



Content and Status Summary of Amendments and Projects March 2025

Note: A summary table of progress towards rulemaking and implementation is in Appendix A.

Recently Submitted or Implemented:

Joint Commercial Logbook Amendment

Staff lead: Myra Brouwer

Purpose of Amendment: To allow submittal of electronic commercial logbooks.

Action Summary: This amendment is being developed jointly with the Gulf of Mexico Fishery Management Council. The amendment modifies the FMPs for South Atlantic Snapper Grouper, Atlantic Dolphin Wahoo, Atlantic and Gulf of Mexico Coastal Migratory Pelagics, and Gulf Reef Fish to require commercial logbooks be submitted via electronic reporting forms instead of the currently used paper-based forms.

Most recent document: Final Amendment in Administrative Record.

Development level: Under review. Amendment submitted on February 27, 2024.

Key Events: refer to December 2023 Active Amendments Document.

Snapper Grouper

Recently Submitted or Implemented:

Amendment 55 (Scamp and Yellowmouth Grouper)

Staff Lead: Allie Iberle

Purpose of Amendment: Respond to the latest stock assessment (SEDAR 68).

Action Summary: Establish a scamp/yellowmouth grouper complex, remove yellowmouth grouper from the shallow water grouper (SWG) complex, establish catch levels and sector allocations for the new complex, adjust catch levels and sector allocations for the SWG complex.

Most recent document: Final Amendment in Administrative Record.

Development Level: Under review. Amendment submitted on December 9, 2024.

Key Events: Refer to December 2024 Active Amendments Document.

Amendment 48 (Wreckfish ITQ Program Modernization)

Staff Lead: Christina Wiegand

Purpose of Amendment: The Council finished its second review of the Wreckfish ITQ program in September of 2019. As part of the review there were several recommendations made to modernize the program, which will be addressed in this amendment.

Action Summary: moving away from a paper coupon-based program to an electronic program; fishing season; cost recovery; wreckfish permit requirement; allocation issues; offloading sites and times; and monitoring requirements.

Most recent document: Final Amendment in Administrative Record

Development Level: Under review. Amendment submitted to NMFS on December 19, 2024.

Key Events: Refer to December 2024 Active Amendments Document.

Under Development:

Amendment 46 (Private Recreational Permit and Education Requirement)

Staff Lead: John Hadley

Purpose of the Amendment: Address deficiencies in recreational data through the creation of a permit requirement for private recreational vessels or anglers. Additionally, considers establishing a required education component to encourage best fishing practices that help reduce discard mortality in the snapper grouper fishery.

Action Summary: This amendment considers establishing a permit and education requirement for anglers or vessels to participate in the private recreational component of the snapper grouper fishery.

Most recent document: March 2025 decision document.

Development Level: Scoping has been conducted and the amendment is being developed. Approval for public hearings is expected at the June 2025 meeting.

Key Events:

- November 2020: Suspended work on the amendment (which was initiated in 2017) and directed staff to convene a workgroup to explore approaches for a private recreational permit and reporting requirements in the South Atlantic region. The workgroup convened three times during 2021.
- December 2021: Requested that discussion on this amendment be added to the March 2022 agenda.
- March 2022: Reviewed background information, recommendations from the workgroup, and directed staff to assemble candidates for an ad hoc advisory panel (AP) to be selected in June 2022.
- June 2022: Ad hoc AP appointed. AP met August 2022.
- December 2022: Removed consideration of reporting requirement, included consideration of an education component, and approved for scoping.
- Jan/Feb 2023: Scoping hearings (Jan 30 and Feb 6 via webinar)
- March 2023: Reviewed scoping comments and revised amendment. AP met May 2023.
- June 2023: Reviewed AP comments and revised amendment. Approved purpose and need statements and revised actions for inclusion in the amendment.
- September 2023: Reviewed AP comments and modified actions and alternatives. Council directed staff to assemble candidates for an ad hoc advisory panel made up of private anglers.
- December 2023: Reviewed AP comments, selected preferred alternatives for Actions 1 and 2, and provided direction for amendment development including AP review in the first half of 2024 and that the amendment would not come back for consideration of approval for public hearings until the June 2024 meeting. Also appointed the Private Recreational Ad Hoc Advisory Panel.
- June 2024: Reviewed feedback from APs. Directed staff that the next discussion of the amendment would take place at the December 2024 meeting. At the September 2024 meeting, hold a discussion on MRIP revisioning and improvements.

