

Amendment 29 to the Fishery
Management Plan for the Snapper
Grouper Fishery of the South Atlantic
Region

DECISION DOCUMENT

Update to the ABC Control Rule, ABC Adjustments to
Unassessed Species, and Management Measures for
Gray Triggerfish

JUNE 2014

Purpose and Need

The purpose of the actions is to: update the South Atlantic Fishery Management Council's (South Atlantic Council) acceptable biological catch (ABC) control rule ~~to incorporate methodology for determining the ABC of "Only Reliable Catch Species" (ORCS)~~ based on recommendations from the Scientific and Statistical Committee (SSC); adjust ABCs for the affected species; revise the ACLs for affected species; and ~~establish~~ revise management measures for gray triggerfish in federal waters of the South Atlantic region.

The need for action is to: specify ABCs, ACLs, and ACTs for snapper grouper species based on the best available scientific information, lengthen the commercial season for gray triggerfish to diminish and/or prevent derby conditions, and ensure that overfishing does not occur pending a new assessment of the gray triggerfish stock in the South Atlantic region.

Rationale: It was suggested that making reference to a specific approach (ORCS) in the Purpose statement was too limiting from a NEPA perspective. Broadening the statement as presented above would address this concern. The Council added an action to the amendment in March 2014 to establish ACLs, hence a statement to that effect should be included in the Purpose. It was also noted that management measures for gray triggerfish have been established and are in place now. What the Council wants to do is revise those measures.

COMMITTEE ACTION: APPROVE RECOMMENDED EDITS TO PURPOSE & NEED

Proposed Actions and Alternatives

Action 1. Update the South Atlantic Council’s Acceptable Biological Catch (ABC) Control Rule

Alternative 1 (No Action). Utilize the South Atlantic Council’s ABC control rule as adopted in the Comprehensive Annual Catch Limit (ACL) Amendment to specify ABCs for snapper grouper species.

Table 2.1.1. ABC control rule currently in place. Parenthetical values indicate (1) the maximum adjustment value for a dimension; and (2) the adjustment values for each tier within a dimension.

Level 1 – Assessed Stocks	
Tier	Tier Classification and Methodology to Compute ABC
1. Assessment Information (10%)	<ol style="list-style-type: none"> 1. Quantitative assessment provides estimates of exploitation and biomass; includes MSY-derived benchmarks. (0%) 2. Reliable measures of exploitation or biomass; no MSY benchmarks, proxy reference points. (2.5%) 3. Relative measures of exploitation or biomass, absolute measures of status unavailable. Proxy reference points. (5%) 4. Reliable catch history. (7.5%) 5. Scarce or unreliable catch records. (10%)
2. Uncertainty Characterization (10%)	<ol style="list-style-type: none"> 1. Complete. Key Determinant – uncertainty in both assessment inputs and environmental conditions are included. (0%) 2. High. Key Determinant – reflects more than just uncertainty in future recruitment. (2.5%) 3. Medium. Uncertainties are addressed via statistical techniques and sensitivities, but full uncertainty is not carried forward in projections. (5%) 4. Low. Distributions of F_{MSY} and MSY are lacking. (7.5%) 5. None. Only single point estimates; no sensitivities or uncertainty evaluations. (10%)
3. Stock Status (10%)	<ol style="list-style-type: none"> 1. Neither overfished nor overfishing. Stock is at high biomass and low exploitation relative to benchmark values. (0%) 2. Neither overfished nor overfishing. Stock may be in close proximity to benchmark values. (2.5%) 3. Stock is either overfished or overfishing. (5%) 4. Stock is both overfished and overfishing. (7.5%) 5. Either status criterion is unknown. (10%)
4. Productivity and Susceptibility	<ol style="list-style-type: none"> 1. Low risk. High productivity, low vulnerability, low susceptibility. (0%)

<p>– <i>Risk Analysis</i> (10%)</p>	<p>2. Medium risk. Moderate productivity, moderate vulnerability, moderate susceptibility. (5%)</p> <p>3. High risk. Low productivity, high vulnerability, high susceptibility. (10%)</p>
<p>Level 2 - Unassessed Stocks. Reliable landings and life history information available</p>	
<p>OFL derived from "Depletion-Based Stock Reduction Analysis" (DBSRA). ABC derived from applying the assessed stocks rule to determine adjustment factor if possible, or from expert judgment if not possible.</p>	
<p>Level 3 - Unassessed Stocks. Inadequate data to support DBSRA</p>	
<p>ABC derived directly, from "Depletion-Corrected Average Catch" (DCAC). Done when only a limited number of years of catch data for a fishery are available. Requires a higher level of "informed expert judgment" than Level 2.</p>	
<p>Level 4 - Unassessed Stocks. Inadequate data to support DCAC or DBSRA</p>	
<p>OFL and ABC derived on a case-by-case basis. ORCS ad hoc group is currently working on what to do when not enough data exist to perform DCAC.</p> <p>1. Will catch affect stock? NO: Ecosystem Species (Council largely done this already, ACL amend) YES: GO to 2</p> <p>2. Will increase (beyond current range of variability) in catch lead to decline or stock concerns? NO: ABC = 3rd highest point in the 1999-2008 time series. YES: Go to 3</p> <p>3. Is stock part of directed fishery or is it primarily bycatch for other species? Directed: ABC = Median 1999-2008 Bycatch/Incidental: If yes. Go to 4.</p> <p>4. Bycatch. Must judge the circumstance: If bycatch in other fishery: what are trends in that fishery? what are the regulations? what is the effort outlook?</p> <p>If the directed fishery is increasing and bycatch of stock of concern is also increasing, the Council may need to find a means to reduce interactions or mortality. If that is not feasible, will need to impact the directed fishery. The SSC's intention is to evaluate the situation and provide guidance to the Council on possible catch levels, risk, and actions to consider for bycatch and directed components.</p>	

Preferred Alternative 2. Adopt the SSC’s recommended approach to determine ABC values for Only Reliable Catch Stocks (ORCS). This approach will become Level 4 of the ABC control rule and the existing Level 4 will be renumbered as Level 5.

Table 2.1.2. ABC control rule proposed under Preferred Alternative 2. Parenthetical values indicate (1) the maximum adjustment value for a dimension; and (2) the adjustment values for each tier within a dimension.

