

**South Atlantic Fishery Management Council  
Snapper Grouper Committee – Gag Discussion  
September 2006**

Mr. Currin: George, thank you. Those are some good points that you bring forward and I hope everybody will take the time to look at that and tomorrow we will enter back into a discussion of this to try to hone that down for staff's benefit and ours. Is there anything else on 14? Let's move into the gag assessment and receive an update on that and see if there's anything that anybody has got for comments regarding that or suggestions as to how to move forward with this. Gregg, are you going to do this?

Mr. Waugh: Yes, and I'm not going to go through the advisory report and review workshop report. Those are there for your background. As we laid out in the overview, our original timing is for the SSC to look at the gag assessment at their December meeting and we will be meeting in December with our Snapper Grouper AP and deal with it there.

At the last meeting, there was some concern that we may need to look at taking action sooner because the projections that were being done were showing that in addition to the overfishing that's undergoing that the stock was projected to become overfished and that we might want to take action sooner.

The review panel has -- In completing their work, they are pointing out that the current definition of minimum stock size that the council is using, one minus M times the BMSY, is, due to the natural mortality being so low, it's estimated to be 0.14, that you're always going to be close to your target and your threshold at the same time.

In Amendment 15, we're looking to rectify that and what the panel has suggested is rather than using that standard formula that they are recommending that the minimum stock size threshold could be set at the lowest observed spawning stock biomass, about five million pounds, until reexamined in the next assessment.

If you use that new minimum stock size threshold, then the stock is not projected to become overfished and so given that, then that removes some of the need to move forward sort of ahead of our planned schedule. Right now, the way it stands is this will be one of the major items that the SSC deals with at the December meeting and what we wanted to get here was any specific terms of reference that you all want for the SSC to address. We put together a draft list here and I've got it projected and we would look for any guidance from you all in terms of what specific questions or directions we give the SSC.

Mr. Currin: Thank you, Gregg. That's Tab 4, Attachment 3c on your briefing book disk.

Dr. Daniel: I've looked this over and I think it's important that based on some of the reviews we've gotten in the past where we weren't very specific on some of the questions

that we asked the SSC, I have a few specific questions that I think need to be addressed by the SSC that could be included in the terms of reference.

I particularly would like their feedback or their opinion on the -- Under the review workshop's terms of reference, which is under Tab 4, Attachment 3b, there are a lot of bulleted comments in here that I think raise some issues and concerns to me and the first indicates that overall the data were deemed appropriate and used in an appropriate manner. Subject to the concerns of lacking systematic age and length sampling, no fishery independent indices and highly variable annual MRFSS estimates and so I would like their comments back on that in terms of the ability to conduct an adequate assessment based on those caveats.

Next, under the MRFSS information, there's some pretty significant issues in there, but the most important, I think, is on the bottom of page 7. I'm going through this in this detail because of the importance of gag and this is going to be a very significant issue and maybe it will save us a lot of time in subsequent meetings.

What they indicate is that MRFSS landings are the largest contributor to the total landings, but are poorly sampled. The MRFSS landings are dominated by charterboat landings, but then there's an important statement made in there. It says presumably from fishing similar to that on headboats. I think that's a bad presumption. I don't think headboats and charterboats fishing for gag fish similarly. This is from the consensus summary report.

Mr. Currin: Can you give us a page number in the overall briefing book document?

Dr. Daniel: 2477 and it's the last paragraph after the MRFSS and basically what it's saying is that when you're fishing for gags on a charterboat and you're fishing for gags on a headboat that you're fishing in a similar way and I question that conclusion and just would like for some feedback from the SSC on that statement.

Dr. Crabtree: That's fine to ask them. I'm not sure what they're talking about here. The headboat landings come from the headboat survey and the charterboat landings come from the charterboat methodology and that's a complete separate survey and so I don't know where they're coming from on that. I don't know that the SSC is going to be able to tell you what they meant. That may be a better question to ask John Carmichael, if he knows what they're referring to. As I understand it, those are complete separate surveys.