- December 2024: Reviewed SG Private Angler AP feedback, provided direction for edits to purpose and need and actions.
- March 2025: Reviewed IPT comments and recommended edits to purpose and need and actions. Directed the IPT to prepare for public hearings approval in June 2025.

Snapper Grouper Regulatory Amendment 36 (Gag and Black Grouper; On-Demand Gear)

Staff Lead: Mike Schmidtke

Purpose of Amendment: Revise recreational vessel limits for gag and black grouper and specify requirements for on-demand black sea bass pots while transiting through closed areas

Action Summary: Revise the recreational vessel limits for gag and black grouper to be an aggregate bag limit including both species. Revise transit requirements for on-demand black sea bass pots.

Most recent document: September 2024 decision document and draft amendment.

Development Level: Council approved. Preparing for submission.

- September 2023: Amendment development initiated.
- December 2023: Approved for scoping.
- March 2024: Reviewed scoping comments and provided direction for further amendment development.
- June 2024: Approved for public hearings.
- July/August 2024: Public hearings held on July 31 and Aug 1.
- September 2024: Approved for submission.

Snapper Grouper Amendment 56 (Black Sea Bass)

Staff Lead: Mike Schmidtke

Purpose of Amendment: Respond to most recent stock assessment (SEDAR 76).

Action Summary: Revise catch levels and status determination criteria, consider revision of sector allocations, other black sea bass management measures.

Most recent document: March 2025 Decision Document

Development Level: Post-scoping; draft amendment under development.

Key Events:

- June 2023: Amendment development initiated.
- September 2023: Council informed by the SSC that a work group is further evaluating projections of future catch, so overfishing limit and acceptable biological catch recommendations will not be available until the March 2024 Council meeting.
- March 2024: Acceptable biological catch recommendations made by the SSC. Initial discussions about information necessary to evaluate management changes.
- June 2024: Approved for scoping. Directed staff to conduct scoping webinars after the September 2024 Council meeting. Council requested additional projections and SSC consideration of alternative ABC and OFL levels that account for management changes in addition to lowering the annual catch limits, such as changes to minimum size limits or closed seasons.
- August 2024: SSC provided additional direction on the projections and corresponding assumptions to the assessment analysts.

- September 2024: Reviewed SSC progress on developing advice on additional catch recommendations and directed staff to conduct scoping after the December 2024 Council meeting.
- December 2024: Reviewed SSC recommendations on the development of catch projections for ABC recommendations. The SSC will review updated projections to develop ABC recommendations in April 2025. Directed staff to conduct scoping prior to the March 2025 Council meeting.
- March 2025: Reviewed scoping comments and gave direction to staff on the actions and alternatives to develop in the draft amendment.

Abbreviated Framework 4 (Golden Tilefish)

Staff Lead: Mike Schmidtke

Purpose of Amendment: Respond to the latest stock assessment (SEDAR 89) by updating catch levels.

Action Summary: Revise ABC and ACLs.

Most recent document: None

Development Level: Pre-scoping

Key Events:

- December 2024: Amendment development initiated.
- March 2025: Directed staff to develop an abbreviated framework amendment to revise catch levels only and include consideration of modifying the recreational season start date in another amendment.

Planned or postponed:

Snapper Grouper Amendment 44/ Reef Fish Amendment 55 (Yellowtail Snapper)

Staff Lead: Allie Iberle

Purpose of Amendment: Respond to the latest stock assessment (SEDAR 64). Yellowtail snapper are not overfished and overfishing is not occurring.

Action Summary: adopt recommended ABC, adjust jurisdictional allocation between the South Atlantic and Gulf of Mexico Councils, adjust ACLs, and sector allocations (SA only).

Most recent document: September 2023 decision document

Development Level: Post-scoping. Development paused.

Key Events:

- December 2020: Amendment development initiated (jointly with the Gulf Council).
- June 2021: Review the APs input on the fishery's performance, a fishery overview, and a draft options paper including actions previously considered (in 2018).
- September 2021: Review preliminary analyses and approve for scoping. Request input from stakeholders on commercial management measures (commercial trip limits) and get feedback from advisors (SG and Reef Fish APs) and the Gulf Council.
- November 2021: Scoping hearings held on November 2 and 3.
- December 2021: Work on the amendment suspended pending an interim analysis to include three additional years of data (through 2020).
- September 2022: Interim analysis results presented to Council. Direction to reinstate work on the amendment.
- December 2022: Direction to resume work on the amendment in June 2023.