Level 1 – Assessed Stocks	
Tier	Tier Classification and Methodology to Compute ABC
<i>1. Assessment Information (10%)</i>	<ol style="list-style-type: none"> 1. Quantitative assessment provides estimates of exploitation and biomass; includes MSY-derived benchmarks. (0%) 2. Reliable measures of exploitation or biomass, no MSY benchmarks, proxy reference points. (2.5%) 3. Relative measures of exploitation or biomass, absolute measures of status unavailable. Proxy reference points. (5%) 4. Reliable catch history. (7.5%) 5. Scarce or unreliable catch records. (10%)
<i>2. Uncertainty Characterization (10%)</i>	<ol style="list-style-type: none"> 1. Complete. Key determinant – uncertainty in both assessment inputs and environmental conditions are included. (0%) 2. High. Key determinant – reflects more than just uncertainty in future recruitment. (2.5%) 3. Medium. Uncertainties are addressed via statistical techniques and sensitivities, but full uncertainty is not carried forward in projections. (5%) 4. Low. Distributions of F_{MSY} and MSY are lacking. (7.5%) 5. None. Only single point estimates; no sensitivities or uncertainty evaluations. (10%)
<i>3. Stock Status (10%)</i>	<ol style="list-style-type: none"> 1. Neither overfished nor overfishing. Stock is at high biomass and low exploitation relative to benchmark values. (0%) 2. Neither overfished nor overfishing. Stock may be in close proximity to benchmark values. (2.5%) 3. Stock is either overfished or overfishing. (5%) 4. Stock is both overfished and overfishing. (7.5%) 5. Either status criterion is unknown. (10%)
<i>4. Productivity and Susceptibility Analysis (10%)</i>	<ol style="list-style-type: none"> 1. Low risk. High productivity, low vulnerability, low susceptibility. (0%) 2. Medium risk. Moderate productivity, moderate vulnerability, moderate susceptibility. (5%) 3. High risk. Low productivity, high vulnerability, high susceptibility. (10%)
Level 2 – Unassessed Stocks. Reliable landings and life history information available	
OFL derived from “Depletion-Based Stock Reduction Analysis” (DBSRA). ABC derived from applying the assessed stocks rule to determine the adjustment factor if possible, or from expert judgment if not possible.	
Level 3 – Unassessed Stocks. Inadequate data to support DBSRA	
ABC derived directly from “Depletion-Corrected Average Catch” (DCAC). Done when only a limited number of years of catch data for a fishery are available. Requires a higher level of “informed expert judgment” than Level 2.	
Level 4 – Unassessed Stocks. Only Reliable Catch Stocks.	
OFL and ABC derived on a case-by-case basis. Apply ORCS approach using a catch statistic, a scalar derived from the risk of overexploitation, and the Council’s risk tolerance level.	
Level 5 – Unassessed Stocks. No reliable catch.	

OFL and ABC derived on a case-by-case basis. Stocks with very low landings that show very high variability in catch estimates (mostly caused by the high degree of uncertainty in recreational landings estimates), or stocks that have species identification issues that may cause unreliable landings estimates. Use “decision tree”:

1. Will catch affect stock?
NO: Ecosystem Species (Council done this already, ACL Amend)
YES: Go to 2
2. Will increase (beyond current range of variability) in catch lead to decline or stock concerns?
NO: ABC = 3rd highest point in the 1999-2008 time series
YES: Go to 3
3. Is stock part of directed fishery or is it primarily bycatch for other species?
Directed: ABC = Median 1999-2008
Bycatch/Incidental: If yes, go to 4.
4. Bycatch. Must judge the circumstance:
If bycatch in other fishery: what are trends in that fishery? What are the regulations? What is the effort outlook?

If the directed fishery is increasing and bycatch of stock of concern is also increasing, the Council may need to find a means to reduce interactions or mortality. If that is not feasible, will need to impact the directed fishery. The SSC’s intention is to evaluate the situation and provide guidance to the Council on possible catch levels, risk, and actions to consider for bycatch and directed components.

Two Alternatives Considered

Section 1502.14(a) of the National Environmental Policy Act (NEPA) states that “agencies shall: rigorously explore and objectively evaluate all reasonable alternatives...” Two reasonable alternatives for this action, including the no action alternative, have been identified by NMFS and the South Atlantic Fishery Management Council (South Atlantic Council). The Magnuson-Stevens Fishery Conservation and Management Act national standard 1 guidelines, at 50 C.F.R. section 600.305, states that for stocks and stock complexes required to have an ABC, each Council must establish an ABC control rule based on scientific advice from its Scientific and Statistical Committee (SSC). The ABC control identified in **Alternative 1 (No Action)** was developed by the South Atlantic Council’s SSC and approved by the Council and implemented through the Comprehensive ACL Amendment (SAFMC 2011c). **Preferred Alternative 2** represents updates to the ABC control rule developed and recommended by the South Atlantic Council’s SSC. The SSC has provided no other options, modifications or recommendations to the ABC control rule for the South Atlantic Council’s consideration. Therefore, the South Atlantic Council and NMFS have determined it is not reasonable to include additional alternatives for modifications to the ABC control rule.

A Summary of the Effects of the Alternatives

Updating the ABC control rule, as proposed in **Preferred Alternative 2**, would not have any direct biological effects. This change would, however, indirectly benefit the biological environment since an approved scientific methodology would be adopted to establish ABCs for snapper grouper species that have not been assessed but for which there are reliable catch statistics. **Alternative 1 (No Action)** and **Preferred Alternative 2** would have no added beneficial or adverse economic impacts because **Action 1** is an administrative action; however, **Preferred Alternative 2** allows for subsequent action (**Actions 2 and 3**) to select ABC and associated ACLs that could have beneficial and/or adverse economic impacts beyond the status quo. Because the ABCs for the species that have been designated as ORCS would not be adjusted to reflect the new SSC method to specify the ABC for these stocks, including information from fishermen and scientific experts, **Alternative 1 (No Action)** would not result in any social benefits. On the other hand, the proposed ABC control rule under **Preferred Alternative 2** could help to increase some ABCs and associated ACLs, which would be more beneficial to the commercial and for-hire fleets, recreational fishermen, fishing businesses and communities than maintaining the current ABC control rule under **Alternative 1 (No Action)**. The administrative impacts of **Preferred Alternative 2** would be minimal, and not differ much when compared with **Alternative 1 (No Action)**. Administrative burdens may result from revising the ACL values (**Actions 2 and 3**) in the form of development and dissemination of outreach and educational materials for fishery participants and law enforcement.

Action 2. Apply the Revised ABC control rule to select unassessed snapper grouper species

Alternative 1 (No Action). ABCs for select unassessed snapper grouper species are based on the current ABC Control Rule.

