

Subject: RE: Regulatory Amendment 12 (Golden Tilefish) for your review

Myra,

I realize that I have missed your March 5th deadline. My apologies. I have now had a chance review all the documents and have a few comments on the Actions and Alternatives in Regulatory Amendment 12 - I hope that it is not too late to share with the council before they discuss the issues this week.

First let me say that I am thrilled to learn that the Annual Catch Limit for golden tilefish will be increasing based on the results of the recent stock assessment. Golden tilefish has become very popular for chefs and consumers in South Carolina and a larger supply will be welcomed. I appreciate the Council's desire to address this issue now, such that the increase can go into effect before the 2013 fishing season opens, but I also hope they recognize the difficulty they have presented the AP in asking us to address this issue on such short notice and without the benefit of a face to face meeting.

Action 1: I am torn between supporting Alternative 2 and Alternative 5, thus I will explain my support for both below.

Alternative 2: $ACL = OY = ABC$. I believe we can afford to set the $ACL = OY = ABC$ because the SSC has already accounted for so much uncertainty by setting the ABC where they have. They have effectively incorporated a >530,000 lb buffer between the Allowable Biological Catch and the Overfishing Limit in order to account for the scientific uncertainty and the high risk aspects of golden tilefish life history. I feel this is more than adequate to protect against the risks posed by scientific uncertainty. I understand that there are still risks posed by management uncertainty, especially the uncertainty in the government's ability to monitor landings and close the fishery in a timely manner, but I believe this should be accounted for with Annual Catch Targets in Action 2 and will address that issue below.

Alternative 5: $ACL = OY = \text{yield} @ 75\% \text{ FMSY}$ when stock is at equilibrium. I am attracted to this alternative because of the stability it could give both the fishermen targeting golden tilefish and the consumers/chefs/retailers who buy and serve golden tilefish - instead of ACLs changing every year, or every time the assessment is updated, the ACL would be stable year after year unless something major changes in the stock status or environment. But I think the fishermen have the most at stake here and the decision between stable and fluctuating ACLs should be left up to them. But I am curious about the choice of 75% FMSY in this Alternative. Why 75% - could it be changed to 85% or something else that would allow a slightly higher ACL? (I realize that being new to the AP I may just be missing a bit of knowledge to explain this selection).

Action 2: I support Alternative 2, $\text{Commercial ACT} = 90\% \text{ commercial ACL}$.

I certainly wish that there was no need for a buffer between the ACT and ACL to account for management and implementation uncertainty, but the reality is that the government has not been able to track the harvest in a timely enough manner to prevent overharvest. I certainly hope that the new Dealer Reporting Amendment that was mentioned in Regulatory Amendment 12 will improve this system and I look forward to learning more about it. But because the Dealer Reporting Amendment is likely to take effect at the same time as these golden tilefish fishery modifications, we have no way of knowing and need to include some sort of buffer. Ideally, the

new reporting system will eliminate the need for this buffer between ACT and ACL and the regulation can be modified at a later date. Though some commercial overages in the past few years have been in the 25-35% range, I have chosen only a 10% buffer for a few reasons: I hope the new system will reduce overages, I hope the higher catch limits will reduce some of the pressure to fish so hard and fast, and most importantly because we have a very healthy biological buffer in the golden tilefish stock right now. The current spawning stock biomass is currently double that which is needed to produce Maximum Sustainable Yield, so even if the commercial fishery continues to exceed the ACL in the next few years I don't think we run a very high risk of the stock decreasing to the Minimum Stock Size Threshold (this is just a guess, I wish we could've posed the question to a knowledgeable scientist). This will give us time to see if this new Dealer Reporting Amendment system is effective, and at the same time allow the fishermen, whose actions have built this population to such a healthy size, to benefit from their efforts.

Action 3: I have much less familiarity with the recreational fishery, and the chefs and seafood consumers I feel I am representing on this AP do not have a stake in the recreational fishery through their seafood purchases, so I am choosing not to comment on this Action.