



# **Gray's Reef National Marine Sanctuary**

## **Research Area Concept**

### **Scoping Summary**



**June 2008**

**Gray's Reef National Marine Sanctuary**  
**Research Area Concept**  
**Public Scoping Comments**  
**May 2008**

The concept of a research area within Gray's Reef National Marine Sanctuary has been under discussion for several years. The concept was first raised in 1999 during the early stages of the Gray's Reef Management Plan review process. In 2004 the Sanctuary Advisory Council made a decision to form a working group to further consider the concept. The findings and recommendations of that working group – and subsequently the Advisory Council – were adopted by NOAA and the decision was made to further explore the concept through a formal public process under the guidance of the National Marine Sanctuaries Act and the National Environmental Policy Act.

A notice to develop a Draft Environmental Impact Statement on the research area concept was announced on March 5, 2008, and a period of “scoping” began for input and information from the public and other specific constituent groups. This is a summary of the comments received from March 5 to April 21, 2008, by email, facsimile, U.S. Postal Service mail, hand delivery and public meetings. A total of 118 comments were received.

The comments are divided into topical categories based on the nature of the comments. Each bullet does not represent one individual's contribution, but a different comment, thought or idea. There is no priority in their listing.

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### **Education and Outreach**

- Education of anglers in a manner to gain their voluntary cooperation will be a critical component of achieving research success
- Anglers must understand the purpose of a research area or they will protest

### **Enforcement**

- Support need for enforcement
- Enforcement of such an area will be a nightmare, if not impossible
- Only way to enforce would be to close the entire research area to any and all boat traffic
- As a matter of enforcement, practicality suggests that all fishing activities be curtailed in the area
- Small area difficult to enforce
- Don't want to be hassled by enforcement officers
- Scenario #6 seems best for enforcement

- Clearly identify research area so well-meaning fishers and divers can steer clear
- Include buffer zone so people will know they are getting close to restricted area
- If fish is hooked on one side of the line, anglers are going to follow it across the line
- More and better enforcement of fishing regulations needed; agencies not sufficiently funded or staffed
- Concern regarding ability to locate boundaries as every GPS is a little different
- Research area must be well marked preferably with line-of-sight buoys

### **Fishing Rights and Access**

- Concern that closing off one section of the sanctuary for a research area will be followed by total closure
- Concern that data will be used/tailored to support closing more areas to fishing
- Interested in seeing that fishing will be available to future generations
- Don't believe research is important enough to justify excluding fishing
- Believe that fishing is a valid use of the resource
- Believe we are entitled to do what we enjoy, which is fishing
- Research area is taking away the right of fishermen
- Don't want the only people who can enjoy the resources to be researchers
- Gray's Reef is only available to the relatively few fishermen who can afford to pay charter fees or have their own boats costing many tens of thousands of dollars
- Gray's Reef is the only place to fish
- Suggest using log books as solution and/or providing information on catch through a permit system
- Suggest closing other area besides Gray's Reef as Gray's Reef is the best fishing area
- The right of individuals to fish recreationally should be protected even if this requires stricter size and bag limits
- You're taking a big chunk of the ocean accessible to small boats
- Believe that public access is a problem and that there are so many obstacles to fishing it's just not worth the effort
- Cumulatively there are numerous impacts of governmental regulations on users
- Comment about how few black sea bass we can catch now
- Concern that research area proposals include the best fishing areas and leave nothing for fishermen
- The loss of any meaningful area that holds fish this close to shore is a significant issue at today's fuel prices
- Restricting Gray's Reef restricts lives of many; doesn't give young people the opportunity to reap the benefits and pleasure of the cleanest sport on earth
- Research will prove nothing and will merely deprive the local fishermen
- Concerned that closing an area to fishing will put more pressure on other areas