Preferred Alternative 2. Assign a risk tolerance scalar to stocks deemed by the SSC to be under low risk of overexploitation (scalar = 2):

Sub-alternative 2a. Apply a risk tolerance scalar of 0.75

Stock	Catch Statistic (Highest landings 1999-2007)	Risk of Overexploitation Scalar	Risk Tolerance Scalar	New ABC (lb ww)	Current ABC (lb ww)	Difference in ABC
Bar Jack	34,583	2	0.75	51,875	24,780	+27,095

Preferred Sub-alternative 2b. Apply a risk tolerance scalar of 0.90

Stock	Catch Statistic (Highest landings 1999-2007)	Risk of Overexploitation Scalar	Risk Tolerance Scalar	New ABC (lb ww)	Current ABC (lb ww)	Difference in ABC
Bar Jack	34,583	2	0.90	62,249	24,780	+37,469

Preferred Alternative 3. Assign a risk tolerance scalar to stocks deemed by the SSC to be under moderate risk of overexploitation (scalar = 1.5):

Sub-alternative 3a. Apply a risk tolerance scalar of 0.75

Stock	Catch Statistic (Highest landings 1999-2007)	Risk of Overexploitation Scalar	Risk Tolerance Scalar	New ABC (lb ww)	Current ABC (lb ww)	Difference in ABC
Margate	63,993	1.5	0.75	71,992	29,889	+42,103
Red Hind	27,570	1.5	0.75	31,016	24,867	+6,149
Cubera Snapper	52,721	1.5	0.75	59,311	24,680	+34,631
Yellowedge Grouper	46,330	1.5	0.75	52,121	30,221	+21,900
Silk Snapper	75,269	1.5	0.75	84,678	25,104	+59,574
Atlantic Spadefish	677,065	1.5	0.75	761,698	189,460	+572,238
Gray Snapper	1,039,277	1.5	0.75	1,169,187	795,743	+373,444
Lane Snapper	169,572	1.5	0.75	190,769	119,984	+70,785

Preferred Sub-alternative 3b. Apply a risk tolerance scalar of 0.80

Stock	Catch Statistic (Highest landings 1999-2007)	Risk of Overexploitation Scalar	Risk Tolerance Scalar	New ABC (lb ww)	Current ABC (lb ww)	Difference in ABC
Margate	63,993	1.5	0.80	76,792	29,889	+46,903
Red Hind	27,570	1.5	0.80	33,084	24,867	+8,217
Cubera Snapper	52,721	1.5	0.80	63,265	24,680	+38,585
Yellowedge Grouper	46,330	1.5	0.80	55,596	30,221	+25,375
Silk Snapper	75,269	1.5	0.80	90,323	25,104	+65,219
Atlantic Spadefish	677,065	1.5	0.80	812,478	189,460	+623,018
Gray Snapper	1,039,277	1.5	0.80	1,247,132	795,743	+451,389
Lane Snapper	169,572	1.5	0.80	203,486	119,984	+83,502

Preferred Alternative 4. Assign a risk tolerance scalar to stocks deemed by the SSC to be under moderately high risk of overexploitation (scalar = 1.25):

Preferred Sub-alternative 4a. Apply a risk tolerance scalar of 0.70

Stock	Catch Statistic (Highest landings 1999-2007)	Risk of Overexploitation Scalar	Risk Tolerance Scalar	New ABC (lb ww)	Current ABC (lb ww)	Difference in ABC
Rock Hind	42,849	1.25	0.70	37,493	37,953	-460
Tomtate	105,909	1.25	0.70	92,670	80,056	+12,614
White Grunt	735,873	1.25	0.70	643,889	674,033	-30,144
Scamp	596,879	1.25	0.70	522,269	509,788	+12,481
Gray Triggerfish	819,428	1.25	0.70	717,000	626,518	+90,482

Sub-alternative 4b. Apply a risk tolerance scalar of 0.75

Stock	Catch Statistic (Highest landings 1999-2007)	Risk of Overexploitation Scalar	Risk Tolerance Scalar	New ABC (lb ww)	Current ABC (lb ww)	Difference of ABC
Rock Hind	42,849	1.25	0.75	40,171	37,953	+2,218
Tomtate	105,909	1.25	0.75	99,290	80,056	+19,234
White Grunt	735,873	1.25	0.75	689,881	674,033	+15,848
Scamp	596,879	1.25	0.75	559,574	509,788	+49,786
Gray Triggerfish	819,428	1.25	0.75	768,214	626,518	+141,696

Sub-alternative 4c. Apply a risk tolerance scalar of 0.50

Stock	Catch Statistic (Highest landings 1999-2007)	Risk of Overexploitation Scalar	Risk Tolerance Scalar	New ABC (lb ww)	Current ABC (lb ww)	Difference in ABC
Rock Hind	42,849	1.25	0.50	26,781	37,953	-11,172
Tomtate	105,909	1.25	0.50	66,193	80,056	-13,863
White Grunt	735,873	1.25	0.50	459,921	674,033	-214,112
Scamp	596,879	1.25	0.50	373,049	509,788	-136,739
Gray Triggerfish	819,428	1.25	0.50	512,143	626,518	-114,375

A Summary of the Effects of the Alternatives

An increase in harvest can have a negative biological impact on a species if harvest is not maintained at sustainable levels. However, all of the ABC sub-alternatives under this action were developed by the South Atlantic Council's SSC using the ORCS approach, and would not be expected to cause overfishing and result in negative biological impacts. There is uncertainty involved through the selection of the risk of overexploitation scalar (determined by the SSC) and the selection of the risk tolerance scalar (which would be selected by the South Atlantic Council under this action). If the South Atlantic Council selects the risk tolerance scalar to achieve the most conservative values of ABC, biological impacts would be minimized. However, while conservative ABCs may provide the greatest biological benefit to the species, higher ABCs would not be expected to negatively impact the stock as long as harvest is maintained at sustainable levels and overfishing does not occur. Furthermore, harvest for most species listed under the sub-alternatives is currently not constrained by the ACLs. Because the ACLs (commercial or recreational) for most of the species have not recently been met or exceeded, the increases in the ABC under **Sub-alternatives 2a, Preferred 2b, 3a, Preferred 3b, 3c, Preferred 4a, and 4b** are not expected to affect commercial and recreational fishermen harvesting these species. The lower ABCs expected under **Sub-alternative 4c** could impact some fisheries if harvest increases in the future.

Because the ACLs (commercial or recreational) for most of the species have not recently been met or exceeded, the increases expected by the proposed ABCs under **Sub-alternatives 2a, Preferred 2b, 3a, Preferred 3b, 3c, Preferred 4a, and 4b** are not expected to affect commercial and recreational fishermen harvesting these species. The lower ACLs expected from lower ABCs under **Sub-alternative 4c** could impact some of the stocks if harvest increases in the future. The decrease in ABC for white grunt under **Preferred Sub-alternative 4a** could limit fishing opportunities for this species, particularly for recreational anglers in south Florida and the Florida Keys, where the species is a popular, easy-to-target recreational species.

ABC alternatives selected in this action would result in modification of ACLs in **Action 3**. Alternatives in either **Action 2** or **Action 3** that allow for an increase in harvest could slightly reduce administrative burdens because the likelihood of triggering accountability measures (AMs) would be reduced. Conversely, alternatives in either **Action 2** or **Action 3** that result in a decrease in allowable harvest could increase the administrative burden because it would be more likely that AMs would be triggered and action would be needed to ensure overfishing did not occur. Administrative burdens resulting from revising the values under **Alternative 2, Alternative 3, Alternative 4, and associated sub-alternatives** would take the form of development and dissemination of outreach and educational materials for fishery participants and law enforcement.

ACLs and recreational annual catch targets (ACTs) resulting from proposed changes in ABCs under **Alternatives 2-4** are provided in **Action 3**. Some species in **Action 2** are

contained within a complex and do not have sector ACLs or recreational ACTs at the species level.

