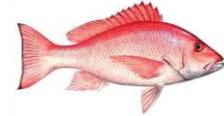


SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

David Cupka, SouthEast Data, Assessment and Review (SEDAR) Committee Chair
South Atlantic Fishery Management Council (SAFMC) Chair
4055 Faber Place Drive, Suite 201
North Charleston, South Carolina 29405

Friday May 27, 2011

To: Mr. David Cupka,

Southeastern Fisheries Association (SFA) East Coast Fisheries Section (ECFS) Board and members want me to submit this letter to your attention for agenda consideration with regard to the SAFMC SEDAR Committee meeting to be held at 3:30 PM - 4:30 PM, Sunday June 12, 2011 in the Marriott, Key West, Florida. You are the chair of the SEDAR Committee and also the chair of the SAFMC. You are in a position of great influence affecting the SFA ECFS membership fishing interests. Gregg Waugh suggested to address our concerns and desires about the SEDAR process to you for the SEDAR Committee to consider at the June 12, 2011 Key West SAFMC meeting. This request includes allowing the SFA ECFS consultant to speak at the SEDAR Committee meeting when in attendance and when the SAFMC full membership discusses SFA ECFS issues with the SEDAR process also.

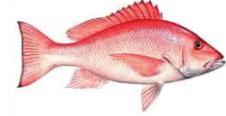
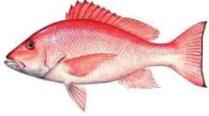
Hundreds of SFA ECFS membership had high hopes for improving the SEDAR process back in early 2009 when I gathered together concerned stakeholders and consumers to engage the SAFMC. The SFA ECFS members and myself as Chairman submitted oral and written concerns about the old Atlantic red snapper science known as SEDAR 15. The final SEDAR 15 assessment results opened the door to proposed (and since implemented) draconian changes by the SAFMC through the Amendment process for the Snapper Grouper (SG) Fishery Management Plan (FMP). The SAFMC SG FMP actions got the stakeholders and consumers alarmed throughout the US Southeastern coastal fishing communities.

As a result of SAFMC SG FMP proposed choices the SFA ECFS hired a scientist named Dr. Frank J. Hester to investigate the Atlantic red snapper science results from SEDAR 15. Dr. Hester found legitimate problems with SEDAR 15 and questioned the credibility of those results. These scientific concerns eventually led to an experimental version of a "Full Benchmark Assessment" known as SEDAR 24 to be conducted for Atlantic red snapper beginning in 2010. There was no physical assessment workshop coupled with an accelerated schedule that compromised the final SEDAR 24 product ultimately as you know.

Dr. Hester was allowed to be a SEDAR 24 Data Workshop (DW) and Assessment Workshop (AW) Panelist. Also, the SAFMC had Dr. Hester as a DW & AW Panelist for SEDAR 16 for king mackerel and SEDAR 19 for red & black grouper. I commend the SAFMC for allowing the SFA ECFS stakeholders to have the industry scientist represent us in the past SEDAR science process and strongly feel that every time we hire a scientist(s) to represent the SFA ECFS membership that the SEDAR allow them to be on the Panel during both the Data and Assessment Workshops. It is a bad idea to deprive the SFA ECFS membership of proper scientific representation at the SEDAR science meetings like SEDAR 25.

Recently the SFA ECFS had retained a second scientist, Dr. Peter Barile to assist the SFA ECFS at the SEDAR 25 DW for the black sea bass and golden tilefish "Standard Assessment" held during April 2011. SFA ECFS has directed Dr. Barile to attend the SEDAR 25 AW meeting in Beaufort, NC during June 21-23, 2011. Dr. Barile has submitted an application to be included on the SEDAR AP Pool and consideration of same is to be handled at the SAFMC Key West meeting next month.

SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

Like Dr. Hester, the SFA ECFS needs Dr. Barile to be appointed to the SEDAR AP Pool. Whenever the SFA ECFS membership retain the services of scientists to participate at SEDAR stock assessments, I feel that the SAFMC needs to make sure the hired scientists are seated. They need to be fully involved on behalf of the stakeholders and not kept away from the working papers development on the FTP web site, the debate, whether physically, by email, on webinars and/or conference calls.

With that said, I have a bullet point list of SEDAR issues that need further attention by the SEDAR Committee, the SAFMC and the SEDAR Steering Committee. These issues include, but are not limited to:

1. Make sure the stakeholders scientists are included on the future Data and Assessment Workshop Panels. SAFMC failed to appoint an industry scientist during SEDAR 25.
2. Allow stakeholders' scientist(s) to present a position paper to the Review Workshop Panelists.
3. Stakeholders need to fully understand the species SEDAR is modeling when appointed to the SEDAR Data, Assessment and Review Panels, and be able to speak at all three workshops.
4. If a stakeholder is not able to attend for whatever reasons after being selected by the SAFMC, a proxy should be appointed for the empty seat in a timely way.
5. Allow stakeholders and their scientists to submit a Minority Report if needed at any stage of the SEDAR workshops since precedent was set at the SEDAR 2 full benchmark.
6. Better Full Benchmark Assessment scheduling and flexibility with models and data.
7. Revision of the Standard Assessment description to allow more flexibility with how data and modeling is conducted. Otherwise this process seems a lot like the Update was handled. The idea of combining the Data and Assessment workshops in the future may be a problem.
8. Make sure that if a previous SEDAR assessment insisted on a Full Benchmark that it happens such as the SEDAR 2 black sea bass update during 2005 recommended a benchmark assessment, not a Standard Assessment as SEDAR 25 has evolved into recently.
9. Recent evidence about reporting issues with the headboat index across history need to be examined and reanalyzed resulting in a report to the SAFMC.
10. Webinars are not to be used to replace data, assessment or review workshops, but can be used to share information as it develops.
11. Webinars are really seminars and it was suggested teleconferencing is a better choice.
12. Public comment periods on an incomplete SEDAR assessment product do not work well enough as seen with SEDAR 24 assessment input changes that radically changed the final results that did not get commented about by the public or the Assessment Panel before going to the Review Workshop.
13. The Assessment Workshop Panelists (including stakeholder scientists) should be able to do a final review of the assessment workshop product, be able to adjust the product's inputs through further sensitivity runs if needed before it is sent to the Review Workshop Panelists. The failure during SEDAR 24 was when the NMFS analysts made significant changes to the Assessment model inputs, dramatically changing the results and sent that "final" product to the SEDAR 24 Review Workshop panelists without the input of the Assessment Workshop Panelists to question the final changes.

Jimmy Hull, Chairman, SFA ECFS
