



**UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric  
Administration**

National Marine Fisheries Service  
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**MEMORANDUM FOR:** John Carmichael  
Executive Director, South Atlantic Fisheries Management Council

**FROM:** Clay E. Porch  
Director, NOAA Southeast Fisheries Science Center

**SUBJECT:** SAFMC March 2023 meeting request

The Center has carefully considered the Council request dated February 2, 2023. Dr. Kyle Shertzer has prepared the attached analyses for South Atlantic Scamp (SEDAR 68), and he is prepared to make that presentation to the Council. The Center has also prepared the analysis of the alternative Fmsy proxy (FSPR30) because we understand it is needed to represent the status quo reference point. Nevertheless, we think it important to point out that, while the Council has the discretion to choose between a suite of *equally reasonable* proxies, in this case the best scientific information available indicates that FSPR40 is more likely than FSPR30 to achieve a level of biomass that will produce the MSY. Accordingly, a decision to retain FSPR30 as the Fmsy proxy would not be consistent with BSIA and would contribute to greater than a 50% chance of overfishing.

Regarding Spanish Mackerel (SEDAR 78), the Center has taken note of the SSC recommendations regarding natural mortality, assumed recruitment and catch estimates, and agrees that those issues should be considered during the next scheduled stock assessment. However, as the proposed revisions are exploratory in nature and require extensive rework, they cannot be accomplished in a timely fashion. Therefore, the Center recommends the SSC develop its ABC advice based on the assessment and supporting analyses completed to date. Pursuant to National Standard 2 Guidelines 50 CFR 600.315(a)(6)(v): *Mandatory management actions should not be delayed due to limitations in the scientific information or the promise of future data collection or analysis.* The Center has also determined that the use of data-limited approaches such as DB-SRA or DCAC in place of the current age-structured assessment model would not be consistent with BSIA. The current assessment is superior to any product that can be derived from these simple approaches even when considering the issues identified by the SSC.

Thank you,

Clay E. Porch,  
Director, NOAA Southeast Fisheries Science Center

CC: John F. Walter , Shannon Cass-Calay, Erik Williams