## **General Comments or Status of Resources**

- Much money spent already creating artificial reefs to attract sport fish and provide habitat for sport fishing interests, must we also continue to defile our most outstanding natural reef?
- Fishing pressure at Gray's Reef is low; therefore impacts are less than at other areas where studies have investigated fishing pressure
- Government should protect Gray's Reef as a real "sanctuary" defined as a place of refuge or protection where animals are sheltered for breeding purposes and may not be hunted or trapped
- Fishermen are more conscientious than they used to be
- We see more fish and bigger fish than ever before; there is not a problem
- Recently saw the largest black sea bass from GRNMS and believes that shows there are no impacts from fishing
- Hate to see closing of any part of the resource to public access, but convinced without some pain there will be no gain
- Most fishing done during tournaments
- Believe that the significant impact in Georgia is coming from Florida fishermen
- Commercial fisheries take millions of tons of sea bass a year - they are the ones doing all the damage, not the recreational fishers
- Recreational fishermen are feeling blamed for everything
- Purpose of research area is not to take something away from fishing community, but to gain knowledge to allow resources to be enhanced for good of all
- Applaud efforts to protect marine resources at Gray's Reef.
- Very valuable resource well deserving of protection
- Concerned about the entire fishery; feel there are many species in serious trouble; convinced we don't have the knowledge needed to properly manage the fishery
- Provide examples of reserve effectiveness elsewhere

## **Mitigation of area closure**

- Consider mitigation to replace what is taken away from others
- Suggest mitigation for impact by way of artificial reefs or other means

## **Oppose Research Area Concept and/or Fishing Restrictions for Research Area:**

- Opposed because alleged researchers are studying the same things over and over and harassing and causing the deaths of more animals
- Opposed to any closure prior to a significant period of closure that only applies to commercial interests
- Oppose because no one is allowed to anchor now; that will preserve the bottom structure under current regulations
- No reason to ban fishing in any area of the reef; waste of government money

- Just another plot by a government agency to make up work in order to collect government funds
- Oppose because most species are migratory and you need to manage the species and catch rate not the area
- South Atlantic Fishery Management Council should manage fishing in Gray's Reef
- Call the whole reef a research area just don't close it to the fishing community
- Oppose because escalating gas prices will take care of many of the problems that you people are concerned with
- Oppose because with increased gas prices more people will want to go to Gray's Reef that would normally go further offshore
- Oppose any closure; not in support of Coastal Conservation Association's position
- Totally against any attempt to close any part of Gray's Reef.
- Keeping area open to recreational fishing and diving should be the priority

## **Research Needs**

- Living and non-living resources at the Sanctuary are so inexorably interrelated ecologically that one cannot be understood, managed or conserved without a fundamental understanding of the other
- Information on the status and natural variability of fish communities, habitat and ecological systems is essential for informed management of GRNMS
- Must have area that can function as a control against which we can compare and contrast conditions and ecosystems within other parts of the Sanctuary
- Request information on origins of marine debris
- Investigate links between species and the habitat within which they reside
- Interested in knowing relationship between pelagic and bottom species and habitats
- Establishing control area for research – of sufficient size to have meaningful significance on an ecological scale – provides the best opportunity for helping to identify whether changes or trends in marine fish and wildlife populations are caused by human activities and management practices, or whether they are being influenced by other phenomena, such as global climate change or natural weather patterns, such as El Nino events.
- Understanding the ecological consequences of exploitation is a necessary component of ecosystem-based management
- Need knowledge of total fishing mortality
- Understand tradeoffs to biodiversity and population structure within ecosystem that result from high levels of extraction
- Resulting information should be available to quantitatively compare any potential costs and benefits of other presently proposed fishery reserves
- Important that we understand the connections between the watershed and reef
- Need research area to understand how and why fish are connected to live bottom and how fishing may affect these relationships

