# PUBLIC HEARING SUMMARY

## for Comprehensive Ecosystem-Based Amendment 3

South Atlantic region ~ Amends the Snapper Grouper and Golden Crab Fishery Management Plans

South Atlantic, Mid-Atlantic and New England regions ~ Amends the Dolphin and Wahoo Fishery Management Plan

Gulf of Mexico, South Atlantic and Mid-Atlantic regions ~ Amends the Coastal Migratory Pelagic Resources Fishery Management Plan

## August 2012

Send written comments to:
Bob Mahood, Executive Director
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

E-mail comments to: **CEBA3PHComments@safmc.net** 

Comments must be received by 5 p.m. on August 20, 2012







### Why is the South Atlantic Council taking Action?

The for-hire sector contributes to recreational landings that count towards the recreational annual catch limit (ACL). Catches from charter vessels are captured in the Marine Recreational Information Program (MRIP) program but headboat catches are monitored separately. Delays in receiving and processing headboat data have contributed to the recreational annual catch limit (ACL) being exceeded in some fisheries. Electronic reporting via computer/internet will reduce delays and result in less recreational ACL overruns.

Commercial logbooks will serve as a means to verify dealer reports and comply with the Atlantic Coastal Cooperative Statistics Program (ACCSP) standards that require two sources for verification of quota monitored species. This type of verification can lead to better monitoring of commercial catches and reduce the likelihood of commercial ACL overruns.

Bycatch is an important component of ensuring total mortality remains below the ACLs and acceptable biological catch (ABCs). The Amended-Magnuson Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) requires the Councils to develop a plan for monitoring bycatch and the actions being considered would meet this requirement.

### **Purpose for Action**

The *purpose* of Comprehensive Ecosystem-Based Amendment 3 (CE-BA 3) is to improve data collection methods and tracking of annual catch limits to ensure overages do not occur in the South Atlantic fisheries.

CE-BA 3 would modify commercial and charter/headboat vessel reporting requirements and bycatch requirements to enhance data collection throughout the South Atlantic.

#### **Need for Action**

The **need** for action in CE-BA 3 is to improve data tracking methods, limit overages in annual catch limits, and account for discards and bycatch in South Atlantic fisheries.

## What Are the Proposed Actions?

There are 3 actions being proposed in CE-BA 3. Each action has a range of alternatives, including a 'no action alternative' and a 'preferred alternative'.



#### Proposed Actions in Comprehensive Ecosystem-Based Amendment 3

- Modify Permits and Data Reporting for For-Hire Vessels
- 2. Modify Permits and Data Reporting for Commercial Vessels
- 3. Modify Bycatch and Discard Reporting

#### What Are the Alternatives?

#### Action 1. Modify permits and data reporting for for-hire vessels

Alternative 1 (No Action). Retain existing permits and data reporting systems for the for-hire sector. Currently, the owner or operator of a vessel for which a charter vessel / headboat permit for Gulf coastal migratory pelagic fish, South Atlantic coastal migratory pelagic fish, Gulf reef fish, South Atlantic snapper grouper, or Atlantic dolphin and wahoo has been issued, or whose vessel fishes for or lands such coastal migratory pelagic fish, reef fish, snapper-grouper, or Atlantic dolphin or wahoo in or from state waters adjoining the applicable Gulf, South Atlantic, or Atlantic EEZ, and who is selected to report by the SRD, must maintain a fishing record for each trip, or a portion of such trips as specified by the SRD, on forms provided by the

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SRD. Completed records for charter vessels must be submitted to the Science and Research Director weekly, postmarked no later than 7 days after the end of each trip (Sunday). Completed records for headboats must be submitted to the Science and Research Director monthly and must either be made available to an authorized statistical reporting agent or be postmarked no later than 7 days after the end of each month.

**Alternative 2.** Require that charter and headboat vessels submit fishing records to the Science and Research Director (SRD) weekly via electronic reporting (via computer or internet). Weekly = 7 days after the end of each week (Sunday).

**Sub-Alternative 2a.** Charter and headboat **Sub-Alternative 2b.** Headboat only

**Alternative 3.** Require that charter and headboat vessels submit fishing records to the Science and Research Director (SRD) daily via electronic reporting (via computer or internet). Daily = by noon of the following day.

