

Spiny Lobster Amendment 13



Photo credit: Ben Gutzler

Decision Document

Background

A bully net is a type of gear for harvesting spiny lobster that generally consists of a mesh net with a long handle. Participation in the bully net fishery has steadily increased in recent years with landings using this gear type increasing from 1% to 3.4% of total landings in one year (**Figure 1**). Currently, there is little information indicating bully net harvest landings occur in federal waters. Constituents expressed concerns to Florida Fish and Wildlife Conservation Commission (FWC) about increased participation in the open-access bully net component of the spiny lobster fishery along with growing conflicts between recreational bully netters, commercial bully netters, and other members of the public such as waterfront homeowners. In response, FWC developed and implemented a permit program for the commercial bully net fishery that would allow for them to better quantify participation, while continuing to allow entry into the fishery, and address other industry and stakeholder concerns. The new regulations took effect May 1, 2017.

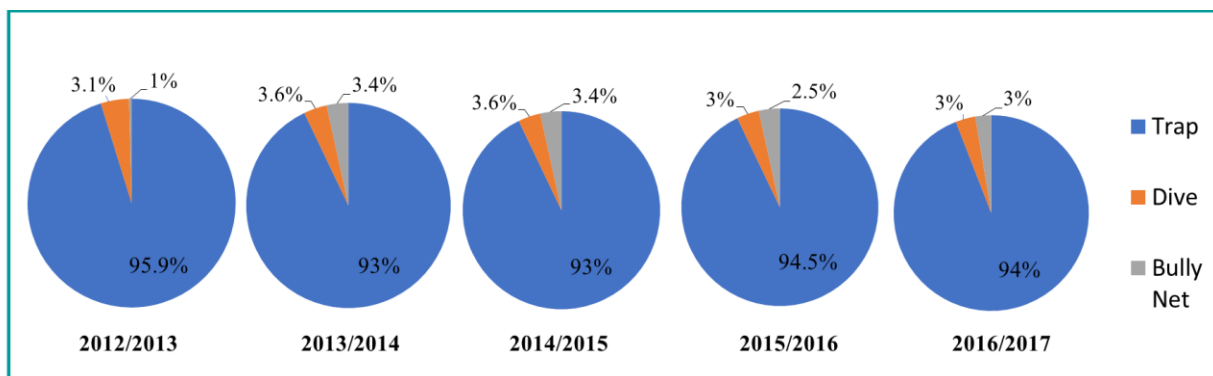


Figure 1. Proportion of commercial lobster landings by gear type.

Source: Florida Trip Ticket records; October 2, 2017.

In 1992, Amendment 2 to the Spiny Lobster FMP was implemented (GMFMC and SAFMC 1989) which allowed FWC to propose Florida regulations for implementation in the EEZ through NMFS rulemaking. This procedure was based on the premise that timelier regulatory mechanisms was need for state and federal coordination. Any regulations proposed under the procedure were required to be consistent with the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act), objectives of the Spiny Lobster FMP, and other applicable federal law. However, NMFS determined that the previous cooperative management procedure for the spiny lobster protocol established in Amendment 2 was inadvertently removed in 2012 with the implementation of Spiny Lobster Amendment 10; therefore, FWC cannot propose rules directly to NMFS for implementation. Instead, any changes proposed by FWC for federal regulations must go through the Council process of either an FMP framework action or full amendment

This amendment addresses the bully netting regulations proposed by Florida, other incompatibilities between federal and Florida states laws, and addresses reinstating the cooperative management procedure, which would allow Florida to directly submit proposed regulations to NMFS.

Actions in this amendment

Action 1: Florida state bully net permit, marking requirements, and gear prohibitions for bully net gear in the exclusive economic zone (EEZ) off Florida.

Action 2: Commercial spiny lobster bully net and dive gear trip limits in the EEZ off Florida.

Action 3: Specification of degradable panels in spiny lobster traps in the EEZ off Florida.