SSC comments:

One SSC member expressed the following concerns regarding the ORCS approach:

- Scalars are being applied inappropriately because they leave no buffer for uncertainty.
- Selecting the maximum catch as the catch statistic and scalars greater than 1 contradicts the idea that lower levels in the control rule have higher uncertainty. It's almost a negative buffer.
- The SAFMC is the only one using maximum catch values to determine ABCs for ORCS. Other regions/councils are using means or medians.
- Current ORCS approach may be allowing fisheries to expand. This seems counter-intuitive for data-poor stocks.
- There's been a recent evolution of data-poor approaches. Evaluation of these approaches that has caused some to reconsider current ones.
- We've had a chance to see how the ORCS approach has been applied in different regions.

Originally, the SSC reasoned that selecting maximum catch as their catch statistic in the ORCS approach was Ok because ABC is, after all, a cap not a target.

One SSC member expressed concern about the ABC for gray triggerfish increasing substantially through application of the ORCS approach.

SSC wants to do a more "programmatic" revision to the proposed ABCs under the ORCS approach.

SSC still considers the current ORCS approach as "Best Available Science" but cautions that they will be revisiting the approach in October 2014.

SSC is OK with the Council moving forward with Am 29 noting that there is a minority opinion on the use of the ORCS approach.

2.3 Action 3. Establish ACLs for select unassessed snapper grouper species

Alternative 1 (No Action). $ACL=OY=Current\ ABC$

Alternative 2. $ACL=OY=Proposed\ ABC$

Alternative 3. $ACL=OY=0.95*Proposed\ ABC$

Alternative 4. $ACL=OY=0.90*Proposed\ ABC$

Alternative 5. $ACL=OY=0.80*Proposed\ ABC$

Table 2.3.1 describes proposed ACLs based on the preferred alternatives in Action 2 (**Preferred alternative 2, Preferred Sub-alternative 2b, Preferred alternative 3, Preferred Sub-alternative 3b, Preferred alternative 4, Preferred Sub-alternative 4a**).

For an analysis of proposed ACLs based on **all** proposed alternatives in Action 2 see **Tables 4.3.1-4.3.9** in Chapter 4 of the amendment document.

COMMITTEE ACTION: APPROVE SUGGESTED EDITS TO ALTERNATIVES 2-5.

One issue pointed out by an IPT member is that an emergency rule is currently in place that temporarily removed blueline tilefish from the deepwater complex and temporarily specified ACLs for blueline tilefish and the deepwater complex without blueline tilefish. The temporary measures will be in place for 180 days (through October 14, 2014) and may be extended for 186 additional days. If Amendment 29 is approved, the regulations could be effective in fall and put a much larger ACL in place for the deepwater complex that is currently specified by the Emergency Rule.

The IPT member suggests the specification of the ACL for the deepwater complex in Action 3 be removed from Amendment 29. The change in the ABC for silk snapper in Action 2, which is the change that affects ACL for the deepwater complex could be retained. Amendment 32 addresses the ACLs for the deepwater complex and blueline tilefish. This amendment is scheduled to be approved by the Council in the fall. The change in the ABC for the complex from Action 2 can be incorporated in Amendment 32. This way there would be no conflict with the measures currently in place for the emergency rule and those proposed in Amendment 32.

Table 2.3.1. Proposed commercial and recreational ACLs and recreational ACTs based on alternatives in Action 3 and preferred alternatives in Action 2.

Species or Complex	Action 3, Alternative 1			Action 3, Alternative 2			Action 3, Alternative 3			Action 3, Alternative 4			Action 3, Alternative 5		
	ACL=OY=Current ABC			ACL=OY=Proposed ABC			ACL=OY=0.95*Prop ABC			ACL=OY=0.90*Prop ABC			ACL=OY=0.80*Prop ABC		
	Comm ACL	Rec ACL	Rec ACT	Comm ACL	Rec ACL	Rec ACT	Comm ACL	Rec ACL	Rec ACT	Comm ACL	Rec ACL	Rec ACT	Comm ACL	Rec ACL	Rec ACT
Deepwater Complex (a)	376,469	334,556	197,100	447,733	353,886	200,576	441,870	352,453	200,169	436,007	351,020	199,762	424,281	348,154	198,948
Snappers Complex (b)	215,662	728,577	624,197	344,884	1,172,832	984,898	327,655	1,114,367	935,742	310,426	1,055,902	199,762	275,969	938,971	938,971
Grunts Complex (c)	218,539	588,113	442,970	217,903	618,122	455,962	207,008	588,350	433,747	196,113	558,577	411,532	174,322	499,032	367,102
SWG Complex (d)	49,776	46,656	23,595	55,542	48,648	20,542	53,183	47,478	20,160	50,823	46,309	19,778	46,105	43,969	19,013
Bar Jack	5,265	19,515	9,758	13,228	49,021	11,912	12,567	46,570	11,912	11,905	44,119	11,317	10,582	39,217	9,530
Atlantic Spadefish	35,108	154,352	96,470	150,552	661,926	413,704	143,025	628,830	393,018	135,497	595,733	372,333	120,442	529,541	330,963
Scamp	333,100	176,688	94,316	341,251	181,018	103,530	324,188	171,968	91,796	329,063	174,554	93,177	292,501	155,159	82,824
Gray Triggerfish	272,880	353,638	284,325	312,325	404,675	325,359	296,709	384,441	309,091	281,093	364,207	292,823	249,860	323,740	260,287

(a) Deepwater Complex: **Yellowedge grouper**, blueline tilefish, **silk snapper**, misty grouper, queen snapper, sand tilefish, black snapper, blackfin snapper

(b) Snappers: **Gray snapper**, **lane snapper**, **cubera snapper**, dog, mahogany

(c) Grunts: **White grunt**, **margate**, sailor's choice, **tomtate**

(d) Shallow Water Grouper: **Red hind**, **rock hind**, coney, graysby, yellowfin grouper, yellowmouth grouper

A Summary of the Effects of the Alternatives

Action 3 would specify ACLs and recreational ACTs for four species groups and four species based on the ABCs selected by the South Atlantic Council in **Action 2**. **Table 2.3.1** displays the proposed commercial and recreational ACLs and recreational ACTs based on the preferred ABC alternatives in **Action 2** and the proposed ACL alternatives in **Action 3**. For an analysis of proposed ACLs based on all proposed alternatives in **Action 2** and **Action 3**, see Chapter 4 of the amendment (**Tables 4.3.1-4.3.9**).

Alternatives 3-5 would have a greater positive biological effect than **Alternative 2** because they would create a buffer between the ACL/OY and ABC, with **Alternative 5** setting the most conservative ACL at 80% of the ABC (**Tables 2.3.1, and Tables 4.3.1-4.3.9**). Creating a buffer between the ACL/OY and ABC would provide greater assurance that overfishing is prevented, and the long-term average biomass is near or above SSB_{MSY} . However, the South Atlantic Council's SSC ABC control rule takes into account scientific uncertainty. The Magnuson-Stevens Act national standard 1 guidelines indicate an ACL may typically be set very close to the ABC. Setting a buffer between the ACL and ABC would be appropriate in situations where there is uncertainty in whether or not management measures are constraining fishing mortality to target levels. An ACT, which is not required, can also be set below the ACL to account for management uncertainty and provide greater assurance overfishing does not occur.

