October 24, 2014

Dear Dr. Merrick:

The purpose of this letter is to express the Council’s concern about the quality of the information that was available for the recent blueline tilefish stock assessment (SEDAR 32). Based on the results of the stock assessment the Council was required to reduce the blueline tilefish ACL significantly, turning what had been an important fishery for a number of our fishermen, into a bycatch fishery.

There are three major issues that exemplify the problems with the blueline tilefish stock assessment that we believe can be addressed:

1. MRIP is inadequate for rare event species:
   South Atlantic deepwater species like blueline tilefish, golden tilefish and snowy grouper are simply not adequately captured by the MRIP survey, and even MRIP staff readily agrees this is not what the survey is designed for. It is rare to have PSEs less than 0.7, yet we are forced to use these very imprecise (and likely inaccurate) estimates in stock assessments, catch level projections, and ACL tracking. Occasional encounters of rare event species lead to outlier catch events that exert far more influence over management than is justified considering the uncertainty in such values. Recently the Council experienced such an event with unusually high catches of blueline tilefish in 2013. This was traced back to a single intercept sample, which expanded into a catch that was 50% higher than the entire estimate for 2012. It’s time for MRIP to be an active partner in solving this problem, as it disadvantages fishermen from all sectors and detracts from improvements they are trying to make in other areas.

2. Adequate funding for fishery-independent surveys:
   Existing resources are inadequate to survey our managed species throughout their range, even despite recent additions such as the Southeast Reef Fish Survey. In particular, a gap remains with the deepwater species such as tilefishes and snowy grouper. Current sampling does not capture the full range of management jurisdiction, let alone the full range of the
species. For example, blueline tilefish are found all the way to Montauk, NY, yet the available surveys only cover a small portion of the species range. Moreover, cuts in funding have completed eliminated portions of existing surveys, such as longline sampling conducted through the SC DNR MARMAP program, that were the only means for surveying tilefishes. As more regulations are imposed in the form of trip limits and early season closures, our fishery-dependent indices are becoming less representative of the resource, making the need for fishery-independent indices even more critical. Furthermore, even the best fishery-dependent indices alone simply cannot account for market-based shifts in effort, nor access to the resource that is limited by weather events or shifting oceanographic conditions, nor provide information necessary to evaluate management actions. Factors such as this can artificially inflate or deflate indices and are not necessarily reflective of the true abundance – but it’s the fishing public that pays the price for such uncertainty.

3. Assessment-focused cooperative research/monitoring:
Focused research, conducted in cooperation with the fishermen in advance of an upcoming stock assessment needs to become an institutionalized part of the process. Given the chronic paucity of sampling resources in the Southeast, this is likely the only way we can ensure there is enough information to fill specific data needs and calculate key age and growth parameters that are the backbone of an assessment. Without North Carolina fishermen pitching in through an EFP during the deepwater closure in 2011, there would have been even less age and growth information for the last assessment of blueline tilefish. In hindsight, given the decision to evaluate blueline tilefish as a unit stock on a coast wide (ME-FL) basis (despite the lack of information available to index the stock over that spatial scale), these efforts should have been expanded northward.

Our final point really has to do with the inflexibility in the MSA of “ending overfishing immediately”. Blueline tilefish is a classic example of a specific set of conditions, including considerable uncertainty in critical yet basic datasets, under which the Councils should be allowed to phase in ending overfishing provisions over three years. The defacto fishery closure that the blueline tilefish ACLs will create puts us in a negative feedback loop whereby we will cut off our only source of data, that was provided from the fishery. Therefore the next assessment will be even more data poor, the uncertainties will increase, and the Council will be expected to be even more conservative when applying buffers. The agency should never close a fishery without a funded plan in place to collect the fishery independent data required to ensure that a future assessment can be conducted to evaluate the management action and ultimately reopen the fishery. Fishermen on all sides of the aisle deserve better than that, and so do the analysts who have to make difficult decisions about model inputs.

We realize you can’t address all of these issues, some of which are currently being considered by Congress. However, there are ways you can address the first three items listed. The Council looks forward to working with you to resole these issues.

Perhaps at some point in the future we could arrange a meeting to discuss our concerns in more detail.

If you have any questions, please contact Bob Mahood or me.
Sincerely

[Signature]

Ben Hartig
Chairman

cc: Eileen Sobeck and Sam Rauch
    Bonnie Ponwith and Theo Brainerd
    Steve Turner and David Gloeckner
    Phil Steel, Andy Strelcheck and Jack McGovern
    Monica Smit-Brunello
    Council Members and Staff