Dr. Daniel: What they did was they used the MRFSS headboat length frequencies as representative of the charterboat length frequencies and I think that's an improper assumption to make, that the headboat fish were the same as the charterboat fish. The charterboats are going to be fishing -- It's like if you go flounder fishing with a finger mullet or a two-hook bottom rig with bloodworms. You might catch a flounder with a bloodworm on a two-hook bottom rig, but you'll most likely catch big flounders on a mullet and that's exactly the way this fishery operates.

I think there's a big difference between the length frequency distributions from the charterboats than there are from the headboats and I think that's something that the SSC needs to discuss and let us know if they think that's an appropriate thing.

Dr. Crabtree: That's fine. I'm not sure what they mean. It doesn't say anything here that I see about length frequency and so I'm not sure what they're really referring to. The charterboat estimates of the estimates we get out of the MRFSS survey are probably much better described in lower CVs, I think, than the private boat sector landings are, because they don't have the similar problem in terms of the effort estimates in the charterboat survey. I'm just not sure what they're referring to here in the consensus report.

Dr. Daniel: If you read the other document, it will explain it. Another issue is in the sensitivity analyses and what they did is they ran various models by taking out and omitting certain things and if you look at the bottom of page 10, one of the last few sentences there, I would like for there to be some discussion from the SSC on those last few comments.

It says relative to SSB, the run with the headboat CPUE data omitted shows the population increasing rapidly in the most recent years, reaching the highest terminal value of all the runs. Then it says in contrast the run with the commercial hand line CPUE omitted results in the lowest SSB value in the terminal year and that highlights the balance fit between the two indices.

You've got one going up and you've got one going down and so you split the difference and that's an adequate portrayal of the stock and that seems kind of screwy to me and I think -- Recognizing that the headboat CPUE is what's driving this assessment and basically you've got a CPUE that arguably is not real representative of the population, when you take it out it shows what we all sort of thought was going on with gag and that is the population is doing pretty good, based on all the restrictions we've put in.

I think that's a confounding statement in there, to me, that I think the SSC needs to address and provide feedback for us. Then the other issue that just sort of continues on this same similar line is the increasing landings from the shore mode. That must be a hell of a caster, but on page 2450 of the next document, it says that the catch share among sectors has been changing over the last decade with increased landings from the charter private boat and shore mode recreational sectors relative to the commercial hand line sectors.

Mr. Waugh: Where do you see that, Louis?

Dr. Daniel: It's Attachment 3a and it's page 2450 of 2971 and that just kind of jumped out at me, that the increase in the shore mode recreational catches of gag and I would be just curious to know where those shore-based gag catches are coming from.

Mr. Currin: I've seen reference to that before, Louis, and it's always made me scratch

my head and then I said, you know, in Florida there's probably some of those fish that are actually caught from bridges and wherever else. I don't know that, but I've seen that in reference, not only to gag, but other snapper grouper species.

Dr. Crabtree: That's my guess, is off of bridges and things, and you do catch gag off of bridges down in the Keys and in other parts of Florida and so it may have increased. I agree it's certainly going to be a minor component of the catch, but it may well have increased. You do catch them from those kinds of areas and that would certainly be shore mode.

Dr. Daniel: I think probably the most significant question is the one related to the data omitted shows it going up and another data source omitted shows it going down and it shows a balance fit between the two indexes and it's my understanding and what we've done in the past with things like weakfish or whatever, and other assessments, is that if you have conflicting indexes of abundance you have to select the one that you think is most representative of what's going on or else the model blows up on you. That raises a real -- To me, that raises a real significant concern and probably the most significant concern and then I'll shut up, for the time being, is -- This is a serious problem.

Mr. Currin: This is another one?

Dr. Daniel: This is another one and this is the most significant problem that I see and that's on page 17, which is 2487 of 2971, and we've been talking about this toolbox problem ever since the red pogy assessment and -- If you'll look at that last paragraph, it says on the approach -- This is for the South Atlantic.