- June 2023: Gulf and South Atlantic Councils reviewed actions and alternatives, preliminary analysis and draft amendment.
- September 2023: Paused development to allow time for SSCs (SA and Gulf) to reconsider the recommended stock ABC because of MRIP-FES issue and to determine whether the assessment can be re-done with FL State Reef Fish Survey data.
- October 2023: Gulf Council made a motion to de-prioritize work on the amendment until after a new assessment is completed that incorporates SRFS data.
- December 2023: Motion to de-prioritize work on the amendment until after a new assessment is completed that incorporates SRFS data.
- December 2024: Assessments for both species will be completed and reviewed by sub-groups of both the South Atlantic and Gulf SSCs in February 2025. The Council discussed and approved the proposed approach to address the OFL, ABC, and jurisdictional allocation between the South Atlantic and Gulf of Mexico for both yellowtail snapper and mutton snapper in this amendment following the SSC's recommendations in February. The Gulf Council will be the administrative lead.

Evaluation for the Need of Continued Management for 9 Snapper Grouper Species

Staff Leads: Myra Brouwer & Mike Schmidtke

Purpose of the Amendment: In October 2019, the SSC recommended designation of Cubera Snapper, Margate, Silk Snapper, Coney, Saucereye Porgy, Yellowfin Grouper, Misty Grouper, Blackfin Snapper, and Yellowedge Grouper as ecosystem component (EC species).

Action Summary: To determine the need for conservation and management of 9 snapper grouper species.

Most recent document: None

Key Events:

- November 2020: The Snapper Grouper AP discussed and provided recommendations.
- December 2020: Direction to include an action in a future amendment to the Snapper Grouper FMP (possibly the amendment addressing unassessed species' ABCs) to address this topic but exclude Margate, Yellowedge Grouper, Yellowfin Grouper, Silk Snapper, and Cubera Snapper. Directed staff to work with the SEFSC on a possible approach for data-poor species to set a single ACL with an assessed indicator species.

Evaluation for the Need of Continued Management for the Snapper Grouper Fishery Management Unit

Staff Leads: Myra Brouwer & Mike Schmidtke

Purpose of the Amendment: Determine whether species in the snapper grouper fishery management unit are in need of conservation and management.

Action Summary: Consider whether snapper groupers should continue to be included in, be removed from, or be designated as ecosystem component species in the snapper grouper fishery management unit

Most recent document: None

Key Events:

- December 2024: Direction to begin an evaluation to determine the continued need for conservation and federal management for species in the Snapper Grouper FMU.
- March 2025: Reviewed stock assessment and annual catch limit information for all species. Direction to fully evaluate the need for conservation and management for the following species:

Atlantic Spadefish, Bar Jack, Sand Tilefish, Misty Grouper, Blackfin Snapper, Queen Snapper, Cubera Snapper, Banded Rudderfish, Jolthead Porgy, Knobbed Porgy, Saucereye Porgy, Scup, Whitebone Porgy, White Grunt, Sailor's Choice, Tomtate, and Margate.

Snapper Grouper Management Strategy Evaluation

Staff Lead: Chip Collier, Judd Curtis

Purpose of the Amendment: Dead releases are a major issue in the snapper grouper fishery as a whole and affect many species within the complex. The Council has directed a management strategy evaluation (MSE) project that would consider multispecies effects of potential management changes and be used to develop a more holistic approach to management of the snapper grouper fishery. The amendment will follow the MSE project and consider implementation of management changes evaluated through the MSE.

Action Summary: This amendment will provide actions intended to incorporate recommendations from the MSE project.

