

January 23, 2026

Coral 11/Shrimp 12 Amendment comment

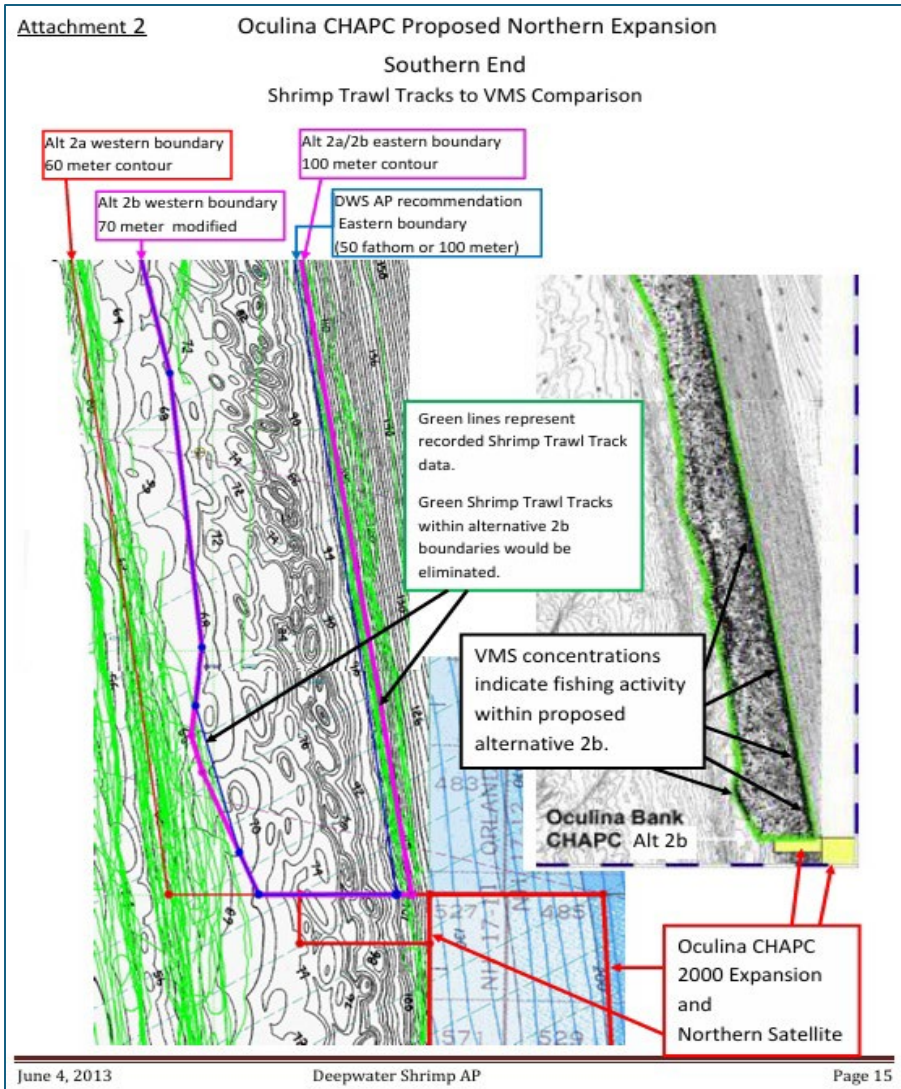
Thank you for the opportunity to comment on Coral 11/Shrimp 12 Amendment. My name is Mike Merrifield, current Chair of the Deepwater Shrimp AP. I've have been working to correct this issue ever since Coral Amendment 8 was "completed" in 2013.

At the May 9, 2013 Deepwater Shrimp AP meeting, the southeast edge of the northern OHAPC boundary was identified by shrimp fishermen as an issue that removed valuable fishing area from the fishery.

Excerpt from that meeting:

- The DWS AP has recommended shifting the southern half of the eastern boundary slightly westward to remove historic rock shrimp fishing from the proposed expanded closed area. This is clearly identifiable by the concentration of VMS dots in figure 5 of the "Spatial Information on Habitat and Fishery Operations..." document as well as the Shrimp Trawl Track data, both illustrated together in **attachment 2**.
- Regardless of where the eastern boundary defined by the 100 meter contour exists, historic rock shrimp fishing has occurred within the eastern boundary defined by alternative 2b but still occurs well off-shore of the structured bottom that may contain Oculina coral. Shifting the boundary slightly westward would allow rock shrimp fishing to continue in this area and still protect the Oculina with a reasonable buffer zone.
- ...the fishery impact to the southern third of the eastern boundary. **Attachments 1 and 2** show significant rock shrimp activity in the area that would be closed by alternative 2b, particularly in the southern region.

There have been numerous mistakes during the development of the Oculina HAPC over the years. The first Oculina experimental closed area did little to protect Oculina coral because the boundaries encompassed little to no Oculina coral. The experimental closed area was expanded and became the Oculina HAPC. Less than 1/3rd of the expanded Oculina HAPC consists of coral and hard bottom, the rest is soft substrate bottom that used to be rock shrimp fishing bottom. The OHAPC eliminated a 60+ mile north to south expanse from 100-400 meters in depth. Next, two small satellite boxes protruding from the western boundary of the OHAPC were added to cover unprotected Oculina coral missed in the previous OHAPC expansion. Then the western boundary was expanded again by connecting the 2 satellites and angling southward to meet the OHAPC boundary in Coral 8. The rock shrimp industry adapted and complied. Coral 8 also extended the OHAPC northward from Cape Canaveral to St Augustine. The shrimp fishermen did not object, except for the narrow sliver along the southeastern edge of the northern expansion where the proposed SFAA is located.



At that time, the Council acknowledged the fact that VMS data indicated significant effort occurred within the proposed OHAPC expansion boundary. Council staff did not want to make the change because it would require taking the amendment back out for public review and comment. The Council, with Roy Crabtree's concurrence, stated this would be addressed and corrected in a follow-up amendment. It wasn't until 7 years later that it was brought up as unfinished business that needed to be addressed.

Bottom line is, Coral Amendment 8 established the southeastern edge of the northern extension too far east eliminating valuable, historic rock shrimp fishing area. VMS, required by all rock shrimp vessels confirms this to be true. The Council has made attempts to correct this error. It's long past time to complete this amendment and for NOAA to approve it and implement the correction.

On another subject, the Deepwater Shrimp AP, as well as numerous other fishermen, have been sounding the alarm for years regarding the damage the Okeechobee Lake run-off directed through the St Lucie locks is causing on the east coast of Florida. This has destroyed the rock shrimp bottom from Port St Lucie to the southern boundary of the OHAPC and now extends 18-20 miles north. Where is the concern for the rare Oculina coral? What action is being taken to stop this destruction?

Thank you for your effort in making this a complete amendment and taking the time to read and consider my comment.

Mike Merrifield