



April 17, 2015

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 again provide input on proposed Snapper-Grouper Amendment 36.

As the fishery council is aware, there is great concern from stakeholders about increasing the amount of area in the South Atlantic that is closed or substantially restricted to bottom fishing.

In addition to the nearly 700 square miles of the eight deep-water Marine Protected Areas in which bottom fishing is prohibited, there are nearly 24,000 square miles of deep-water coral Habitat Areas of Particular Concern in the South Atlantic where bottom fishing is substantially restricted by prohibitions on anchoring and bottom longlines.

As referenced in the Amendment 36 public hearing document, the MPA Expert Work Group has stated that HAPCs are 50 percent as effective as an MPA in protecting snapper-grouper species. So the nearly 24,000 square miles of HAPCs are effectively the equivalent of 12,000 square miles of additional MPAs.

Given the significant amount of existing protected areas for deep-water snapper grouper, it is important that the spawning Special Management Zones under consideration in Amendment 36 be kept as small as possible to reduce further adverse economic impacts on fishermen and coastal businesses.

These SMZs should be as small as possible and not turn into MPAs by another name. We ask that the fishery council approve as preferred alternatives or sub-alternatives the SMZs that are smallest in size off each state.

Last week, the Snapper-Grouper Advisory Panel unanimously approved the following motion regarding Action 4. Establish new Spawning Special Management Zones (Spawning SMZs) off South Carolina:

MOTION: COUNCIL CONSIDER AN AREA ADDING TO THE NORTHERN SC MPA TO THE SOUTH AND OFFSHORE TO BE EVALUATED AS AN ALTERNATIVE TO THE GEORGETOWN HOLE.

We urge the fishery council take the Advisory Panel's advice and add this extension of the northern South Carolina MPA as a spawning SMZ alternative to the Georgetown Hole (Devil's Hole).

OPTIMIZATION AND SUSTAINABILITY
FOR THE RECREATIONAL AND COMMERCIAL FISHING INDUSTRY

The proposed spawning SMZs must only prohibit fishing for and/or possession of snapper-grouper species. Fishing for pelagic species should be allowed at all times within the SMZs.

The transit provisions in Action 8, Alternative 2 should be approved. Transit of fishing vessels with snapper-grouper species onboard through the SMZs should be allowed with fishing gear properly stowed.

An adequate SMZ system management plan that describes in detail the monitoring and evaluation requirements for the proposed SMZs must be adopted as a part of Amendment 36. It would be unacceptable to approve any more closed fishing areas in the South Atlantic without first having a workable plan, including funding commitments, to evaluate their effectiveness.

Again, we appreciate the opportunity to comment on Amendment 36 and ask for the council's consideration.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Tom Swatzel', with a long horizontal flourish extending to the right.

Tom Swatzel
Executive Director