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
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