Summary of Public Comments for Amendment 11 to the Coral, Coral Reefs, and Live Hardbottom Fishery Management Plan and Amendment 12 to the Shrimp Fishery Management Plan

Two public hearings were held for this joint amendment in August 2025, one via webinar and one in-person. The webinar hearing was held on August 5th with Trish Murphey as the Council representative. This hearing had 34 attendees and 10 comments. The in-person hearing was held in St. Augustine, Florida, on August 7th with Jessica McCawley and Carolyn Belcher in attendance. The in-person meeting had 15 attendees and 10 comments. Full transcripts of comments are at the end of this document.

Public comment was also solicited online via the Council's website from July 22 through August 12 (it was extended for one week at the public's request). Comments submitted through the online form (n=125) are available to view in full HERE. There were 21 comments submitted via email or attachment, which are included in the Council's briefing book for the September 2025 meeting.

Online Respondent Characteristics:

Affiliation	Number of Respondents[1,2]	Supportive of Alternative 1 (No Action)	Supportive of Preferred Alt 2 or Alt 3
Fishermen (commercial and recreational) and dealers	76	47	29
Non-Gov't Organization[3] or University	3,143	3,142	1
Other	49	47	2
Totals	3,268	3,236	32

[1]Includes online respondents and individuals that provided state and sector affiliation.
[2]Some respondents chose more than one affiliation.
[3]Two NGOs resubmitted letters with 3098 signatures in support of Alternative 1 (No Action) that were gathered in 2022 and originally submitted as comments for Coral 10.

Comments Supporting Alternative 1 (No Action)

Those in support of **Alternative 1 (No Action)** included recreational fishers, environmental groups, scientists, and concerned citizens. Most commenters emphasized irreversible ecological damage, limited economic benefit, lack of scientific information, and risks to biodiversity.

- **Ecological harm**
    - Rock shrimp bottom trawling damages or destroys fragile deep-water coral reefs, which grow very slowly and provide critical habitat for over 2,000 species (including shrimp, snappers, and groupers).
    - Coral already faces compounding stressors (warming, acidification, disease) that make it more vulnerable.
- **Sedimentation risks**
    - Trawling stirs up silt and clay, smothering coral polyps and larvae.
    - Currents can carry sediment onto reefs despite proposed buffer zones.
- **Loss of biodiversity & fisheries impacts**
    - Coral habitat supports spawning and juvenile stages of commercially and recreationally important species (snappers, groupers).
    - Bycatch in the southeastern shrimp fisheries remains a concern despite TEDs and BRDs.
- **History of damage**
    - Up to 90% of Oculina coral was destroyed before protection in 1984; recovery has been limited. The true cause of the destruction is unknown, but supporters of Alternative 1 commented that they believe the shrimpers are responsible
    - Past use by the shrimp fishery does not justify reopening the area.
- **Lack of Scientific information**
    - Scientists and NGOs criticized the seeming exclusion of the Coral Advisory Panel and disregard for decades of research.
    - Lack of new sediment/trawling studies; data gaps remain.
- **Economic skepticism**
    - The rock shrimp fishery is small and has not historically met optimal yield (OY) without the area; there is a large gap between the current landings and OY; the shrimpers admit that they would use this small area sporadically; reopening the proposed SFAA to shrimping would likely provide minimal benefit and not allow shrimpers to achieve optimum yield.
    - Could undermine Florida's investments in coral restoration and harm broader fisheries and tourism.
- **Precedent concerns**
    - Reopening protected areas could weaken conservation commitments and set damaging precedents.
- **Additional points raised by those supporting Alternative 1**
    - It was suggested that monitoring should occur for at least a year if the area is opened to track coral impacts.
    - Benefits to shrimpers do not outweigh risks to rare coral ecosystems.

Comments Supporting Alternatives 2 and 3

Support of **Alternatives 2 and 3** came mostly from rock shrimp fishermen, processors, and trade groups such as the Southeastern Fisheries Association. Their comments focused on emphasizing historical use, lack of coral in the SFAA, protective measures, and economic relief.

- **Historic fishing grounds**
  - The SFAA was traditionally used before Coral Amendment 8 closures in 2013.
  - Fishermen do not think that fishing activities in the area will have negative effects on the coral because when the original OHPAC was created, the coral did not show damage from fishing activities in the area when it was open.
- **No coral present**
  - NOAA mapping in 2025 and a 2022 visual survey reportedly found no reported live or dead *Oculina* coral within the proposed SFAA.
- **Protective measures**
  - Shrimpers avoid coral due to gear costs and allow an additional buffer when deploying/retrieving gear.
  - VMS monitoring ensures compliance, reducing risk of illegal trawling.
  - Bycatch has been significantly reduced through TEDs and BRDs, with industry compliance.
- **Economic need**
  - Closures have harmed small fishing businesses and coastal economies; reopening would support livelihoods.
  - Amendment supports Executive Order 14276 on "Restoring American Seafood Competitiveness" by reducing burdens on the industry.
  - While use the of area is expected to be variable, due to the "annual-crop" nature of the rock shrimp fishery, it would be beneficial during years of lower harvest in other areas.
- **Challenges to scientific claims**
  - Some historical damage attributed to shrimping was inaccurate, unfeasible, or caused by other fisheries (e.g., scallops).
  - Exact causes of past coral death remain uncertain.
  - Shrimpers have argued that there are not bottom currents that would move trawl sediment onto the coral mounds.
- **Other greater threats to corals**
  - Gray water releases from Lake Okeechobee, cruise ship pollution from Cape Canaveral, and space industry impacts are more significant threats than shrimping.

