

Aug. 8, 2025

Re: SAFMC Coral Amendment 11 & Shrimp Amendment 12

To Whom it Concerns,

Thank you for the opportunity to provide comments on Coral Amendment 11 and Shrimp Amendment 12. In prior decades, I served on the SAFMC's Snapper-Grouper Advisory Panel, Habitat Advisory Panel, Oculina Bank Reserve Evaluation Team, MPA Expert Workgroup, Interdisciplinary Planning Team, and Fishery Ecosystem Plan writing teams.

Several key scientific and administrative issues regarding this issue were explained by Prof. John Reed and Michael Gravitz on the webinar earlier this week. As mentioned by Mr. Gravitz and others, there was also no reference to the Coral Advisory Panel. Have these experts not been invited to provide input on this issue as a panel?

When a similar effort to open part of the protected area was made several years ago, the scientists who sit on the Coral AP approved the no-action alternative. Various details are similar here and the opinion of experts who do not financially benefit from their recommendations has foundational value to this decision-making.

The webinar also briefly referred to the OHAPC as Essential Fish Habitat, without further discussion. The Oculina Bank was designated as EHF-HAPC (Habitat Area of Particular Concern) by the SAFMC's Comprehensive Habitat Amendment in 1998. Since then, amendments involving potential degradation of EFH-HAPC typically required a habitat consultation by the NMFS Habitat Office as part of the evaluation process. Has such a consultation been conducted and, if not, has there been a formal policy change?

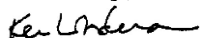
Given the hybrid history of their respective FMPs, the most prudent path would seemingly include recommendations from the applied scientists and others who serve on the Coral AP and the Snapper-Grouper AP. The latter AP is relevant for multiple reasons described in past SAFMC management plans and amendments. Is it possible to convene these APs with the Shrimp AP to obtain collective input, perhaps via an interactive web mtg., or to request such input from the Coral and SG AP individually?

Additional reasons to protect the Oculina Bank from expanded bottom trawling include:

- The Coral AP has consistently recommended continuation of a buffer area to protect both the coral pinnacles and lower relief hard bottom. This makes sense based on past trawling impacts (including the documented loss of grouper spawning habitat) and the need for a spatial buffer to keep trawling gear and sediments off reef structures.
- After all the SAFMC's work on fishery ecosystem planning over decades, opening buffer areas of the OHAPC is a contradictory precedent. If trawling buffers are removed from sensitive deep coral protected areas that provide habitat for fishery species, a new precedent to contradict ecosystem-based management is established.

Based on the history of efforts to protect the Oculina Bank, the Council's long-term emphasis on fisheries ecosystem management, and the Coral AP's past positions, the no alternative action is recommended. I appreciate the opportunity to provide comments.

Sincerely,



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