August 5, 2025

Re: OHAPC proposed Coral Amendment 11/ Shrimp Amendment 12_Surveys of Northern OHAPC_8-5-2025

For 10 years (2010- 2021) I have been a Co-Principal Investigator along with NOAA Fisheries scientists on surveys documenting the shelf-edge MPAs with ROV and multibeam sonar from south Florida to North Carolina, including the Oculina coral reefs and OHAPC. In fact, it was on our surveys in 2011 when we documented that the Oculina habitat extended north of Cape Canaveral and nearly up to St. Augustine. 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, roughtongue 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. Proposed Amendments 11/12 show maps of the Northern HAPC and SAFF but did not use the available data and maps from our research surveys of the region (see below, Harter et al. 2019). The Oculina coral habitat is more than just coral it is an ecosystem of hundreds of species that are associated with it including 70 species of finfish.

Unfortunately, the mounds appear to have been impacted by years of bottom shrimp trawling as documented within the Oculina HAPC (Reed et al. 2007, Koenig et al. 2005). Since the reefs' discovery in 1970s, snapper and grouper populations have fallen drastically, and large swaths of the reef have been reduced to rubble (Koenig et al. 2005). Continued trawling near the reefs prevents any possibility of recovery and regrowth of new recruits of coral and impact the fish populations.

Figure 1. Harter, Stacey, John Reed, Stephanie Farrington, and Andy David. 2019. South Atlantic MPAs and Oculina HAPC: Characterization of Benthic Habitat and Biota. NOAA Ship Pisces Cruise 19-02. NOAA CIOERT Cruise Report, 388 pp. Harbor Branch Oceanographic Technical Report Number 193. http://www.cioert.org/wp-content/uploads/2020/01/2019-Harter-South-Atlantic-MPAs-and-Oculina-HAPC-Characterization-Cruise-19-02.pdf.

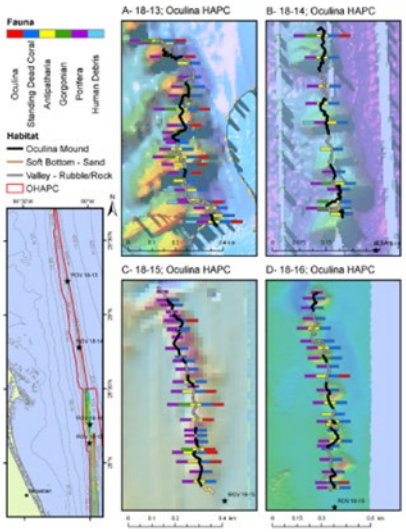

Figure 9. Presence of corals (Scleractinia, gorgonian octocorals, Antipatharia), sponges, and fishing gear based on video analysis of ROV video in 5-minute increments on *Oculina* HAPC reef sites during the NOAA Ship *Pisces* cruise 18-02, May 12-24, 2018.

Table 1 (from. Harter, Stacey, John Reed, Stephanie Farrington, and Andy David. 2019).

Table 9. Counts of major benthic macrobiota and fishing gear from video analysis of ROV dive 19-32 on *Oculina* HAPC reef site during the NOAA Ship *Pisces* cruise 19-02, June 7-20, 2019.

Phylum/Group/scientific name	No.
Porifera	**206**
Demospongiae	**206**
Chondrilla sp.	92
Demospongiae	113
Poecilosclerida	1
Cnidaria	**283**
Alcyonacea - Alcyoniina	**10**
Nidalia occidentalis	10
Alcyonacea - gorgonian	**16**
Anthozoa - Non Coral	**90**
Cerianthidae	85
Corallimorpharia	5
Antipatharia	**91**
Antipathes atlantica	4
Stichopathes luetkeni	81
Tanacetipathes tanacetum	6
Coral- Scleractinia	**52**
Cladocora sp.	11
Oculina varicosa	41
Hydrozoa	**24**
Chordata	**3**
Ascidiacea	3
Arthropoda	**7**
Decapoda	7
Echinodermata	**192**
Asteroidea	6
Echinoidea	186
Human debris	**1**
Human debris- fish line/gear	1
Habitat	**56**
dead standing Oculina (habitat)	56
Grand Total	**748**

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