

December 6, 2023

To: Administrator@safmc.net
Re: SAFMC Meeting, Dec 2023
Habitat and Ecosystem Report
Guidance for Resubmission of Amendment 10
NOAA-NMFS-2021-0126; Coral_Amendment10_Nov21_508
Public Comment - R. Grant Gilmore, Ph.D.

From:
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I am commenting on NOAA-NMFS-2021-0126, Coral Amendment 10 that is a proposal to allow Rock Shrimp, *Sicyonia brevirostris*, fishery trawling in the proximity of the Oculina Habitat Area of Particular Concern (OHAPC) and reefs that reside outside the OHAPC off the Florida east coast.

I have spent over 50 years studying the fish, fisheries and fish habitats in the Southeastern United States and Florida as a research scientist in fish ecology and life histories, first with the Harbor Branch Oceanographic Institution (HBOI; 1971-1999), then at the Kennedy Space Center (NASA, NOAA & Dynamac Corp., 1999-2004), finally with Estuarine, Coastal and Ocean Science Inc. and collaborators (incl. HBOI, NOAA, USFWS, ACE, SAFMC, FFWCC; 2004-present).

My studies included manned submersible (JSL-I & II, Clelia), remotely operated vehicles (ROVs: CORD, Hysub, Super Phantom) observations/collections, traps, hook and line, dredges, various trawls, and bottom grabs.

My research and that of my colleagues has produced the following conclusions:

- We know that the extensive and once robust East Florida Oculina Coral Reef is unique to this region of the world and is the largest coral reef structure on the East Florida continental shelf. As such it supports the greatest biodiversity of aquatic organisms off East Florida and is a national and global asset.

- We know the Oculina Coral reef forms structural habitat that supported important regional fisheries, notably the spawning of Gag, *Mycteroperca microlepis*, Scamp, *M. phenax*, Speckled

Hind, *Epinephelus drummondhayi*, Red Porgy, *Pagrus pagrus*, Black Seabass, *Centropristis striata*, and Blue Angelfish, *Holacanthus bermudensis*. It was also a social roundevious and feeding site for Warsaw Grouper, *Hyporthodus nigritus*, Snowy Grouper, *H. niveatus*, Greater Amberjack, *Seriota dumerili*, Almaco Jack, *S. rivoliana*, Little Tuny, *Euthynnus alletteratus* and Scalloped Hammerhead Sharks, *Sphyrna lewini*.

- We now know that these fisheries and fish populations, including Rock Shrimp, are vulnerable to habitat loss as well as fishing pressure.

- We know that shrimp trawlers have damaged fragile Oculina coral and have created acres of coral rubble throughout much of the OHAPC, thus eliminating much of this unique and productive habitat.

What is the South Atlantic Fishery Management Council (SAFMC) responsibility?

Years ago I sat as an advisor to the SAFMC grouper-snapper committee. It was my understanding that the SAFMC was to insure that regional fisheries remained viable and that a multi-species "ecosystem" approach in fishery management actually benefits all regional fisheries as they are truly interdependent. Even Rock Shrimp fisheries benefit from restoration of Oculina Coral "ecosystems".

Like the Oculina Coral, the Rock Shrimp fishery is basically unique to East Florida waters and associated with the viability of east Florida continental shelf and Oculina Coral ecosystems.

So why would the SAFMC want to allow a trawl fishery that has been documented in causing destruction of unique coralline habitats and biological diversity (past, present and future fisheries) this regional ecosystem supports?

Why endanger an extremely fragile habitat that supports an equally fragile Rock Shrimp, Grouper-Snapper fishery?