PUBLIC HEARING WEBINAR COMMENTS

August 5, 2025

John Reed, Hi, this is John Reed. I'm a research professor emeritus at Harbor Branch Oceanographic Institute. The Oculina reefs are probably the best studied deep-water reefs in the world. We have detailed knowledge of the fish communities, communities of animals that live in the coral habitat, coral reproduction, and the currents. There's been a lot of misinformation stated by the shrimpers about what the currents will be. The surface currents out on the deep Oculina reefs were measured by us. We had current meters on the bottom. I've sent this information to the council numerous times. We had current meters that measured the speed and direction of the currents on the bottom at the shelf edge reefs at 270 feet. We also had them at the mid-shelf at 130 feet and inshore at 30 feet. What we found out is, whereas the surface currents are typically north from the Gulf Stream, once you get down to 150-200 feet, the bottom conditions are totally different, and you cannot tell what the bottom conditions are from the surface. What we found out with a year's worth of current meter data, we collected data 24 hours a day, seven days a week for a year, is the most detailed information about currents ever done. We found out that bottom currents occasionally go north, but there's also an east-west tidal current, but more importantly, there's a deep water current that comes up from the shelf, comes up from the Straits of Florida onto the shelf. This current moves west. That means any sedimentation east of the reef will blow over the reef. We've also found that these currents are critical to both the corals and the fish. Deepwater grouper spawn out there. They go to the deepwater reefs to spawn. The grouper larvae and juveniles come inshore on these currents and end up in the estuaries and Indian River Lagoon where the juvenile groupers grow up in the grass beds and mangroves. Then as they mature. At the age of about 15 years, they move back to the deep reefs for their spawning grounds. Also, the coral Oculina spawns out there. The coral larvae are very fragile, and they also move inshore on that westerly current. We know that sedimentation is known to stress corals that do not need another stress factor. Increased sedimentation causes smothering, burial of coral polyps, shading, tissue necrosis, and reduces recruitment, and survival and settlement of the coral. Sedimentation can also affect the coral physiology and reproductive health from studies done by Dr. Voss at FAU. Planula larvae are released into the water column where they live for weeks before they settle. Sediment plumes from trawling could prevent the baby coral recruits from settling, and the coral recruits are particularly susceptible to that. Sediment plumes are also shown to create conditions for coral disease to thrive. For example, researchers have found a positive relationship between the overall coral disease prevalence and the length of time that reef was exposed to sediment plumes. I also want to just make a statement about the trawling and the historical fishing grounds. Yes, it's true, the rock shrimp fishers fished on the shelf out there, but throughout the period of time since 1984 when the OHAPC was first enacted, it only prohibited trawling from Fort Pierce to Sebastian. Everything north of there from Sebastian to Cape Canaveral up to Daytona was open for the trawlers. I have publications showing the effects of that. During that time period up to 90% of the corals were damaged or destroyed. That's a fact.

So, we do not need any more trawling near these reefs. I was also at the meeting where we originally drew in 2016 the eastern border for the northern HAPC. We specifically had members of the council including the Habitat Committee and the Shrimp Committee there. We specifically put the eastern border at 100 meter depth. The Oculina reefs, the dunes, the Oculina dunes end about 80 to 90 meters. This provided a good buffer zone, which the Coast Guard approved. They have said that it would be very good to have a wide protective area that they can, you know, keep poachers out of, and so that's why we decided on that hundred meters. And to bring it inshore of that is just going to lead to sedimentation on the reefs. A year's worth of data of bottom current meters documenting the current speed and direction showing the currents do go west on the bottom.

Drew Martin. Hi, my name is Drew Martin. I'm a volunteer with the Sierra Club. I also serve on the Marine team, which is a national team for Sierra Club marine issues. I oppose the amendment that is being introduced and support the no activity in this area. I do this because it is my belief that these reefs can, over time, regrow themselves, trawling, whether it's shrimp trawling or any other form of trawling is extremely damaging and will kill any of the existing reefs that are regrowing. Further, it has not been allowed for many years and I believe that the shrimping industry has other places where it can harvest shrimp and does not need to go on the Oculina Reef. This area is an extremely valuable resource and needs to be protected. I do not believe that this should be opened up to trawling. Now trawling basically destroys everything on the ocean floor and that means that if there's any attempt of the reefs to regrow that will not happen if trawling is occurring. Professor Reed mentioned that the sedimentation from this trawling will cause harm to other species, as well as the corals that are there, and could contaminate corals, including much of the Oculina. I also note that he had mentioned grouper, and so that's just one of many species that could be harmed by trawling, and I believe that it is unnecessary. We need to set certain areas of the ocean aside, and what happens when we do this? It will improve the shrimp harvest outside of this Oculina reef because the shrimp will have a place where they can successfully mature and grow, and then they can be harvested outside of the protected areas. But to allow shrimp fishermen to go into protected areas, I think, is a huge mistake. The other thing is, it seems that the shrimpers are even trying to get out of the simple protections you have established. Now, I attended the meeting before where you turned down this, and I believe that was the proper decision. I am asking you once again not to move forward with Coral Amendment 11 and Shrimp Amendment Number 12. I am asking you to keep the Oculina reefs off limits to this trawling and fishing, and to leave them as an area where wildlife can rejuvenate and prosper. Thank you.

James Moir. Hi, my name is Jim Moir. I'm the Indian Riverkeeper. I urge this council to please take no action. I think that both Coral Amendment 11 and Shrimp Amendment 12 are misguided. The deep-water coral reefs in the world are under incredible stress and provide incredible services for innumerable species besides just the Oculina corals. Bottom trawling is notoriously damaging to the bottom habitat as well as destructive to habitats nearby. The sediment plumes

from deep trawl would, without question affect the corals on the upstream side. And those, as Dr. Reed correctly pointed out, can be on the western side by many thousands of feet. There is no value other than to the human species for bottom trawling for rock shrimp in this area. The chances of negatively impacting hundreds of different species of those reefs is, without question a huge risk and not worth taking. I urge you again to take no action. The cost of monitoring these incursions into the OPHAC would far exceed the benefit. There is just no justification for allowing shrimp trawling for rock shrimp any closer than it already is permitted to the OHAPC. Thank you for your time and I hope you do the right thing.

Michael Gravitz. My name is Michael Gravitz and I am the Senior Policy Fellow at the Marine Conservation Institute and as you may remember I've been following this Oculina habitat issue for several years. We at Marine Conservation Institute continue to oppose the creation of a shrimp fisheries access area within the Northern area of Oculina HAPC because allowing trawling closer to the reefs threatens the last 10% of deep sea Oculina reefs, which are still the only ones known in the world. They are unique and shrimpers have already destroyed approximately 90% of them in the 1970s through the 1990s. Very little has changed since NOAA fisheries rejected Coral Amendment 10. And I would say that Coral Amendments 11 and Shrimp Amendment 12 are really basically rewritten Coral Amendment 10. But very little has changed since July of 2022. There's little new information with which to answer the questions posed by NOAA almost two years ago. There is no new information presented about bycatch in the fishery, let alone impacts on species like snappers and groupers, which are known to aggregate and spawn in this area. The snapper's groupers are under a recovery plan and destroying their habitat while trying to rebuild populations is really a cross-purposes. Your environmental assessment of these proposed amendments does not have a bycatch practicability analysis, as requested by NOAA in July 2022. The one-week cruise in 2022 to a small part of the buffer area next to the Oculina coral produced little new evidence. But what it did show and establish is that the bottom currents are wicked and unpredictable. The ROV operators were only able to complete two transects in an entire week of attempts. An important reason you state as the objective of these amendments is to benefit fishermen. But there is no evidence that opening the buffer strip would have a significant economic impact on the fishery or its participants. On the contrary, your draft environmental assessment of the proposed amendments concludes there's no quantifiable benefit. One economic reason stated for the proposed amendments is to allow fishermen to achieve optimum yield in the rock shrimp fishery. But this area will never produce a million more pounds of shrimp per year, which would enable the South Atlantic Council to reach its about five million pound per year optimum yield. There's just not enough room in this currently closed area to produce that kind of shrimp. And so I guess I would say you ought to go looking elsewhere or conclude that your fishermen won't reach the optimum yield and in fact rock shrimp catches in the area in this specific area of sort of north central Florida east coast have generally been increasing for the last several years without the additional new area that you're proposing to open up. Your analysis of sedimentation and sediment plumes from trawling is inadequate. This is crucial to determining the true impact of these proposed amendments that

