



ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

STEPHEN W. MURPHEY
Director

March 1, 2019

Gregg Waugh
Executive Director
South Atlantic Fisheries Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Dear Gregg,

North Carolina has one of the most extensive artificial reef programs in the country consisting of 68 estuarine, nearshore and ocean reefs, and sanctuaries. Of these, the North Carolina Artificial Reef Program maintains 30 artificial reef sites in the Exclusive Economic Zone (EEZ) off the coast of North Carolina. Nearshore and ocean reef sites are located from one-half mile to 38 miles from shore and are situated so they can be reached from every maintained inlet in the state. This proximity creates an opportunity for high exploitation of the fishery resources aggregated by these reefs.

The first Fishery Management Plan for Snapper and Grouper in the South Atlantic recognized the potential negative impacts on the relative abundance of fish by “exceptional gears” in and around these sites. The plan established a mechanism by which states could request special management zones with specific gear restriction around their artificial reefs in the EEZ to mitigate the negative affects highly efficient gears could have on the aggregated resource. Gears that could be considered exceptional commonly used in the EEZ off of North Carolina include black seabass pots, sink nets, and bandit gear. The catch per unit effort of these gears are high and have the potential to remove large amounts of aggregated snapper and grouper species from these sites, disproportionately affecting access to other anglers.

To ensure equitable access to the fishery resource around these reefs to all user groups, the North Carolina Division of Marine Fisheries requests that the South Atlantic Fishery Management council designate 30 artificial reefs within the EEZ off of North Carolina as Special Management Zones. Gear restrictions in the zones should include the prohibition of fishing with any gear other than handline, rod and reel, and spearfishing gear. Additionally, the Division requests that the harvest and possession of snapper and grouper with spearfishing gear be limited to the recreational bag limits for those species.

The Division believes designating artificial reefs as Special Management Zones with the preceding restrictions will increase opportunities for anglers by reducing the potential impact restricted gears can have on the relative abundance of snapper and grouper species. By limiting allowable gears to handline, rod and reel, and spearfishing gear, fishery removals will be moderated and allow for greater access by anglers if increasing effort occurs. Additionally, limiting spearfishing gear to the lower recreational limits of snapper grouper species may mitigate some of the biological concerns for the resource that arise when species with complex and social life histories are selectively harvested. Numerous snapper and grouper species have reproductive strategies that include complex social structures predicated on large individuals

controlling reproduction by out competing others for spawning and maintaining harems. If numerous large individuals within a group are removed, it may take considerable time for the social group to restructure affecting reproductive success. Spearfishing gear has the potential to selectively remove large individuals from a reef and by limiting removals to the recreational limits lessens the chance that the complex community structure on the site is affected.

A restriction on gear types may also benefit certain species listed and protected under the Endangered Species Act of 1973 (ESA). As part of the federal permitting process for reef construction, The National Oceanic and Atmospheric Administration Protected Resources Division (NOAA PRD) provides consultation on potential impacts to ESA listed species in North Carolina. NOAA PRD has raised derelict fishing gear as a point of particular concern for many species, highlighting the possibility of entanglement or entrapment. In recent consultations, the Division has been asked to detail its plans for mitigating these impacts presented by artificial reefs. By limiting allowable gears at artificial reef sites, dereliction of gear may become less likely and less frequent, therefore minimizing possible impacts to ESA listed species. The proposed restrictions support the Division's mission of reef enhancement for the benefit of many target species, including snapper and grouper.

Thank you for consideration of this request. To facilitate moving forward with review and expected regulatory amendment development, attached are corner coordinates and artificial reef site names for thirty artificial reefs located in the EEZ off of North Carolina. The Division would also request that during the review and development of Council actions that there be three public hearings in North Carolina to receive input on the proposed designation. Please do not hesitate to contact the Division should you need additional information or clarification.

We look forward to assisting in the fulfilment of this request.

Sincerely,



Stephen W. Murphey, Director

SM/sp/jp

Appendix

Table A1. Artificial reef sites in the EEZ off of the coast of North Carolina. Reef sites are the area within the boundary delineated by the corresponding four corner coordinates.