They were tickled with the Gulf's models, but they said that the approach has been used in the assessment of other species and it's not clear that the model building conforms to the model except in the terms of the reference of the assessment workshop. We don't have a peer reviewed modeling approach and we still don't have the documentation on the AD model builder modeling approach and they say that it violates the terms of reference from the assessment workshop.

This peer review panel raised significant concerns about the model that was used and we need some resolution to that, five years later, as to what's the appropriate model and whether AD model builder is a useful tool or one that's been positively peer reviewed, because it hasn't yet. I would ask also maybe for the attorneys to let us know how that relates to the Data Quality Act if we're running assessments based on un-peer reviewed models, which all of our models have been done using AD model builder. This, I would say, this statement in here is related to all of the assessments that we've recently completed for red pogy, vermilion, black sea bass, golden tilefish, and snowy grouper.

Mr. Currin: The last issue I'm sure is a question for the region to ponder and consider and the Science Center, I guess. I don't know the answer to that and I'm not sure that the SSC can help us with that, but maybe they can. The others, as far as adding those to the terms of reference for the SSC on the gag assessment, can we hold off on that last one,

Louis, and deal with all the rest of them and see if we can get a consensus from the committee to add those to the terms of reference?

I noticed the same thing you did with respect to the sensitivity runs. I was talking to Rick about that a little bit and made some inquiries with John Carmichael about using and not using the headboat data and it was curious to me that they were so diametrically opposed and the base run ends up in the middle and I don't know enough about modeling to know whether that's usual and acceptable and all that, but it was certainly curious to me. Are there comments about the desire to add at least the four items Louis raised to the terms of reference for the SSC? Is there any opposition to that? Seeing none, then we'll ask the SSC to ponder those.

The last one, Louis, I guess was an opinion or reaction to the model being used and whether that's approved or part of the toolbox or whatever. I don't know, Roy, the best way to go about that, but --

Dr. Crabtree: I think a first step would be to ask the Science Center, the Beaufort guys, about it. Beyond that, I don't know. I hadn't seen that statement before and so I don't have any comment, other than the review workshop with the CIE folks, who wrote this, still said this is the best available science and suitable for management and so it has been peer reviewed in that sense, but I think we would have to ask the Science Center for the details of it.

Mr. Currin: Anything further we need to do to accomplish that or how should we best make that request? Is that something you would ask them to do or is that something the council should send them a formal request in terms of a letter or Gregg can --

Dr. Crabtree: It's really up to how you want to do it.

Mr. Waugh: However you want us to handle it.

Mr. Currin: I would just as soon keep the bureaucratic involvement to a minimum and get our answer and so if that's best made through an informal request so it doesn't have attached with it any of the strings of a letter or an email or something more official like that -- The most efficient way is the way I would like to handle it.

Dr. Crabtree: I'll ask Jack to contact the Beaufort Lab and ask them if they can explain the comment and the implications of it and then we can report back to you.

Mr. Currin: That would be a very good first step.

Dr. Crabtree: If Jack can do that, we may be able to report back to you at full council.

Mr. Currin: That would be great. Anything else? Are there any other questions or comments about -- I hope everybody has had an opportunity to go through this review workshop from the gag assessment and Louis obviously has done his homework and

raised some issues, some good issues, that I think we will benefit from our SSC's assessment of those. Anything else?

Dr. Daniel: It kind of goes back to something Roy just said, that it has been deemed the best available data, and I guess, once again, whose decision -- Who makes the decision that you move forward with an assessment? If we just do an assessment on any species we want to do and it's based on the best available data, does that mean we have to move forward and take action based on those results?

If it means that -- If you guys will remember back when we did the Magnuson amendment, we had data levels and we started off with some stocks in Data Level 1 and maybe a 2 and then most of them fell out in the 3 and 4 range. We've been down in the 4 range now for a while and now we've got a stock that's probably one of the most important to the South Atlantic, where for whatever reason it has very, very poor data. There's very little information available.

