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**Fw: Comments in Opposition to Coral Amendment 11 and Shrimp Amendment 12 that would allow rock shrimp fishing along the Oculina Bank Habitat Area of Particular Concern**

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**From** Myra Brouwer <Myra.Brouwer@safmc.net>  
**Date** Thu 1/22/2026 10:00 PM  
**To** Kathleen Howington <Kathleen.Howington@safmc.net>; Allie Iberle <allie.iberle@safmc.net>; Nick Smillie <nick.smillie@safmc.net>

Myra Brouwer  
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**From:** Colleen Coogan <colcoogan10@gmail.com>  
**Sent:** Thursday, January 22, 2026 9:33 PM  
**To:** Murphey, Trish <Trish.Murphey@deq.nc.gov>; Andy Strelcheck <andy.strelcheck@noaa.gov>; Myra Brouwer <Myra.Brouwer@safmc.net>  
**Cc:** Grace Collins <grace88collins@gmail.com>  
**Subject:** Comments in Opposition to Coral Amendment 11 and Shrimp Amendment 12 that would allow rock shrimp fishing along the Oculina Bank Habitat Area of Particular Concern

Please accept these comments regarding the subject Amendments, also submitted via the Council's comment portal.

**Ms. Trish Murphey**

*Chair, South Atlantic Fishery Management Council*  
4055 Faber Place Drive, Suite 201  
North Charleston, SC 29405

**Mr. Andy Strelcheck**

*Southeast Regional Administrator, NOAA Fisheries*  
263 13th Avenue South  
St. Petersburg, FL 33701

**Myra Brouwer**

*South Atlantic Fishery Management Council*  
4055 Faber Place Drive, Suite 201  
North Charleston, SC 29405

**Re: Opposition to Coral Amendment 11 and Shrimp Amendment 12 that would allow rock shrimp fishing along the Oculina Bank Habitat Area of Particular Concern**

Dear South Atlantic Fisheries Management Council and NOAA Fisheries Southeast Regional Administrator:

We urge you to reject the Preferred Alternative and Alternative 3 within the proposed *Coral Amendment 11* and proposed *Shrimp Amendment 12* (Last accessed January 22, 2026 at [https://safmc.net/documents/hec\\_sc\\_a1b\\_c11\\_s12\\_draftamendment\\_202512/](https://safmc.net/documents/hec_sc_a1b_c11_s12_draftamendment_202512/)) for reasons listed below, and regret missing the public comment period at tomorrow's council meeting due to schedule conflicts.

The Council has not sufficiently addressed the reasons for the disapproval of the nearly identical Coral Amendment 10; rejected for inconsistency with the Manguson-Stevens Act and other applicable laws. NOAA Fisheries determined then that "Coral Amendment 10 and supporting analyses did not adequately demonstrate how the proposed action: minimizes to the extent practicable the adverse effects of fishing on essential fish habitat; minimizes bycatch to the extent practicable and, to the extent bycatch cannot be avoided, minimizes the mortality of such bycatch; and is consistent with the goals and objectives of the South Atlantic Coral Fishery Management Plan, specifically in regards to protection of essential fish habitat." (this summary last accessed on January 22, 2026 from <https://www.fisheries.noaa.gov/bulletin/noaa-announces-decision-commercial-rock-shrimp-fishing-access-area-request-within>). Nothing in the latest draft Amendment fixes these basic flaws in the previous attempt to implement this action.

Specific comments:

1. The Purpose and Need provided in the current version of the proposed amendments still do not support any of the Coral FMP Goals and Objectives, restated here:
  - Optimize the benefits generated from the coral resource while conserving the coral and coral reefs
  - Minimize adverse human impacts on coral, coral reefs and live hard bottom habitat
  - Designate Coral Habitat Areas of Particular Concern (C-HAPCs) to protect coral and live bottom habitat
  - Increase public awareness of the importance and sensitivity of coral and coral reefs
  - Provide a coordinated management regime for the conservation of coral and coral reefs.
2. The Draft Amendment does not provide any analyses to suggest Alternatives 2 and 3 will meet the claimed purpose and need (provide access for shrimpers while :

- First: the rock shrimp fishery has increased landings over the past 10 years, and catch per unit effort has increased, along with a slight increase in participati
  - Potential negative impacts to the shrimp fishery were not discussed. The environmental assessment prepared for Draft Amendment 10 to the Fishery Manag
  - The analysis in the Amendment did not provide an adequate description of the past impact of the shrimp fishery on Oculina or the demonstrated need for b
3. The draft Amendment does not provide any new information that changes the basis for the existing HAPC borders, which were scientifically determined and inclu
4. The Draft Amendment documents do not adequately describe or evaluate the biological, sociopolitical and economic value of the Oculina HAPC.
- The HAPC is a global example of coral protection. It was the first deep-sea coral protected area in the world and these corals are designated “Species of Co
  - The HAPC provides a refuge for other species, likely including rock shrimp, as well as valuable game fish. Damage to the reef would negatively impact spc
  - The slight potential benefit to a few boats does not offset the likely harm to Oculina, a slow growing species that has been condensed in area to this small re

Respectfully submitted,

Grace Collins, *Marine Conservation Biologist, Divemaster*

Colleen Coogan, *Former NMFS Marine Mammal and Endangered Species Biologist*