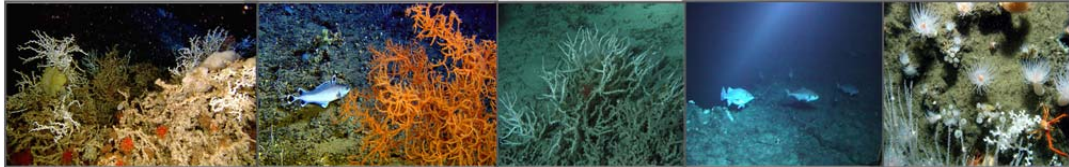


Decision Document

Comprehensive Ecosystem-Based Amendment 3



AMENDMENT 26 TO THE FISHERY MANAGEMENT PLAN FOR THE SNAPPER GROUPER
FISHERY OF THE SOUTH ATLANTIC REGION

AMENDMENT 3 TO THE FISHERY MANAGEMENT PLAN FOR THE DOLPHIN AND WAHOO
FISHERY OF THE ATLANTIC

AMENDMENT 21 TO THE FISHERY MANAGEMENT PLAN FOR COASTAL MIGRATORY
PELAGIC RESOURCES IN THE GULF OF MEXICO AND ATLANTIC REGION

AMENDMENT 7 TO THE FISHERY MANAGEMENT PLAN FOR THE GOLDEN CRAB
FISHERY OF THE SOUTH ATLANTIC REGION

February 12th, 2013



What Action is the South Atlantic Council Proposing in CE-BA 3?

The action in Comprehensive Ecosystem-Based Amendment 3 (CE-BA 3) would:

- Modify bycatch and discard reporting.

*Note: The South Atlantic Fishery Management Council (South Atlantic Council) considered several other actions during development of CE-BA 3. For a complete list of Actions previously included and rationale for splitting them out of CE-BA 3, see **Appendix A**.*

Which Fisheries Would be Affected by CE-BA 3?

The action in CE-BA 3 would affect fisheries for snapper grouper, dolphin and wahoo, coastal migratory pelagics (in the South Atlantic Council area only), and golden crab.

Why is the South Atlantic Council taking Action?

Action 1 considers improvements to bycatch reporting in fisheries for snapper grouper, coastal migratory pelagic, dolphin/wahoo, and golden crab by adopting standards in the Atlantic Cooperative Statistics Program bycatch module. The magnitude and composition of bycatch is an important component of total fishing mortality and stock assessments for these species. Better bycatch and discard data would provide a better understanding of the composition and magnitude of catch and bycatch, enhance the quality of data provided for stock assessments, increase the quality of assessment output, provide better estimates of interactions with protected species, and lead to better decisions regarding additional measures to reduce bycatch.

The IPT proposed wording for the Purpose and Need:

Purpose for Action

CE-BA 3 would improve bycatch/discard data collection methods to better quantify all sources of fishing mortality in South Atlantic fisheries.

Need for Action

The ***need*** for CE-BA 3 is to improve data collection methods that will allow for a better quantification of the type and magnitude of bycatch, improve the quality of stock assessments, and allow for better management measures that will reduce bycatch in South Atlantic fisheries.

MOTION: ACCEPT THE IPT RECOMMENDATION FOR THE PURPOSE AND NEED FOR CE-BA 3.

What Are the Alternatives for the Action Being Considered?

Action 1. Amend the Snapper Grouper, Dolphin and Wahoo, Coastal Migratory Pelagic Resources, and Golden Crab Fishery Management Plans to modify bycatch and discard reporting

Alternative 1 (No Action). The Atlantic Coastal Cooperative Statistics Program (ACCSP) Release, Discard and Protected Species Module is currently the required methodology. Until these standards are fully funded, require the use of a variety of sources to assess and monitor bycatch including: observer coverage on vessels; logbooks; electronic logbook; video monitoring; MRFSS; state cooperation; and grant funded projects. After the ACCSP Bycatch Module standards are implemented, continue the use of technologies to augment and verify observer data. Require that commercial vessels with a snapper grouper permit, for-hire vessels with a for-hire permit, and private recreational vessels if fishing for snapper grouper species in the exclusive economic zone (EEZ), if selected, shall use observer coverage, logbooks, electronic logbooks, video monitoring, or any other method deemed necessary to measure bycatch by the National Marine Fisheries Service.

