

## ATTACHMENT 6

### Comments on Amendment 15 Alternatives 1/31/06<sup>1,2</sup>

#### Management Reference Points

1. General: Currently, some tables (e.g., MSST tables) specify the parameter values used to calculate management benchmarks, but other tables (e.g., MSY and OY tables) do not. Suggest we reference the source(s) of all values in tables.
2. MSY Alternatives (General): Suggest we include a column in the MSY tables identifying associated  $F_{MSY}$  proxies (e.g.,  $F_{30\%SPR}$ ) or point estimates and their values because this information is needed to understand/compare environmental effects.
3. OY Alternatives (Golden Tilefish and Vermilion Snapper): Text in the OY equation column of Alternatives 2-4 should be edited to recognize these stocks are not under a rebuilding plan (e.g., OY equals the average yield available on a continuing basis from applying  $F_{OY}$ ).
4. OY Alternatives (Red Porgy): Text in the OY equation column of Alternatives 2-4 should be edited to recognize this stock is under a rebuilding plan (e.g., Until the stock is rebuilt, OY equals the yield specified by an approved rebuilding plan. After the stock is rebuilt, OY equals the average yield available on a continuing basis from applying  $F_{OY}$ ).

#### Rebuilding Schedules

1. Snowy Grouper: Should clarify SEDAR4 (2004) was the source of the generation time estimate for snowy grouper, rather than the maximum recommended rebuilding timeframe.
2. Black Sea Bass: Suggest we state within the text of Alternative 1 when the current 10-year plan was implemented, as we did with snowy. The text of the second sentence is no longer relevant because we are no longer referring to a sea bass complex, just to the black sea bass stock. Alternative 4 should read “Maximum recommended time period to rebuild to  $B_{MSY}$  if  $T_{MIN} < 10$  years. This would equal 10 years.”

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<sup>1</sup> Based on file “A15 Alternatives tables 1.17.06.doc”, 243 KB, received via e-mail 1/17/06.

<sup>2</sup> Redline strikeout edits to document provided as “Edits to A15 Alternatives tables 1.31.06.doc”, 520 kb, via e-mail 1/31/06

## **Rebuilding Strategies**

1. General: We suggest deleting the yield stream data for 2005 and 2006, simply because Amendment 15 will not be implemented until 2007.
2. Snowy Grouper: Why does the text describes TAC for defined periods? For example, the constant catch strategy would define TAC as 104,914 lbs or 185,188 lbs each year until 2039 or until the Council makes an adjustment, not just until 2010. Modified F strategies for snowy grouper are included in the alternatives table, but not in the alternatives text.
3. Black Sea Bass: Alternative 5 is being replaced with a scenario that complements management measures recently approved by the Council in Amendment 13C. We suggest editing the text of Alternative 1 to read the same as the red porgy text (i.e. Do not define a yield-based rebuilding strategy...). We also suggest editing the text of Alternative 4 to read "...rebuilding to  $B_{MSY}$  [delete: if  $T_{MIN} < 10$  years. This would equal] in 10 years." The last sentence of the alternatives text indicates only Alternatives 2-4 were calculated using data from the Central Run of the age-structured model. What about Alternative 5?

## **Queen Snapper Management**

1. If the purpose for this action is to address waste related to a high (100%) discard mortality rate, then it seems reasonable to evaluate a retention requirement (e.g., "Eliminate the queen snapper minimum size limit and require all fish captured be landed."). Recommend this be added.

## **Sale of Recreationally Caught Fish**

1. Delete the word "commercial" in the text of Alternative 3.

## **Permit Transferability**

1. Considerable confusion arose when discussing these alternatives at SERO. While the concept should go forward, adoption of current language through finalization of alternatives should not occur until further TEAM discussions are held.
2. The current objectives and rationale for this action include biological reasons. There are several other reasonable ways the Council could address the biological problems with the 2 for 1 provision other than removing it entirely, e.g., implement a new controlled access program in Amendment 15 such as IFQ or eliminate latent permits. These viable alternatives should be considered in Amendment 15.