Alternatives under **Action 3** would increase the ACL for some species or species complexes or decrease the ACL for species or species complexes. For most species and species complexes, the ACLs are currently not being met. If harvest is less than the proposed ACLs, biological and economic effects would be expected to be minimal. **Alternative 2** is expected to produce the largest increase in annual net commercial landings and dockside revenues (from \$41,007 to \$54,434), followed in turn by **Alternative 3** (from \$32,883 to \$49,445) and **Alternative 4** (from \$11,334 to \$27,896). **Alternative 5** would reduce annual net commercial landings and dockside revenues by \$15,206 to as much as \$31,768. For the recreational sector, both **Alternatives 2 and 3** would yield the largest expected net increases in combined recreational landings for the eight species/complexes (from 0 to 65,582 lb ww), followed in turn by **Alternative 4** (0 to 43,323 lb ww) and **Alternative 5** (0 to 2,856 lb ww). **Alternatives 2 and 3** would also rank first in expected net economic benefits, followed in turn by **Alternatives 4 and 5**.

Regarding social effects, **Alternative 2** would be the most beneficial to fishermen and communities by setting the ACL at the highest level allowed by the ABC specified in **Action 2**, and **Alternative 5** would be the least beneficial. However, because the ABCs set in **Action 2** are based on ORCS methodology and for stocks with limited available data, a buffer as proposed in **Alternatives 3-5**, could be more beneficial to resource users in the long term, if future data indicate the ABCs should be lower.

Alternatives that result in higher ACLs for species or species complexes could slightly reduce administrative burdens because the likelihood of triggering AMs would be reduced. Conversely, alternatives that decrease ACLs could increase the administrative burden because it would be more likely that AMs would be triggered and action would be needed to ensure overfishing did not occur. Administrative burdens also may result from revising the values under the alternatives in the form of development and dissemination of outreach and educational materials for fishery participants and law enforcement.

Action 4. Modify the minimum size limit for gray triggerfish

Alternative 1 (No Action). Currently, the minimum size limit for gray triggerfish is specified in inches total length (TL) in federal waters off the east coast of Florida only. In Florida state waters, the minimum size for gray triggerfish is specified in inches fork length (FL). The minimum size limit is 12 inches TL in federal waters off the east coast of Florida and 12 inches FL in ~~east Florida state waters~~ state waters off the east coast of Florida.

Alternative 2. Specify a minimum size limit for gray triggerfish of 12 inches fork length (FL) in federal waters off the east coast of Florida.

Sub-alternative 2a. The minimum size limit applies to the commercial sector.

Sub-alternative 2b. The minimum size limit applies to the recreational sector.

Preferred Alternative 3. Specify a minimum size limit for gray triggerfish of 12 inches fork length (FL) in federal waters off North Carolina, South Carolina, and Georgia.

Preferred Sub-alternative 3a. The minimum size limit applies to the commercial sector.

Preferred Sub-alternative 3b. The minimum size limit applies to the recreational sector.

Alternative 4. Specify a minimum size limit for gray triggerfish of 14 inches fork length (FL) in federal waters off North Carolina, South Carolina, Georgia, and the east coast of Florida.

Sub-alternative 4a. The minimum size limit applies to the commercial sector.

Sub-alternative 4b. The minimum size limit applies to the recreational sector.

Preferred Alternative 5. Specify a minimum size limit for gray triggerfish of 14 inches fork length (FL) in federal waters off the east coast of Florida.

Preferred Sub-alternative 5a. The minimum size limit applies to the commercial sector.

Preferred Sub-alternative 5b. The minimum size limit applies to the recreational sector.

Rationale: One IPT member suggested clarifying language pertaining to the area the regulations would apply (federal/state waters off the east coast of Florida vs. federal/state waters off east Florida). Also, an IPT member suggested that the Council select preferred sub-alternatives under the preferred alternatives, unless the Council intends for the proposed change to not be applicable to both sectors.

COMMITTEE ACTION: APPROVE SUGGESTED EDITS TO ALTERNATIVES

A Summary of the Effects of the Alternatives

There would be little difference in the biological benefits of **Alternatives 1 (No Action)**, **Alternative 2**, and **Preferred Alternative 3** since the establishment of a 12 inch fork length (FL) minimum size limit under **Alternative 2** and **Preferred Alternative 3** would do little to restrict commercial or recreational harvest of gray triggerfish in the South Atlantic. A minimum size limit of 12 inch FL for North Carolina, South Carolina, and Georgia under **Preferred Alternative 3** would provide slightly greater spawning opportunities for gray triggerfish, relative to no action (**Alternative 1**). A minimum size limit of 14 inches FL under **Alternative 4** (North Carolina, South Carolina, Georgia, and the east coast of Florida), and **Preferred Alternative 5** (east coast of Florida only) would provide the greatest spawning opportunities of the alternatives considered. Therefore, biological benefits would be greatest for **Alternative 4**, followed by **Preferred Alternatives 3 and 5 combined**, **Preferred Alternative 5**, **Preferred Alternative 3**, **Alternative 2**, and **Alternative 1 (No Action)** for the commercial and recreational sectors.

Combined Tables from Section 4.4. Projected commercial gray triggerfish quota closure dates for the 2014 fishing season under Alternative 1, Alternative 2, Preferred Alternative 3, Alternative 4, Preferred Alternative 5, and combined effects of Preferred Alternative 3 and Preferred Alternative 5 for the current commercial ACL of 272,880 lb ww, and proposed commercial ACLs under Action 3.

ACL (lb ww)	Alternative	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 3&5
272,880	Current ACL	26-Jul	26-Jul	30-Jul	31-Aug	2-Aug	5-Aug
312,325	Action 3, Alt 2	18-Aug	19-Aug	21-Aug	20-Sep	25-Aug	29-Aug
296,709	Action 3, Alt 3	9-Aug	9-Aug	11-Aug	11-Sep	15-Aug	18-Aug
281,093	Action 3, Alt 4	1-Aug	2-Aug	4-Aug	4-Sep	7-Aug	10-Aug
249,860	Action 3, Alt 5	8-Jul	8-Jul	11-Jul	14-Aug	13-Jul	17-Jul

Table 4.4.21. Percent reduction in annual South Atlantic recreational sector gray triggerfish landings from implementing size limits under Alternatives 2-5 and Preferred Alternatives 3 and 5 combined.

Year	Alt 2	Pref Alt 3	Alt 4	Pref Alt 5	Pref Alts 3 and 5
2010	0.8	2.7	22.3	4.9	7.5
2011	1.1	3.7	21.9	6.0	8.7
2012	1.1	3.7	28.0	6.0	9.7

Note: MRIP and headboat landings included.