We got no MARMAP information on gag and we have no independent surveys. We have no systematic age and length sampling and yet we're going to just continue to move forward and take action on this stock just because the data exists, just because some data exists. Is it worthwhile or is it even worth discussing -- At what point have you stretched it so far that you just can't stretch it any further?

We're going to have very significant impacts when we take action on gag grouper. How comfortable does anybody feel with that and is it okay just to say it's the best available data and so we're going to move forward and cut this fishery by 43 percent based on this? At some point, we're going to have to look at this stuff and figure out at what point do we just stop. How comfortable are we going to feel with a white grunt assessment?

Dr. Crabtree: Let's not forget that we put together a very comprehensive process to produce these assessments. We had a lot of very knowledgeable people from all parts of the fishery, from the states, from the federal government come together in three workshops and then we had three experts from the Center of Independent Experts come in to review all this and so this was put together in a very deliberative and very comprehensive and transparent fashion.

Probably the data for gag is as good as for most things. Gag don't enter traps and so the MARMAP survey is not part of it, but we've been in here with assessments when we did have MARMAP survey data and the issue has been there's problems with the MARMAP survey.

We probably have better data on gag than we have for some species and the other point is we have had assessments rejected. We had a hogfish assessment rejected by a SEDAR working group a couple of years ago and I know we have on a couple of occasions -- I don't know that it's happened with the South Atlantic Council, but we've had situations where there wasn't sufficient information there to do an assessment and there was nothing done. That's happened quite a few times in the Caribbean.

I think we need to remember that we've got a good process that involves a lot of people that produce these assessments. It's going to go to our SSC and be reviewed again and so I think we have a very good process and I think we're acting appropriately on this and so let's get this through the process and let's ask the questions that Louis raised of the SSC and then let's get moving.

Ms. Merritt: I don't disagree that we're getting the best opinion and best advice that they can possibly provide based on what they're using. To Louis's question of how comfortable are you, I'm not comfortable. I depend on people who are knowledgeable of science and biology, because I don't have that kind of training. I don't understand half of this. It has to be explained to me oftentimes and when Louis said he needed to shut up with some of those questions he had, I say go on.

We need to hear these things challenged and questioned. The scientists themselves, the information they give us, they question themselves at times that they're using good data. I know they're doing the best they can with what they've got, but it's just that -- No, I'm not comfortable with it and that's the way I feel about it.

I do think that if they are in an advisory capacity to us that we should measure our own comfort level as to whether or not we want to take it and how far we want to take it, just the way that we are directed to take the socioeconomic information. It should just all be part of the whole formula in this recipe of coming up with regulations.

Mr. Currin: Are there other comments or questions? I have one and I don't know who best or who might be best to answer it, but if we make the assumption and let's just say we all buy in to Louis's questions and concerns about the gag data and we say okay, the indices that we have are no good, what do we then use to develop management measures for the gag grouper population?

It's unacceptable to me to say because we don't know anything that we shouldn't do anything and we should just let the fishermen have at it or continue on under regulations that were developed on the same datasets, in many cases, but many years ago and not considering anything that's been gathered in between.

I've had the same question when we went through the issues with snowy grouper. Let's say none of these are any good. How do we then develop -- What kind of science do we use or do we have that we can then use to develop management measures to implement for any species and we can just -- Since we're talking about gag, let's deal with that. How do we then manage? What kind of science do we have or how do we proceed as managers?

Dr. Crabtree: You mean if we were to reject all of the abundance indices from the assessment?

Mr. Currin: Just for example or let's say we can agree on one or can we agree on one

that everybody buys into and says this is good? If we have a length frequency dataset or some landings -- Which I think everybody can probably agree the landings are probably pretty good and what else would we need then to -- I guess what I'm asking, Roy, is can we take a step down from doing an assessment model and running a model and then what methodology do we use to try to manage some of these stocks?

Dr. Crabtree: If you went back six or seven years or more, we were largely using catch curves, I think, that were generated from the Beaufort Lab. I would be extremely uncomfortable and think it would be a move in the wrong direction to go back to that, because I think what you're getting now is by far the best scientific advice that you've ever gotten in this council.

