



PUBLIC EMPLOYEES FOR ENVIRONMENTAL RESPONSIBILITY

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August 29, 2022

Dr. Richard Spinrad  
Administrator  
NOAA/National Oceanic and Atmospheric Administration  
1401 Constitution Avenue NW, Room 5128  
Washington, DC 20230

Dear Administrator Spinrad:

I am writing to you on behalf of Public Employees for Environmental Responsibility (PEER) to seek your review of a NOAA practice that, in our view, is needlessly harming sea floor habitats in the Gulf of Mexico.

Every year, the Southeast Area Monitoring and Assessment Program (SEAMAP) conducts two bottom trawl surveys in the Gulf of Mexico from offshore of Brownville, Texas to west of central Florida to collect critical fishery-independent information about the relative abundance and life history of marine life. Each survey consists of multiple trawls.<sup>1</sup>

During the period between 2008 and 2015, a total of at least 2,546 SEAMAP trawl operations swept a combined area of approximately 100 km<sup>2</sup> of sea floor in just the eastern Gulf alone.<sup>2</sup>

### **Damage Done by Survey Trawls**

Because these bottom trawls are designed to fish directly on the sea bottom, live sea bottom habitats and the associated fauna can be irreparably damaged or killed. When these ecosystems are damaged the effects can be ecologically catastrophic and long term.

One indication of the damage is that many survey trawls could not be hauled aboard due to the weight and volume of the trawl-captured corals and sponges. In 133 instances, there were tows where gear was damaged or lost from bottom contact in the eastern Gulf of Mexico.<sup>3</sup> In many cases, this lost bottom trawl gear, snagged on sea bottom features, remain as “ghost fishing” nets where they will likely persist for decades.

The eastern Gulf of Mexico supports diverse live bottom habitats composed primarily of epibiotic algae, sponge and coral communities associated with rock, and firm substrate live bottom areas can have low relief. An agency review of the impacts of these trawl operations during the 2008-2015 period<sup>4</sup> found that large masses of sponge and coral are captured but are often not even categorized before being discarded.

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<sup>1</sup> <https://www.gsmfc.org/seamap-gomrs.php>

<sup>2</sup> NOAA Technical Memorandum NMFS-SEFSC-723 Quantifying the Impacts to Coral and Sponge Habitats in the Eastern Gulf of Mexico during Southeast Area Monitoring and Assessment Program Fishery-Independent Bottom Trawl Surveys

<sup>3</sup> *Ibid*

<sup>4</sup> *Ibid*

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Even though these surveys operate under bottom trawl damage mitigation guidelines, those guidelines are not routinely followed at all bottom trawl locations, nor are they effective for all trawling scenarios.<sup>5</sup> While some improvements have been made over the years to reduce bio-damage, the very nature of the trawl operations exact an ecological cost.

### **Conflicts with Agency Policies**

NOAA-Fisheries (NOAA/NMFS) has a plethora of policies and guidance promoting protecting live sea bottom habitat.<sup>6</sup> The agency also has expressed concern about the ecological harm done by “ghost fishing” from lost fishery gear.<sup>7</sup> In addition, the agency is a world leader in drawing attention to the loss of coral reefs, with special attention paid to the reefs in the Gulf of Mexico.<sup>8</sup> At the same time, NOAA/NMFS is intimately involved in the restoration efforts following the Deepwater Horizon disaster.<sup>9</sup>

These important NOAA/NMFS habitat protection and conservation efforts all emphasize the need to safeguard fragile live sea bottom habitats from the negative effects of marine fisheries research. The SEAMAP Gulf of Mexico trawling compromises all these policies objectives.

### **Mitigation Limits**

Many of the moderate to higher relief live bottom habitats on the mid to outer Mississippi-Alabama and Florida outer shelves are not well mapped. It will take decades to map the entire Gulf. This lack of mapping hampers the ability to minimize disturbance to these habitats and prevent loss and damage of trawl gear.

In addition, it remains unclear as to whether live bottom biota can be accurately identified through these mapping technologies, and if so, the minimal thresholds needed for detection. While the avoidance of obstructions and live bottom habitats prior to trawl deployment is still being explored, it is not yet close to providing intelligence that will shield these habitats from trawl damage.

### **Non-Damaging Alternatives Available**

NOAA/NMFS has the proven expertise to provide management-important fisheries data by expanding or better utilizing surveys that do not adversely affect live sea bottom habitats. Examples of NOAA/NMFS surveys that are minimally invasive include surveys that record footage at reef locations, ichthyoplankton surveys, longline surveys, midwater trawl surveys. The results from those surveys have provided important NOAA/NMFS fisheries management data that have broad utility and may be adequate substitutes for the data derived from bottom trawls.

While fisheries managers may argue that without the trawl surveys the fish stocks cannot be managed, it should be noted that prior to the expanded survey in 2008 for the eastern Gulf, fish stocks for that area were managed.

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<sup>5</sup> *Ibid*

<sup>6</sup> <https://www.fisheries.noaa.gov/national/habitat-conservation/essential-fish-habitat>

<sup>7</sup> [Wildlife Entanglement and Ghost Fishing | OR&R's Marine Debris Program \(noaa.gov\)](#)

<sup>8</sup> [Gulf of Mexico Coral Reef Report Card \(noaa.gov\)](#)

<sup>9</sup> [Deepwater Horizon Oil Spill Marine Mammal Restoration and Monitoring Activities | NOAA Fisheries](#)

The damage to habitats from bottom trawls interjects a management problem that NOAA/NMFS can choose to avoid.

**Value of Research Versus Ecological Destruction**

Given the inability to limit most of the ecological damages from these bottom trawls and the availability of alternatives means of gaining this information without incurring that damage, PEER urges you to undertake a fresh look as to whether these bottom trawls are worth continuing.

We are happy to provide any supplemental information, should that be helpful. Thank you for your consideration of this matter.

Sincerely,

Tim Whitehouse  
Executive Director