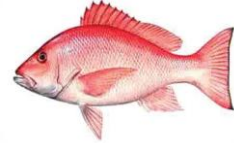
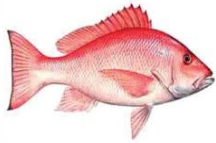


# SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



## EAST COAST FISHERIES SECTION (ECFS)

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August 18, 2014

Mr. Bob Mahood, Executive Director  
South Atlantic Fishery Management Council  
4055 Faber Place Drive, Suite 201  
North Charleston, SC 29405

**Email comments to: [Mike.Collins@safmc.net](mailto:Mike.Collins@safmc.net)  
(Subject line: Amendment 36 Scoping comments)**

Re: Snapper Grouper Amendment 36 Special Management Zones

Mr. Mahood,

The Southeastern Fisheries Association (SFA), East Coast Fisheries Section (ECFS) submits this written comment to the South Atlantic Fishery Management Council (SAFMC) on the Snapper Grouper (SG) Amendment 36 scoping for Special Management Zones (SMZs).

The SFA ECFS membership are concerned about the expediency, as iterated below, for implementation of this scoping<sup>1</sup> into the rulemaking process. There is a lot of critical information not yet available that is necessary to discuss and develop management options for protecting "spawning aggregations" of the common SAFMC SG species.

Specifically, there are pertinent spatial and temporal considerations critical to scheduling closures, bag/trip limit reductions, slot sizes, etc., that need to be thoroughly discussed before iteration of options. Our membership looks forward to being a part of the "discovery" process before the development of management options. Indeed, this discussion needs to be broadened to provide justification that SMZs are actually an effective management tool for increasing productivity or conservation of South Atlantic SG species.

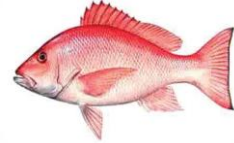
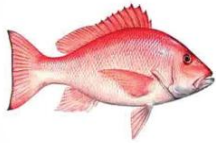
**Pasted below is the SAFMC scoping summary and timeline for SG Amendment 36, accompanied by SFA ECFS comments highlighted in red.**

"The Council is considering the following actions in Amendment 36: Specify a process for identifying spawning sites/aggregations for snapper grouper species, including speckled hind and warsaw grouper, based on the characteristics of sites important for

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<sup>1</sup> <http://www.safmc.net/managed-areas/special-management-zones-smzs>

# SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



## EAST COAST FISHERIES SECTION (ECFS)

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spawning (bottom topography, current systems, etc.) (See **Appendix C<sup>2</sup>** for more specifics on this approach)."

**The SFA ECFS anticipates a NMFS-SERO presentation of spatially and temporally explicit information on SG spawning aggregations. This information needs to be available and vetted by an expert work group before management options are developed. We believe a special SMZ data meeting needs to be scheduled during 2015 based on this SAFMC timeline pasted below.**

**"Note: Currently Spawning SMZs would only consider prohibiting fishing for and/or possession of snapper grouper species (species in the snapper grouper fishery management unit); fishing for all other species would be allowed!"**

**SFA ECFS questions the ability of the NMFS law enforcement team, including the state marine law enforcement, to properly monitor the private recreational sector to ensure compliance and accountability. The commercial and for-hire fleet, and seafood dealers are critically monitored to ensure accountability; but clearly, accountability does not exist in the recreational sector for such a management plan.**

"During scoping and public hearings, the public will be encouraged to suggest sites that could be considered. The scoping document does not include any proposed sites. It is anticipated that the public hearing draft would include preliminary sites (based on public input from scoping, as well as additional information), and the final amendment would specify proposed Spawning SMZ sites."

**SFA ECFS members, consultants and scientists have supplied important information throughout the marine protected areas (MPAs) conceptual development process. The SAFMC needs to more fully incorporate what they have learned, during this process, into the public documents for developing management options, as soon as possible.**

"Explore placement of artificial reefs on appropriate bottom type within existing MPAs to target warsaw grouper, speckled hind, and other snapper grouper species. **Note: The Spawning SMZ approach would not make any changes to the existing MPAs.** The Council is developing a System Management Plan to specify the

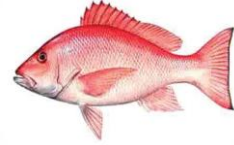
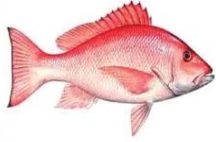
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<http://safmc.net/sites/default/files/meetings/pdf/Public%20Hearings%20&%20Scoping/Aug%202014/SGAm36ScopingDoc072314.pdf>

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# SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



## EAST COAST FISHERIES SECTION (ECFS)

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outreach, law enforcement, and monitoring/research projects (with cost estimates) necessary to effectively monitor and evaluate the existing MPAs."

**SFA ECFS can support placement of new artificial reefs on the ocean bottom, both within existing MPAs, and around other unutilized bottom fishing regions. The Council has, historically, not adequately monitored the efficacy of the current MPAs; we insist that SPZs can only be implemented with coherent monitoring and research plans, in place, to evaluate their efficacy.**

### **SAFMC SG Amendment Timeline:**

Council reviews scoping comments & provides guidance for more complete analyses September 15-19, 2014 in Charleston, SC

Council reviews amendment, approves measures & approves for public hearings December 1-5, 2014 in New Bern, NC

Council holds public hearings January 2015 NC - FL

Council reviews public hearing input & approves all actions March 2-6, 2015 in St. Simons Island, GA

Council approves final document June 8-12, 2015 in Key West, FL

Council submits Amendment to Secretary of Commerce for formal review & implementation July 2015

Target Implementation Date January 1, 2016

Jimmy Hull, Chairman  
SFA ECFS