Most recent document: None

Key Events:

- June 2021: Received the results of SEDAR 73 that indicated Red Snapper is not yet rebuilt and is undergoing overfishing.
- September 2021: Reviewed the SSC's recommendations and provided direction to staff to begin development of a long-term amendment to revise management measures in the snapper grouper fishery.
- December 2021: Reviewed a proposed work plan for a management strategy evaluation for the fishery and directed staff to continue development of this project. The management strategy evaluation is intended to inform the Council on potential tradeoffs in the fishery if different suites of actions are selected. The MSE began in June 2022 and will take two years to complete.
- October 2022: Snapper Grouper AP and SSC received initial presentations on the MSE process.
- December 2022: The Council directed that a guidance document detailing the MSE process and project responsibilities be developed. The Council also directed for the contractors to present a description of the process (similar to what was provided for the Snapper Grouper AP) at the March 2023 Council meeting.
- March 2023: The contractors (Blue Matter Science) presented an overview of MSE and description of the snapper grouper MSE to the Council.
- April 2023: The contractors discussed objectives of the MSE with the Snapper Grouper Advisory Panel and a public scoping hearing was held.
- October 2023: Discussion with Snapper Grouper AP.
- March 2024: Presentations and discussions with the SSC, Snapper Grouper AP, and Council about management strategies to be included for evaluation.
- October 2024: SSC and Snapper Grouper AP received a presentation on the findings of the MSE.
- December 2024: The Council received a presentation on the findings of the MSE that indicated effort would be reduced to rebuild Gag and Red Snapper. Landing limits (size limits) seemed to be ineffective.
- January 2025: Staff will develop a request for proposals to continue MSE work for the Snapper Grouper Fishery Management Unit.
- 2025: Work will continue to narrow the range of management measures to actionable measures.

Unassessed Snapper Grouper Species ABCs/ACLs/Allocations

Staff Lead: TBD

Purpose of the Amendment: Update the ABCs, ACLs, and sector allocations for unassessed snapper grouper species based on catch level recommendations from the SSC.

Action Summary: adjust ABCs, ACLs, and sector allocations for unassessed snapper grouper species to incorporate revised recreational landings based on updated MRIP-FES methodology.

Most recent document: None

Key Events:

- October 2019: The SSC provided updated catch level recommendations.
- December 2021: Council decided to update catch level recommendations for the unassessed snapper grouper species once the ABC Control Rule Amendment is implemented (likely late 2023).
- December 2024: The Council directed staff to begin an evaluation to determine the continued need for conservation and federal management for species in the Snapper Grouper FMP. This evaluation may affect development of this amendment.

Dolphin Wahoo

Under development:

Regulatory Amendment 3 (Minimum Size Limit and Recreational Retention Limits for Dolphin)

Staff Lead: John Hadley

Purpose of the Amendment: This amendment will seek to extend the applicable range of the minimum size limit for dolphin and modify recreational retention limits for dolphin.

Action Summary: This amendment includes actions that would extend the applicable geographic range of the minimum size limit, modify recreational bag and vessel limits, and remove captain and crew bag limits for dolphin.

Most recent document: December 2024 decision document.

Development Level: Scoping has been conducted and work on the amendment is underway.

Key Events:

- June 2021: Amendment initiated to examine extending the geographic coverage of the minimum size limit for dolphin, reducing or removing captain and crew bag limits onboard for-hire vessels, and specifying different retention limits for dolphin and wahoo onboard private vessels and charter vessels.
- September 2021: Information paper and direction to staff to continue developing options that would extend the applicable range of the minimum size limit for dolphin, establish separate retention limits for dolphin onboard for-hire and private vessels, and reduce or remove for-hire captain and crew bag limits for dolphin.
- March 2022: Approved the amendment for scoping.
- June 2022: Revised options.
- December 2022: Paused work on amendment until June 2023 to allow for completion of dolphin stakeholder workshops being held for the Dolphin MSE (led by the SEFSC).
- June 2023: Reviewed comments received during MSE stakeholder workshops and postponed further development of the amendment until the December 2024 meeting or the Dolphin MSE report is available, whichever comes first.

- December 2023: Received the Dolphin Wahoo AP report and an update on the progress of the Dolphin MSE, noting that the MSE report is now scheduled for the middle part of 2025. The Council reiterated their intent to review Regulatory Amendment 3 at the December 2024 Council meeting.
- December 2024: Reviewed progress of the MSE for Dolphin and directed staff to re-commence work on the amendment with the intent of using modeling results from the MSE to help inform the Council's decisions in the amendment. The preliminary MSE results will be reviewed by the SSC in April 2024 and by the Council in June 2024.
- March 2025: Directed staff to delay the amendment until the MSE has been completed.