Action 4: Harvesting restrictions near artificial habitat in the EEZ off Florida.

Action 5: Establish an enhanced cooperative management procedure for federal and Florida state agencies for the management of spiny lobster.

Objectives for this meeting

- Review IPT changes to action and alternatives, modify as necessary and approve.
- Review the effects analysis and select preferred alternatives.
- Approve the amendment for public hearings.

Expected amendment timing

	Process Step	Date
✓	South Atlantic and Gulf Councils direct staff to begin work on amendment to address bully-nets and reestablish the procedure.	June 2017
✓	Gulf Council reviews draft options paper.	October 2017
✓	South Atlantic Council reviews draft options paper.	December 2017
✓	South Atlantic scoping webinars	January 2018
✓	Gulf Council reviews new draft options paper and approves actions/alternatives to be analyzed.	January 2018
✓	South Atlantic Council reviews new draft options paper and approves actions/alternatives to be analyzed.	March 2018
	South Atlantic and Gulf Councils review public hearing draft of Spiny Lobster Amendment 13, selects preferred alternatives.	June 2018
	Public Hearings	Summer 2018
	Gulf Council reviews public input, makes changes if necessary and considers approval of final document.	August 2018
	South Atlantic Council reviews public input, makes changes if necessary, and considers approval of final document.	September 2018

Purpose and need statement

Purpose for Actions

The purpose of this action is to align federal regulations for spiny lobster that apply to the exclusive economic zone off Florida with Florida state regulations, re-establish the procedure for an enhanced cooperative management system, and update management measures to aid law enforcement.

Need for Actions

The need for this action is to effectively manage and enforce the harvest of spiny lobster to prevent overfishing while achieving optimum yield.

Committee Action:

- REVIEW PURPOSE AND NEED, AS NECESSARY
- OTHERS?

Proposed Actions and Alternatives

Action 1: Florida state bully net permit, marking requirements, and gear prohibitions for bully net gear in the exclusive economic zone (EEZ) off Florida

Alternative 1: No Action. A Florida state commercial bully net permit is not required for bully net gear or regulations related to bully nets for spiny lobster commercial harvesters in the EEZ off Florida in the Gulf of Mexico (Gulf) and the South Atlantic.

Alternative 2: Align federal regulations to be consistent with Florida regulations for spiny lobster commercial harvesters *using bully net gear* by implementing the following:

- Require commercial bully net vessels in the EEZ off Florida to have a bully net permit from Florida
- Require that the vessel be marked with the harvester's Florida bully net permit number using reflective paint or other reflective material
- Prohibit commercial bully net vessels from having trap pullers onboard
- Prohibit the simultaneous possession of a bully net and any underwater breathing apparatus (not including dive masks or snorkels) onboard a vessel used to harvest or transport spiny lobster for commercial purposes.

Discussion:

- Under **Alternative 1**, (No Action), a Florida state commercial bully net permit is not required for bully net gear and there are no regulations specific to bully nets for spiny lobster harvesters in the EEZ off Florida in the Gulf and the South Atlantic.
- **Alternative 2** would make regulations in the EEZ off Florida in the Gulf and South Atlantic consistent with the changes made by the Florida in its regulations.
 - No new federal permit will be created under **Alternative 2**, and NMFS will require the same regulations as the Florida to harvest spiny lobster using bully nets in the EEZ off Florida (see below).
 - Consistency between federal and Florida regulations under is expected to improve enforcement. Public testimony includes statements such as possible illegal diving for lobster without a commercial dive permit, illegal trap robbing/working traps without trap certificates/trap tags, or illegally working traps at night. Vessel markings with reflective paint would aid law enforcement to identify the bully netters at night and would help reduce the potential for individuals to use the bully net fishery as cover for illegal lobster harvest at night.
 - Consistency in regulations between federal and state waters reduces confusion among the fishers and is expected to aid in compliance with regulations.

