



August 4, 2014

Chairman Ben Hartig
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

RE: Proposed Snapper-Grouper Amendment 36 – Spawning Special Management Zones

Dear Chairman Hartig,

Thank you for the opportunity to provide input on proposed Snapper-Grouper Amendment 36.

I also want to thank the council for listening to the legitimate concerns of fishermen and coastal businesses and voting to halt further consideration of Snapper-Grouper Regulatory Amendment 17 and its proposed deep-water Marine Protected Areas, which would have unnecessarily hurt the region economically.

As you know, snapper-grouper fishermen and related businesses have been severely impacted by fishery regulations brought about by the Magnuson-Stevens Act of 2006. From 2007 to 2012, snapper-grouper fishing effort and landings from all sectors combined in the South Atlantic region plunged by nearly 40 percent and 35 percent respectively. So we urge a very cautious approach to implementing any spawning Special Management Zones via Amendment 36.

The council should consider the following prior to pursuing any spawning SMZs:

- It is very likely snapper-grouper species, including speckled hind and warsaw grouper, are spawning within the eight deep-water MPAs that were implemented in 2009. One of the first priorities of the council's draft MPA system management plan should be to identify spawning aggregation sites within the MPAs.
- Coral Amendment 8 will expand existing HAPCs by over 800 sq. miles, providing even more protection for deep-water species, including speckled hind and warsaw grouper.
- Substantial spawning protection exists for many grouper species through Snapper-Grouper Amendment 16, which established a four month (January-April) spawning season closure of the recreational and commercial fisheries for gag, black grouper, red grouper, scamp, rock hind, red hind, coney, graysby, yellowfin grouper, yellowmouth grouper, and tiger grouper.

Should the council decide to pursue spawning SMZs we ask that the following be considered:

1. Sites should be selected only where substantial spawning aggregations of snapper-grouper species can be documented through a cooperative effort of scientists and fishermen. Just saying

OPTIMIZATION AND SUSTAINABILITY
FOR THE RECREATIONAL AND COMMERCIAL FISHING INDUSTRY

POST OFFICE BOX 2398 | MURRELLS INLET, SC 29576 | (843) 879-8585 | SUSTAINABLEFISHING.ORG

that the habitat looks favorable for spawning is not sufficient information to merit closing an area to fishing.

2. Sites should encompass only the spawning aggregation area with no buffers. These SMZs should be as small as possible and not turn into MPAs by another name.
3. Fishing for snapper-grouper species within the SMZs should only be prohibited during the spawning season.
4. Fishing for pelagic species should be allowed at all times with the SMZs.
5. Transit of snapper-grouper fishing vessels through the SMZs when fishing is prohibited should be allowed with fishing gear properly stowed.
6. A SMZ monitoring and evaluation plan must be adopted as a part of Amendment 36. The resources and funding must exist to implement the plan. Given that the proposed MPA system management plan will require substantial resources; will there also be sufficient resources for SMZ monitoring and evaluation?
7. We urge the council to be very cautious and consider no more than one spawning SMZ per state, particularly as it relates to the resources necessary to implement an effective monitoring and evaluation plan.

And finally, we agree with the Snapper-Grouper Advisory Panel that descending devices should be evaluated for use in the fishery. These devices have been shown as effective in reducing release mortality in deep-water fisheries off the US west coast.

Your consideration of our comments is appreciated.

Respectfully,


Wayne Mershon
President