- Research area that allows studies identifying the trophic connections between fish productivity and encrusting invertebrate populations in the absence of fishing pressure may allow us to better manage the entire resource in areas where fishing is allowed
- Resource management is only as good as the science on which it is based; many gaps in science that need to be filled
- Strong case to be made for research area; the general understanding of live bottom areas is very limited
- Many reef fish species are overfished and/or undergoing overfishing and traditional management methods are failing to address the problem. Marine Protected Areas where fishing is prohibited are becoming an important method for managing and protecting fisheries. Establishing this research area would help determine if this method would work in the South Atlantic Bight.
- Support the research area within Gray's Reef Sanctuary; we need to know all we can about this resource, especially how climate patterns may affect it.
- Support for establishment of a well-funded, autonomous research unit to track the impacts of human activity in the area of Gray's Reef
- Pressure on resources is increasing over time along with population increases therefore we need baseline data
- Establishment of a no-take reserve for research would immediately provide much needed information to assist management agencies in establishing long-term fishing goals focused on sustainable fish resources
- Needed for a very long time to describe the ecology of natural reef assemblages and evaluate their ability to contribute positively to any nearby over-fished reef areas
- Research area would be beneficial if we identify which resources retain fish populations
- We need to be gathering as much information concerning our seas and the life within as quickly as possible
- First and foremost develop an in-depth understanding of how such ecosystems function from both the large perspectives of community/population interactions and bio-feedback mechanisms to the smaller scales concerning natural history requirements on a species level
- Need to enhance our understanding of the connectivity that exists between the offshore, nearshore and inshore habitats and organisms within this latitude

### **Perceived Flaws in Research Area Concept**

- Fish moving in and out of any area is a problem
- Fish will go to a research area where there is no pressure and therefore the results of research would be biased
- By protecting area it's cheating because of course there will be more fish in there
- There is no such thing as natural area without impacts
- Being heavily fished is the "natural state" of Gray's Reef and a closed area would be invalid for study because it is unnatural

- Believe proposed research area is too small to be of scientific value
- There are negative impacts from fishing and research
- A research area cannot give you all the answers
- Not convinced scientific data will lead to conservation

### **Socioeconomics**

- Fuel costs impact fishing effort
- Economic impacts to fishermen are too high as compared to the potential benefits of information gathered in the research area
- Information from a research area not worth the cost of establishing, managing and enforcing a research area
- Request that we estimate a value of having a research area so it can be evaluated against the cost to fishermen
- Concern about socioeconomic impacts of research area in current economic environment
- People will decide not to fish anymore; regulations are too confusing, expensive and exclusionary

### **Specific Alternatives**

- Prefer Scenario #6 (Southern Expansion)
- Scenario #6 is a good compromise alternative, least intrusive
- Scenario #6 gives a clear separation between public and research areas
- Research area in more densely used areas would be harder for fishermen to abide
- Everyone including recreational anglers will gain by adoption of scenario #1 which optimizes the scientific value of the research area
- Southern Expansion (#6) option is clearly the best from a research perspective.
- Prefer Scenario #2 (minimum fishing displacement)
- Compromise option (#3) is second preference and could be morphed slightly to align with sanctuary boundaries to ease marking, etc.
- Option #3 (compromise option) presents best balance of habitat diversity needed and minimization of user impacts.
- Prefer a “do nothing” alternative
- Hope site picked for closure will best represent all interests (fishermen, divers, researchers, boaters); believe that is #6

### **Support Research Area Concept**

- Research Area Working Group (RAWG) has thoroughly evaluated options available for the creation of a research area
- NOAA GRNMS should establish a designated research area within Gray's Reef National Marine Sanctuary
- Keep this ecologically important area pristine for research

- Support need for a research area at Gray's Reef due to human use/development activities threatening its health
- Support because South Atlantic Bight does not contain area for research area; no area free from fishing; this designation in GRNMS would provide a needed location
- Questions cannot be answered without the exclusion of fishing pressure of any kind
- There can be no signature of fishing pressure if we are to achieve our goals with this area
- Must create a control area which limits human impact to the greatest degree possible; speaks to closing whatever research area is selected to all fishing activities
- Designate an area in GRNMS restricted from both commercial and recreational fishing efforts by any and all types of gears and that is devoted to research of natural (unfished) fish and invertebrate assemblages
- A no-take research area in GRNMS would advance the primary purpose and the goals of the National Marine Sanctuary Act by providing urgently needed natural laboratories or “control areas” in which to study the marine environment and the effects of our activities on species and habitats, and thereby better preserve, our marine sanctuary resources
- Support research area because to manage the sanctuary properly, must first understand the processes that are critical to its function
- Support because failure to understand the impact of fishing and other human influences could undermine the entire system upon which the fisheries depend
- Good research now is key to a future of robust fishing at Gray’s Reef
- Value recreational fisherman will receive from this action will far exceed the sacrifice that is made
- Support because scientific studies have a direct bearing on fish productivity and the sustainable management of recreational fisheries
- Gray’s Reef is the logical choice for this research area due to the existence of a history of research and data collection, which would enhance and inform future research
- Believe this research is imperative to preserve the area's natural qualities
- Proposed action represents proactive efforts to prevent things from “getting worse”
- Offshore reef fish assemblage is a common property resource and fishers must be managed to ensure that both the reef fish species and the community diversity are available for future generations
- Recognize the value of a research area to resources beyond fish
- A very small area would provide answer to a huge area; it has a large effect on a large area
- A study of our marine habitat is a vital part of continued efforts to insure that future generations will be able to enjoy our marine resources