Spiny Lobster Advisory Panel Recommendation:

The Spiny Lobster Advisory Panel (SL AP) felt that consistency in regulations was important for law enforcement officers, though bully nets are not utilized in federal waters. The SL AP unanimously approved a motion recommending **Alternative 2** under **Action 1**.

Law Enforcement Advisory Panel Recommendation:

The Law Enforcement Advisory Panel (LE AP) felt consistency across the board would be beneficial for law enforcement as well as commercial and recreational fishermen. One AP member asked whether it would make more sense to ban bully nets in federal water as opposed to imposing regulations that won't be called into effect.

Committee Action:

- MODIFY ACTION AND ALTERNATIVE AS NECESSARY
- SELECT PREFERRED ALTERNATIVE
- OTHER?

Action 2: Commercial spiny lobster bully net and dive gear trip limits in the EEZ off Florida

Alternative 1. No Action. Do not establish a commercial daily vessel harvest and possession limit for spiny lobster harvested by bully net or dive gear in the EEZ off Florida.

Alternative 2. Establish a commercial daily vessel harvest and possession limit of 250 per day/vessel for spiny lobsters harvested by bully net in or from the entire EEZ off Florida.

Alternative 3. Establish a commercial daily vessel harvest and possession limit of 250 per day/vessel for spiny lobsters harvested by diving in or from the EEZ off only Broward, Dade, Monroe, Collier, and Lee Counties, Florida.

Note: In Action 2, both Alternative 2 and Alternative 3 could be selected as preferred.

Discussion:

- Under **Alternative 1 (No Action)**, there is not a commercial daily vessel harvest and possession limit for spiny lobster harvested by bully net or dive gear in the EEZ listed in federal regulations.
 - Note: federal regulation state in the EEZ off Florida, commercial spiny lobster harvesters must have the licenses and certificates specified to be a “commercial harvester,” as defined in Florida’s regulations and Florida’s regulations state that commercial harvesters are restricted to the commercial harvest limits listed in **Alternatives 2 and 3** when bully net gear or dive gear is used.
 - There is little information available on how much, if any, bully net harvest occurs in federal waters. Landings records indicate dive harvest is regularly conducted in state and federal waters.
- **Alternative 2** would modify federal regulations and list a commercial daily vessel harvest and possession limit of 250 per day for spiny lobsters harvested by bully net in or from the EEZ off Florida. This alternative would simplify the regulations for both anglers and law enforcement by explicitly stating that the possession limit applies to the EEZ off Florida.
- **Alternative 3** would modify federal regulations and list a commercial daily vessel harvest and possession limit of 250 per day for spiny lobsters harvested by diving in or from the EEZ off Broward, Dade, Monroe, Collier, and Lee Counties, Florida, only. Similar to **Alternative 2**, **Alternative 3** would make regulations clearer and lessen potential enforcement issues.

Spiny Lobster Advisory Panel Recommendation:

The SL AP felt it was important to establish trip limits in federal waters, especially for commercial diving. The SL AP unanimously approved a motion recommending **Alternative 2** and **Alternative 3** under **Action 2**.

Committee Action:

- MODIFY ACTION AND ALTERNATIVE AS NECESSARY
- SELECT PREFERRED ALTERNATIVE
- OTHER?

Action 3: Specification of degradable panels in spiny lobster traps in the EEZ off Florida

Alternative 1. No Action. In the EEZ off Florida, a spiny lobster trap constructed of material other than wood must have a panel constructed of wood, cotton, or other material that will degrade at the same rate as a wooden trap. Such panel must be located in the upper half of the sides or on top of the trap, so that, when removed, there will be an opening in the trap no smaller than the diameter found at the throat or entrance of the trap.

Alternative 2. In the EEZ off Florida, a spiny lobster trap constructed of material other than wood is required to have a degradable panel no smaller than 6 inches by 4 inches or no smaller than the dimensions of the throat or entrance of the trap, whichever is larger, and shall be constructed of cypress or untreated pine slats no thicker than $\frac{3}{4}$ in (0.6 cm). This degradable panel must be located on the top horizontal section of the trap.