Artificial Reef Site Name	North-West corner		North-East corner		South-East corner		South-West corner	
	Lat.	Long.	Lat.	Long.	Lat.	Long.	Lat.	Long.
AR-130	36°0'N	75°32.09'W	36°0.43'N	75°31.49'W	35°59.94'N	75°31.51'W	35°59.95'N	75°32.11'W
AR-140	35°57'N	75°32.07'W	35°56.98'N	75°31.47'W	35°56.48'N	75°31.49'W	35°56.5'N	75°32.1'W
AR-145	35°54.27'N	75°24.18'W	35°54.26'N	75°23.57'W	35°53.76'N	75°23.59'W	35°53.78'N	75°24.2'W
AR-220	35°8.63'N	75°41.21'W	35°8.6'N	75°40.01'W	35°7.61'N	75°40.05'W	35°7.64'N	75°41.26'W
AR-225	35°7.02'N	75°39.61'W	35°7.01'N	75°39.01'W	35°6.51'N	75°39.03'W	35°6.53'N	75°39.63'W
AR-230	35°6.39'N	75°43.22'W	35°6.37'N	75°42.62'W	35°5.88'N	75°42.64'W	35°5.89'N	75°43.24'W
AR-250	34°57.15'N	75°55.15'W	34°57.14'N	75°54.55'W	34°56.65'N	75°54.57'W	34°56.66'N	75°55.17'W
AR-255	34°55.74'N	75°58.2'W	34°55.72'N	75°57.6'W	34°55.23'N	75°57.62'W	34°55.24'N	75°58.22'W
AR-285	34°33.64'N	76°26.64'W	34°33.62'N	76°26.04'W	34°33.13'N	76°26.06'W	34°33.14'N	76°26.66'W
AR-300	34°18.77'N	76°24.42'W	34°18.76'N	76°23.83'W	34°18.26'N	76°23.84'W	34°18.28'N	76°24.44'W
AR-302	34°10.52'N	76°13.99'W	34°10.51'N	76°13.4'W	34°10.01'N	76°13.41'W	34°10.02'N	76°14.01'W
AR-305	34°16.94'N	76°38.94'W	34°16.92'N	76°38.35'W	34°16.43'N	76°38.36'W	34°16.44'N	76°38.96'W
AR-330	34°34.14'N	76°51.85'W	34°34.12'N	76°50.66'W	34°33.13'N	76°50.68'W	34°33.15'N	76°51.88'W
AR-340	34°34.57'N	76°58.64'W	34°34.56'N	76°58.04'W	34°34.07'N	76°58.05'W	34°34.08'N	76°58.65'W
AR-345	34°32.55'N	76°58.76'W	34°32.54'N	76°58.16'W	34°32.05'N	76°58.17'W	34°32.06'N	76°58.77'W
AR-355	34°21.43'N	77°20.29'W	34°21.43'N	77°19.7'W	34°20.93'N	77°19.71'W	34°20.94'N	77°20.3'W
AR-362	34°15.97'N	77°30.71'W	34°15.96'N	77°30.12'W	34°15.47'N	77°30.13'W	34°15.47'N	77°30.72'W
AR-366	34°13.2'N	77°25.54'W	34°13.19'N	77°24.95'W	34°12.7'N	77°24.96'W	34°12.71'N	77°25.55'W
AR-368	34°9.82'N	77°26.13'W	34°9.81'N	77°25.53'W	34°9.32'N	77°25.54'W	34°9.32'N	77°26.13'W
AR-372	34°6.52'N	77°45.21'W	34°6.52'N	77°44.61'W	34°6.02'N	77°44.62'W	34°6.03'N	77°45.21'W
AR-376	34°3.53'N	77°39.93'W	34°3.53'N	77°39.33'W	34°3.03'N	77°39.34'W	34°3.04'N	77°39.93'W
AR-382	33°58.83'N	77°41.46'W	33°58.82'N	77°40.87'W	33°58.33'N	77°40.88'W	33°58.34'N	77°41.47'W
AR-386	33°57.77'N	77°33.69'W	33°57.76'N	77°33.1'W	33°57.27'N	77°33.11'W	33°57.27'N	77°33.7'W
AR-400	33°29.55'N	77°35.55'W	33°29.55'N	77°34.96'W	33°29.05'N	77°34.97'W	33°29.06'N	77°35.56'W
AR-420	33°51.3'N	78°7'W	33°51.3'N	78°6.41'W	33°50.8'N	78°6.42'W	33°50.8'N	78°7.01'W
AR-440	33°50.05'N	78°13.38'W	33°50.05'N	78°12.78'W	33°49.55'N	78°12.79'W	33°49.55'N	78°13.38'W
AR-445	33°45.03'N	78°14.39'W	33°45.03'N	78°13.8'W	33°44.53'N	78°13.81'W	33°44.54'N	78°14.4'W
AR-455	33°47.28'N	78°18.18'W	33°47.28'N	78°17.58'W	33°46.78'N	78°17.59'W	33°46.79'N	78°18.18'W
AR-460	33°50.34'N	78°22.32'W	33°50.33'N	78°21.72'W	33°49.84'N	78°21.73'W	33°49.84'N	78°22.32'W
AR-465	33°23.67'N	78°11.34'W	33°23.67'N	78°10.75'W	33°23.17'N	78°10.76'W	33°23.18'N	78°11.35'W