**Sub-Alternative 3a.** Charter and headboat **Sub-Alternative 3b.** Headboat only

**Alternative 4.** Require that charter and headboat vessels submit fishing records to the Science and Research Director (SRD) weekly or at intervals shorter than a week if notified by the SRD via electronic reporting (via computer or internet). Weekly = 7 days after the end of each week (Sunday).

**Sub-Alternative 4a.** Charter and headboat **Sub-Alternative 4b.** Headboat only

#### IPT Recommendations for Action 1

The interagency planning and review team (IPT) compiles the documents and develops analyses. The IPT recommends the Council consider the following changes to the language of Action 1 and the alternatives at their next meeting (September 2012):

- Change the language of the Action to state: Action 1. Amend the Snapper Grouper, Dolphin and Wahoo, Coastal Migratory Pelagic Resources, and Golden Crab Fishery Management Plans to modify data reporting for charter/headboat vessels.
- Remove "require that charter and headboat vessels" from Alternative 2-4 and replace with "require that vessels". This information is clear in the sub-alternatives.
- For sub-alternatives in Alternatives 2-4, split out "charter" as one sub-alternative and "headboat" as the other sub-alternative. If the Council's interest is to select both vessel types, selection of muti-preferred sub-alternatives is an option.

The Sub-alternatives should read:

Sub-Alternative 2a (and 3a & 4a). Charter

Sub-Alternative 2b (and 3b & 4b). Headboat

#### What's currently in place for charter and headboat vessels?

*Charter vessels* are required to maintain a fishing record for each trip, or a portion of each trip as specified by the Science and Research Director (at the Southeast Fisheries Science Center), on forms that are provided. Forms include instructions, indicate all of the required information and must be postmarked no later than 7 days after the end of each week (on Sunday).

Harvest and bycatch are monitored by the Marine Recreational Information Program (MRIP). A 10% sample of charter vessel captains is called weekly to obtain trip level information. Additionally, standard dockside intercept data are collected from charter vessels and vessel clients are randomly sampled.

*Headboat vessels* are also required to report important information about their fishing trips. Vessels must complete and mail reporting forms to the Science and Research Director. The forms are due on a monthly basis, and must either be made available to a fisheries statistics reporting agent or be postmarked no later than 7 days after the end of each month.

Harvest and bycatch data are monitored by the Southeast Fisheries Science Center. Headboat trips are sub-sampled for data on species lengths and weights. Biological samples are obtained as time permits, and lengths of discarded fish are occasionally obtained.

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#### **Action 1: Summary of Effects**

**Biological:** Alternative 1 (No Action) would retain existing data reporting systems for the for-hire sector and electronic reporting (via computer/internet) would not be required.

Alternatives 2-4 would require that data be submitted to the Science Center more frequently than the current situation. Alternatives 2-4 would require data be submitted via computer/internet. All of the action alternatives would result in positive indirect biological effects, as the data would be reported in a more timely and efficient way resulting in better monitoring of the annual catch limits. Requiring charter vessels to report weekly or daily would greatly improve the timeliness of reporting. Alternative 3 would require daily reporting resulting in the most positive indirect biological effects, and Alternative 2 would require weekly which is the same as the status quo (Alternative 1); however, Alternative 2 would require data be submitted electronically. Alternative 4 would initially require weekly reporting, with the additional requirement for data to be submitted via computer. Alternative 4 would allow the Science and Research Director to require faster data submissions in the future without the Council having to prepare an additional amendment.

**Economic:** Alternative 1 (No Action) does not necessarily maximize economic returns for these for-profit businesses. Alternatives 2 – 4 including the sub-alternatives could increase potential economic return for these businesses by leading to more timely reporting of their catch. Electronic data collection, in theory, leads to more timely monitoring of annual catch limits (ACLs) and ought to reduce the potential for overrunning an ACL and triggering an accountability measure (AM) that might include future paybacks (such as reducing future fishing opportunities). Alternatives 2 – 4 could require for-hire businesses to incur costs. If the business does not currently have access to a computer, they would need to either purchase one or take time to go to a public access source to enter their landings online. Currently, there is no estimate of the number of for-hire operations that do not have a computer or internet access.