Discussion:

Degradable panel requirements in Florida state waters are more specific than those in federal waters and there are several inconsistencies between the two sets of regulations:

Current Regulations in Federal Waters:

- Material: must be constructed of wood, cotton, or other material that will degrade at the same rate as a wooden trap.
- Size: when removed, there will be an opening in the trap no smaller than the diameter found at the throat or entrance of the trap.
- Location: located in the upper half of the sides or on top of the trap.

Current Regulations in Florida State Waters:

- Material: must be constructed of cypress or untreated pine slats no thicker than $\frac{3}{4}$ in (0.6 cm).
- Size: no smaller than 6 inches by 4 inches or no smaller than the dimensions of the throat or entrance of the trap, whichever is larger.
- Location: located on the top horizontal section of the trap.

Alternative 1 would not update regulations for degradable panels in spiny lobster traps in federal waters off Florida and would continue the inconsistency between state and federal requirements for degradable panels in spiny lobster traps.

Alternative 2 would modify federal regulations for degradable panels in spiny lobster traps and update the panel material, size, and location requirements to match those in Florida state waters.

- Wooden spiny lobster traps are most common, traps constructed of material other than wood are occasionally utilized, particularly in deeper waters where trap stability and lifespan are important.
- **Alternative 2** would create consistency in trap construction requirements and would only apply to spiny lobster traps.

Spiny Lobster Advisory Panel Recommendation:

The SL AP noted that degradable panel construction is one of the few examples where state and federal regulations should not be aligned. Non-wooden traps constructed for use in federal waters utilize treated wood due to organisms found offshore that eat the wooden panels. SL AP members felt cypress or untreated pine would not last a full 90-days. The SL AP unanimously approved a motion recommending **Alternative 1 (No Action)** under **Action 3**.

Law Enforcement Advisory Panel Recommendation:

The LE AP mentioned that specifying the material for traps and panels (wood type) is not relevant from an enforcement perspective since a case will not be made solely on the material used for constructing the trap.

Committee Action:

- MODIFY ACTION AND ALTERNATIVE AS NECESSARY
- SELECT PREFERRED ALTERNATIVE
- OTHER?

Action 4: Harvesting restrictions near artificial habitat in the EEZ off Florida

Alternative 1. No Action. Federal regulations have no formal definition developed for artificial habitat and there are no restrictions for harvest and possession of spiny lobster in the EEZ off an artificial habitat as defined by Florida Administrative Code (FAC).

Alternative 2. No person shall harvest any spiny lobster from artificial habitat in the EEZ off Florida. The harvest and possession in the water of spiny lobster in excess of the recreational bag limit is hereby prohibited within 10 yards of artificial habitat as is consistent with FAC. For spiny lobster, “artificial habitat” means any material placed in the waters of the state that is reasonably suited to providing cover and habitat for spiny lobster. Such material may be constructed of, but is not limited to, wood, metal, fiberglass, concrete, or plastic, or any combination thereof, and may be fabricated for this specific purpose or for some other purpose. The term does not include fishing gear allowed by rule of the Florida Fish and Wildlife Conservation Commission (FWC), legally permitted structures, or artificial reef sites constructed pursuant to permits issued by the United States Army Corps of Engineers or by the state regulatory agency.

