



SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

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The South Atlantic Fishery Management Council (Council) received an update during its March 2026 meeting on NOAA Fisheries' effort to develop a risk and value matrix to prioritize management and science activities. The presentation included an overview of the approach and the information being used to assign Council stocks to risk and priority categories. The Council asserts that it is critical to properly account for its managed stocks in this exercise given the change in intent. When the risk/value matrix was initially presented at the May 2025 Council Coordination Committee (CCC) meeting the stated purpose was to align council and agency priorities. The purpose apparently shifted to addressing resource allocation when an update was provided to the Council Executive Directors in January 2026. This letter details South Atlantic Council concerns with the prioritization approach and data used for Council-managed stocks.

Process Concerns

The South Atlantic Council has not been included in development of the risk/value matrix to this point, despite it being introduced to the Councils at the May 2025 CCC meeting as a collaborative process. The January 2026 update included a "Baseline Assumption" that "Creation and application of regional R/V matrices must be co-developed with Science Center, Regional Office and Councils", but so far there has been no effort to meaningfully include the Council or Council staff in the process in a collaborative manner as seems to be occurring with other Councils. The Council is concerned about the lack of collaboration thus far, and questions how

effective co-development will occur when the agency expects a completed matrix by April 03, 2026. Given that the Southeast Fisheries Science Center (SEFSC) has not completed the social valuation component nor provided the Council with a draft populated as of the completion of this letter, there seems no way for the Council to provide input by the April 3rd deadline.

With the shift in focus of the prioritization process from aligning priorities to allocating budget and staff resources, accurately valuing Council fisheries is critical. Fishery values categories in the risk/value matrix include commercial and recreational economic value, which is presented in dollars, and some yet-to-be-determined social value. There is no mention of ecological value. While “ecosystem role” was identified as a risk category in the initial May 2025 matrix it was removed in the January 2026 version. If ecosystem role or ecosystem functioning is without value in this application, then a fishery such as Sargassum, for which the Council has a fishery management plan (FMP) and which is a fishery under the Magnuson Stevens Act (MSA), contributes no value to the South Atlantic. The same can be said for coral, with no value placed on the Council’s long-standing efforts to protect important shallow and deepwater corals such as those on the Oculina Bank and Blake Plateau that also constitute important habitat for managed species.

Many questions remain regarding the “alternative management” options that could be selected for “low value” and “low risk” stocks. While designating stocks to ecosystem components (EC) is mentioned in passing, the Council has been advised in the past that imposing management on an EC stock would negate the justification for classifying it as such. The Council has also been advised over the years that all MSA requirements apply to all managed stocks, and that selection of indicator stocks to evaluate the status of multiple stocks in a complex is contrary to Best Scientific Information Available (BSIA) principles. Specific information on the flexibility available is needed before the Council can effectively evaluate “alternative management” and consider which of our managed stocks can be adequately conserved under such approaches.

Data and Analytical Concerns

The Council has identified several data and analytical decisions in the information presented at the March 2026 meeting that appear to be problematic and undervalue our managed fisheries. The economic “value” (or in the case of how it is being applied in the NMFS risk-value matrix, the economic impact measure of “value added”¹) of both the recreational and commercial fisheries is being notably underestimated, thereby severely handicapping the South Atlantic Region and the Southeast Region as a whole.

¹ While it is acknowledged that “impact” and “value” are different economic terms and measures, the words are used interchangeably in this letter since value added economic impacts are being used as a proxy for economic value in the NMFS risk-value matrix.

Recreational Issues

- Due to several factors explained below, the economic impact of marine recreational fishing is being drastically underestimated by the methodology applied thus far by NMFS in the risk-value matrix. **This is particularly problematic for the South Atlantic region, as it is the #1 region in the United States when it comes to the number of marine recreational fishing trips taken each year, both in total and in the Exclusive Economic Zone (EEZ)².**
- The approach used to “value” recreational fisheries does not reflect the true value or economic impact of these fisheries, as it focuses solely on individual trip expenditures and does not account for expenses on durable goods such as boats, fishing gear, and other equipment. In doing so, the recreational sector is notably short changed, as according to NMFS, **durable goods expenses account for over 80 percent of the total economic impacts of recreational fishing.³**
 - This sentiment is illustrated when comparing the estimated economic impacts of marine recreational fishing provided in Fisheries Economics of the United States, 2023 (FEUS 2023) to those offered by the Southeast Fisheries Science Center (SEFSC) in March 2026. FEUS, 2023, estimates the value-added impacts of marine recreational fishing for the Nation at \$78.4 billion⁴, yet the economic impact of marine recreational fishing in the part of the country where the most recreational fishing effort occurs is estimated to have a value-added impact of only \$3.7 billion⁵. This does not appear logical and indicates a significant difference in the agency’s own efforts to value recreational fisheries. While these estimates are derived using different methods (inclusive versus exclusive of durable goods expenditures), it demonstrates the point that leaving out durable goods expenditures vastly underestimates the realized economic impacts of marine recreational fishing, which again, unproportionally disadvantages the South Atlantic and the Southeast region as a whole.