narrow the existing buffer strip that currently protects corals. These are real impacts, but you have presented no new data about directions of currents at the bottom, the speeds of currents at the bottom. And you seem to want to ignore the information that Dr. John Reed has sent to you numerous times in the past documenting currents that move from east to west, which would carry the sediment trawled by the shrimp trawlers over the corals and over the coral larvae. Your process for considering these amendments has been very deliberate and very lengthy, but you have skipped a critical step by not consulting your own coral experts on the Coral Advisory Panel. They're waiting to be contacted and asked what they feel about these two new amendments. In fact, it would appear to an objective, you know, sort of an outside observer, that you've studiously avoided asking the coral experts what they think about these two amendments. Our advice to you is to abandon this entire process, save money and time for more pressing issues in the South Atlantic Council. The existing boundaries of the Northern OHAPC were originally based on good science and good judgment. There was no error made at this time, at the time on determining the eastern boundaries as some of the fishermen claim.

Alex Alnes. Hi, I'm Alex. I'm a marine scientist at Oceana. Oceania has been involved with coral conservation in the South Atlantic region for many years, beginning in 2005.Oceana strongly supported the creation of the coral habitat areas of particular concern in the South Atlantic region. Oceana encourages the Council to proceed with caution in making any changes to these areas that were designated following the National Marine Fisheries Service guidance on HAPCs. The Oculina Bank is the only known place in the world where deep-sea Oculina varicosa form reef structures. This one-of-a-kind ecosystem supports marine life throughout the region well beyond the reef itself. Oculina Bank is also a spawning site for several species of groupers, which are important fish prized by recreational and commercial fishermen in the South Atlantic. Oceana opposes the Council's proposed Coral Amendment 11 and Shrimp Amendment 12, which would establish a shrimp fishery access area along the northeastern edge of the Oculina bank HAPC. Damage and harm to deep-sea corals like Oculina can take decades to centuries to recover. The preferred alternative, alternative 2, selected at the last council meeting, would open part of this HAPC to bottom trawling, removing decades-old protections for this deep-water coral ecosystem. It is important that the council have a very clear understanding of the effects of this action, as well as the uncertainties, and make sure that any unanswered questions are resolved and clearly analyzed before proceeding. However, at the June meeting, there were concerns raised about bycatch and sedimentation where council staff scientists responded that analysis isn't quite done yet. As stated at the June meeting, mapping studies did not note the presence of live standing dead or coral rubble within the proposed SFAA for alternative two. However, any sediment plumes from trawling this area will still damage nearby Oculina coral, disrupting their ability to filter feed and preventing juvenile recruits from settling. The council should take steps to ensure that sedimentation is clearly analyzed before taking final action. Another concern is that wayward trawls can also damage coral outside the intended trawling area. Heavy shrimp trawling nets are difficult to always position correctly at depths of 200 to 300 feet, especially with the strong and variable cross currents typical of this area. The

Council should take steps to ensure that any changes to the coral HAPC include robust tools for monitoring and enforcing fishing near the HAPC. Making a decision to open this area to trawling without complete analysis of the effects of the action is irresponsible and illegal. The Council should not proceed with its consideration of this action until a clear analysis is provided to describe the expected effects and the Council can develop an action that will prevent, mitigate, or minimize any adverse effects from fishing. We have only one chance to protect this one-of-a-kind ecosystem. The Council got it right in protecting the Oculina HAPC from harmful trawling practices decades ago. The Council should make the right decision and uphold the progress made over the past decades to protect Oculina banks. Thank you.

Bryan Jones. Good evening, everyone. And thank you so much. I appreciate the opportunity to comment here. Hearing everyone in opposition, it's important that at least one shrimper gets on here and talks about the appreciation for their passion for protecting the reefs and we are environmentalists ourselves, because without a strong and robust environment, then we wouldn't be able to have the shrimp that we harvest. But we do appreciate the idea of following the executive order for restoring seafood competitiveness by reducing regulatory burdens, which I think we can all attest, there are quite a few regulations that affect our ability to access fisheries. Particularly if we think about the Oculina reef being off of Florida, you know, a lot of our South Carolina shrimpers don't make the trip or their trawler or even shrimp off of South Carolina because of the myriad of, you know, regulatory obstacles. So, I just wanted to say I appreciate you considering this. There are hundreds, used to be thousands of shrimp fishermen. Bottom trawling does not destroy everything. There are a lot of, you know, factors we put in mitigation, which, you know, you mentioned as far as TEDs, the turtle excluder devices, which the majority of large game fish swim out of, the birds, the bycatch reduction devices, the fish eyes, that they're proven and they reduce bycatch and we want to be efficient and effective. So, to make a blanket statement, it's almost like, and I hate to say propaganda, but it's like watching the ocean documentary with Sir David Attenborough, which has such a wonderful voice, and the wonderful music makes me almost hate myself. I'm joking about that, but it is just very disappointing to hear how hardworking fishermen and shrimpers in particular are made villains when we're trying to provide for our families. So, we do appreciate the idea, and I'll wrap it up here, or the desire to think about ways where we can increase access to fisheries, be more competitive, and strengthen the resiliency of our domestic food supply. So, thank you very much.

Molly Masterton. I'm Molly Masterton. I'm a senior attorney with the Natural Resources Defense Council and appreciate you giving us a chance for those of us in other states to weigh in virtually tonight. It's really helpful. NRDC has a historic interest, like some of the other groups on this meeting today, in protecting essential fish habitat and HAPC across the regions were most involved in the mid-Atlantic New England and Pacific regions but have some history with Oculina Banks as well and we similar to some other folks on the call we want to urge the council to select no action for Coral Amendment 11 and Shrimp Amendment 12 really with the aim of continuing to prevent not maybe prevent but actually prevent damages to the existing protected