**Social:** Increased frequency in reporting under **Alternatives 2-4** may have some negative effects on vessel owners and captains by imposing additional time and money requirements. The requirement for electronic reporting under **Alternatives 2-4** will affect vessel owners who do not already use computer systems in their businesses. Some fishermen are not familiar with computers or internet, and some may simply be more comfortable with paper fishing records. However, more frequent reporting would be expected to improve quota monitoring, allowing NOAA Fisheries to better track landings and calculate expected closures and electronic reporting would be expected to produce the most accurate means of tracking landings. Improved monitoring would also be expected to reduce the likelihood of the recreational sector exceeding the ACL and the associated AMs.

**Administrative:** The administrative effects of changing permits and reporting requirements for the for-hire sector will most likely be associated with rule-making, outreach, and implementation of the revised reporting scheme. In general, increased frequency in reporting under **Alternatives 2-4** would increase the administrative burden on the agency. As the number of vessels affected increases (under the sub-alternatives), so do the administrative impacts.

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#### Action 2. Modify permits and data reporting for commercial vessels

**Alternative 1.** (**No Action**) Retain existing permits and data reporting systems for the commercial sector. Snapper grouper logbooks are required to be submitted 7 days after the end of each trip.

**Alternative 2.** Modify permits and data reporting for commercial vessels as follows:

**Sub-Alternative 2a.** Require NMFS develop a system for commercial permit holders to submit their logbook entries electronically via an electronic version of the logbook made available online. Fishermen are encouraged to submit their logbook reports

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electronically but would be allowed to submit paper logbooks. Commercial landings and catch/effort data are to be submitted in accordance with ACCSP standards. Require that the three logbooks (landings, economic, and bycatch) be submitted within 21 days after the end of each trip.

**Alternative 3.** "No fishing forms" must be submitted at the same frequency [currently submitted monthly], via the same process, and for all species as is currently specified for snapper grouper species. A fisherman would only be authorized to sell commercially-harvested species if the fisherman's previous reports have been submitted by the fisherman and received by NMFS in a timely manner. Any delinquent reports would need to be submitted by the fisherman and received by NMFS before a fisherman could sell commercially harvested species from a federally-permitted U.S. vessel.

**Alternative 4.** Require all commercial snapper grouper fishing vessels to be equipped with VMS. The purchase, installation, and maintenance of VMS equipment must conform to the protocol established by NMFS in the *Federal Register*. The purchase of VMS equipment will be reimbursed by the National Office of Law Enforcement VMS reimbursement account if funding is available. Installation, maintenance, and communication costs will be paid for or arranged by the shareholder.

#### IPT Recommendations for Action 2

The interagency planning and review team (IPT) compiles the documents and develops the analyses. The IPT recommends the Council consider the following changes to the language of Action 2 and the alternatives at their next meeting (September 2012):

- Change language of Action to state: Action 2. Amend the Snapper Grouper, Dolphin and Wahoo, Coastal Migratory Pelagic Resources, and Golden Crab Fishery Management Plans to modify data reporting for commercial vessels.
- Remove Alternative 2 and Sub-Alternative 2a becomes the new Alternative 2. Replace "online" with "computer or internet" in this alternative and it should read:

  Alternative 2. Require NMFS to develop a system for commercial permit holders to submit their logbook entries electronically via an electronic version of the logbook made available via computer or internet. Fishermen are encouraged to submit their logbook reports electronically but would be allowed to submit paper logbooks. Commercial landings and catch/effort data are to be submitted in accordance with ACCSP standards. Require that the three logbooks (landings, economic, and bycatch) be submitted within 21 days after the end of each trip.
- Begin Alternative 3 with an action word: "Alternative 3. Require "No fishing forms" to be submitted at the same frequency..."
- Change the wording of "shareholder" to "permit holder" in Alternative 4 because there are no shareholders. The language in Alternative 4 should read: **Alternative 4.** Require all commercial snapper grouper fishing vessels to be equipped with VMS. The purchase, installation, and maintenance of VMS equipment must conform to the protocol established by NMFS in the *Federal Register*. The purchase of VMS equipment will be reimbursed by the National Office of Law Enforcement VMS reimbursement account if funding is available. Installation, maintenance, and communication costs will be paid for or arranged by the permit holder.
- Remove Alternative 4 from Action 2 and make this measure a stand-alone Action. The Action would read:

Action 3. Require all commercial snapper grouper fishing vessels to be equipped with VMS.