For the commercial sector, the season length would be greatest under **Alternative 4** followed by **Preferred Alternative 5**, and **Preferred Alternative 3**. There would be little difference in the season length under **Alternative 2** and **Alternative 1 (No Action)**. **Alternatives 2-5** could result in negative economic effects associated with loss of annual commercial landings. It is possible that fishermen may attempt to reduce the impacts by increasing the length of a trip to harvest the same number of pounds; however, an increase in the length of a trip would increase trip-related costs, such as fuel, bait, and risk. In addition, the ability to mitigate for these reductions is dependent on other actions in this amendment, such as **Action 3** that would change the commercial ACL, and **Action 5** that would split the annual commercial ACL to create two 6-month seasons. Overall, **Alternative 4** would result in the largest average annual reduction in both commercial and recreational landings of gray triggerfish, followed in turn by **Preferred Alternative 5**, **Preferred Alternative 3**, **Alternative 2** and **Alternative 1 (No Action)** (**Table 4.4.24**). **Sub-alternatives 5a and 5b** and **Alternative 2** would not affect commercial or recreational landings in Georgia, North Carolina or South Carolina.

Table 4.4.24. Reduction in average annual commercial and recreational landings of gray triggerfish by alternative.

Alternative		Commercial	Recreational
1 (No Action)		0	0
2	a	1,824 lb (\$3,138)	0
	b	0	661 lb
3 (Pref)	a	6,194 – 9,292 lb (\$11,328 - \$16,991)	0
	b	0	4608 lb
4	a	59,488 – 87,249 lb (\$107,371 - \$157,478)	0
	b	0	96,953 – 98,806 lb
5 (Pref)	a	13,029 – 19,110 lb (\$22,414 - \$32,875)	0
	b	0	22,853 – 24,706 lb

Changing the minimum size limit to 12 inches FL off North Carolina, South Carolina, and Georgia under **Preferred Alternative 3** would establish a minimum size limit that is consistent with the current minimum size limit requirements in state waters off east Florida (**Alternative 1 No Action**). However, the South Atlantic Council has selected an alternative that would increase the minimum size limit to 14 inch FL off the east coast of Florida (**Preferred Alternative 5**). Thus, selection of **Preferred Alternatives 3 and 5** would result in inconsistent regulations between the east coast of Florida and the other South Atlantic states. A 14-inch FL minimum size limit specified in **Alternative 4** (North Carolina to east Florida) and **Preferred Alternative 5** (east Florida) would allow for consistent minimum size limit regulations for gray triggerfish in the Gulf of Mexico and South Atlantic, which is particularly troublesome for fishermen and law enforcement in the Florida Keys. However, **Preferred Alternative 3** and **Alternative 4** could have some negative effects on recreational and commercial fishermen harvesting gray

triggerfish in the EEZ off states that currently do not have size limits by limiting the number of fish that can be kept.

Some social effects of implementing minimum size limits would be associated with the positive and negative biological effects of minimum size limits on the gray triggerfish stock. Positive effects of allowing only fish of a certain size that are caught in the South Atlantic EEZ to be landed could help maintain sustainability of harvest and the health of the stock, which would be beneficial to recreational and commercial fishermen in the long term. Negative effects of potential increase in discard mortality due to a newly established size limit in North Carolina, South Carolina, and Georgia under **Preferred Alternative 3** and **Alternative 4**, compared to allowing all fish to be landed in those states under **Alternative 1 (No Action)**, **Alternative 2**, and **Preferred Alternative 5**, could affect the stock and in turn, commercial and recreational fishing opportunities.

Beneficial administrative effects would be expected from **Alternative 2**, **Preferred Alternative 3**, and **Alternative 4**, and **Preferred Alternative 5** when compared with **Alternative 1 (No Action)**. **Alternative 4** and **Preferred Alternative 5** would further avoid confusion with regulations and aid law enforcement by specifying the same minimum size limit (14 inches TL) in the South Atlantic (**Alternative 4**) and east Florida (**Preferred Alternative 5**) that is specified in federal waters of the Gulf of Mexico and in state waters off the west coast of Florida. Administrative impacts on the agency associated with the action alternatives would be incurred by rule making, outreach, education and enforcement.

NOTE: One SSC member pointed out that changing minimum size limit for gray triggerfish will affect selectivity in future stock assessments. The minimum size limit change needs to be accounted for in projection scenarios so the SSC will be able to make recommendations in the future. Request modifying TORs as needed to make sure this gets addressed in the future.

2.5 Action 5. Establish a commercial split season for gray triggerfish

Alternative 1 (No Action). The commercial fishing year for gray triggerfish is the calendar year (January 1- December 31). The commercial ACL is allocated for the entire year.

Preferred Alternative 2. Allocate the directed commercial gray triggerfish ACL into two quotas: 50% to the period January 1 through June 30 and 50% to the period July 1 through December 31. Any remaining quota from season 1 would transfer to season 2. Any remaining quota from season 2 would not be carried forward.

Alternative 3. Allocate the directed commercial gray triggerfish ACL into two quotas; 40% to the period January 1 through June 30, and 60% to the period July 1 through December 31. Any remaining quota from season 1 would transfer to season 2. Any remaining quota from season 2 would not be carried forward.

COMMITTEE ACTION: APPROVE SUGGESTED EDIT TO ALTERNATIVE 1

A Summary of the Effects of the Alternatives

The biological impacts of a split season for gray triggerfish under **Alternatives 2 (Preferred)** or **3** are likely to be neutral since overall harvest would be limited to the sector ACL and split-season quotas, and AMs would be triggered if the ACL or quotas were exceeded. Dividing the ACL into two time periods could result in the gray triggerfish commercial harvest being open for a short period of time, and possibly encourage derby conditions to a greater extent than **Alternative 1 (No Action)**. Derby conditions would be expected to be more pronounced in season 1 under **Alternative 3** because season 1 would be much shorter than season 2. As a result, there could be increased targeting of gray triggerfish under season 1 in an effort to harvest some gray triggerfish before the season closed. Discards of greater triggerfish would be expected after quotas are met under **Alternatives 2 (Preferred)** and **3** due to fishermen targeting co-occurring species. However, the magnitude of discards would be expected to be similar under the two alternatives. Furthermore, survival of discarded gray triggerfish is estimated to be very high (~88%). Thus, the stock would not be expected to be negatively impacted by alternatives that might result in an increase in regulatory discards. **Preferred Alternatives 2** and **3** would establish fishing seasons that have opening and closing dates similar to vermilion snapper. Since gray triggerfish and vermilion snapper are co-occurring species that are caught together, **Alternatives 2 (Preferred)** and **3** could reduce bycatch of both species. Additionally, split season quotas would allow fishermen in different regions to target gray triggerfish when weather is good in their area. Therefore, alternatives that divide the ACL into two time period quotas would allow for a greater opportunity among fishermen in all areas to catch gray triggerfish. Furthermore,

dividing the ACL into two seasons would allow fishermen to target gray triggerfish in summer when historical catches have been the best.