- Georgia offshore fisherman would love to see additional research at Gray's; been bottom fishing off Georgia for many years and have seen dramatic changes, especially in the red snapper populations
- Support RA so research can continue at Gray's
- Gray's Reef is important for our work; possibilities for collaboration are many
- Without the data provided by such an area current and future policies dealing with reduced fish populations are meaningless
- Establishing a research area at GRNMS will serve to: deepen our understanding of the complexity of ocean life and our impacts on that life; increase and sustain regionally dwindling fish populations; restore the health of our ocean ecosystems; and, ensure that our use of economically valuable marine resources is sustainable over the long term
- Consider the proper management, maintenance, health and conservation of the Sanctuary's living resources of supreme importance to the quality of life expected from us by future generations
- Initiative involving the research area concept has been conducted in an equitable and conscientious fashion as your program addresses issues associated with proper resource management while simultaneously assuring a minimum of impacts upon Grays Reef's user communities of divers and sport fishermen

### **Terms of Closure**

- Trolling should not be banned because there are no trolling impacts on the bottom
- Trolling does not result in much lost gear on bottom
- Potential closure needs to be considered in the context of other management measures
- Not opposed to idea of research area, total closure is the objection
- Guiding concern should be for optimizing research capability rather than providing fishing opportunities
- Prefer smaller area for closure with buoys to mark it.
- Suggest seasonal closure
- Make scientific research your top priority when choosing the size and location of the research area
- Close only to bottom fishing or fishing for demersal species
- Allow trolling for pelagic species with dead and artificial baits
- Site to minimize impact on recreational fishing yet still allow credible research
- Allow navigation in and through the area
- Implement only after a clear research plan and goals have been communicated to the interested public
- The closed portion needs to be an area that is deemed valuable for research and can be enforced
- Commitment should be made to provide to the interested public an annual report on the research achievements versus the goals
- Commitment should be made to review annually and report to the interested public on whether the size of the designated research area is absolutely necessary to further the research goals and options to minimize the size of the closed area

once goals are met or if it is determined the designated research area is no longer needed

- Commitment should be made to critically review the research plan and goals at least every five years and to report to the interested public the results of the review including any changes in the research plan and goals
- Establish bottom fishing ban for a maximum period of ten years; subsequent extensions of the fishing ban would occur after a public process similar to that employed in the initial evaluation and creation of the research area
- Closure should be for a specified period of time; recommend 5 years; after that, the project would be examined and a decision made as to whether or not the research area should be redesignated for some period of time
- Support bottom fishing prohibition in area, which may include limitations on the use of downriggers.
- Research area should be as small as possible and should be selected so that it has the minimum impact possible on recreational fishing but still meets the research criteria
- Consider allowing tournament fishing for king mackerel
- The first step in addressing the issues is to adopt a proactive, precautionary management regime founded on ecosystem planning and marine zoning
- “As a saltwater recreational angler, I support the position taken by CCA GA as outlined in the Position Statement concerning the proposed MRA within the Gray's Reef National Marine Sanctuary.” – (80 comments email, letter and fax; CCAGA position points included throughout above comments)

### **Organizations Commenting:**

- Marine Conservation Biology Institute (MCBI)
- Coastal Conservation Association of Georgia (CCAGA)
- Ocean Conservancy
- Sierra Club and Clean Coast (joint comment)
- The Georgia Conservancy
- Ossabaw Island Education Alliance (Board of Regents/University System of GA, GADNR, Ossabaw Island Foundation)
- The Nature Conservancy
- Southern Kingfish Association