**Alternative 1.** No Action.

**Alternative 2.** The purchase, installation, and maintenance of VMS equipment must conform to the protocol established by NMFS in the *Federal Register*. The purchase of VMS equipment will be reimbursed by the National Office of Law Enforcement VMS reimbursement account if funding is available. Installation, maintenance, and communication costs will be paid for or arranged by the permit holder.

#### What's currently in place for commercial vessels?

Snapper grouper logbooks are required to be submitted 7 days after the end of each trip. If selected by NOAA Fisheries, a vessel fishing in the EEZ must carry an observer and install an electronic logbook and/or video monitoring equipment provided to them. Participants in the fishery may also be selected by the Science and Research Director to maintain and submit a fishing record on provided forms.

Commercial quotas are monitored by the Southeast Fisheries Science Center and landings information is obtained from dealers. Dealer selections for this data are made annually and are based on the previous year's production. Selected dealers must report landings by the 5<sup>th</sup> of a following month, even if no purchases were made.

#### **Action 2: Summary of Effects**

**Biological:** Alternative 1 (No Action) would not require commercial vessels with a snapper grouper permit to use vessel monitoring systems (VMS) and would also not make any improvements to the accountability of fishermen to submit logbooks in a timely manner or provide fishermen a means to report their information electronically via an electronic form. Alternative 2 would give fishermen the option to submit their logbooks electronically and would change the deadline for submission of logbooks from 7 days after the trip to 21 days after the trip. Alternative 3 would require "no fishing forms" when fishermen don't fish and would authorize fishermen to sell fish only when the previous reports have been submitted and received by NMFS. Alternative 4 would require use of VMS that would greatly improve biological understanding of the fishery. Knowing where fishermen are fishing would help understand how fishing pressure is distributed across the South Atlantic.

**Economic:** While the status quo will not change the economic effects, **Alternative 1** (**No Action**) does not necessarily maximize economic returns for these for-profit businesses. Electronic data collection, in theory, leads to more timely monitoring of ACLs and ought to reduce the potential for overrunning an ACL and triggering an AM that might include future paybacks. **Alternative 2** could require commercial fishermen who choose to file electronically to incur costs. If the fisherman does not currently have access to a computer, they would need to either purchase one or take time to go to a public access source to enter their landings online, or continue to file paper logbooks at no additional cost. The only potential economic impacts to a fisherman from **Alternative 3** would come if the fisherman was out of compliance and could not sell fish until delinquent reports were filed. **Tables 1 & 2** describe economic impacts for implementation of VMS (**Alternative 4**).

**Table 1.** NMFS-approved VMS units and costs.

Brand and Model	Cost
Boatracs FMCT-G	\$3095
Thrane and Thrane TT-3026D	\$2495
Faria Watchdog KTW304	\$3295
CLS America Thorium TST	\$3095

Source: Data provided by NMFS Office of Law Enforcement, July 2012.

**Table 2.** NMFS-approved VMS communications costs.

- 1. Qualcomm (for Boatracs units)
  - \$30/mo satellite fee, \$.30/message, \$.006 per character for messaging (average price Estimated \$35/month which includes 24/7 operations center support)
- **2.** Telenor (for Thrane units)
  - \$.06 per position report or \$1.44 per day for 1 hour reporting. If in the "In Harbor" mode, then \$.36 per day. Messaging costs \$.24 per e-mail. (\$30/mo average)
- 3. Iridium/Cingular Wireless (for Faria units)
  - \$50.25 per month which includes 12,000 Iridium bytes and 35,000 GSM bytes for email and e-forms reporting.
- **4.** Iridium (for CLS America units)
  - \$45 per month for hourly reporting, \$1.75 per kbyte for e-mail or forms submission.

Source: Data provided by NMFS Office of Law Enforcement, July 2012.