Proposed Action in Comprehensive Ecosystem-Based Amendment 3

1. Amend the Snapper Grouper, Dolphin and Wahoo, Coastal Migratory Pelagic Resources, and Golden Crab Fishery Management Plans to modify bycatch and discard reporting

Table 1 illustrates the current data collection programs and their relation to the standards of the ACCSP.

Alternative 2. Implement the Atlantic Coastal Cooperative Statistics Program (ACCSP) Release, Discard and Protected Species Module as the preferred methodology.

Alternative 3. Implement aspects of the Atlantic Coastal Cooperative Statistics Program (ACCSP) that are not currently being done.

IPT Recommendations for rewording Alternative 2 and Alternative 3:

Alternative 2. Require that commercial vessels with: a Commercial Atlantic Dolphin Wahoo Permit, a Spanish Mackerel Commercial Permit, King Mackerel Commercial Permit and a King Mackerel Commercial Gillnet Permit; for-hire vessels with a Charter/Headboat Permit for Dolphin/Wahoo, Charter/Headboat Permit for Coastal Migratory Pelagics (CMP); and private recreational vessels if fishing for dolphin/wahoo or CMP species in the EEZ, if selected, shall use observer coverage, logbooks, electronic logbooks, video monitoring, or any other method deemed necessary to measure bycatch by the National Marine Fisheries Service (NMFS).

MOTION: ACCEPT THE IPT RECOMMENDATION FOR ALTERNATIVE 2.

Alternative 3. Implement mandatory observer coverage as described by the ACCSP standards.

Sub-alternative 3a. Snapper-Grouper

Sub-alternative 3b. Coastal Migratory Pelagics

Sub-alternative 3c. Dolphin Wahoo

Sub-alternative 3d. Golden Crab

MOTION: ACCEPT THE IPT RECOMMENDATION FOR ALTERNATIVE 3.

What's currently in place to monitor bycatch and discard reporting?

Bycatch and discard reporting is currently being done through a variety of different means for the snapper grouper, coastal migratory pelagic, dolphin/wahoo, and golden crab fisheries (see Section 4 in the CE-BA 3 for a complete description). ACCSP standards, which are further described in **Appendix H**, include:

- Quantitative standards for commercial fisheries
 - including 2-5% observer coverage
 - mandatory self-reporting systems;
- Quantitative recreational reporting
 - recreational intercept surveys;
 - observer data to collect recreational data, where possible;
 - mandatory reporting of marine mammal interactions in Category I or II fisheries;
 - minimum ACCSP data elements included on data reporting forms;
 - training programs for at-sea samplers;
 - pilot studies for new data collection programs;
 - training and outreach programs on bycatch.

With the exception of observer coverage, the ACCSP standards have been met for the snapper grouper, coastal migratory pelagic, and dolphin/wahoo fisheries. Current bycatch and discard data collection methods and their relation to the ACCSP standards are identified in **Table 1**.

Table 1. Current bycatch and discard data collection methods and their relation to the ACCSP standards.

ACCSP Standards	Current Reporting Requirements	Level of Coverage
Quantitative Standards for Commercial Fishing		
<p>Observer Program (2-5% coverage)</p> <p><i>“Targeted at-sea sampling programs (“observer”) and collection of bycatch data through established fisherman self-reporting systems comprise the primary methods used to quantify bycatch.”</i></p> <p>The ACCSP standard for observer coverage is 5% of total trips for high priority fisheries; and 2% of total trips for all other fisheries. Data should be collected at the haul level for commercial fisheries.</p>	<p>Snapper-Grouper: Current regulations require observers, if selected.</p> <p>Golden Crab: Current regulations require observers, if selected. There is no developed observer program for golden crab.</p> <p>Dolphin Wahoo: There is no requirement to carry observers.</p> <p>Coastal Migratory Pelagics: There is no requirement to carry observers.</p>	<p>Snapper-Grouper: As part of a pilot program, less than 1% of the commercial snapper-grouper vessels were selected for coverage each year during 2007-2010.</p> <p>Golden Crab: 0% coverage</p> <p>Dolphin Wahoo: 0% coverage</p> <p>Coastal Migratory Pelagics: Some portion of Spanish mackerel gillnet and king mackerel gillnet covered by shark observers and state gillnet observers (i.e. North Carolina). More work is needed to quantify this.</p>
<p>Mandatory Fishermen Self-Reporting Systems</p> <p>Collection of self-reported data through established systems are important sources of supplemental data.</p>	<p>Snapper-Grouper: <i>Commercial Supplemental Discard Logbook:</i> Collects bycatch data on discards and protected species. Currently being collected for 41% of the fishery. <i>Commercial Logbook:</i> Collects information on catch.</p> <p>Dolphin Wahoo: <i>Commercial Supplemental Discard Logbook:</i> Collects bycatch data on discards and protected species.</p>	<p>Snapper-Grouper: Discard Logbook designed to sample 20% of vessels, currently getting reports from 41% of snapper grouper fishery.</p> <p>Dolphin Wahoo: Discard Logbook samples 20% of</p>

