



House of Representatives

State of South Carolina

Stephen L. Goldfinch, Jr.
District No. 108 - Charleston -
Georgetown Counties
P. O. Box 823
Murrells Inlet, SC 29576

August 19, 2015

306-A Blatt Building
Columbia, SC 29201

Tel. (803) 212-6927

Committee:

Agriculture, Natural Resources
and Environmental Affairs

Robert Mahood, Executive Director
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
N. Charleston, SC 29405

Dear Mr. Mahood,

Thank you for the opportunity to comment on draft Snapper-Grouper Fishery Management Plan Amendment 36, which would put in place a number of spawning Special Management Zones prohibiting bottom fishing for snapper-grouper species.

As a state House member representing coastal areas of the Georgetown and Charleston counties, I have great concern about the economic impacts of any additional live bottom areas being closed to fishing, particularly an area as vital and productive as the Georgetown Hole. As an experienced offshore fisherman, I know first hand about fishing in the Georgetown Hole and how important the area is for commercial and recreational fishermen.

The actions in Amendment 36 to close additional areas of live bottom to fishing are not part of any fishery rebuilding plan required under the Magnuson-Stevens Act and are not required for fishery sustainability.

Given that Amendment 36 is an entirely optional action on the part of the fishery council, I believe the council has an obligation to abide by what the majority of fishery stakeholders want on this amendment, especially given the economic hardships snapper-grouper fishermen and related businesses have had to endure since the rigid annual catch limits and accountability measures of the 2007 Magnuson-Stevens Act Reauthorization came into effect. From 2007 through 2013, overall snapper-grouper fishing effort has fallen 45 percent and overall landings have fallen 20 percent. Not many businesses can survive this kind of reduction in revenue.



South Carolina House of Representatives

P. O. BOX 11867 • COLUMBIA, S.C. 29211 • TELEPHONE 734-2010

Page 2
Mr. Mahood
August 19, 2015

Not only are the live bottom SMZs in the amendment not required, they are duplicative of the eight existing deep-water Marine Protected Areas in the purpose of protecting spawning snapper and grouper. As you are aware, these MPAs, totaling 676 sq. miles (172 sq. miles off SC), prohibit bottom fishing, significantly impacting fishermen, and have been in place since 2009 via Snapper-Grouper Amendment 14.

From the Amendment 14 Purpose and Need statement (p. 8):

*"The primary purpose of these actions is to employ a collaborative approach to identify sites for Type 2 marine protected areas (MPAs) with the potential to protect a portion of the population (**including spawning aggregations**) and habitat of long-lived, slow growing, deepwater snapper grouper species (speckled hind, snowy grouper, Warsaw grouper, yellowedge grouper, misty grouper, golden tilefish, and blueline tilefish) from directed fishing pressure to achieve a more natural sex ratio, age, and size structure within the proposed MPAs, while minimizing adverse social and economic effects."*

From the Amendment 14 Objectives and Goals -- Maximize Biological Benefits (p. 9-10):

*"Objective C. **Protect some areas where spawning activity of snapper grouper has been recorded.** The Marine Resources Monitoring, Assessment, and Prediction Program (MARMAP) has noted locations where fish (e.g., snowy grouper, golden tilefish, speckled hind, red porgy, vermilion snapper, gray triggerfish, red snapper, scamp, gag, red grouper, gray triggerfish, and others) were caught in spawning condition. This information, in part, was used to site the MPAs to maximize the biological benefits."*

It's clear that one of the major purposes of the MPAs in Amendment 14 is to protect spawning snapper and grouper, which is identical to the purpose of the spawning SMZs in Amendment 36.

One of the especially troubling aspects of the fishery council's pursuit of these duplicative spawning SMZs in Amendment 36 is that six years after the Amendment 14 MPAs have been in place, there has been no systematic monitoring to determine how effective the MPAs have been in protecting snapper and grouper because the council has yet to adopt a system monitoring and evaluation plan. Until the council and NOAA Fisheries can properly assess spawning activity and other fishery biological information within the existing MPAs, it's



South Carolina House of Representatives

P. O. BOX 11867 • COLUMBIA, S.C. 29211 • TELEPHONE 734-2010

Page 3
Mr. Mahood
August 19, 2015

wrong and unfair to fishermen and fishing communities to close more live bottom areas without solid justification.

I ask the council to drop any further consideration of the live bottom SMZs in Amendment 36 and instead focus on the actions in the amendment having to do with artificial reefs, which are all specific to South Carolina.

The SC Dept. of Natural Resources has led efforts off our state to build artificial reefs on unproductive sandy bottom, not for fishing, but as havens for snapper and grouper that will build fishery biomass without closing live bottom areas and harming fishermen. I very much support these efforts, as I believe most fishery stakeholders do.

Specifically I support Action 4, Alternatives 3 and 4 that establish spawning SMZs for Areas 51 and 53 off South Carolina. These areas are mid-shelf experimental artificial reefs constructed by SCDNR in 1998 and 2003 respectively of which the locations have been kept secret so they would not be fished.

I also support Action 7, Alternative 2, which would move the existing Charleston Deep Artificial Reef MPA boundaries 1.4 miles to the northwest to actually encompass the reef materials, which drifted during deployment. This SCDNR led project cost about \$450,000.00 to create another experimental artificial reef on unproductive sandy bottom to "test how well artificial reefs can work to increase the abundance of fish and provide them the opportunity to grow and reproduce in an un-fished area," as stated in the amendment.

Again, I respectfully ask the fishery council to stop any further consideration of live bottom spawning SMZs until the existing MPAs have been evaluated as to their effectiveness in protecting spawning snapper and grouper. I also urge the council, other states, and NOAA to follow South Carolina's lead on constructing artificial reefs as MPAs or SMZs on sandy bottoms as a means of building fishery biomass without negatively impacting fishermen.

Respectfully,


Representative Stephen L. Goldfinch Jr.