Discussion:

- **Alternative 1 (No Action)** would not allow the placement of artificial habitat for spiny lobsters. However, it would also not prohibit harvest from existing artificial structures in federal waters. This alternative creates an inconsistency between the federal and state regulations, which is directly contradictory to the objectives established in the Fishery Management Plan for the Spiny Lobster Fishery of the Gulf of Mexico and South Atlantic (Spiny Lobster FMP).
 - Artificial habitat for lobsters, commonly referred to as ‘casitas,’ are structures placed on the sea floor by dive fishermen to aggregate lobsters. Though placement of artificial habitat is considered illegal dumping, approximately 1,000-1,500 artificial habitats were placed in the lower keys during the late 1990s and early 2000s.
 - FWC noticed a shift in the harvest in the commercial sector from trap fishermen to commercial diving, and sought management measures to maintain the historical makeup of the fishery.
 - The presence of artificial habitats also changes the natural habitat/benthic structure and ecosystem surrounding the structure.
- Under **Alternative 2**, specifically prohibiting harvest from within 10 yards of artificial habitat and prohibited harvest of spiny lobster from artificial habitat as defined in the FAC in the EEZ off Florida maintains consistency with Florida’s regulations. Alternative 2 would serve as an additional disincentive to illegally place casitas in federal waters. The artificial habitat designation and harvest prohibition outlined in **Alternative 2** are specific to spiny lobster

IPT Recommendation:

Alternative 1. No Action. Federal regulations have no formal definition developed for artificial habitat* and there are no restrictions for harvest and possession of spiny lobster in the EEZ off an artificial habitat as defined by Florida Administrative Code (FAC).

Alternative 2. No person shall harvest any spiny lobster from artificial habitat* in the EEZ off Florida. The harvest and possession in the water of spiny lobster in excess of the recreational bag limit is hereby prohibited within 10 yards of artificial habitat as is consistent with FAC 64B-24.006(12).

***Note:** For the purpose of this prohibition, “artificial habitat” means any material placed in the waters of the state of Florida or in the EEZ off Florida that is reasonably suited to providing cover and habitat for spiny lobster. Such material may be constructed of, but is not limited to, wood, metal, fiberglass, concrete, or plastic, or any combination thereof, and may be fabricated for the specific purpose of attracting lobsters or for some other purpose. The term does not include fishing gear allowed by federal regulations, legally permitted structures, or artificial reef sites constructed pursuant to permits issued by the United States Army Corps of Engineers or by the state regulatory agency.

IPT Recommendation:

Due to concerns regarding the ability to provide notice to fishermen regarding the location of artificial habitat in federal waters and the ability to enforce such regulations in the EEZ the IPT recommends removal of **Action 4** from Amendment 13.

Spiny Lobster Advisory Panel Recommendation:

SL AP members approved of discouraging the placement of casitas in federal waters but noted that the definition was vague and doesn't address material in federal waters that isn't permitted but wasn't placed intentionally (ex. bridge rubble that is commonly used by divers harvesting spiny lobster). The SL AP unanimously approved a motion recommending **Alternative 2** under **Action 4**.

Law Enforcement Advisory Panel Recommendation:

The LE AP expressed concerns about the ability to notice fishermen regarding the location of artificial habitat given the broad definition. Regulations that are intended to modify behavior are not always enforceable or practical. It was also noted that NOAA OLE does not have dive teams available and such work is done through agency partnerships.

Committee Action:

- MODIFY ACTION AND ALTERNATIVE AS NECESSARY
- APPROVE THE IPT'S RECOMMENDED WORDING FOR ACTION 4
- APPROVE THE IPT'S RECOMMENDATION TO REMOVE ACTION 4
- SELECT PREFERRED ALTERNATIVE
- OTHER?

Action 5: Establish an enhanced cooperative management procedure for federal and Florida state agencies for the management of spiny lobster

Alternative 1: No Action. Do not establish an enhanced cooperative management procedure for the management of spiny lobster. The Councils must develop an amendment to the Fishery Management Plan for the Spiny Lobster Fishery of the Gulf of Mexico and South Atlantic (Spiny Lobster FMP) to establish new federal regulations consistent with new Florida regulations.