	<p><i>Commercial Logbook:</i> Collects information on catch.</p> <p>Coastal Migratory Pelagics: <i>Commercial Supplemental Discard Logbook:</i> Collects bycatch data on discards and protected species. <i>Commercial Logbook:</i> Collects information on catch.</p> <p>Golden Crab: <i>Golden Crab Trip Report:</i> Mandatory trip reporting that includes discarded species.</p>	<p>vessels.</p> <p>Coastal Migratory Pelagics: Discard Logbook samples 20% of vessels.</p> <p>Golden Crab: Discards a component of logbooks that all fishermen complete.</p>
Qualitative Standards for Commercial Fishing		
Port Interviewing	<p>Snapper-Grouper: Port Sampler Program collects information on catch, life history information and collection of otoliths.</p> <p>Dolphin Wahoo: Port Sampler Program collects information on catch, life history information and collection of otoliths.</p> <p>Coastal Migratory Pelagics: Port Sampler Program collects information on catch, life history information and collection of otoliths.</p> <p>Golden Crab: Port Sampler Program collects information on catch, life history information and collection of otoliths.</p>	<p>About 300 trips sampled in the South Atlantic each year through the ACCSP Trip Interview Program (TIP). (See Chapter 4 for a description of the TIP program.)</p>
<p>Entanglement/Stranding Reports</p> <p>NMFS stranding and entanglement networks serve as the ACCSP standard stranding and entanglement data for sea turtles and marine mammals.</p>	<p>For all fisheries in the South Atlantic: Stranding networks have been established in the Southeast Region. The NMFS Southeast Fisheries Science Center (SEFSC) is the base for the Southeast United States Marine Mammal Stranding Program (http://sero.nmfs.noaa.gov/pr/strandings.htm). This information is included in fishery management decisions through consultation with the Office of Protected Resources.</p>	<p>About 650-700 strandings are responded to each year in the South Atlantic. Data are reported to the SEFSC.</p>

Quantitative Standards for For-Hire Fishing

“for quantitative bycatch data for for-hire fisheries include existing charter boat angler intercept surveys and an at-sea sampling program for headboats, which may be supplemented with intercept sampling.”

<p>At-Sea Samplers</p> <p>Data should be collected at the drop level (each time gear is wet) for for-hire fisheries.</p>	<p>Snapper-Grouper: Headboats are required to carry observers, if selected. There is no observer program for charter vessels.</p> <p>Dolphin Wahoo: Headboats are required to carry observers, if selected. There is no observer program for charter vessels.</p> <p>Coastal Migratory Pelagics: Headboats are required to carry observers, if selected. There is no observer program for charter vessels.</p> <p>Golden Crab: There is no for hire sector.</p>	<p>The SEFSC indicates that observers are placed on about 2% of the headboat trips out of South Carolina to Florida, and about 9% of the headboat trips out of North Carolina. This applies to the snapper-grouper, dolphin wahoo and coastal migratory pelagic fishery. There is no for hire sector for golden crab.</p>
<p>Intercept Surveys</p>	<p>Snapper Grouper: NMFS Headboat Survey; MRIP Charter Program</p> <p>Dolphin Wahoo: NMFS Headboat Survey; MRIP Charter Program</p> <p>Coastal Migratory Pelagics: NMFS Headboat Survey; MRIP Charter Program</p> <p>Golden Crab: Not applicable/No recreational or for-hire fishery.</p>	<p>The SEFSC indicates that NMFS Headboat Survey port agents sample about 17% of the headboat trips in North Carolina, 5% in South Carolina and 8% from Georgia to Florida. This applies to the snapper-grouper, dolphin wahoo and coastal migratory pelagic fisheries. There is no for hire sector for golden crab.</p>