buffer strip, which is really serving to protect the reefs from drifting sediment and potential unintended collisions with shrimp nets. As Kathleen mentioned in the presentation, the previous Coral Amendment 10 was rejected by NMFS in 2022, and NMFS did provide some specific recommendations in its rejection letter, which I know are covered in the decision document. And so, as folks probably know, the agency's primary reasons for rejecting Coral Amendment 10 were that the EFH practicability analysis and the extent to which bycatch reduction was being prioritized and addressed were insufficient under the Magnuson-Stevens Act and its implementing regulations. NMFS also found that the action was inconsistent with the objectives of the Council's own Coral FMP, which emphasizes the need for enhanced protection in designated HAPCs like the OHAPC. So, at this stage, obviously, the council can submit a revised amendment under Section 304 of the Act, but it is going to have to address these relevant legal requirements. And for tonight, I'm just going to focus on EFH, but we do have similar concerns about the bycatch issue as well. So, under the Magnuson Act, the council is required to minimize adverse effects on EFH to the extent practicable, and the implementing regs there further state that once EFH is designated and protected, that amendments to the FMP, like we're looking at tonight, They must ensure that they're continuing to minimize, to the extent practicable, adverse effects on EFH caused by fishing. The FMP has to explain the reasons for the council's conclusion regarding past or new actions that minimize, to the extent practicable, the adverse effects of fishing on EFH. And the practicability analysis specifically is supposed to include the nature and extent of the adverse effects on EFH and the long and short term costs and benefits of potential management measures to EFH associated fisheries and the nation. So sorry that that's kind of a word vomit, but the too long didn't read version of it is that the Council really needs to be able to show that it's not practicable to keep this area protected any longer. And our understanding based on the kind of historically sporadic shrimping in the area and the lack of concrete economic data is that it would be really quite difficult to make that conclusion so that's why we're continuing to even with the new research and models we're continuing to recommend no action in this case. The council is really a leader from our view, kind of at the national level, is a leader in protecting EFH and HAPCs from bottom-tending gears and something that not every region does as well as the South Atlantic. And we do understand these are really challenging management decisions and balancing acts to work on. So, we appreciate the council's work on it and members of the industries as well. And just as a final note on the process, we would request if it's at all possible to extend the written comment period for the public because I just remember from 2022 there were a lot of local and national groups with this kind of deep interest in protecting coral ecosystems and not all of them will have an opportunity to weigh in by Friday of this week given the quick timeline. It would also be helpful and really important for the public to understand what the Coral recommendations are in this instance. Thanks again.

Mark Perry. My name is Mark Perry. I'm the executive director and CEO of Florida Oceanographic Society. Our headquarters are here in Stewart, Florida, right on the East Coast, very close to the Oculina Reef and other reef systems. I am joining other scientists like Dr. John,

Dr. Grant Gilmore, John Howes, Walt Japp, and others in order to protect these offshore and nearshore reef systems. I've known and worked on this reef as other scientists, and we've worked on this reef area since 1978. When I've been involved, I grew up on this coast since 1957. These nearshore reefs, actually the St. Lucie Nearshore Reef and the Oculina Bank were proposed as National Marine Sanctuary, and they were on the site evaluation list for years. That was by John Reed and others who proposed that many years ago, back in the 80s. And then back in the 90s, of course, we looked at trying to protect this particular habitat, this deep Oculina on a reef offshore is, as you know, habitat for over 2 ,000 species of marine life that really depend on this habitat, particularly it's a spawning aggregation for Grouper and several other species that use this reef habitat. And we've shown the destruction that happens due to the fishery that happened. And that's what implemented the protection of this area back in those days. And so we finally got some protection on it. It got extended to where it needed to be north of the system all the way along that line. And now we're gonna open it up again or to destructive fishery practices, I don't think that's prudent. We strongly oppose these amendments, proposed amendments, and you should take no action, and I'm surprised you'd even take action to consider or reconsider the fact that we're opening this up to a more destructive habitat. This is an essential fishery habitat. It's connected to a lot of other essential fishery habitats up and down our coast. The St. Lucie Inlet Nearshore Reef and the St. Lucie Inlet State Preserve Reef and those hard bottoms right near St. Lucie Inlet are also very important to our ecology. This is like the northern limit for these types of corals. We have Oculina diffusa and other corals on the St. Lucie Reef. These reef systems are so valuable, and you all should know that and know how important it is to preserve and protect these habitats. That's why we have areas of particular concern or marine protected areas. We need to keep this protected area. And I'm sorry if there's a destructive activity of the fishery activity that's going to destroy this habitat or even have the risk of destroying this habitat, we should stop that and not allow that. We shouldn't allow these habitats to be polluted by other means as well or destroyed by other activities. So, I implore you as the council to protect this habitat by all means, and not consider these two proposed amendments, and really go back to the idea of we need to protect that habitat. As Dr. Gilmore said, if there's no habitat, there's no fish. And you're just going to run out of anything to manage if you continue to allow destruction of these coral reef habitats up and down our coast. And so that's really what I have to say. We are submitting written comments along with others and we'll submit them by Friday, as required. But I just really have the opportunity now to tell you firsthand that this is not a wise move in order to even consider these proposed amendments. So, I strongly recommend you deny these amendments and not consider them. Thank you.

Shari Anker. My name is Sherry Anchor. I'm president of Conservation Alliance of St. Lucie County. We hail from the same county that John Reed, Professor John Reed and Harbor Branch are situated in, and so are particularly concerned about this issue. And I have a general comment, which I'd like to share. We, first of all, strongly urge the council to deny amendments 11 and 12. In addressing Executive Order 14276, Restoring American Seafood Competitiveness, the in-

water reality must be fully taken into account. The shrimp fishery has already destroyed 90% of the Oculina coral reef bank. Oculina corals serve as a keystone species that provides habitat, spawning, and breeding space for 2 ,000 plus other species, including fin fish like grouper and snapper. Should the shrimp fishery usurp all these species and their ecological and economic value, shrimp species do not require living coral and thus can be found in other non-protected areas. Shrimp will make use of coral rubble created by the trawlers, however, continued bottom trawling of the same area further degrades the ocean bottom's capacity to regenerate any coral habitat. Importantly, just because an area has served as historic fishing or hunting grounds does not mean that it will be available in perpetuity. There are countless examples of habitat destruction, overfishing, and overhunting species until they are extinct. Here, the shrimpers wish to freely do their bottom trolley in proximity to HAPC, with no absolute guarantee that mistakes won't be made or that the irreplaceable habitat will not be destroyed or degraded. Bottom trolley is documented by NOAA to be the most ecological destructive fishery method. What's historic here is the rush to a tragedy of the commons, in spite of the science advising the need for protection. Interested parties are left with nothing or such degradation that a fishery collapses. What is competitive about that state of affairs? I guess I can add one more thing here. Second, the Council of NOAA, since the first protected area was created in 1984, it recognized the incredible ecological value of this unique in the world deep sea, Oculina bank. With foresight, additional northern areas of Oculina Reef Bank were added through 2016. Decades-long scientific research establishing the banks and import, ecosystem structures, species interactions, and more serve as the record for the basis of the designation of the HAPC designation, including HAPC for essential fish habitat. Now, however, the Council has not included in this evaluation of the request by the strip industry its own science-based coral advisory panel, a highly irregular development. Both historic and recent scientific research should be included in your decision. For one example, Professor John Reed has forwarded to you documentation establishing that the bottom ocean currents are not configured in a way that supports the claim that sediment plumes will trawl and conveniently flow away from the reefs. Additionally, his recent submitted responses will reveal substantive errors and conclusions about the presence or absence of coral habitat on the proximate ocean bottom as well. There are numerous red flags to warrant as NOAA Regional Administrator, Mr. Strelchek stated in his July 22 letter disapproving of amendment 10 which is very, very close to 11 and 12 to suggest the choice to quote adhere to the precautionary approach found in the Food and Agriculture Organization of the United Nations Code of Conduct for responsible fisheries when faced with uncertainty concerning any of these factors, unquote. Like the Hippocratic oath, first do no harm. Thank you for taking my comments.

