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**Subject:** Oculina Coral HAPC proposed Amendment 10  
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**Attachments:** [SAFMC Amendment 10- Facts against this proposal- J Reed Sept 5 2024.pdf](#)

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Re: Response to Oculina Habitat of Particular Concern (OHAPC) Proposed Amendment 10

The attached document provides critical information that clearly shows why the proposed Amendment 10 of the Magnuson-Stevens Fishery Conservation and Management Act must be denied. The western boundary of the proposed shrimp trawling access zone abuts and even extends directly over high-relief habitat, i.e., *Oculina* coral ecosystem habitat (see Fig. 2 of attached document). NOAA Fisheries surveys of this region show that these high-relief features in this region depict coral ecosystem and fin fish habitat (see Fig. 1 a,b).

During ROV dives conducted with NOAA Fisheries at the sites in the northern OHAPC (Reed and Farrington, 2011), the dominant fish observed included scamp (common), gag grouper, snowy grouper, red porgy (common), amberjack (abundant), black seabass (abundant), tilefish, red hogfish, tattler, cubbyu, blue angelfish, bank butterfly, morays, rough-tongue bass, bigeye, scorpionfish, batfish, wrasses. Dominant invertebrates include *Oculina varicosa* coral (10-40 cm colonies), gorgonian corals, black coral (abundant), sponges, starfish, sea urchins, and mollusks. Unfortunately, the mounds appear to have been impacted by years of bottom shrimp trawling as documented within the Oculina HAPC.

The current eastern border of the OHAPC of Amendment 8 was purposely drawn along the 100 m contour line and varies from a minimum of 500 m to about 1000 m east from the high relief bathymetry. This is a quite reasonable buffer. Per the Coast Guard, straight borders, and wide buffer zones allows easier enforcement to keep potential poachers and errant trawls far from the reef habitat.

If passed, this Amendment will allow shrimp trawlers access to bottom trawl within the boundaries of a portion of the OHAPC. It will increase the degradation and proximal destruction of this unique-in-the world coral reef system. Adding in the already existing environmental stressors the coral reefs here (and around the world) and we could see the unintended expansion of degradation and destruction growing within the marine protected area. The purpose of marine protected areas like the OHAPC are to protect areas of essential habitat, fish populations and their spawning grounds. That is the whole purpose of establishing marine protected areas. It is not and should not allow special interests devalue MPAs of their purpose. If we destroy the habitat, we lose the fish; if we lose the fish, we lose the fisheries.

The deep-water *Oculina* coral reefs are a unique coral reef ecosystem like no other on earth. These are truly a treasure that should be protected for perpetuity. Destructive fishing gear, specifically bottom trawls, should have no right to be used within the OHAPC. They have been banned for 38 years, there is no good data to suggest it is OK to allow it now. Opening a portion of the HAPC to trawling is a bad precedent. What would prevent the trawlers from requesting other portions of the OHAPC or the Deepwater CHAPC protected areas to be opened? Now is the time to protect these reefs, to allow the corals to recover, to allow the spawning aggregations of important grouper and snapper to recover. Now is not the time to diminish an area that is already protected.

I am requesting that NOAA Fisheries and the South Atlantic Fishery Management Council deny Amendment 10. I ask you keep the current protections in place: "No person may use a bottom longline, bottom trawl, dredge, pot, or trap in the Oculina Bank Habitat Area of Particular Concern. If aboard a fishing vessel, no person may anchor, use an anchor and chain, or use a grapple and chain." Currently there are no shrimp fishery access areas within the Oculina Bank Habitat Area of Particular Concern, and now is not the time to reverse course, nor to redraw the boundaries of the protected area.

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