Qualitative Standards for For-Hire Fishing		
Call-In Reports	Call-in numbers have been set up for fishermen to report stranding and protected species interactions as well as fishery enforcement violations.	1-800-WHALE-HELP to report dead, injured or entangled marine mammals. Sea turtle hotline to report stranding or entangled sea turtles. Enforcement hotline (1-800-853-1964) to report enforcement violations.
Entanglement Stranding Reports NMFS stranding and entanglement networks serve as the ACCSP standard for stranding and entanglement data for sea turtles and marine mammals.	For all fisheries in the South Atlantic: Stranding networks have been established in the Southeast Region for both sea turtles and marine mammals. The NMFS SEFSC is the base for the Southeast United States Marine Mammal Stranding Program (http://sero.nmfs.noaa.gov/pr/strandings.htm). This information is included in fishery management decisions through consultation with the Office of Protected Resources.	About 650-700 strandings are responded to each year in the South Atlantic. Data are reported to the SEFSC.
Add Ons	Gulf and South Atlantic Fisheries Foundation Observer Pilot Project (2008) and (2010); North Carolina Sea Grant, Archipelago Marine Research Ltd. Video Monitoring Pilot Project (2011); Mandatory Electronic Reporting Amendment (in prep, 2013)	Pilot projects further described in Chapter 4 in the Amendment.
Quantitative Standards for Private Recreational Fishing		
Recreational intercept surveys	<p>Snapper-Grouper: <i>Marine Recreational Information Program (MRIP):</i> Estimates of the number of recreational discards</p> <p>Dolphin Wahoo: <i>Marine Recreational Information Program (MRIP):</i> Estimates of the number of recreational discards</p>	The number of discards are estimated through phone interviews and dockside intercepts. Level of coverage likely varies each year. Data for 2012 are not complete.

	<p>Coastal Migratory Pelagics: <i>Marine Recreational Information Program (MRIP):</i> Estimates of the number of recreational discards</p> <p>Golden Crab: There is no recreational golden crab fishery.</p>	
<p>Recreational Observer Program, where possible</p> <p>Data should be collected at the drop level (each time gear is wet) for recreational boat mode fisheries.</p>	<p>Snapper-Grouper: None for private recreational; Headboat Observer program</p> <p>Dolphin Wahoo: None for private recreational; Headboat Observer program</p> <p>Coastal Migratory Pelagics: None for private recreational; Headboat Observer program</p> <p>Golden Crab: There is no recreational golden crab fishery.</p>	N/A
<p>Verification of angler reports, where possible</p>	<p>Snapper-Grouper: Dockside Interviews done by MRIP, charter and private</p> <p>Dolphin Wahoo: Dockside Interviews done by MRIP, charter and private</p> <p>Coastal Migratory Pelagics: Dockside Interviews done by MRIP, charter and private</p> <p>Golden Crab: There is no recreational golden crab fishery.</p>	<p>Dockside interviews are conducted to verify angler reports. Data for 2012 are not complete.</p>
Qualitative Data Collection (Data collected from opportunistic sources)		
<p>Marine Mammal Authorization Program:</p> <p>Collection of Marine Mammal Authorization Program (MMAP) reports from Category I and II commercial fisheries. The Marine Mammal</p>	<p>Snapper-Grouper: Most of the fishery is Category III. The black sea bass pot component of the South Atlantic snapper grouper fishery is part of the Atlantic mixed species trap/pot fishery, a Category II fishery, in the 2012 List of Fisheries (76 FR 73912 November 29, 2011); although there has never been a documented interaction between marine mammals and</p>	