Mike Merrifield. I'm with the Deepwater Shrimp Advisory Panel. And first of all, I'd like to dispel the notion that keeps being repeated over and over again that the rock shrimp fishermen are trawling through the Oculina coral. The VMS points that went into effect, VMS went into effect in 2003. This was long before, 10 years before the Northern extension of the Oculina Bank had been put into place. And if you look at the VMS points, when they were free to go over

wherever they wanted to, they were not trawling on Oculina Coral. They were trawling along the edge, and when the boundaries were made during Coral Amendment In 2008, the boundary took away a lot of the territory that was important to the rock shrimp fishermen that they had been trawling on for several years, and when it was not right up onto the coral reef, it was at least a half a mile away, and there's just plenty of buffers on there to protect that coral, and the sedimentation there, this is not sedimentation like we're doing a dredging operation, this is minimal impact to the bottom and the sedimentation is just not the same that you're seeing in dredging operations. So that's entirely different. So they are very sensitive to the coral. The coral is habitat that they rely on for their livelihoods as well. So, and if you look at the, especially the offshore side of the rock shrimp fishery on that, in this area that we're talking about, the SFAA, the bycatch is absolutely minimal. There, I've just seen pictures just from recent trials and there's minimal bycatch. So, and this is a regulated fishery we have to have permits, we have to have VMS, We have to have heads, turtle extruder devices. We have to have bycatch reduction devices. We have transiting requirements. This is a managed fishery. This is not just some uncontrolled fishery like you'll see in some of the documentaries being issued today. But I can tell you, all this amendment is trying to do is restore a small area that is important to the fishery that was taken away by mistake in Coral Amendment 8, which was a huge expansion of the Oculina Northward. And we're just trying to get that back because it's an important area. And at that time, when we raised the issue, it was told that we would correct this at a later date. Well, here we are 13 years later, and still we're fighting this issue. But I can just assure you that the fishermen are not trawling through the Oculina coral. And they have not done that even before this area was put up. The expansion to the boundaries was made. You can see, and the VMS bears that out. So all we're trying to do is regain this little bit of area. It's not even a very large area at all. I'm astounded sometimes at how big this has become, and I know it's important to a lot of people, but there's plenty of buffer there for sedimentation to drop to the bottom before it reaches that Oculina world. And that's all I have to say at this point. Thank you.

IN-PERSON PUBLIC HEARING COMMENTS

ST. AUGUSTINE FL, AUGUST 7, 2025

Brian Krolick: I've lived on this peninsula for 60-some years. It's rather disheartening to me that we must have this battle over and over again. The value of the Oculina coral is greater when it is protected than when it is exploited. The reef is a spawning ground, nursery, and lifetime habitat for a myriad of species. It should be of higher importance to protect the reef system than allow more possible devastation by bottom trawling for shrimp. In response to those who say the currents would not send sediment over the coral and harm it, I say stand on any beach in Florida during a cold-water upwelling and realize how powerful those deep currents are and how far their impact travels. I think allowing bottom trawling is akin to killing the goose that lays the golden eggs. I got one other note I thought of, there's an optimum yield that you guys mentioned. I think I heard it Tuesday night. Was it 5 million pounds a year? It's right under 5 million, yeah. Okay. I think that number is unrealistic compared to the catch charts published by the FWC. Doesn't look like you guys [shrimp fishermen] ever catch near that many shrimp. I think maybe the fishery should be closed during spawning instead of putting more coral and other species at risk and see how this affects catch rates. They do it with lobster, and I think that works pretty well for the lobster industry. Thank you very much.

Sherylanne McCoy: I'm Cherylanne McCoy with Cape Canaveral Shrimp Company, and I don't really have anything written up to present formally tonight. I just want to say we are so tired of addressing this again and again and again. And when I had to go back to these captains and crew and boat owners, other docks, and tell them, okay, we're having to go through this again, it's time to fix it. It was done on a technical error. It was a staff error that caused this. We need to get this fixed. I don't know what else to say. And then also on the economic end of it, when you're talking about the economic importance, in the last year and a half, we have been bombarded with imports into our shrimp industry. Rock shrimp, they have not been able to figure out how to farm raise them. So that is one vital area of economic importance to the shrimpers now. There was just a question about not reaching optimum yield, but I think we originally started out with 150 permits when we went to the closed entry. Anybody correct me on that? We're down to I think 100. So, by process of elimination, we don't have near the boats. We have lost a lot of the fleet. The imported prices have killed the fleet. Most of the boats that are being sold now are going out of the country. They can't even remain in the country and fish for domestic shrimp. So given the fact that this was done in error, you've got an executive order now that is pushing to get a balance with our shrimp, we've got over 90 percent of shrimp that's imported I think you really need to address this and let them fish. Thank you, oh and then I know there's a misconception one reason I didn't prepare a comment after hearing some of the comments and seeing them online, I'm so irritated about this – these boats do not drag on coral. I don't know where that myth has gotten put out there that so many people are commenting that they're dragging through coral. They don't drag on it and they never have the rock shrimp boats haven’t.

Laurilee Thompson: I'm Laurilee Thompson. I sit on the Deepwater Shrimp AP. I want to say, you know, some of the things that we heard on Tuesday night during the comment session were basically untrue. The rock shrimp industry has cooperated with everything that was, you know, they were asked to do to protect the Oculina habitat. In 1984, when the first Oculina protected area was established, 84 square miles, 15 miles northeast of Fort Pierce, no one from the rock shrimp industry said anything. The local rock shrimp fishermen, and those are the ones that started the industry and have been fishing there for decades, ever since the 1960s, do not go into the reef. They know that they don't want to drag in the coral and tear up or lose their gear, and they also knew that the coral was important for their fishery. Instead, they started going to the Council meetings to lobby NOAA to implement protections for the Oculina coral. They were really excited in 1996 because something was finally going to happen to protect the coral but when the numbers came out they ended up being devastating to the industry so what was done in 1996 is a fishery amendment number one, shrimp fishery amendment one prohibited trawling east of 80 degrees west longitude between 27 degrees 30 minutes north and 28 degrees 30 minutes um yeah between 27 30 and 28 degrees 30 minutes north latitudes so that you know that prohibition did not even protect not even one millimeter of Oculina habitat. It was too far to the east. They missed the coral completely. Instead, the rock shrimpers lost 60 miles of historical mud bottom where they had been fishing since the 1960s. So, the rock shrimpers still staying out of the coral, even though it has zero protection aside from the original 1984 HAPC. Then in 2000, Coral Amendment 4 increased the size of the Oculina HAPC to 300 square miles, and they did this by placing the prohibited trawl area into a HAPC. Two tiny satellites to the west were added, and finally, 16 years since the first HAPC, a teeny tiny bit of Oculina coral was in protection. The rock shrimpers are still not going into coral, even though it's still not inside a HAPC. So, they continued staying out of the coral. And finally, in 2015, the northern expansion of the HAPC was conceived. And also, along with that, in Coral Amendment 8, a line was drawn that connected the two satellites and the Oculina south of Cape Canaveral was finally protected. So that was also, like I said, when the northern expansion happened. So, we are talking about, in this little teeny tiny shrimp fishery access area, 0.3% of the entire Oculina HAPC. It's 0.5% of the northern expansion. This is such a small area, it's ridiculous that we are still here talking about it. It took 31 years to finally get the Oculina coral off of Florida's east coast protected. 31 years. And the whole time, the rock shrimp people are doing everything they were asked to do. The rock shrimp industry was, let me see here. They were like the first fishery that was required to have vessel monitoring systems. They were the first industry that was required to have, well, they have turtle excluder devices. They were the first fishery in the South Atlantic to have limited access endorsements, like my sister said, that limited the number of boats in the fishery actually to 155 boats. Once an endorsement is retired, it cannot be brought back. There's really only about 20 to 30 active boats in the rock shrimp fishery now, even though there's still 100 permits that are active. There's only 20 to 30 boats that are actually actively fishing. In 2006, bycatch reduction devices were required, and they dramatically decreased the amount of bycatch that the shrimpers were catching. There have been observers on the rock shrimp boats to verify