I would urge you not to go back to that. These SEDAR groups have looked at these indices and all of this as carefully as they can to put these models together, but I think if you were to basically reject the modeling approaches and all that are being followed, in the end you come back about to where we were ten years ago.

Mr. Currin: I'm not suggesting that we do that. This is just purely for my education, because the same issue came up. We're wrangling over these things and the question logically, in my mind at least, came to where would we be without all this and what would we use then and how would that compare to -- I certainly agree with you that we've got more data and should be feeding in and providing us with a better model, better assessment, of that population, but how would they compare?

If we went back and just said let's look at catch curve analysis, since that's what was used before, and compare that to the assessment that we're getting from all the datasets and the indices that we're using, how would the management measures recommended by those two different methods compare? That's kind of the ultimate question, if that makes sense.

Dr. Crabtree: I'm not sure about that, because I don't think anybody has done a catch curve on gag in some years. I know it has been listed in the report to Congress as undergoing overfishing I think for some time, but I'm not sure exactly when it first was listed as undergoing overfishing and I suspect that that determination was based on something that came out of the Beaufort Lab some years back. Gregg may remember whether it was a catch curve or not. Jack is telling me that it was a VPA done by Chuck Manooch years ago.

Mr. Currin: Don't take my questions or comments to mean that I don't feel like the SEDAR process is worthwhile. I have a lot of faith in it and I'm delighted that we --

Dr. Crabtree: I understand and I don't have any problem with going to the SSC and I think Louis is right when he says it will save us time later. I think if there are questions that Louis has, let's lay them out now and put them before the SSC.

Dr. Daniel: That is my intent. Believe me, nobody is as tired of dealing with this stuff as I am and nobody has spent more time looking at this stuff, probably, than I have. I would like to have these issues addressed and be able to deal with them. I think your question though is a good one and I think it's a healthy discussion that we're having around the table, because this is going to become more and more of a problem as we progress down the line.

The main question and I think the thing that keeps driving me crazy is we implemented Amendment 9 in February of 1999 and we increased the size limit to twenty-four inches, we decreased the bag limit to two fish, we put in a March/April spawning season closure, and we were told at the time by the best available science that that would restore the population.

Now, with really no additional new information, an arguably worse analysis that has not been peer reviewed, the techniques, and perhaps the AD model builder is not an appropriate model to use for gag grouper with the data deficiencies that we have there. It's telling us that we need an additional 43 percent reduction just to not be overfishing and so there's a problem there, I think, and so what do we do?

The state of North Carolina, just like the state of South Carolina and the state of Georgia and the state of Florida, can look at the trends and look at what's going on in the fishery and we've done that in North Carolina and what we're seeing is that when we put in a regulation the landings drop and they come back up and stabilize. When we put in restrictions, the landings drop and then they stabilize.

That's exactly what has happened since 1999. The landings dropped when we put in the spawning season closure and now they're back up and they've stabilized. We've got a good length frequency distribution. We've seen the number of permitted fishermen drop in half since we implemented Amendment 9. The number of trips have dropped in half, but the CPUEs have gone up.

That's a little bit contradictory to me, that type of information, that empirical data. It's a little contradictory to me from a 43 percent reduction severely overfishing and that we need to take

additional action in order to end overfishing. When I continue to weigh these different things and one comes out one way, just like not including the headboat index.

I agree don't include the headboat index. What does it say? The population is going great guns, which is what it appears to be doing, based on the empirical data. No, we've got to use the headboat CPUE because it's a long-term dataset. It's absolutely no reflection -- I don't care what the SSC says and I don't care what the SEDAR panels say. The headboat index is not a representative index of abundance for gag grouper, but yet we're going to use it anyway and that's going to moderate the assessment and say we need a 43 percent reduction. I'm not comfortable with that. It seems that's the road we're heading, is to do it anyway.