<p>Protection Act (MMPA) requires Category I and II fisheries to report any injuries or mortalities that occur incidental to their fishing operations. Reports must be made within 48 hours of the end of a fishing trip.</p>	<p>black sea bass trap/pot gear in the South Atlantic.</p> <p>Dolphin Wahoo: Not applicable because fishery is Category III under the MMPA.</p> <p>Coastal Migratory Pelagics: Category II (Spanish Mackerel and king mackerel gillnet) so must report these interactions by law.</p> <p>Golden Crab: Not applicable because fishery is Category III under the MMPA.</p>	
<p>Stranding/entanglement data from commercial, for-hire, and recreational fisheries</p> <p>Data should include assessment of human interaction; physical contact between marine species and fishing gear; vessel/boat strikes; and other human-related causes.</p>	<p>For all fisheries in the South Atlantic: Stranding networks have been established in the Southeast Region. The NMFS SEFSC is the base for the Southeast United States Marine Mammal Stranding Program (http://sero.nmfs.noaa.gov/pr/strandings.htm). This information is included in fishery management decisions through consultation with the Office of Protected Resources.</p>	<p>About 650-700 strandings are responded to each year in the South Atlantic. Data are reported to the SEFSC.</p>
<p>Port Interviews to verify voluntary data collected in commercial fisheries</p>	<p>Life history information (weight, length, otoliths) are considered voluntary data. These data are collected by port samplers by agreement with the fishermen.</p>	
<p>Other ACCSP Elements</p>		
<p>Training and Outreach</p> <p>Programs should be developed to improve reporting accuracy by fishermen, when needed.</p>	<p>The NMFS Southeast Regional Office issues public announcements, Southeast Fishery Bulletins, or News Releases on different topics, including use of turtle exclusion devices, bycatch reduction devices, use of methods and devices to minimize harm to turtles and sawfish, information intended to reduce harm and interactions with marine mammals, and other methods to reduce bycatch for the convenience of constituents in the southern United States.</p>	

ACCSP data elements on reporting forms	Based on the information in the ACCSP guidance document, it is expected that the reporting forms contain adequate information. However, data reporting forms would need to be reviewed to determine if the data format is consistent with what the ACCSP requests.	
Training programs for At-Sea samplers	Observers go through a rigorous training program as described by the National Observer Program. It is expected the training is sufficient based on the ACCSP standards. However, data reporting forms would need to be reviewed to determine if the data format is consistent with what the ACCSP requests.	
Pilot Studies for new data collection programs	Gulf and South Atlantic Fisheries Foundation Observer Pilot Project (2008) and (2010); North Carolina Sea Grant, Archipelago Marine Research Ltd. Video Monitoring Pilot Project (2011); Headboat Pilot Study; Charterboat Pilot Study; MRIP Pilot Studies; Mandatory Electronic Reporting Amendment (in prep, 2013)	

Summary of Effects

Biological: The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) states that fishery management plans shall: Establish a standardized reporting methodology to assess the amount and type of bycatch occurring in the fishery, and include conservation and management measures that, to the extent practicable and in the following priority: (A) minimize bycatch; and (B) minimize the mortality of bycatch which cannot be avoided; assess the type and amount of fish caught and released alive during recreational fishing under catch and release fishery management programs and the mortality of such fish, and include conservation and management measures that, to the extent practicable, minimize mortality and ensure the extended survival of such fish.

With regard to bycatch reporting National Standard 9 at § 600.350 states:

(1) Promote development of a database on bycatch and bycatch mortality in the fishery to the extent practicable. A review and, where necessary, improvement of data collection methods, data sources, and applications of data must be initiated for each fishery to determine the amount, type, disposition, and other characteristics of bycatch and bycatch mortality in each fishery for purposes of this standard and of section 303(a)(11) and (12) of the Magnuson-Stevens Act.

In accordance with the Magnuson-Stevens Act, a standardized reporting methodology is in place to collect bycatch information in the snapper grouper, coastal migratory pelagic, dolphin/wahoo,

and golden crab fisheries (see Section 4). Furthermore, actions have been taken in amendments to fishery management plans to these fisheries to reduce bycatch (**Appendix F**).

Alternative 1 (No Action) would continue programs (**Table 1**) in place to collect information on catch and bycatch in South Atlantic fisheries for snapper grouper, coastal migratory pelagic, dolphin/wahoo, and golden crab. When funding is available, **Alternative 1** would implement the standards associated with the ACCSP bycatch module.