Alternative 2. Establish an enhanced cooperative management procedure that allows Florida to request changes to the spiny lobster federal regulations through NMFS rulemaking. Following is the proposed language (adapted from Amendment 2 to the Spiny Lobster FMP) for the procedure to be added to the existing protocol (established in Amendment 10 to the Spiny Lobster FMP):

Proposed Language for Enhanced Cooperative Management Protocol and Procedure Joint Fishery Management Plan for the Spiny Lobster Fishery of the Gulf of Mexico (Gulf and South Atlantic Procedure for Enhanced Cooperative Management:

1. The Gulf of Mexico and South Atlantic Fishery Management Councils (Councils) and National Marine Fisheries Service (NMFS) acknowledge that the spiny lobster fishery is largely a State of Florida (State) fishery, which extends into the exclusive economic zone (EEZ), in terms of current participants in the directed fishery, major nursery, fishing, landing areas, and historical regulation of the fishery. As such, this fishery requires cooperative state/federal efforts for effective management through the Fishery Management Plan for the Spiny Lobster Fishery of the Gulf of Mexico and South Atlantic (Spiny Lobster FMP).
2. The Councils and NMFS acknowledge that the State is managing and will continue to manage the resource to protect and increase the long-term yields and prevent depletion of lobster stocks and that the State Administrative Procedure Act and rule implementation procedures, including final approval of the rules by Governor and Cabinet, provide ample and fair opportunity for all persons to participate in the rulemaking procedure.
3. The Florida Fish and Wildlife Conservation Commission (FWC) acknowledges that regulations proposed for implementation under any fishery management plan amendment, regulatory or otherwise, must be consistent with the management objectives of the Spiny Lobster FMP, the National Standards, the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) including the National Standards, and all other applicable law. Federal rules will be implemented in accordance with the Administrative Procedure Act.

4. The Councils and NOAA Fisheries Service agree that the State may propose the following regulatory changes directly to NOAA Fisheries Service:

A. GEAR RESTRICTIONS:

- a. Limiting the number of traps that may be fished by each vessel.
- b. Describing the construction characteristics of traps, including requiring escape gaps and their specifications/measurements.
- c. Specification of gear and vessel identification requirements including placement and materials to be used.
- d. Specification of gear that may be utilized or prohibited in the directed fishery and specification of bycatch levels that may be taken as incidental catch in non-directed fisheries.
- e. Changes to soak or removal periods and requirements for traps.

B. HARVEST RESTRICTIONS:

- a. Recreational bag and possession limits.
- b. Changes in fishing seasons.
- c. Limitations on use, possession, and handling of undersized lobsters.
- d. Changes in minimum legal size.
- e. Changes to permit requirements.

5. The State will have the responsibility for collecting and developing the information upon which to base the fishing regulations, with assistance as needed by NMFS, and cooperatively share the responsibility for enforcement with federal agencies.
6. FWC will develop alternative proposed regulations and analyses on the effects of these alternatives, hold public hearings (as required by Florida's Administrative Procedure Act), and at a final hearing select each preferred alternative rule for implementation. After approval of the regulations by the FWC Commissioners, FWC will advise the Councils and the NOAA Fisheries Service's Southeast Regional Administrator (RA) of the recommended regulations and proposed implementation date and will provide to the RA and to the Councils the analyses of the effects and impacts of the recommended and alternative regulations and summaries of public comment. **For regulations to be implemented by the start of the fishing season (currently August 6), FWC must complete these actions on or before February 1.** The Councils may submit the proposed regulations and supporting analyses to the Scientific and Statistical Committees (SSC) for review of the scientific analyses. The Councils may also submit the proposed regulations and supporting analyses to the advisory panels for comment.
7. The RA will review the proposed regulations, analyses, and public record, and will notify the Councils and FWC if the RA preliminarily determines that the regulations are consistent with this Protocol and Procedure, the objectives of the Spiny Lobster FMP, the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) including the National Standards, and other applicable law. If the Councils agree with the RA's preliminary determination, the Councils will deem the proposed regulations as necessary or appropriate, and the RA will proceed with implementation of the proposed

regulations as specified in Paragraph 9. If the Councils do not agree with the RA's preliminary determination, the RA will not proceed with implementation of the proposed regulations until this issue has been resolved. If in the judgment of the RA, the proposed regulations or the supporting record are not consistent with this Protocol and Procedure or the Spiny Lobster FMP objectives or the applicable law, the RA will immediately notify the Councils and FWC of the deficiencies in the regulations or supporting record. FWC may submit, for the RA's review, additional information or analyses to correct the deficiencies in the record.