Planned or Postponed:

Pelagic Longlines in the Dolphin Wahoo Fishery

Staff Lead: John Hadley

Purpose of the Amendment: This amendment would consider implementing changes to the commercial longline fishery for dolphin and wahoo to better align with HMS requirements and potentially respond to recommendations from the forthcoming updated Biological Opinion for the dolphin wahoo fishery.

Action Summary: TBD

Most recent document: None

Key Events:

- September 2020: The Council moved, from Amendment 10, actions that would modify gear, bait, and training requirements in the commercial longline fishery for dolphin and wahoo to better align with HMS requirements to a new amendment. The Council also added an alternative that would prohibit the use of pelagic longline gear in the dolphin wahoo fishery unless a vessel has the limited entry HMS permits that allows the use of this gear.
- June 2021: Guidance to examine this potential amendment once the updated biological opinion for the Dolphin Wahoo fishery is available.

December 2022: paused consideration to allow for completion of the Dolphin MSE (led by the SEFSC). The MSE is expected to be completed by mid 2026.

Golden Crab

Recently Submitted or Implemented: None

Under Development: None

Planned or Postponed: None

Coral

Recently Submitted or Implemented: None

Under Development:

Coral Amendment 11/Shrimp Amendment 12 (CHAPC Modifications and Shrimp Fishery Access Area)

Staff Lead: Kathleen Howington & Allie Iberle

Purpose of the Amendment: To establish a Shrimp Fishery Access Area (SFAA) along the western boundary of the northern extension of the Oculina Bank Habitat Area of Particular Concern (OHAPC) where fishing for rock shrimp would be allowed. The area under consideration was once utilized by the fishery but access to it was restricted with implementation of Coral Amendment 8 in 2014.

Action Summary: To establish an area within the existing OHAPC where rock shrimp fishing would be allowed to restore access to historic grounds to the fishery while maintaining protection for Oculina coral.

Most recent document: March 2025 Decision Document

Key Events:

- September 2024: Council directed staff to begin preparing Coral Amendment 11/Shrimp Amendment 12 to establish a SFAA.
- March 2025: The Council reviewed the range of alternatives which included a proposed alternative which would establish a smaller SFAA than the one selected as the preferred during Coral Amendment 10. The Council determined that this alternative did not satisfy the purpose and need of the amendment and it was not included. The IPT will analyze the current range of alternatives and present this analysis in June 2025.

Planned or Postponed: None

Shrimp

Recently Submitted or Implemented: None

Under Development: Shrimp Amendment 12/Coral Amendment 11. See details under Coral FMP above.

Planned or Postponed: None

Mackerel Cobia

Recently Submitted or Implemented: None

Under Development: None

Planned or Postponed:

Framework Amendment 13 (Atlantic Spanish mackerel catch levels)

Staff Lead: Christina Wiegand

Purpose of Amendment: Responds to the latest stock assessment (SEDAR 78). Atlantic Spanish Mackerel are neither overfished nor undergoing overfishing. This amendment will update catch levels based on the SSC recommendations.

Action Summary: adoption of new catch level recommendations.

Most recent document: December 2023 decision document

Development Level: Scoping

Key Events:

- June 2023: amendment development initiated.
- September 2023: approved for scoping
- November 2023: Mackerel Cobia AP discussion
- December 2023: work on amendment paused until after port meetings are completed.

Amendment 33 (Gulf King Mackerel Assessment and Allocations)

Staff Lead: Christina Wiegand

Purpose of Amendment: Responds to the latest stock assessment (SEDAR 38 Update). Gulf king mackerel are not overfished nor undergoing overfishing. This amendment will update catch levels based on Gulf SSC recommendations and update allocations.

Action Summary: adoption of updated catch levels; sector allocations.

Most recent document: December 2022 Meeting Document

Development Level: Scoping

Key Events:

- December 2021: South Atlantic Council reviewed options.
- March 2022: South Atlantic Council reviewed options.
- September 2022: South Atlantic Council reviews and proposed revisions to the CMP FMP objectives.
- October 2022: Gulf Council stops work on amendment.

Spiny Lobster

Recently Submitted or Implemented: None

Planned or Postponed:

Spiny Lobster Regulatory Amendment 5 (commercial trip limit for vessels with an SG1 and LT permit off NC, SC, and GA)

Staff lead: Christina Wiegand

Purpose of Amendment: to allow vessels with a snapper grouper unlimited permit (SG1) and a spiny lobster tailing permit (LT) to retain commercial quantities of spiny lobster, allowing them to supplement their snapper grouper trips with additional income from lobster.

