Summary of Public Hearing Comments on Snapper Grouper Amendment 29 (ABCs for ORCS and Gray Triggerfish Management Measures)

- 8 written comments (as of Feb 6, 2014).

ABC Control Rule changes and ABCs for ORCS:

- General support for proposed update to the ABC Control Rule and application of the ORCS methodology.
- Request for Council to delay action on Am29 until the SSC has had another opportunity to review the proposed application of the Only Reliable Catch Stocks (ORCS) approach for specifying allowable biological catch (ABC) in the ABC control rule.
- Am29 would result in ABCs that are 20-80% above the highest reported landings for each species.
- Some commenters expressed concern that the ORCS approach seems overly risky.
- Concern that the approach has a high probability of allowing severe overfishing and do not reflect the best scientific information and methods available for the management of data-limited stocks.
- Council should abandon the proposed changes contained in Action 1 of Amendment 29 and work in coordination with NMFS, the States, and other partners on a comprehensive and systematic process for applying the best assessment and ACL-setting methods available.
- Concern over ACLs increasing for all but two of the species when the majority of the ACLs being adjusted "have never been met."
- Concern that the "selected interpretation of the ORCS methodology deviates from the version developed by the original ORCS working group and as such does not adequately protect the majority of unassessed snapper grouper species from overfishing and would likely lead to biomass reductions and overfished statuses for those species."

Gray Triggerfish:

- Most commenter supported a 12-inch minimum size limit off the South Atlantic states. However, there were concerns about the increase in regulatory discards.
- There was some support for increasing the minimum size limit to 14 inches off east Florida and implementing off the rest of the SA states.
- Support for removing size limits.
- Should have included an alternative to implement a 12" Total Length (10.5" Fork Length) size limit in Federal waters of the South Atlantic.
- One comment in support for Alternative 1 (No Action) on the size limit change.
- One commenter was of the opinion that there are not enough data to justify making changes to the gray triggerfish ACL at this time.

- Most commenters supported a commercial split season using equal allocation of the ACL for each half of the year.
- Most commenters expressed support for commercial trip limits but some thought the Council should consider more alternatives for the step-down trip limits (i.e., 50-150 pounds).
- Most support for a commercial trip limit of 1,000 pounds. Some support for a 500-pound trip limit.
- Suggestion for a 1,000-pounds trip limit until 75% of the ACL is met at which time the trip limit would be reduced to 500 pounds.
- Consider eliminating the circle hook requirement.
- Consider a bag limit for species that are often caught together in order to minimize discards.