There would be little difference in annual economic impacts among **Alternative 1 (No Action)**, **Preferred Alternative 2**, and **Alternative 3** because there would be no change in annual total landings and dockside revenues, assuming all of the ACL is caught each year and the price of gray triggerfish remains relatively constant. **Preferred Alternative 2** and **Alternative 3** redistribute when fishing and landings of gray triggerfish can occur throughout the year. The degree of economic effects depends primarily on the timing of the closures in relationship to other seasonal closures. **Alternative 1 (No Action)** is the status quo and no closure would be expected until summer. **Preferred Alternative 2** is expected to have direct negative economic effect; however, **Alternative 3** is expected to have even greater direct negative economic effect due to the predicted timing of seasonal closures, potentially leaving at least some snapper grouper commercial fishermen with no species to target. As shown in **Tables 4.5.2** and **4.5.4**, the second split season under **Preferred Alternative 2** and **Alternative 3** is expected to close prior to the end of the calendar year; however, **Alternative 1 (No Action)** would have the season close sooner than either **Preferred Alternative 2** or **Alternative 3**, resulting in greater direct negative economic effects. Because **Alternative 3** would extend the second split season longer than **Preferred Alternative 2**, it is expected to have a greater positive direct economic benefit.

Table 4.5.2. Expected dates the gray triggerfish semi-annual quotas (based on ACL alternatives in Action 3) would have been met for January-June and July-December split seasons (**Preferred Alternative 2**), assuming a 12 inch FL minimum size limit is put into place for North Carolina, South Carolina, and Georgia, and a 14 inch FL minimum size limit is put into place for east Florida (Preferred Alternatives 3 and 5 under Action 4).

ACL (lb ww)	January-June			
	ACL Alternative	Mean	L95%	U95%
136,440	Current ACL	20-Mar	No Closure	18-Feb
156,163	Action 3, Alt 2	9-Apr	No Closure	25-Feb
148,355	Action 3, Alt 3	31-Mar	No Closure	22-Feb
140,547	Action 3, Alt 4	24-Mar	No Closure	19-Feb
124,930	Action 3, Alt 5	9-Mar	No Closure	14-Feb

ACL (lb ww)	July-December			
	ACL Alternative	Mean	L95%	U95%
136,440	Current ACL	21-Sep	27-Nov	30-Aug
156,163	Action 3, Alt 2	30-Sep	No Closure	5-Sep
148,355	Action 3, Alt 3	26-Sep	21-Dec	3-Sep
140,547	Action 3, Alt 4	23-Sep	3-Dec	1-Sep
124,930	Action 3, Alt 5	17-Sep	15-Nov	25-Aug

* Unused quota from January-June would roll over to July-December.

** Landings during September-December 2012 are assumed to be similar to those of 2008-2011.

Table 4.5.4. Expected dates the gray triggerfish semi-annual quotas (based on ACL alternatives in Action 3) would have been met for January-June and July-December split seasons (**Alternative 3**), assuming a 12 inch FL minimum size limit is put into place for North Carolina, South Carolina, and Georgia, and a 14 inch FL minimum size limit is put into place for east Florida (Preferred Alternatives 3 and 5 under Action 4).

ACL (lb ww)	January-June			
	ACL Alternative	Mean	L95%	U95%
109,152	Current ACL	25-Feb	No Closure	8-Feb
124,930	Action 3, Alt 2	9-Mar	No Closure	14-Feb
118,684	Action 3, Alt 3	4-Mar	No Closure	12-Feb
112,437	Action 3, Alt 4	27-Feb	No Closure	9-Feb
99,944	Action 3, Alt 5	21-Feb	No Closure	5-Feb

ACL (lb ww)	July-December			
	ACL Alternative	Mean	L95%	U95%
163,728	Current ACL	3-Oct	No Closure	7-Sep
187,395	Action 3, Alt 2	15-Oct	No Closure	15-Sep
178,025	Action 3, Alt 3	10-Oct	No Closure	12-Sep
168,656	Action 3, Alt 4	5-Oct	No Closure	9-Sep
149,916	Action 3, Alt 5	27-Sep	25-Dec	3-Sep

A split season under **Preferred Alternative 2** or **Alternative 3** would likely increase access to the commercial ACL for North Carolina and South Carolina, which would be beneficial to commercial businesses in these areas. Additionally, a split season under **Preferred Alternative 2** or **Alternative 3** could reduce discards of vermilion snapper because the vermilion snapper and gray triggerfish are commonly caught together. This could improve trip efficiency and help reduce regulatory discards for vessels catching vermilion snapper. The proposed 40%-60% split in the commercial ACL under **Alternative 3** reflects recent harvest patterns for gray triggerfish, and would be expected to result in fewer changes for the commercial fleet than under **Preferred Alternative 2**, which could impose some limited access to the commercial ACL during the second part of the year.

Alternative 1 (No Action) would have fewer administrative impacts than **Preferred Alternative 2** or **Alternative 3** because only one quota would need to be monitored. Relative to **Alternative 1 (No Action)**, **Preferred Alternative 2** and **Alternative 3** would increase the administrative impacts in the form of rulemaking, outreach, education, monitoring, and enforcement.

Action 6. Establish a commercial trip limit for gray triggerfish

Alternative 1 (No Action). There is no commercial trip limit for gray triggerfish in the South Atlantic region.

Preferred Alternative 2. Establish a commercial trip limit for gray triggerfish in the South Atlantic region.

Sub-alternative 2a. 500 pounds whole weight (lb ww)

Preferred Sub-alternative 2b. 1,000 lb ww

Sub-alternative 2c. 1,500 lb ww

Alternative 3. When 75% of the gray triggerfish commercial seasonal quota is met or is projected to be met, the trip limit is reduced to:

Sub-alternative 3a. 200 lb ww

Sub-alternative 3b. 500 lb ww

Sub-alternative 3c. 750 lb ww

A Summary of the Effects of the Alternatives

The biological effects of **Alternatives 1 (No Action)**, **Alternative 2 (Preferred)** (and associated sub-alternatives), and **Alternative 3** (and associated sub-alternatives) would be expected to be neutral because ACLs and AMs are in place to cap harvest, and take action if ACLs are exceeded. **Alternative 1 (No Action)** could present a greater biological risk to gray triggerfish in terms of exceeding the ACL than **Alternatives 2 (Preferred)** and **3** since no trip limit would be in place to slow down the rate of harvest and help ensure the ACL is not exceeded. However, improvements have been made to the quota monitoring system, and the South Atlantic Council has approved a Dealer Reporting Amendment (effective August 7, 2014), which should enhance data reporting. Therefore, any biological benefits associated with trip limits would be expected to be small. Larger trip limits would not constrain catch and could result in the ACL being met earlier in the year. Early closures of gray triggerfish could result in increased bycatch of gray triggerfish when fishermen target co-occurring species such as vermilion snapper and black sea bass. However, release mortality of gray triggerfish is considered to be very low. Thus, commercial closures associated with meeting the ACL are not expected to negatively affect the gray triggerfish stock due to bycatch.