Action Summary: allow vessels with an SG1 and LT permit to retain 20/30/40 lobster per trip harvested via diving, off NC, SC, and GA.

Most recent document: None

Key Events:

- March 2019: Amendment development initiated.
- June 2019: Options paper reviewed during meeting.

Generic Amendments

Under Development:

Comprehensive Recreational For-Hire Limited Entry Amendment

Staff Leads: John Hadley & Myra Brouwer

Purpose of Amendment: To establish limited entry for the for-hire components of the snapper grouper, coastal migratory pelagics, and dolphin wahoo fisheries.

Action Summary: TBD

Most recent document: June 2024 Meeting Document.

Development Level: Pre-scoping.

Key Events:

- December 2023: Amendment development initiated. Additional control dates of December 8, 2023, for for-hire permits and December 5, 2023, for reporting to SEFHIER established.
- March 2024: Reviewed a discussion document on the existing control date for the for-hire fishery, previous consideration of limited entry in the snapper grouper for-hire fishery, and permit information through 2020.
- June 2024: Paused development until permit data are available.

Comprehensive For-Hire Reporting Improvement Amendment

Staff Leads: John Hadley & Myra Brouwer

Purpose of Amendment: To improve compliance with for-hire reporting requirements

Action Summary: TBD

Most recent document: March 2025 Discussion Document

Development Level: Scoping.

Key Events:

- June 2024: Direction to initiate amendment to improve the SEFHIER program in the South Atlantic.
- September 2024:
 - Appointed some members to the For-Hire reporting AP (FHR AP). Additional appointments will occur in December 2024.
 - Revised Purpose and Need statement to include economic data.
 - Reviewed draft list of actions and requested additional information from SERO to be presented at the December 2024 meeting.
- December 2024: appointed remaining members for the FHR AP and directed staff to convene FHR AP and Law Enforcement AP prior to the March 2025 meeting.
- March 2025: Reviewed APs input, expanded purpose and need to potentially include the Southeast Region Headboat Survey, approved for scoping.

Other Work Items

South Atlantic Ecopath with Ecosim Model Application

Staff Lead: Chip Collier

The SSC reviewed the SAFMC EwE model development in October 2020 and recommended that the model was ready for applying to specific questions of interest to the Council. In December 2020, the Council identified 4 potential questions to address with the model. Staff is working with FL FWC staff to provide a contract to support FWC leading the effort to apply the model to 2 of the Councils questions. The impact of high Red Snapper recruitment was reviewed by the SSC in October 2021 and presented to the Council in December 2021. The second product will be the development of a model of intermediate complexity for ecosystem analysis (MICE). The MICE model was completed in June 2022

and a preliminary model was developed. A new contract was developed in 2023 to add Ecospace module into the Ecopath model to describe potential shifts in species distribution. The pilot species is Black Sea Bass. The project will be presented to the SSC in April 2025.

Appendix A. Rulemaking progress for SAFMC amendments (updated 11/12/24)

Amendment	Council voted final action	Council submitted to NMFS	NOA published (comments due)	Proposed rule published (comments due)	Final rule published	Amendment Approval date	Implementation date
SG Reg 36 (transit and bag limits)	9/20/24		n/a			n/a	
SG 48 (wreckfish)	6/14/24	12/19/24					
SG 55 (scamp and yellowmouth)	9/20/24	12/9/24	3/17/25 (5/16/25)				
Joint Commercial Electronic Logbook	Sept 2023 SA) Oct 2023 (Gulf)	2/27/2024					

Note: Blank cells indicate that the action has not occurred.

Framework Amendments

- The approximate time frame from when Council submits a framework amendment to NMFS and the implementation date is 6-9 months.
- NMFS does not publish an NOA for a framework amendment.
- The public comment period for proposed rules is usually 30 days.

- Plan Amendments

- The approximate time frame from when Council submits a plan amendment to NMFS and the implementation date is 9-11 months.
- NMFS publishes an NOA for a plan amendment, followed by the proposed rule.
- The public comment period for proposed rules and amendments (NOA) are usually 30 and 60 days, respectively.