Dr. Crabtree: Just remember one thing about when we last put regulations in place back in 1998. It did stabilize the commercial catch, but I believe the recreational catch continued to go up and on top of that, I believe the recreational discards went up tremendously and remember that gag is predominantly recreational. I don't know what percentage of the catch is, but I think it's 60 or 70 percent recreational.

We did put regulations in place, but they appear to have been only partly effective and so there's a lot of things going on here and you just have to look at all of these things and all of these issues.

Mr. Waugh: The difficulty you're having with this is that you're looking for logic and the rules we're operating under now are not logical. When Magnuson was reauthorized, it included a discussion about having MSY and managing to MSY and I think Bob may be the only other one here that was at that meeting when Penny Dalton came down and she was acting AA at that time and we asked her about this, do we have to specify an MSY for every species or just the ones that we have data for and we were told for every species.

I even asked if even for something like pudding wife do you have to generate an MSY and the answer was yes. Logically, what you would do is look at trends in landings, trends in average size, trends in catch per unit effort, and continuing down that road as far as the data allow you to go.

If you're comfortable doing a yield per recruit analysis, you do a yield per recruit analysis. If you have sufficient size and age data that you can do a VPA, you do a VPA. The problem is now the requirement is that we specify a biomass-based value for each and every species and that's why regardless of what the data are and how far a scientist would normally push those data, those scientists are now required to take whatever data are available and generate biomass-based values.

If you remember when Joe Powers first started working on this at the Center, the Center scientists were very uncomfortable trying to generate biomass-based values for a lot of these species, because it's pushing the data beyond where a scientist would like to push it, but we are all operating under a set of rules that require that we come up with biomass-based values for every species and that's the box we're in.

Dr. Crabtree: In this case, remember the issue is fishing mortality and really what we're focusing on in gag is ending overfishing, because we're not saying the stock is overfished. I attended some of the gag workshops and there were problems with the MSY-based estimates of biomass, but that could be addressed by using SPR proxies and things that are independent of the spawning recruit relationship somewhat.

Gregg is right in some cases. The law has forced us into things that stretch the science, in particular the long-term projections of biomass trends and recovery rates and that has been a problem, particularly when you get into these stocks with twenty and thirty-year

recovery periods.

In this particular assessment, that's really not what we're focused on. What we are focusing on here is fishing mortality rate, which I think all of us, and it's certainly my view, think is where the focus should be on and I do wish the system would be revised somewhat to put more emphasis on controlling overfishing and less emphasis on the biomass types of trends. In this case of this assessment, that's the issue, is fishing mortality and ending the overfishing.

Mr. Robson: I would have to echo everything that Roy has said so far. At our state level, we've been looking at the assessment and our commission has had a lot of concerns about where we're heading with gag grouper, but the most significant thing to them that they saw last week in a meeting was the indications of high discard mortality and high releases on the recreational sector and that comes right out of the assessment.

That seems to be a big part of what we are trying to address, is that fishing mortality, and particularly the discards is something that is a concern in Florida. There's quite a bit of recreational activity and a lot of harvest and it is what we should be focusing on.

Mr. Mahood: I'm not going to speak for Louis, but in listening to him, I know he's a supporter of the SEDAR process, even though he has said some things about the SEDAR on gag. I think Louis has been very consistent, both nationally working with the other councils and working with Congress and everything, but his big concern is when is the data good enough for management.

SEDAR, a lot of times that question arises. You can read the SEDAR reports that the scientists themselves question the data and whether it's usable for management, but, as Mac said, we're in a system, or Gregg said we're in a system, that that's a requirement. We've got to go with what we've got.

If you read Louis's testimony before the congressional committee, he tried to get the point across that somebody needs to determine within Magnuson and amend Magnuson to say what is the best available science and what does that mean? Is that any data? You take the Marine Recreational Fisheries Survey, the report that was just done on that said it's not usable for management, but we're going to use it for management because that's all that's there.

I think it's kind of a -- The council is really between a rock and a hard place when it comes to some of these things. You're required by law to do certain things. On the other hand, and Robert and I talked about this a little bit the other day at the office, is you can't offer people virtual certainty of what you're doing based on what you have to work with and again, that puts council members in a very difficult and, as Rita said, a very uncomfortable position and how we get around that, I don't know.