that they're not catching that much bycatch. So they were in a big hurry to get Coral Amendment 8 passed even though they had this this scrivener's error because the coral was in really really good shape north of Cape Canaveral and so NOAA really wanted to get Coral Amendment 8 in in shape so yet this coral was in really really good shape even though the rock shrimpers had been fishing on the offshore side of the coral for 45 years so if the rock shrimpers are so terrible and they're destroying all this coral why is that coral north of Cape Canaveral in such good shape. There's shrimp fishery access areas in coral HAPCs for royal red shrimpers so that they can access historical areas where they shrimp their shrimp, fishery access areas for golden crabs in a deep water coral HAPCs so that they could access historical areas where they have shrimp This is the same thing. We're talking about teeny tiny shrimp fishery access area inside a HAPC. It's not a reduction of the HAPC. It's just an area where they will be allowed to fish. The best available science says that there's no live coral, dead coral, or suitable habitat for coral inside the shrimp fish access area. Corals not going to grow there no matter how long it's closed. It's mud bottom folks there's no substrate there for coral to grow on. So I see that I'm well past my time thank you for your indulgence. I have a picture here I want to give to you that shows a picture from the 1970s that was taken prior to the time when bycatch reduction devices were required. And then there's four pictures that were taken in 2017, and you can see a dramatic difference in the amount of bycatch that's in the piles of shrimp. Thank you.

Lee Vogelsong: My name is Lee Vogelsong. I'm on the rock shrimp AP. First, I would like to say I or no one drags in the coral. We don't drag across coral at all. I am for Alternative three to get opened back up, but I will go with Alternative two being how it's already been passed through. I've been shrimping in these waters for 31 years. Yeah. And no one that I know of or ever has drug across any coral. As far as the boundary line, I would like to say that no one, or I don't, I don't believe no one sets their gear on the boundary. When we do drag on the offshore side of the boundary, we set out offshore of it and then move into the boundary. And before we haul our gear, we move off of the boundary to haul our gear back up. I wanted to clarify that. And as far as the gear, gear costs, I don't know if anyone's aware of how much our gear costs, but the gear that I pull, behind my boat, costs me $86,000 every single time I set out. That's how much my cables, doors, nets, TEDs, bags, chains, everything costs. So, no one wants to lose all their gear dragging across rocks, ledges, or coral. That's why no one does or has. I just want to bring that up to y'all's attention. That's how much my gear costs, and most of all our family's boats are around the same cost of what the gear costs. 85 plus thousand dollars every time we set out is how much our gear cost and let me see I got some other stuff in here and as far oh yeah as far as the bottom currents I would like to address that i don't know where that's coming from as far as any currents on the bottom but I've been shrimping and the only currents I ever see is on the surface and maybe halfway down you'll have some cross tides. so as far as the John Reed scientists or whatever he says he does. I don't know if he knows his head from his ass, but he's wrong about any bottom currents. I would like to bring that up. As far as the bycatch, we pull fish eyes, we have TEDs, we have no bycatch at all. It's mostly all clean, pure shrimp. And that's pretty much all I got to say for right now.

Marilyn Solorzano: Hello everyone and thanks for coming out. Thanks to the Council for putting up with us again and again and again and for all you taking your time to listen to me chatter. So, my name is Marilyn and I'm on the Shrimp AP, Deepwater shrimp AP. I have shrimp boats. I'm a fifth generation, fourth generation for me fishermen, grandchildren and children in the business. I've been at it a really long time, longer than Dr. Reed has. Okay, so anyway, I'm going to go with I would prefer option three, but since two has already been approved and worked into the agenda and Council and everyone has went along with that, we'll settle for that. So my next topic that I really want to complain about is I've been here as long as I said. I'm about tired of this Dr. Reed spewing his lies about the commercial rock shrimp industry. He's had a couple of submersible dives, very few in his expertise years of Oculina diving. He has created false narratives stating that rock shrimp vessels in the late 70s and early 80s would take gear and put chains between nets and pull it to dredge the bottom intentionally to destroy coral. No shrimper has ever done that. I was around in the 70s and 80s. This is absolutely not true, and I can tell you why. The vessels in the late 70s and early 80s winches weren't capable of going out to 50 fathoms of water and getting into some of this coral. Their drums were too small. It couldn't carry enough cable to do what he states he saw done. The horsepower on the vessels of these boats back then couldn't go into the Gulf Stream and hold up to do that and pull those cables. So he's wrong. John Reed used students to go in and assign them assignments where they wrote papers, which were, as you all know, just to get the grades. He nor his students could clearly tell the difference between rock shrimp gear and scallop gear. In the 70s and early 80s, there was a lot of scallop boats out of Canaveral. They did use a heavier gear than what shrimp boats used. They were inside of the Oculina bank just as the shrimp boats were back then. There were very few vessels working for rock shrimp because most of the vessels out of Canaveral during those years were working for scallops. Up until the mid-80s rock shrimp were predominantly on the east coast and folks like Rodney Thompson and this lovely family had introduced and made it from the 60s through the 80s had made it a very locally delicacy that people came to Florida to eat, was the rock shrimp, as things progressed along into the late 80s and early 90s when folks like JBS and Fleet Marine and the Thompsons ended up taking the rock shrimp industry and making it more world-renowned by taking it to places like the Boston Seafood Show and other seafood expos where people worldwide became familiar with rock shrimp and they wanted it. The business and the marketing increased. There was more demand for the rock shrimp. During this time more boats came into it [the rock shrimp fishery]. And we created the early 90s, the Council came in and set up to protect the coral because there were a few more boats working on it. And they thought, oh, goody, goody, let's manage this too. Like sometimes they like to do. I'll stop there. But environmentalists have been falsely led into believing that John Reed's so-called scientific studies are factual and have used them to attempt to undermine the rock shrimp industry for decades now. John Reed's experience with rock shrimping is a handful of dives, a submersible, and is nowhere as accurate as the fishermen who do it for a full-time living every day, every year. All year round, they are either working on their boats, preparing to shrimp, or shrimping, in the Southeast Atlantic, most of the guys that rock

