

Gulf of Mexico Fishery Management Council
Public Comment Guidelines
Month 2021

About these Guidelines

The following guidelines are created for Council staff and the public to outline Council procedures for collecting, storing, and communicating public comments. Consideration of public comment is an integral part of the Council process; thus, staff is responsible for ensuring that public comments are handled properly. We strive to provide easy opportunities to provide public comment and prioritize the effective synthesizes of comments for Council use in the decision-making process.

Written Comment Collection

Written public comment is welcome at any time and on any topic. In addition to gathering general comments, we endeavor to collect issue specific comments throughout the development of Amendments to our Fisheries Management Plans. We also collect targeted comments on extra issues including, fish stock status, Executive Orders and Coral Grant related activities. We ask commenters to submit their name, email address, location, and association with the fishery along with each comment so we can gain a better understanding of each perspective. However, those who wish to remain anonymous may do so by simply choosing not to fill in those data fields on the online comment forms or by requesting that comments sent via email remain anonymous.

General Comments

Written general comments can be submitted by email (to gulfcouncil@gulfcouncil.org), by written correspondence, or through our General Comment web form. Comments received via email or written correspondence will be uploaded to the appropriate comment repository. Comments received online will automatically populate in the comment repository. Comments submitted by Tuesday prior to each Council meeting will be included in the “other fisheries issues’ portion of the public comment agenda item in the Council briefing materials.

Comments Specific to a Council Action

Upon initiation of an Amendment or Framework Action staff will create a unique comment form and link it to the “Amendments Under Development” webpage. The simplest way to do this is to copy another Google Form in the Gulf Council Google Drive folder: Amendments - Implemented, Under Dev, On Hold, Gen Comments> Under Development. The title will need to be updated with the appropriate document name and a new spreadsheet will need to be created to capture responses. These links will then need to be added to the appropriate “Submit Comment” and “Read Comments” on the “Amendments Under Development” page. Staff will search comments in the general comment repository from the year prior to initiation of action and add those

legacy comments to the newly created issue specific comment repository. Issue specific comments can still be submitted via email and written correspondence and staff will sort them into the appropriate issue specific comment repository. Issue specific comments will be collected until 5:00 PM eastern time on the Tuesday before the Council meeting when final action on the issue is scheduled to take place. Staff will summarize all comments received, add the summary and full text comments to the Council briefing materials, and present them to the appropriate Council Committee before final action is taken. After final action is taken on a document staff will disable the comment form and the comments will be added to the document itself.

.pdf Comments and Comments Received on Multiple Issues

If a letter/PDF document comes through, it is saved in Google Drive>Public Comment PDF Letters. Then the link that is created is added as the “comment” in the appropriate comment sheet. If it covers multiple issues the comment/link is entered multiple times over the appropriate comment forms.

Comment Campaigns/Form Letters

When form letters or comment campaigns with identical comments are received, staff will upload one copy of the letter to the appropriate comment repository and keep a running list of the name, location, and affiliation of each person who submitted a letter.

SSC Comments

Written comments received in reference to SSC Agenda items will be added to the SSC meeting materials under the public testimony agenda item. They are also added to the ‘General Comment’ repository.

Solicitation of Comments

Written comments on fishery issues are welcome at any time and can be submitted by mail, email, or using our online comment forms. Oral testimony is also a welcome during virtual and in-person scoping, public hearing, AP, SSC, and Council meetings. When the Council initiates scoping or public hearing for an action, it will also provide guidance to staff on how to solicit comments. Typically, formal scoping is bypassed for framework actions and comments are solicited on the public hearing draft of a framework using all written comment mechanisms and through the production of a tutorial video. Full plan amendments can undergo formal scoping, but it is not a requirement. During public hearing for an amendment, staff typically prepares a tutorial video and solicits comments through virtual hearing, in-person hearing, or a combination of both. Additionally, the Council may choose to solicit comments during scoping or public hearing in extra ways. Below is an outline of each method used to solicit comment:

Video

A short video tutorial explaining proposed management changes and the options and alternatives available. Videos should contain information on how to submit written comments. Videos will be posted on the Council website and on social media.

