



FW: testimony from Jim Moir, Indian Riverkeeper regarding shrimp11 coral 12

From SAFMC Administrator <administrator@safmc.net>

Date Fri 1/23/2026 8:55 AM

To Myra Brouwer <Myra.Brouwer@safmc.net>; Kathleen Howington <Kathleen.Howington@safmc.net>; Allie Iberle <allie.iberle@safmc.net>

From: Indian Riverkeeper <indianriverkeeperfl@gmail.com>

Sent: Thursday, January 22, 2026 8:31 PM

To: SAFMC Administrator <administrator@safmc.net>

Subject: testimony from Jim Moir, Indian Riverkeeper regarding shrimp11 coral 12

Dear South Atlantic Fishery Council,

The following is my testimony regarding the proposed amendment 11 and 12 to the OHAPC and the SFAA.

No Change

Hello South Atlantic Fishery Management Council Members. My name is Jim Moir, I'm the Executive Director of the Indian Riverkeeper. I urge you to recommend No Change (option1) on the Coral amendment 11 and Shrimp amendment 12.

I have empathy for hard working commercial fishermen. Although I admit to greatly preferring sustainable harvesting techniques, I admire the traditions and tenacity of the people engaged in the embattled shrimping industry. But.

The Council has failed to put forward any convincing rational or evidence that would overturn the sensible NMFS 2022 decision that overturned Amendment 10. Imperiling the Oculina Habitat of Particular Concern (OHPC) with an unjustified Shrimp Fishery Access Area (SFAA) is unethical and inefficient. This Council should recommend ways to reinforce protections for rare irreplaceable Marine Protected Areas, not risk permeant harm.

Hundreds of millions of dollars are spent annually on coral reef preservation and restoration. The Oculina varicosa corals are unique, precious and possibly invaluable to research. The habitat they provide to commercially important fish species (grouper snapper etc.) during vulnerable portions of their life cycles is irreplaceable. Each coral mound may shelter thousands of other organisms as well. The risk of damaging these ancient treasures for the dubious reward of attempting to reach an ill-defined optimal yield, enabling a fishery that had been this reef's nemesis is a poor decision. More than 32,500 people have voiced strong opposition to amendment 11 and 12, only 30 or so self-interested parties have voiced approval for a SFAA.

Executive Order 14276 or the previous 13921 Restoring American Seafood Competitiveness were intended to level the playing field for domestically harvested seafood and use the best available science to establish sustainable fishery management practices. Amendment 11 and 12 does none of that. There is no imported foreign Rock shrimp, there is no imported competition. The Rock shrimp fishery is a niche boutique market. Only 24 of the 104 valid commercial vessel permits for rock shrimp, 23% actively fish. Rock shrimp trawling activities in the proposed SFAA have been historically low and variable at best. Increasing the supply of rock shrimp might actually drive the price down and hurt the rock shrimpers profits.

There have been no recent observer bycatch studies undertaken. We don't know what the effects of increased trawling activities will have on threatened species. We know that this deep bottom trawling activity is extremely wasteful and even with TEDs and BRDs the bycatch is unacceptably high. When trawling is performed on the edge of the continental shelf it's likely to intersect with many migratory species during haul back operations.

The Council has ignored the testimony of researchers and coral advisory panel members as well as experts from the grouper snapper complex panel about their areas of expertise. Some of them have actually personally been on the bottom of the OHAPC and know the conditions firsthand. The bathymetric survey of the Nancy Foster does not support the creation of a SFAA. It confirmed the proximity of large intact *Oculina* coral pinnacles. It confirmed fine grained sediment; it also confirmed the presence of a nepheloid layer. Suggestive of a cross current or upwelling that could carry suspended fine-grained particles onto the reef. The sediment plume from a bottom trawl could easily suffocate ancient corals. The analysis of temperature data suggesting rare upwellings is misleadingly interpreted. Deep water current profiling over multiple seasons could easily be achieved with certainty by deploying ADCPs Acoustic doppler current profilers.

The council has not used the best science available to comply with either executive orders or to answer the deficiencies stipulated in the 2022 NMFS decision to overturn Amendment 10. The Council has ignored recommendations from advisory panel members and failed to provide data in timely and accurate ways. The Council is following an illogical and ecologically shortsighted path to a decision that can lead to irreparable harm. The original 100-meter bathymetric contour is the appropriate buffer boundary. Creating a SFAA sets a terrible precedent for MPAs in the EEZ and elsewhere.