ACCSP standards include:

Quantitative standards for commercial fisheries:

- including 2-5% observer coverage
- mandatory self-reporting systems

Quantitative recreational reporting:

- recreational intercept surveys
- observer data to collect recreational data, where possible
- mandatory reporting of marine mammal interactions in Category I or II fisheries
- minimum ACCSP data elements included on data reporting forms
- training programs for at-sea samplers
- pilot studies for new data collection programs
- training and outreach programs on bycatch

With the exception of the level of observer coverage for commercial fisheries, the ACCSP standards have been met for the snapper grouper, coastal migratory pelagics, dolphin wahoo, and golden crab fisheries under **Alternative 1 (No Action)**. In contrast to **Alternative 1**, **Alternative 2** would implement any ACCSP bycatch standards that were not in place under **Action 1 (No Action)** as the preferred methodology for assessing and monitoring bycatch in the snapper grouper coastal migratory pelagics, dolphin wahoo, and golden crab fisheries in the South Atlantic. An examination of the bycatch data collection methodologies currently in place under **Action 1 (No Action)** reveals that the only bycatch methodology that does not meet the 2012 ACCSP bycatch standards is a commercial observer program for the snapper grouper, coastal migratory pelagics, dolphin wahoo, and golden crab fisheries. However, there is currently a requirement for both snapper grouper and golden crab vessels to carry an observer if selected. **Alternative 2** would improve bycatch reporting through enhancement of observer coverage and would have positive biological effects.

Under **Alternative 2**, positive indirect biological effects could be expected for fisheries in the South Atlantic; however, if funds were taken from other programs in the Southeast, implementation of the ACCSP bycatch standards for an observer program may have negative biological effects or unforeseen impacts. **Alternative 3** would allow data to be collected using any means as long as the resulting data meet or exceed the ACCSP standards. Examples of activities that would meet or exceed the ACCSP standards may include more pilot projects on observer program, video monitoring, or implementing observer coverage that exceeds the 2-5% level. The indirect biological benefits could be greater than those under **Alternative 2** if the data exceed ACCSP standards and equal to the indirect biological benefits if the data meet ACCSP standards.

Economic: The alternatives under **Action 1** are not expected to have significant, negative economic impacts to the fishermen unless the methods selected to implement bycatch and discard reporting resulted in something other than minimal time commitments. When ACCSP bycatch standards are fully adopted, the agency would incur impacts associated with the cost of observer coverage as described by the ACCSP standards. Until the ACCSP standards are implemented, it is impossible to know the potential impact to individual fishermen or overall.

Social: While there are reporting requirements and standards currently in place under **Alternative 1**, the complete implementation of ACCSP standards under **Alternatives 2** and **3** would be expected to increase social benefits discussed.

There may be some negative impacts on the fleets as a result of any increase in monitoring. Increased observer coverage may result in observers on vessels that have not had any observers on board, and some captains and crew may feel uncomfortable or that they are being unfairly monitored by the federal government (similar to concerns about vessel monitoring system requirements). However, **Alternatives 2** and **3** are expected to overall improve the collection of bycatch data, thereby improving the quality of stock assessments and subsequent fishery decisions.

Administrative: Under the status quo (**Alternative 1**), modules of the ACCSP are implemented as funding allows. Currently the agency and its partners are involved in many data collection activities that meet the ACCSP standards for bycatch (**Table 1**). **Alternative 2** could increase the administrative impacts relative to **Alternative 1 (No Action)** as it would require an observer program be implemented for the commercial sector of the snapper grouper, dolphin wahoo, coastal migratory pelagic and golden crab fisheries. Based on the description of the **No Action Alternative (Table 1)**, the only ACCSP standard not being met is the implementation of a commercial observer program at a 2-5% coverage level. Currently, snapper grouper and golden crab vessels are required to carry an observer, if selected. Dolphin wahoo and coastal migratory pelagics fisheries do not have the same requirements. An observer program could have a significant administrative burden on the agency, associated with the structure of the program, training and debriefing observers, education and outreach to fishermen, data analysis, and costs.