Combined Tables from Section 4.6 for January-June Split Season. Commercial gray triggerfish projected mean closure dates for the preferred January-June split season alternative in Action 5, under a variety of trip limit scenarios for the proposed commercial ACLs in Action 3. Analysis assumes a 12 inch FL minimum size limit is put into place for North Carolina, South Carolina, and Georgia, and a 14 inch FL minimum size limit is put into place for east Florida (preferred alternatives in Action 4).

Alt	Trip Limit	Action 3, Alt 1	Action 3, Alt 2	Action 3, Alt 3	Action 3, Alt 4	Action 3, Alt 4
		136,440	156,162	148,354	140,546	124,930
1	No trip limit	17-Mar	4-Apr	27-Mar	20-Mar	6-Mar
2c	1,500-lb trip limit	18-Mar	8-Apr	30-Mar	22-Mar	7-Mar
2b	1,000-lb trip limit	25-Mar	20-Apr	9-Apr	29-Mar	13-Mar
	750-lb trip limit	7-Apr	6-May	26-Apr	14-Apr	22-Mar
2a	500-lb trip limit	11-May	4-Jun	26-May	16-May	24-Apr
	300-lb trip limit	27-Jun	No Closure	No Closure	No Closure	11-Jun
	200-lb trip limit	No Closure	No Closure	No Closure	No Closure	No Closure
	100-lb trip limit	No Closure	No Closure	No Closure	No Closure	No Closure
3a	200-lb trip limit @ 75% ACL	13-May	1-Jun	24-May	16-May	29-Apr
3b	500-lb trip limit @ 75% ACL	1-Apr	2-May	20-Apr	7-Apr	18-Mar
3c	750-lb trip limit @ 75% ACL	24-Mar	19-Apr	8-Apr	28-Mar	11-Mar

Combined Tables from Section 4.6 for July-December Split Season. Commercial gray triggerfish projected mean closure dates for the preferred July-December split season alternative in Action 5, under a variety of trip limit scenarios for the proposed commercial ACLs in Action 3. Analysis assumes a 12 inch FL minimum size limit is put into place for North Carolina, South Carolina, and Georgia, and a 14 inch FL minimum size limit is put into place for east Florida (preferred alternatives in Action 4).

Alt	Trip Limit	Action 3, Alt 1	Action 3, Alt 2	Action 3, Alt 3	Action 3, Alt 4	Action 3, Alt 4
		136,440	156,162	148,354	140,546	124,930
1	No trip limit	18-Sep	26-Sep	23-Sep	20-Sep	14-Sep
2c	1,500-lb trip limit	18-Sep	26-Sep	23-Sep	20-Sep	14-Sep
2b	1,000-lb trip limit	19-Sep	27-Sep	24-Sep	20-Sep	14-Sep
	750-lb trip limit	20-Sep	28-Sep	25-Sep	21-Sep	15-Sep
2a	500-lb trip limit	22-Sep	2-Oct	28-Sep	24-Sep	17-Sep
	300-lb trip limit	29-Sep	16-Oct	9-Oct	2-Oct	23-Sep
	200-lb trip limit	14-Oct	3-Nov	27-Oct	19-Oct	2-Oct
	100-lb trip limit	17-Nov	12-Dec	27-Nov	20-Nov	7-Nov
3a	200-lb trip limit @ 75% ACL	24-Sep	4-Oct	29-Sep	25-Sep	19-Sep

3b	500-lb trip limit @ 75% ACL	20-Sep	28-Sep	25-Sep	21-Sep	15-Sep
3c	750-lb trip limit @ 75% ACL	19-Sep	27-Sep	24-Sep	20-Sep	14-Sep

Commercial trip limits in general, are not economically efficient. Although lower trip limits can lengthen an open fishing season, trip limits can also economically disadvantage larger vessels and vessels that have to travel further to reach their fishing grounds. Depending on vessel characteristics and the distance required to travel to fish, a trip limit that is too low could result in targeted trips that are cancelled altogether, if the vessel cannot target other species on the same trip. From 2009 through 2013, very few commercial trips, which landed gray triggerfish, landed more than 500 lb ww per trip. Consequently, **Alternative 1 (No Action)** and **Sub-alternatives 2a, 2b (Preferred), and 2c** are expected to have minimal impact on landings of gray triggerfish. It is reasonable to expect that larger vessels that make longer trips could have landings greater than 500, 1,000 or 1,500 lb ww. If so, **Sub-alternative 2a** would have the largest adverse economic impact on commercial fishermen with historically larger landings per trip, followed in turn by **Sub-alternatives 2b (Preferred) and 2c**. **Alternative 1 (No Action)** would have no adverse economic impact beyond that baseline. Because none of the sub-alternatives of **Alternative 3** are expected to have significant impact on extending the length of the fishing season, the sub-alternatives are expected to have minimal economic effects when compared to **Alternative 1 (No Action)**. A trip limit of 750 lb ww after 75% of the ACL has been taken as in **Sub-alternative 3c** would provide the greatest direct positive economic effect, followed by **Sub-alternatives 3b** (500 lb ww) and **3a** (200 lb ww), respectively.

Communities in the South Atlantic Region would be expected to experience positive or negative effects if a commercial trip limit is established. In general, a commercial trip limit may help slow the rate of harvest, lengthen a season, and prevent the ACL from being exceeded, but trip limits that are too low may make fishing trips inefficient and too costly if fishing grounds are too far away. Relative to **Alternative 1 (No Action)**, **Alternatives 2 (Preferred) and 3** could reduce the risk of derby conditions and associated negative impacts that can occur due to an in-season closure or payback provision if the ACL is exceeded. A more restrictive trip limit is more likely to slow the rate of harvest and lengthen the season than a less restrictive trip limit, unless vessels do not currently harvest over a proposed limit. The 500-lb ww trip limit proposed under **Sub-alternative 2a** is the most restrictive under **Alternative 2 (Preferred)**, but a low percentage of trips exceed 500 lb ww of gray triggerfish at this time (**Table 4.5.1**). Very few trips exceed 1,000 lb ww (**Preferred Sub-alternative 2b**) and less than 1% exceed 1,500 lb ww (**Sub-alternative 2c**). The step-down trip limit when 75% of the commercial ACL is met under **Alternative 3** would allow commercial trips to continue fishing for other species, but with a sort of bycatch allowance for any gray triggerfish caught on the trips. **Sub-alternatives 3a-3c** would help to reduce discards of gray triggerfish and could help extend the season. Overall, the social benefits to the commercial fleet, associated businesses, and communities would likely be maximized as a result of some trade-off between season length and economic changes.

Alternative 1 (No Action) would have fewer administrative impacts than **Alternatives 2 (Preferred)** and **3**. Administrative impacts associated with **Alternatives 2 (Preferred)** and **3** would come in the form of rulemaking, outreach, education, monitoring and enforcement. NMFS has implemented trip limits in other fisheries and the impacts associated with **Alternative 2 (Preferred)** and **3** are expected to be minor.

COMMITTEE ACTION: APPROVE AMENDMENT 29 FOR FORMAL REVIEW AND DEEM THE CODIFIED TEXT AS NECESSARY AND APPROPRIATE.