² According to data for 2025 as reported by the MRIP query, accessed March 17, 2026:

<https://www.fisheries.noaa.gov/data-tools/recreational-fisheries-statistics-queries>, and as noted by NOAA Fisheries in the recently released Fisheries Economics of the US Report for 2024.

³As noted on page 12 of Fisheries Economics of the United States, 2023: “Across the United States, impacts from durable equipment expenditures (e.g., rods and reels, fishing-related equipment, boats, and vehicles) accounted for 80 percent of total job impacts, 81 percent of sales impacts, 82 percent of income impacts, and 81 percent of value-added impacts.”: https://www.fisheries.noaa.gov/s3//2026-02/FEUS-2023-web_0.pdf

⁴ As noted on page 11 of Fisheries Economics of the United States, 2023: https://www.fisheries.noaa.gov/s3//2026-02/FEUS-2023-web_0.pdf

⁵ As noted on slide 17: https://safmc.net/documents/fc1_a2c_risk_value_prioritizationframework_safmc_202602024-pdf/

- While durable goods expenditures are difficult to attribute to a single species or group of species, we recommend the agency explore ways to incorporate this information into the risk-value matrix since it is apparent that regional-level analysis is taking place and region-specific data on recreational durable goods expenditures are produced by the agency⁶. One approach is to consider attributing the economic impacts of regional durable goods expenditures based on a percent of total effort in the region directed towards Council-managed species rather than ignore these impacts all together. Another would be to apply an adjustment factor to the total value of recreational fisheries in the event the outcomes of this process are used for more than just determining the relative importance and priority of individual stocks, fisheries, or FMPs for a given Council.
- Selection of only the Marine Recreational Information Program (MRIP) “primary target” metric to estimate recreational fishing trips, with effort being the main input for the NMFS recreational economic impact model, creates a bias toward desirable species while potentially ignoring what is actually caught or harvested on a trip. **The use of only “primary target” also vastly underestimates recreational effort, and thus economic impacts, for Council managed species.** As peer-reviewed literature indicates and anglers report, catch or harvest of a species is often where a large portion of economic value is derived from recreational fisheries. Few trips in the South Atlantic are focused on a single species, so considering what is targeted, caught, harvested, or a combination thereof is often the most accurate representation of the trip. For example, an offshore trip with tuna identified as the “primary target” is likely to catch dolphin or king mackerel. Characterizing trips by a single target prevents trips such as these from being attributed to the value of the Council’s recreational fisheries and negatively biases fishery value. Additionally, it is highly unlikely that a recreational trip analysis built upon primary target only would be considered BSIA by those familiar with the MRIP program.
 - Including other options such as “secondary target” or “harvested” does bring in the possibility of double counting trips when examining multiple species; however, MRIP data can be accurately manipulated to remove double counting of trips and this is routinely done for evaluating catch per unit effort. This effort has been successfully completed by both South Atlantic Council and state agency staff in the region. If the agency does not have this expertise in-house, others in the region are available and willing to help with developing a dataset that accurately reflects recreational effort and thus value for Council-managed species.
 - Council staff often use the metric of “directed trips” when examining recreational effort and estimating economic impacts for Council managed species and in other

⁶ <https://www.fisheries.noaa.gov/national/socioeconomics/marine-recreational-fishing-expenditure-survey>

uses such as portions of the Council’s allocation decision tool. A common practice in applying MRIP estimates is to consider a trip as directed towards a species if that species is listed as “primary target”, “secondary target”, or harvested. Regardless of what anglers may identify as their target, if the species is targeted or harvested on a trip, an economic benefit was clearly derived from that species. This reality is extremely important in multi-species fisheries like those in the South Atlantic.

