



Gulf of Mexico Fishery Management Council

Managing Fishery Resources in the U.S. Federal Waters of the Gulf of Mexico

2203 N. Lois Avenue, Suite 1100, Tampa, Florida 33607 USA
 Phone: 813.348.1630 • Toll free: 888.833.1844 • Fax: 813.348.1711
www.gulfcouncil.org

May 12, 2017

Dr. Francisco Werner, Director
 Southwest Fisheries Science Center
 National Marine Fisheries Service
 8901 La Jolla Shores Drive
 La Jolla, CA 92037-1508

Dear Dr. Werner:

The Gulf of Mexico Fishery Management Council (Gulf Council) appreciates the opportunity to review and provide feedback on the National Marine Fisheries Service's (NMFS) update to the Stock Assessment Improvement Plan (SAIP). The SAIP characterizes the benefits gained and challenges experienced by NMFS and those who rely upon NMFS for data collection, synthesis, and completion of stock assessments. Since the Gulf Council is tasked with recommending management measures explicitly for the US Gulf of Mexico (Gulf), this letter will focus on how the SAIP applies to and affects the Southeast Data, Assessment, and Review (SEDAR) process and the Southeast Fisheries Science Center (SEFSC). The Gulf Council shares the SEFSC's analytical resources with the South Atlantic and Caribbean Councils.

The Gulf Council and its Scientific and Statistical Committee (SSC) anticipate that the next generation "research" and "operational" assessment track approaches have the capacity to yield more, higher quality assessment products than the current SEDAR process. However, numerous details regarding this change in approach still need to be resolved, specifically timelines for deliverables, transparency, and public participation. More guidance should also be considered for switching from a "research" track to "operation" track assessment, and what criteria should trigger such a change. Currently, SEDAR uses a tiered approach. "Benchmark" assessments take ~12 months, and are conducted for first-time assessments and significant overhauls and accompanying peer-review of existing modeling approaches. "Standard" assessments take ~six months, and permit the incorporation of new data. "Update" assessments take ~four months, and only permit the incorporation of additional years of data for existing data streams. The Gulf Council's main concern with SEDAR's current process is the lack of flexibility within a defined type of assessment, which often results in limitations on the number of assessments which can be expected to be completed in a given year and acceptability of the assessment as best available science during the review process. Ideally, only two types of assessments would exist - one to resolve complex issues and address new modeling methods with peer-review; and one with permissible latitude to address modeling constraints, incorporate new data, and otherwise address contemporary data and management needs with a review by the SSC. The Gulf Council thinks this simplification will result in increasingly more numerous and more useful products from the SEDAR process.

The Gulf Council supports the ten SAIP recommendations and the items summarized herein: increased budget and staff; increased training of staff, interagency partnerships and research; and increased assessment awareness and credibility. The Gulf Council thinks the increase in budget and staff may resolve current bottlenecks in fishery-independent and fishery-dependent data collection

and processing. This current limitation poses a serious problem with data availability for stock assessments, as well as the number and quality of completed assessments. Thus, the Gulf Council fully supports efforts to expand NMFS's capabilities and increase partnerships and awareness to address these bottlenecks in a timely manner, which will ultimately lead to improved assessment product credibility. The present environment of data collection and synthesis requires "around the clock" work at current staffing levels to simply produce the minimum required for age-based assessments, and affords little time for staff to innovate and solve contemporary problems.

Models used to perform assessments are increasingly complex, yet data collected have not necessarily concurrently adapted. More assumptions about data and physiology of fishes and invertebrates, as well as ecological processes and interactions, are made than ever before - sometimes in the name of "ecosystem modeling". Less data-intensive methods should not be ignored just because a more data-rich method exists. Demonstrations have shown that similar (yet not always comparable) results can be reached between data-rich and data-poor methods for species with many gaps in knowledge. One major benefit of more appropriately modeling stocks with less than ideal data is timeliness, which is a constant request of the SEDAR process by the Gulf Council. To improve transparency and credibility the Gulf Council would like to see the data used to estimate model parameters, sector-specific catch history and effort, and other data provided during the assessment to be publicly available in a usable format (e.g., Excel, R). Making these data readily available will aid managers in reproducing model outputs, describing assessment findings, and using data to address management concerns.

The Gulf Council supports moving towards a more holistic ecosystem-based approach; however, current resource limitations for single stock assessments make this challenge seemingly insurmountable at present. Thus, the Gulf Council supports increased research and investigation into methods which permit the incorporation of ecosystem components into current assessment methods, as well as novel methods to better represent larger ecosystem functions of related species and associated habitats and environmental cues. Further, more data relevant to socioeconomic drivers which may influence stock assessment data need to be investigated.

The Gulf Council greatly appreciates the opportunity to review the SAIP and provide comment. Feedback from cooperators of the SEDAR process (Councils, marine fisheries commissions, NMFS Highly Migratory Species Branch) increases the quality of SEDAR products, and benefits dependent user groups through the incorporation of better assessment data. We support NMFS's efforts within this document and look forward to continuing to work with you to improve this process. Please contact the Gulf Council if you have any questions concerning our recommendations.

Sincerely,

Leann Bosarge
Gulf Council Chair

cc: Council Members
Council Staff
Susan Gerhart
Andy Strelcheck
Rick Methot
Patrick Lynch
Jason Link