The Paper Suboption

• Fails to adequately address the purpose and need for this action; would not improve catch accounting and enforcement capabilities in the fishery.

• NMFS recommends that this suboption be removed from each of the action alternatives.
The Vessel Account System

“That Tier Permits be loaded into the IFQ Vessel Account System with deductions made as appropriate when a tier delivery is made and recorded on the E Fish Ticket.”

• This language is premature and overly restrictive.

• NMFS recommends that this sentence be removed from each of the action alternatives.