shrimp do. Enough is enough of the lies and the false propaganda. Rock shrimpers do not dredge the bottom to destroy coral or the habitat because that's exactly what we don't want to do. We have to have that. We have to have it to make our living, to live. We're into protecting it, not getting rid of it. So John Reed was allowed to speak six minutes at the last public comment. We got to speak three. Maybe that's why y'all gave us a few extra now, and thank you. I don't know how many minutes he spoke the other night, but I guarantee it's probably more than we did because he claims to be the pro. He's not. The pro are the people who really go out there every day, all the time, know the bottom. They know the bottom like they know their baby's hiney, like they know the wrinkles in the palm of their hand. They know it. They have to. You can discredit us if you want to because you don't like what we do, or you think we're killing habitat and coral. We're not. We need it. John Reed doesn't know the difference between rock shrimp gear and scallop gear. 45 years ago, he didn't. Again, I'm going to state, I support option three, but we'll take option two, either one of those two. We asked for three, and that was what we originally went in and worked on the boundaries with my son and some other people worked with Roger back and they shrunk it down to option two which got approved. I know i went over my boundary and there's one other thing I want to say on Laurilee, she did a fabulous job with her idea you know with her boundaries and telling you the amount of closed areas but to sum it down basically 500 miles has been closed to protect 20 miles of coral. There's no coral in most of what is closed. We have expanded and expanded and expanded [the HAPC]. You've almost expanded the entire industry out of occupation. And it's the one place in the world where you can get rock shrimp. It must be saved, and it must be protected so that people who enjoy this food is allowed to have it. That's all I have to say.

James Moir: Hi, thank you all for having this listening session. I appreciate it. My name is Jim Moir. I'm the Indian Riverkeeper. I'm here to urge you, the South Atlantic Fishery Management Council, to take no action. I hope that you will take Alternative 1, vote no on Coral Amendment 11, Shrimp Amendment 12 for neither Alternative 2 or 3. Oculina varicosa creates a rare yet essential habitat along the continental shelf of Florida's east coast. The Oculina coral habitat is of particular concern, was established to protect this ecosystem from the destruction and the harmful impacts imposed by the same industry that is requesting more lenient restrictions and boundaries. Bottom trawling has been recognized as environmentally harmful and habitat destructive fishing practice since the mid-18th century. Some of these coral pinnacles, some of the coral colonies were alive back then. Bottom trawling not only scours the track of the trawl, but it also creates plumes of sediment and silt that can smother organisms hundreds of meters away. While bathymetric investigation may indicate previously destroyed or few living corals in the proposed shrimp fishery access area, there are high-resolution, high-relief coral heads right on the boundary. The terrigenous sediment, which these rock shrimp prefer, are in that area. It is not muddy. The reporting, both by the Coral Advisory Panel, the Grouper Snapper Complex Advisory Panel, and several oceanographic studies that have been done on the area and shrimpers all point to strong currents mid-water and on the bottom. Otherwise, the larvae and the small fish that are breeding and spawning on these coral habitats wouldn't get into the inshore

ranges if there weren't those currents. Worldwide coral reefs are failing to adequately respond to anthropogenic assaults. Warming oceans, lowering pH, certainly influence the extent of coral disease. While fishing, dredging, runoff, and nutrient pollution make these incredible hotspots of biodiversity even more rare and more valuable. Marine protected areas are recognized worldwide as some of the best tools for conserving and replenishing fish stocks and resources. The hundreds to thousands of species that live in deep coral reefs will be imperiled by expanding the SFAA because logically if you choose to expand the shrimp fishery access area you are effectively shrinking the OHAPC. Federal and state agencies have spent hundreds of millions of dollars on coral reef restoration and resiliency efforts in the state of Florida and in the southeast. This proposal, how does it justify a 245-ton annual catch against hundreds of millions of dollars of investment to preserve marine protected areas in deep coral reefs? The expansion of the OHAPC through Amendment 8 was not a mistake. The Council at the time considered input from the fish and Coral Advisory panels and the shrimp industry and drew the boundaries accordingly. The rock shrimp fishery considers itself to have some sort of ancestral or territorial or traditional territorial right to jeopardize the fragile and rare Oculina habitat and spawning grounds. That's just a preposterous assessment or assertment. Hearing arguments that the cost of VMS is prohibitive, or that increased spacecraft launch scheduling requires an offsetting with a greater fishing access area or that picking up space debris causes economic hardship that can be offset by potentially destroying Oculina corals is just not fair, not reasonable. Destroying Oculina corals to allow damage to another fishery doesn't make sense either. Even with turtle exclusion devices or bycatch reduction devices, the amount of bycatch is still unacceptably wasteful and tragic. The Oculina Coral Reef Bank is a living treasure that must be protected. Reversing protections and exploiting resources for short-term financial gain for a few is unethical and foolish. Follow the advice of the experts on your Coral Advisory Panel and do the right thing. I know that Dr. Reed has submitted several papers talking about his experience on the Oculina Coral Bank, as well as his experience in submersibles. Thank you for your time this evening.

Mary Krolick: My name is Mary Krolick. Can you hear me? I live in Fort Pierce. I've been on mostly the East Coast waters for probably over 40 years, and I am totally against both proposed amendments that would allow any bottom trawling, which to me is the most destructive fishing method, not anywhere near the Oculina reefs or anywhere in the ocean. Bottom trawling seems to be a problem worldwide. The science to me is very clear that the reef hosts over 2,000 species that need to be protected. The deep-water coral is rare and a unique ecosystem that was discovered around the mid-1970s by Professor John Reed and numerous other scientists. Those coral reefs once stood six feet tall and were over like 900 years old. Once full of large groupers and snappers and a large variety of deep-water organisms. Fish are in decline in Florida, and this reef habitat provides space for life cycles of many of these species, which are known to travel back and forth to the Indian River Lagoon. To me, the science is clear. If the Oculina reef system is left alone and protected from fishing and especially trawling, we all would reap many benefits that would greatly outweigh the benefits solely for the small group of local rock shrimp fishermen to establish an access area along the edge of the Oculina Reef. The reef deserves to be

protected and is vital to our ocean's health and our health, every one of us, and all of our well-being. It is unethical and a disgrace to let this reef be destroyed. Thank you.