- It appears that **the value analysis presented to the Council incorrectly assigns all recreational trips taken in Monroe County, Florida to the Gulf region.** Despite the MSA imposing jurisdiction in Monroe County to both the South Atlantic and Gulf Councils, the MRIP query often attributes effort in Monroe County to the Gulf region. Recreational effort in Monroe County is substantial and much higher in the South Atlantic portion than the Gulf portion of the county. For many important species, such as Yellowtail Snapper, Dolphin, and Wahoo, the vast majority of effort and landings occur within the South Atlantic Council’s jurisdiction.
 - Not appropriately assigning recreational effort in Monroe County notably disadvantages the South Atlantic region and does not reflect the reality of fisheries managed by the Council. Additionally, not assigning effort in a regionally correct manner is not adhering to the principle of BSIA, as much better science is certainly available.
- It is the understanding of the Council and staff that **the NMFS value analysis thus far does not include the South Atlantic headboat fishery** since angler trips aboard these vessels are not obtained by MRIP for the South Atlantic region and are instead obtained in a census fashion via the Southeast Region Headboat Survey (SRHS). Thus, this important recreational fishery is considered to have no value whatsoever in the context of how recreational value is being calculated in the NMFS risk-value matrix. However, as the SRHS is conducted through the SEFSC, the data are readily available for consideration.
- **The value analysis does not accurately represent the geographical scope of the Fishery Management Units under the Dolphin Wahoo and Coastal Migratory Pelagics FMPs.** The South Atlantic Council has management jurisdiction over fisheries for Dolphin and Wahoo throughout the Atlantic Coast from approximately Key West, FL through the U.S./Canada border, and management jurisdiction over the fisheries for Coastal Migratory Pelagics (Spanish and King Mackerel) from South Florida through New York and cobia on the east coast of Florida. In addition to needing to include these areas in the value calculations, this is another instance in which the use of MRIP’s “primary target” metric often fails to include landings and trips that are part of the

Council's recreational fishery value. Dolphin is a seasonal and rare species in the more northern part of its range that nonetheless represents a valuable component of the offshore fishery throughout the Atlantic. Due to its rarity, it is unlikely that dolphin will be a "primary target" target of a trip out of a state such as New York but it is a possible and highly desired catch.

- **It is unclear if recreational effort directed towards Council managed species in MRIP-designated state waters, shore-based, inshore, and inland areas is included.** Several species managed by the Council, such as Spanish Mackerel and Mangrove Snapper, have notable landings in state waters and shore components. These fisheries are still accounted for under the MSA, included in calculations of federal catch levels and ACLs, and must be accounted for when the Council makes management decisions, thus these near-shore or on-shore trips should be included when examining the value of Council managed species.

Commercial Issues

- Similar to the concerns raised above regarding recreational fisheries, **the Council is concerned that the value analysis for the commercial fisheries does not represent the actual geographical scope and Fishery Management Units of the Dolphin Wahoo and Coastal Migratory Pelagics FMPs.** As previously noted, the South Atlantic Council has jurisdiction over Dolphin and Wahoo throughout the Atlantic Coast (including Monroe County), and jurisdiction for the Coastal Migratory Pelagics fishery through New York. Revenue generated from commercial landings of these species in the entire appropriate region should be used when calculating the value-added impacts of commercial fishing for South Atlantic Council managed species.
- **It is not clear if commercial value is based on where fish are landed or where fish were caught.** This is important within Monroe County, as noted, but also at the northern boundary of the Council where vessels catching Council-managed species may land in ports in states outside of the region, such as Virginia. Stock assessments are based on the range of the species and routinely include catch and landings from outside the Council's jurisdiction. The same should apply to determining fishery value.

General Concerns

- This is likely an incomplete list of issues and concerns with the analytical approach as the Council has not been provided detailed methods nor any of the data used to derive values or characterize fishery sectors.

- The approach used to assign value cannot result in any value assigned for species that are not a recreational target or landed commercially. Within the South Atlantic, non-harvest species such as Goliath Grouper, Speckled Hind, Warsaw Grouper, Nassau Grouper, coral, and Sargassum are not likely to occur as recreational targets, nor can they appear as legal commercial harvest. Thus they can provide no value to the South Atlantic fishery. Additionally, no value is provided for the Council's efforts to participate in management activities for protected resources, Highly Migratory Species, and stocks under the jurisdiction of the International Commission for the Conservation of Atlantic Tunas (ICCAT).
- The Council's Scientific and Statistical Committee (SSC) has raised BSIA concerns with several of the metrics used to assign risk.
- The applicability of BSIA principles to this analysis has not been addressed.
- It is the Council's understanding that any alternative management approaches and simplified methods of evaluating status and establishing allowable harvest levels are subject to MSA standards. Importantly, this includes the provision that the Council may not exceed the fishing level recommendations of its SSC. While the Council may be willing to accept higher risk for higher landings, under the current system that decision is not fully assigned to us.
- Assigning monetary and staff resources regionally based on the calculated combined value-added impacts of managed species does not incentivize the Council to remove species from management, which seemed to be the whole point of developing the risk value matrix. In fact, it creates an incentive to add more species to federal management, which is contrary to the direction that the Council and agency have wanted to take in recent months.