8. The rules will apply to the EEZ for the management area from North Carolina through Texas, unless the RA or the Councils determine those rules may adversely impact other state and federal fisheries. In that event, the RA may limit the application of the rule, as necessary, to address the problem.
9. When the RA has preliminarily concluded the proposed regulations are acceptable and the Councils have deemed the proposed regulations as necessary and appropriate, the RA will draft and publish a proposed rule for public comment. After reviewing the public comments, the RA may, in consultation with the Councils, make appropriate revisions to the proposed regulations prior to publishing a final rule in the Federal Register. The effective date of rules promulgated under this procedure will be the starting date of the next fishing season following publication of the final rule, unless otherwise agreed upon by FWC, the Councils, and the RA.
10. NOAA Fisheries Service and the Councils agree that their staffs will prepare the proposed and final rules and, based on Florida's analyses of any impacts, the associated National Environmental Policy Act documentation and other documents required to support the rule.

Note: the IPT would like the Councils to provide guidance on the highlighted portions of the enhanced cooperative management protocol and procedure. See IPT Recommendations below.

Discussion:

- For spiny lobster, Florida has been historically allowed to recommend regulations directly to NMFS; however, the procedure governing this process was removed from the Spiny Lobster FMP when the cooperative protocol was updated in Amendment 10. Therefore, these regulations cannot be implemented for the federal segment of the fishery without Council action. **Alternative 1 (No Action)** would keep the current process, which requires that any changes for federal spiny lobster regulations be developed through Council action.
- **Alternative 2** would re-establish a procedure allowing Florida to propose federal regulations directly to NMFS under the existing cooperative protocol. The recommended regulations and corresponding analyses must be based on the best available science and be consistent with Spiny Lobster FMP objectives, the national standards, and any other

applicable law. **Alternative 2** is expected to help expedite making federal regulations consistent with Florida regulations for the EEZ off Florida.

IPT Recommendation:

The IPT would like guidance from the Council on the proposed language for the enhanced cooperative management protocol and procedure. Specifically, section number six outlines a timeline for FWC to submit analyses of the effects and impacts of the recommended and alternative regulations and summaries of public comment to the Councils and RA for implementation to occur before the start of the fishing season. Given variation in workload, would the Council like to see this timeline be modified or removed from the protocol and procedure?

Additionally, the IPT would like guidance on section number eight, which states that rules submitted by FWC will apply to the EEZ from North Carolina through Texas unless the RA or Councils determine the rules may adversely impact other state or federal fisheries. Would the Council like to see this section remain in the procedure and protocol?

Spiny Lobster Advisory Panel Recommendation:

The SL AP felt that the South Atlantic and Gulf Councils have done an excellent job managing spiny lobster and wanted to ensure that the enhanced cooperative management procedure did not allow the state of Florida to impose regulations in federal waters without approval from both Councils. The SL AP unanimously approved a motion recommending **Alternative 2** under **Action 5**.

Committee Action:

- MODIFY ACTION AND ALTERNATIVE AS NECESSARY
- PROVIDE GUIDANCE ON PROTOCOL AND PROCEDURE LANGUAGE
- SELECT PREFERRED ALTERNATIVE

- APPROVE FOR PUBLIC HEARINGS
- OTHER?

Draft Motion:

DRAFT MOTION: APPROVE SPINY LOBSTER AMENDMENT 13 FOR PUBLIC HEARINGS.