Kristen Krolick: Hello, I'm Kristen Krolick, Concerned Floridian. I grew up boating the waters of Florida and grew up learning and appreciation for the coral reefs. I am a biologist, but traditionally more molecular wet lab, so I have not read these studies that have been talked about today, and I have not done ecological studies in general, but I will read these studies and then am in my comment more online if needed. I am empathetic towards being hundreds of thousands of dollars in debt and working decades of your life for something very hard work and having to reinvent yourself and how hard that might be. I am empathetic and listening to the shrimpers talks today and I still urge the Council to go with Alternative One No Action and even if you go with the other two I don't understand why there can't be something else in with this, if it gets approved, that it's going to be watched for the year. It sounds like to me there hasn't been an actual study on if the sediment is reaching the reef or not. So even if this does get allowed, if we can actually study if the sediment is reaching the reef to stop it and have that written in the Preferred Alternative Two or Three, that sounds like the most logical and I'm not sure why. I'll look at the studies you guys were talking about. I understand they're saying over and over again they're not on the reef. And the one scientific study just shows reef's not there. That's not, I don't think the point. The point is, is the sediment reaching the reef and how much is the bycatch affecting the biodiversity? And it sounds like we don't have these studies. So why are we allowing this or maybe allow it and study it that year? And if it does affect it, then stop it. And I want to say that I am empathetic and I hope you understand them. And I still go with alternative action one. And I will read the studies and comment more online. Thank you.

Mike Merrifield: I'm the current chair of the Deepwater Shrimp AP. I've been working with this amendment in one way or fashion or another since 2012. This comment is in support of Coral 11 Shrimp 12 Amendment, Preferred Alternative 2, to establish a shrimp access area along the eastern boundary of the OHAPC northern extension that was approved in Amendment 10 in 2013.
This area is significant to the rock shrimp fishery as it's the start of the soft substrate harvest area for rock shrimp. Starting at the beginning of the harvest area rather than further offshore increases the harvest efficiency and overall catch level. This was presented to the Council during the development of Coral Amendment 8. The Council did not want to delay the amendment but agreed to correct the boundary in a later amendment. Coral 8 added over 900 square miles of coral HAPC, 405 of it was for the Oculina extension northward. The Deepwater Shrimp AP worked with Coral AP to develop this area and were in agreement except for this narrow 22 square mile section of the HAPC where the offshore rock shrimp fishery harvested starts and progresses eastward. VMS has been required on all vessels in the rock shrimp fishery since 2003. VMS clearly illustrates how the fishermen avoided Oculina coral before the northern HAPC boundary was implemented in 2014. Previous references by John Reed that the rock shrimp vessels were mowing down coral are false. His references to goat trails being created by towing

chains along the bottom between two trawl doors is also false. This is not even feasible. This shows a lack of understanding as a whole, there's a lack of understanding of how the rock shrimp fishery operates. In the original Harbor Branch surveys of the Oculina Reef Bank in 1975 to 1977, there was more dead coral cover, basically 31%, than live coral cover, about 19%. The only explanation for this data is that some force, other than trawling, has historically resulted in an extensive Oculina die-off. John Reed wrote in his 2006 report to the South Atlantic Council Oculina Evaluation Team workshop, quote, the exact causes of the extensive areas of dead coral rubble on the modern deepwater reef, including Oculina and Lophilio, is yet unknown. Extensive areas of dead coral on the Oculina reefs as well as Ophelia counterparts may be due to the combination of events including natural evolution of the mound along with degradation through bio-erosion, hydromatic stress through currents and some regions from dredging and trawling and trawling activities from fishermen and scientists. Natural episodic coral die-offs such as occurs with the shallow water Acropora species may be an unknown factor on the deep water coral. Basically, the fact is that this is an extremely volatile environment impacted by a number of natural episodic events that impact the coral, along with numerous other anthropogenic causes, such as the billions of gallons of gray water that's released every day out of the Dade, Broward, Palm Beach counties. The cruise ships dumping and Lake Okeechobee overflow discharged through the St. Lucie River into the Atlantic, this event created a brown algae bloom that suffocated the bottom and eliminated rock shrimp fishing south of the Oculina OHAPC for over five years and most likely had a devastating effect on the Oculina corals inside the closed area. This dead zone now extends over 18 miles north on the OHAPC's southern border and is growing. Regarding sedimentation, the standard rock shrimp fishing practice is to put the gear on the bottom a minimum half mile off of the coral OHAPC boundary, whereupon work up to the quarter-mile from the boundary and then turn away from the boundary to pick up the gear. This equates to a three-quarter to one-mile buffer at a minimum between where fishing occurs and where the coral exists. Surface currents, we've talked about that on the top, they're northern, they go in the mid-water, they tend to go westward, and on the bottom there's little to no current for approximately 10% of the water column. Okay, I'm going to go ahead. My last point is that in reference to the executive order restoring American seafood competitiveness, often regulations do not understand the challenges of producing valuable, healthy, quality seafood to the American consumer. Their focus is on the sustainability enforcement, which is absolutely vital for the long-term health of this resource. The executive order is asking the regulators to look for actions that can be taken to assist the American seafood harvesters to compete with imported, primarily farm-raised seafood that pours into this country at prices often below the cost to produce. This is one of those actions that could assist them. Thank you for letting me come. Thank you.

Mike Eddy: Hi, my name is Mike Eddy. I operate two fish houses, one right down the street here and one in Fernandina Beach and we unload quite a bit of the rock shrimp. I was a long-time commercial fisherman myself. I wasn't planning on speaking until I heard the gentleman insinuate that these fishermen are willing to destroy this wonderful natural resource for short-term financial gain, is I believe what he said. That just made me angry. These people are fighting

for their economic lives, this whole industry. The most endangered natural resource we have right now is commercial fishermen, all up and down the coast, around the country. Fish houses are disappearing right and left around the country because they don't have enough access to product to make a living at it. We're all fighting for our lives. As Mike said, our fishermen have been devastated by the imported shrimp that's produced so cheap, and so they've seen the cheapest prices, the worst prices they've seen in years on the white shrimp and the brown shrimp locally and the rock shrimp is one bright area because there's very little imports on the rock shrimp. So it's an item that doesn't fight near as much competition from the imports. But most of the other comments I was going to say have already been stated, but it's important and it's up to this Council too. They're also supposed to take into consideration the economic impact on the local communities and on the fishermen that are involved in this. Our fishing industry is, you know, every year we got less and less fishermen, less and less boats. We're not recruiting young people into the industry anymore. When I used to fish in the 70s and 80s, you could work hard and you could make a good living. It's very difficult right now because of all the regulations. We don't have access to most of the product. There's more red snapper than you can walk on them off this coast right here. And we're not allowed to catch very little of them. It's kind of ridiculous, but this is just another case that we've over-regulated so many things, and I would just like to see this amendment passed and given the access back to the fishermen. And like I said, these fishermen are the last people that want to destroy that reef. They know the importance of it, and they have no desire. They never have and never will want to destroy the reef. Thank you.