Timeline Concerns

The presentation provided the Council at our March 2026 meeting included a 9-step timeline concluding in summer/fall, presumably of 2026. It was indicated that the region is currently working on Step 2a, leaving 7 additional steps to be completed by summer/fall. Because the presentation to Council Executive Directors on January 20, 2026, indicated the results of the risk/value process will be used to inform FY27 agency planning, we presume, based on the start of FY2027 on October 1, that the conclusion of this effort in summer/fall is likely to occur around September 2026. This raises several concerns about the ability of the Council to collaborate in a meaningful and effective manner despite Council involvement being identified through the timeline. In particular, the Council notes that the timeline and slow progress to-date provides no opportunity to engage our advisors in this process despite the important information they can contribute to the social and economic value of fisheries and stocks and to identifying acceptable and appropriate alternative management approaches.

- As of the drafting of this letter, no apparent progress has been made on establishing the social value of fisheries. Therefore it is not clear when Step 2a, calling for ground-truthing of social and ecosystem values with Councils, can be completed. This step seems ideal for involvement of Council advisors, such as our Snapper Grouper AP and our SSC and SSC Social and Economic Panel that all meet in April.
- The proposed project timeline does not provide a clear opportunity for the Council to review the completed risk/value matrix, which would include assignment of Council managed stocks and fisheries to risk/value categories. The timeline indicated that stocks would be placed in the matrix (Step 3), and reviewed and adjusted (Step 4), by June 30. If Step 3 is not completed prior to June 1, the Council will not be given reasonable time to review and adjust these critical assignments per Step 4 at our June 8 – 12, 2026, meeting.
- There are several other steps within the timeline to be completed during the summer/fall to meet that deadline. For example, the final step indicates Councils and Regional Offices will identify FMP and database changes to be made in response to the matrix outcomes. Considering that Step 3 has yet to be completed, the Council is concerned that we will not have adequate opportunity to complete this final step before the agency begins to act on the outcomes from the risk/value process.

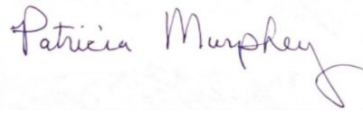
Requests

- The Council requests that further development and populating of the risk/value matrix be done in collaboration with Council staff. We recognize that following the March 2026 meeting staff were contacted by the Regional Administrator to create a group of high level Council and agency staff to regularly discuss this effort and we are optimistic that this will help keep us and our staff informed of the process. However, we would like to take the concept of collaboration further and offer the assistance of Council staff to help address some of the data and analytical issues addressed in this letter, and contribute to the work that would be reviewed by the proposed working group.
- The Council requests presentation of the risk/value approach and application to Council stocks to its SSC and SEP at their April 2026 meetings.
- The Council requests that initial risk/value matrix assignments be completed and available for discussion at our June 2026 meeting. Please provide this information to Council staff by May 20, 2026, for inclusion in the June 2026 Briefing Book.

Despite the concerns noted here, the South Atlantic Council fully supports the underlying intent of the risk/value and prioritization process. The Council has repeatedly and for many years raised concerns with the level of resources available for assessing and managing our stocks. In fact, in the Council's opinion, the resources have never been provided to manage all the stocks under our

jurisdiction to the satisfaction and expectation of the current MSA. The risk/value process will hopefully be an important step to rationalizing the management and science workload and improving access to our fisheries. The Council hopes to be included in a constructive and meaningful manner as the process proceeds and urges that such participation not be diminished to comply with an aggressive timeline. Please do not hesitate to contact the Council Executive Director, John Carmichael to follow-up on our requests or to address any questions.

Sincerely,

A handwritten signature in purple ink that reads "Patricia Murphey". The signature is written in a cursive style and is positioned above a light blue rectangular stamp.

Patricia Murphey
Council Chair

Cc: Council members and staff
LN# 202611