**Social:** Alternative 1 (No Action) would not be expected to result in impacts on commercial fishermen but would reduce long-term social benefits associated with more accurate and timely data. Alternatives 2 and 3 would extend reporting requirements for snapper grouper permit holders to all commercial permit holders, which would increase the burden on fishermen who do not currently hold snapper grouper permits. The option for paper or electronic reporting under Alternative 2 would provide flexibility to fishermen who currently do not own the equipment necessary for electronic reporting. The VMS requirement under Alternative 4 would result in a range of effects on the commercial fleet. It is likely that many fishermen will oppose a VMS requirement because of the independent characteristic of the industry. A VMS mandate for all commercial vessels will eliminate the unfair advantage to fishermen who do not comply with regulations and fish when and where it is not allowed.

**Administrative:** Alternative 2 would result in increased administrative impacts however they would not extend beyond the scope of data management and analysis. An additional requirement to submit a "no fishing form" under **Alternative 3** would result in moderate administrative impacts to both the agency and the fishery participants related to compliance and processing. Administrative impacts associated with **Alternative 4** would be significant and relate to rule-making, enforcement, monitoring, and education and outreach. Establishing a VMS provision is a complicated administrative task for the agency and would result in considerable burden. It is expected that Alternative 4 would be a considerable burden for the fishery participants.

#### **AP Recommendations:**

The Snapper Grouper Advisory Panel (AP) has recommended to the Council on numerous occasions that they consider a requirement to carry VMS for both recreational and commercial vessels in the South Atlantic. In April 2010, the SG AP approved a motion to recommend mandatory VMS for all vessels that interact with snapper grouper species in the EEZ and accountability measures that would prevent fishing in the absence of VMS. Again in April 2012, the SG AP approved a motion to recommend the Council require VMS for any snapper grouper vessel harvesting fish in South Atlantic waters.

#### Action 3. Modify bycatch and discard reporting

Alternative 1 (No Action). Adopt the Atlantic Coastal Cooperative Statistics Program (ACCSP) Release, Discard and Protected Species Module as the preferred methodology. Until this module is 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 is 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 EEZ, if selected, shall use observer coverage,

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logbooks, electronic logbooks, video monitoring, or any other method deemed necessary to measure bycatch by NOAA Fisheries.

Note: This was adopted for the snapper grouper fishery.

**Alternative 2.** Adopt the Atlantic Coastal Cooperative Statistics Program (ACCSP) Release, Discard and Protected Species Module as the preferred methodology. Require that vessels with a commercial permit, for-hire vessels with a for-hire permit, and private recreational vessels if fishing for species in the EEZ under the authority of the South Atlantic Fishery Management Council, if selected, shall use observer coverage, logbooks, electronic logbooks, video monitoring, or any other method deemed necessary to measure bycatch by NOAA Fisheries.

**Alternative 3.** By catch data will be collected to meet or exceed the ACCSP standards.

#### **IPT Recommendations for Action 3**

The interagency planning and review team (IPT) compiles the documents and develops analyses. The IPT recommends the Council consider the following changes to the language of Action 3 and the alternatives at their next meeting (September 2012):

- Change language of action to state: Action 3. Amend the Snapper Grouper, Dolphin and Wahoo, Coastal Migratory Pelagic Resources, and Golden Crab Fishery Management Plans to modify bycatch and discard reporting.
- Remove "adopt" from the language in Alternative 1 (No Action) and indicate these are the current requirements in place.
- Change the language of Alternative 2 to state: **Alternative 2.** Implement the Atlantic Coastal Cooperative Statistics Program (ACCSP) Release, Discard and Protected Species Module as the preferred methodology.
- Remove Alternative 3 from consideration. Include new Alternative 3 to state: **Alternative 3.** Implement aspects of ACCSP that are not currently being done.

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

Bycatch and discard reporting is currently monitored through the Atlantic Coastal Cooperative Statistics Program (ACCSP) Bycatch Monitoring Program. The bycatch standards (modules) of the ACCSP Program are implemented as funding and resources are available. **Table 3**, below, indicates the implementation status of the bycatch and discard reporting requirements of the ACCSP program.

