

## Proposed OHAPC Amendment 11/12- Public Comment- Historical fishing grounds

The rock shrimpers on the South Atlantic Fishery Management Council have stated that they have the right and need to shrimp within the current boundaries of the northern Oculina HAPC because it is their historical fishing grounds. If they have fished there in the past as they claim, then there will be no standing coral there. Oculina coral is fragile as porcelain and no match to 1000 pound rock shrimp trawl doors, chain and net. So the recent mapping of the region was a waste of time and money. Of course they found no live standing coral. Not a surprise.

The rock shrimpers claim that they avoided coral areas in the past. How did they do that? How would they know what was living on the bottom without seeing it like we did with the Johnson-Sea-Link submersibles? Did they have some miracle, unknown high-resolution multibeam maps of the entire Oculina HAPC that showed them where to go to avoid coral? We would like to see those maps. There were no multibeam maps in the 1970s and 80s and 90s when much of the trawl damage was done. In addition peer reviewed publications show that the deep-water Oculina coral, not only lived on high relief mounds, but also on low relief 1 m knolls and even in flat bottom areas (1980 Reed- Distribution and structure of deep-water Oculina varicosa coral reefs off central eastern Florida).

On at least two occasions the rock shrimpers told how they were able to drag their trawl nets over coral habitat. One occasion was during a SAFMC public hearing in Daytona for the original proposed Oculina HAPC. They said they would drag the trawl doors and chain without the net over the coral habitat, knocking the coral down to make 'goat trails'. They would go back and forth until it was trawlable. The coral rubble making perfect habitat for the rock shrimp. They further said that it was actually good because the little coral fragments would then grow into new colonies. Similar to tilling a corn field. I countered that unlike corn kernels that can grow up to 6 ft in 3 months, a branch of Oculina coral, if it survived at all laying in the mud, would take over a century to grow to 6 feet.

In 1984, a small part of the known deep-water coral habitat was first protected as the Oculina Habitat Area of Particular Concern (OHAPC), prohibiting bottom trawls, longlines, dredges, and anchors. Unfortunately, the northern two thirds of the reef system remained open to these gear until 2000 when the OHAPC boundaries were expanded to Cape Canaveral and then to about Daytona in 2016. In the 1970s, the Oculina reefs were teeming with large spawning aggregations of grouper and snapper. By the early 1990s, commercial and recreational fishing had decimated the fish populations, and the coral had been severely impacted by bottom trawling for rock shrimp. Historical photographic transects, taken in the 1970s with the Johnson-Sea-Link submersibles, provide crucial evidence of the status and health of the reefs prior to heavy fishing and trawling activities. Quantitative analyses of photographic images by point count reveal drastic loss of live coral cover between 1975 and 2001.