Table 2. Average number of trips, number of days at sea, and number of days/trip during 2007-2011. Source: SEFSC Commercial Logbook Data 1-13-12, and Golden Crab Logbook Data August 2012.

Fishery	Avg # Trips	Avg # Days Away	Avg Days/Trip
Snapper-Grouper	13,994	23,607	1.69
Dolphin-Wahoo	2,598	5,820	2.24
Coastal Migratory Pelagics	18,373	21,688	1.18
Golden Crab	174	610	3.50*

* Golden crab logbooks do not provide estimates of day at sea. An average of 3.5 days is assumed from discussions with golden crab fishermen.

Table 3 shows that an agency funded observer program at 2% and 5% levels (as specified in the ACCSP bycatch standards) is estimated to cost between \$900,000 - \$1.5 million and \$2.2 million - \$3.9 million, respectively. This value is based on observer cost estimates of between \$850-\$1,500 dollars per observer day. These daily observer costs of \$1,500 per day include but are not limited to: travel, safety gear, sampling gear, observer training, vessel compensation, satellite phones, observer coordination, data entry, program administration, other supplies and facility costs associated with the observer program. The daily observer costs of \$850 per day includes: observer compensation, observer travel, vessel/program supplies including safety gear and sampling gear, liability insurance to protect the vessel, and vessel compensation to offset costs of taking observer and potentially displacing a crew member.

Table 3. Cost of implementing commercial observer program according to ACCSP bycatch standards. Estimated cost per observer day is \$850 (Frank Helies Gulf and South Atlantic Fisheries Foundation) and \$1,500 (Elizabeth Scott-Dentin SEFSC).

Fishery	Coverage	Trips	Days	Cost @ \$850/Day	Cost @ \$1,150/Day
Snapper Grouper	2%	280	472	\$401,316	\$708,204
	5%	700	1,180	\$1,003,289	\$1,770,510
Dolphin-Wahoo	2%	52	116	\$98,947	\$174,612
	5%	130	291	\$247,367	\$436,530
Coastal Migratory Pelagics	2%	367	434	\$368,696	\$650,640
	5%	919	1,084	\$921,740	\$1,626,600
Golden Crab	2%	3	12	\$10,365	\$18,291
	5%	9	30	\$25,912	\$45,728
Total Four Fisheries	2%	703	1,034	\$879,323	\$1,551,747
	5%	1,757	2,586	\$2,198,308	\$3,879,368

Not only would the cost of an observer program be burdensome to the agency, it would require coordination with partners including the U.S. Coast Guard, law enforcement, and contracts with observer providers which may further increase the administrative burden. Under **Alternative 3**, the agency would have the ability to develop bycatch and discard reporting methodologies that meet or exceed the ACCSP standards. Examples could be an observer program with larger coverage, more pilot projects or other projects. The administrative impacts of **Alternative 3** would be greater than those of **Alternative 2** or **Alternative 1**. However, at this point, it is difficult to determine the exact administrative impacts of **Alternative 3** on fishery participants or the agency because it is unclear which bycatch reporting methods would be selected.

THE COMMITTEE NEEDS TO SELECT A PREFERRED ALTERNATIVE FOR THIS ACTION.

APPROVAL OF CE-BA 3

OPTION 1. APPROVE CE-BA 3 FOR FORMAL REVIEW AND GIVE STAFF/CHAIRMAN EDITORIAL LICENSE TO MAKE ANY NECESSARY CHANGES

**If Option 1 is pursued, the Gulf Council will need to approve CE-BA 3 at their next meeting, April 15-18th, 2013.*

OPTION 2. DO NOT APPROVE CE-BA 3 FOR FORMAL REVIEW

OPTION 3. OTHERS?

APPROVAL OF CODIFIED TEXT FOR CE-BA 3

OPTION 1. APPROVE CE-BA 3 CODIFIED TEXT AS BEING NECESSARY AND APPROPRIATE; GIVE STAFF/CHAIRMAN EDITORIAL LICENSE TO MAKE ANY NECESSARY CHANGES AND GIVE THE CHAIR AUTHORITY TO RE-DEEM ANY REVISIONS

OPTION 2. DO NOT APPROVE CE-BA 3 CODIFIED TEXT

OPTION 3. OTHERS?