Webinars

Hearings conducted by webinar should begin with a presentation on the proposed management changes and the options and alternatives available. A question and answer session should follow before public testimony is taken. A combination of communication staff, technical staff, council members, and supporting administrative staff should be present. A staff member will write a summary report of each meeting for inclusion in Council meeting briefing materials before final action. Webinar hearings should be announced via FRN, press release, and on social media.

In-Person Meetings

In-person hearings can be held across the Gulf or in select geographic areas. Council and staff will work together to choose appropriate locations. In-person hearings should begin with a presentation on the proposed management changes and the options and alternatives available. A question and answer session should follow before public testimony is taken. A combination of communication staff, technical staff, Council members, and supporting administrative staff should be present. A staff member will write a summary report of each meeting for inclusion in Council meeting briefing materials before final action. In-person hearings should be announced via FRN, press release, and on social media. Public comment is also taken during Council meetings, SSC meetings, and AP meetings.

Blog Posts

A *Council Meeting Preview* blog article is published in advance of each Council meeting. That article explains any final action items on the agenda and provides learning materials and mechanisms for submitting public comment. When few or no final action items are scheduled, the blog article will focus on highlighting some of the other important issues that will be addressed. When appropriate, links to learning materials and comment forms for those issues are provided.

Social Media

The Council uses social media (Facebook, Instagram, Twitter, and YouTube) to cross promote opportunities to submit public comment. When a press release, video, blog article, or public meeting is available, it is advertised using the appropriate social media channels.

Press Release

The Council will publish a press release to solicit public comment when an FRN publishes to announce meetings. Press releases are also used to solicit comment for non-traditional comment solicitation efforts (e.g. solicitation of comments on an Executive Order or a Something's Fishy effort).

Website

All amendment specific public comment opportunities and a general comment form are available on the "[Amendments Under Development](#)" webpage. Additionally, issues

approved for public hearings are published on the Council [homepage](#). Public hearing meetings, scoping meetings, and all other public meetings that collect public comment are posted on the online calendar and on the appropriate meeting webpage.

Direct Mailing

The Council can send direct mailings soliciting comments to federal Commercial and/or Charter/Headboat permit holders using the address data provided by the federal permit database.

Fish Rules Push

The Council can use the Fish Rules platform to engage anglers by creating a banner advertisement and/or adding a pop-up advertisement. Such adds can target an audience in the recreational app based on species or fishing location. In the commercial app, adds can target users based on permit.

Relaying Comments to the Council

All written comments received, including comments submitted through online comment forms, are collected in the appropriate comment repository and publicly displayed on www.gulfcouncil.org in-real-time. Public comments received via email are added to the appropriate comment repository. Staff does not distribute public comment directly to Council members through email. The Council process is not a direct democracy so staff does not quantify the number of comments received in support or against an action.

General Comment

General public comments received between each Council meeting (and no later than 5:00 PM on the Tuesday before each Council meeting begins) are included under the public testimony section of the Council briefing materials.

Amendment Specific Comment

All Amendment specific comments for actions scheduled for Final Action, received before 5:00 PM on the Tuesday before each Council meeting, are summarized and presented to the appropriate Council Committee before final action is taken. Comments received on Framework Action items are included in the Council Meeting briefing materials as full text comments. Comments received on Plan Amendments and/or during public hearing meetings will be included in the Council Meeting briefing materials as a summarized comment report and in full-text.

Record Keeping

Archiving

At the end of the calendar year, that year's general comments will be moved off the general comments sheet and into its own sheet. Amendments - Implemented, Under Dev, On Hold, Gen>General>Year.

When a document goes final, we will pdf the final list of comments and save it in the transmittal folder on the H drive for the document. The "Submit Comments" link is removed from the website and the "Read Comments" link stays on the implemented page. In Google Drive, the Form is deleted (as no further comments need to be captured) and the Sheet is moved from Amendments - Implemented, Under Dev, On Hold, Gen Comments> Under Dev to Implemented under the appropriate species.