**Table 3.** ACCSP reporting standards and status of implementation of modules.

<b>ACCSP Requirements</b>	Fulfilled?	Method
<b>Reporting Requirements (Discard</b>	ds)	
Commercial	Partial	Supplemental Discards logbook (20% permit holders/year)
For Hire	Full	MRFSS & Headboat Survey
Private/Recreational	Full	MRFSS
<b>Required Reporting (Protected S</b>	pecies Interactions)	
Commercial	Partial	-Supplemental Discards logbook (20% permit holders/year
For-Hire (All vessels)	Partial	Reporting of protected resources interactions not mandatory.
Private/Rec	Partial	Reporting of protected species resources interactions only one year (2006)
Target Sampling -Bandit (h/l) 5% of trips -BSB Pots 3.5% of trips -For-Hire (h/l) 5% of trips	Full	-Supplemental Discards logbook (20% permit holders/year)
Commercial Fishermen reporting system must have standardized data elements	Full	
Mandatory reporting of threatened species and protected finfish species	Partial	-Supplemental Discards logbook (20% permit holders/year)
Observer Coverage	1	,
Pilot program to determine appropriate coverage	Ongoing	Gulf and South Atlantic Fisheries Foundation has a project to implement a pilot observer program in the vertical hook and line fishery.
Commercial	Partial	Cooperative Research Program (only 2006-2007)
For-Hire	None	
Private/Rec	None	
Outreach/Training:		
Programs on Reporting	None	

Note: Both the commercial and for-hire sectors are required to utilize observers, fishermen reporting, and port interviewing to qualitatively and quantitatively describe release, discards, and protected resources interactions.

#### **Action 3: Summary of Effects**

**Biological:** Alternative 1 (No Action) would continue the current situation whereby only 20% of commercial vessels are currently completing discard logbooks and the requirements of the ACCSP are not being fully implemented. Alternative 2 would provide the required data collection program to meet the Magnuson-Stevens Act bycatch reporting requirements. Program standards specify the level of sampling needed. This would result in more positive indirect biological effects. Alternative 3 would allow data to be collected using any means so long as the resulting data meet or exceed the ACCSP standards. The indirect biological benefits would 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:** When the NMFS/NOAA Fisheries implements the ACCSP standards (**Alternative 1(No Action)** and **Alternatives 2** and **3)**, significant negative impacts could result if the fishery participants are required to fund the cost of at-sea observers or other data collection costs. The impact of the cost would be determined by the frequency with which fishermen would have to pay for observers, or other measures. 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 currently in place under **Alternative 1**, if these methods are not the most effective methods for bycatch monitoring and reporting this may result in considerable social action to publicize bycatch in a fishery, resulting in increased social conflict and polarization of the different perspectives. **Alternatives 2** and **3** are expected to improve the collection of bycatch data, thereby improving the quality of stock assessments and subsequent fishery decisions. Each alternative has the potential of imposing costs on individual fishery participants that could be excessive and result in fishery exit, which would be expected to result in additional personal, family, community, and associated industries stress and change.

**Administrative:** Under the status quo (**Alternative 1**), modules of the ACCSP are implemented as funding allows. Administratively, **Alternative 2** would be difficult as it would require funding to be shifted from various sources to implement the reporting modules. Under **Alternative 3**, the agency would have more flexibility in how the bycatch information is collected and would be able to modify the collection to have the least amount of impacts on the agency while maintaining the standards of the ACCSP. At this point it is difficult to determine the administrative impacts of the action on fishery participants for **Alternative 3** because it is unclear which bycatch reporting methods would be selected.

## **Public Hearing Dates and Locations**

Public Hearings will be held from 4 – 7 p.m.

August 6, 2012	August 7, 2012
Richmond Hill City Center	Jacksonville Marriott
520 Cedar Street	4670 Salisbury Road
Richmond Hill, GA 31324	Jacksonville, FL 32256
Phone: 912-445-0043	Phone: 904-296-2222
August 8, 2012	August 9, 2012
Doubletree Hotel	Hilton Key Largo Resort
2080 N. Atlantic Avenue	97000 South Overseas Highway
Cocoa Beach, Florida 32931	Key Largo, Florida 33037
Phone: 321-783-9222	Phone: 305-852-5553
August 14, 2012	August 16, 2012
Hilton Garden Inn Airport	Hilton New Bern/Riverfront
5265 International Blvd.	100 Middle Street
North Charleston, SC 29418	New Bern, NC 28560
Phone: 843-308-9330	Phone: 252-638-3585

Please send written comments to:
Bob Mahood, Executive Director
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4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Please e-mail comments to: CEBA3PHComments@safmc.net

Comments must be received by 5 p.m. on August 20, 2012

## What are the Next Steps?