Mr. Currin: I understand that, Bob, to a large degree. That's why I think that having the SEDAR in place, that process in place, makes me feel a whole lot more comfortable. At

least the people there with a vast amount of knowledge and a diversity of knowledge are at least thinking about things like that. Maybe they're not thinking as deeply or as long and hard about it as we would like at times, but they're asking those questions, some of the same ones that we're asking here. They're just coming up with different conclusions than we might asking ourselves the same question.

Mr. Boyles: I'm sitting here and listening to the discussion and it strikes me -- As a relatively new council member, the discussion is very, very beneficial to me, but one thing that I'm left kind of wanting is at what point -- This discussion we're having in Snapper Grouper, but we could have it in any committee.

At what point do we as a council decide, given the parameters that we operate in, how we're going to deal with these issues of uncertainty, with the issues of -- The way the game is changing or the way the fisheries are changing and I'm left, I think with everyone else, just frustrated and trying to figure a way to move forward, given the fact that budgets are tight and given the fact that we all know we need more data.

What kind of data do we need? At some point, I would benefit from a discussion at some level of are we getting the kind of information we need in this fishery with this FMP and I suspect with other council-managed species.

Dr. Crabtree: I think the whole broad issue of how we deal with uncertainty is one of the most important things we've got to talk with. Even if we doubled our budget for data collecting, we're going to still have very uncertain stock assessments. You can go to New England and they've fought over science up there and they've got time series going back a hundred years and they've got a big time fishery independent groundfish survey. We're not going to have anything like that, because of the nature of our fisheries.

I think that's a huge question and I think as we move into ecosystem management the uncertainties are going to multiply and so I think one of the things that we ought to grapple with in our ecosystem plan is how are we going to adapt to all the uncertainties of all these issues, because as we move into more multispecies ecosystem approaches, the uncertainty is going to be even greater, but we can't let ourselves get in a position where we're frozen in inaction because of uncertainty.

I just don't believe that uncertainty is a reason for inaction. If we do that, we're just doomed and we're not going to get anything done. We put together processes as best we can and we review how we're using our research dollars and make sure that we're using it in the best way we can to meet our needs and then we make the best decisions we can, given the science that we have, and we move forward. I think that's what we've been doing as a council and we need to keep doing it.

Mr. Iarocci: Robert, you bring up a very, very valid point. I've been talking to Jimmy Rule at the Mid-Atlantic and members of the New England Council and Phil Horn and a couple of members of the Gulf Council. All the council members I've talked to right now were making decisions --

Roy, you're right. We've got a process and we're moving ahead with what we have, but the process needs to get better.

Speaking not as a council member right now, but speaking as a commercial fisherman and dealing with industry at the table and I'm talking just the South Atlantic and not talking -- I deal with a lot of guys from different places, but just the people we're dealing with in our element right now, they're totally, totally confused with what we're seeing and what we're getting on the table and what they're seeing on the water.

There's got to be a way to blend in or mesh and I know Ben right now is working in a process of trying to bring some kind of cooperative research together to get this kind of data. I hope we all can envision in the future working together with NMFS and industry in doing this and getting better science and getting better socioeconomic information to the table to make decisions on. If we don't, this process is going down the tubes and I hate to say that.

I see more council members getting frustrated and I see way more industry people getting frustrated and I look at the NGO community right now and everybody I'm talking to, we've got to fix this and we've got to get better data and we've got to move forward in the right direction and I hope we can do that together.

Mr. Currin: That's been good discussion and helpful to me at least and it gives us something to think about, I guess. I guess the reason I raised that question was just trying to look at an alternative or comparative sort of process to fall back on as at least another tool in the toolbox, to use an overused phrase.

Our next -- I'm going to wait another thirty minutes or so before we take a break, but we're going to move right ahead into our next agenda item and that's Amendment 15. Rick is going to walk us through that.