



SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

4055 Faber Place Drive, Suite 201, North Charleston SC 29405
Call: (843) 571-4366 | Toll-Free: (866) SAFMC-10 | Fax: (843) 769-4520 | Connect: www.safmc.net

Dr. Michelle Duval, Chair | Charlie Phillips, Vice Chair
Gregg T. Waugh, Executive Director

DRAFT

February 16, 2017

NOAA – who is appropriate person?

Dear NOAA:

Requirements to manage fisheries with specific Annual Catch Limits (ACLs) under the Reauthorized Magnuson-Stevens act have significantly raised the importance of recreational catch estimates provided by the Marine Recreational Information Program (MRIP). This has led to closer scrutiny of MRIP methods, which has in turn led to a number of changes in those methods over the last few years. While many knowledgeable experts and scientific reviewers agree that these changes have reduced bias and improved the statistical properties of the estimates, there remains considerable skepticism among the fishing public that the MRIP program accurately reflects recreational catch and effort. This skepticism is particularly acute among those who fish in the Exclusive Economic Zone (EEZ) in the South Atlantic and pursue species managed by the South Atlantic Fishery Management Council (SAFMC), as many of these species fall into the category of “rare events”, exhibiting catch estimates that are prone to outliers and high uncertainty. One success of increased efforts to promote awareness and understanding of MRIP is a more knowledgeable fishing public. The flip side of this is that same public is now more aware of shortcomings and challenges and is more prone to let their dissatisfaction be heard, particularly when estimates that seem “wrong” to them lead to closures of favored fisheries.

Prior to requirements to manage by ACLs, large increases or “spikes” in MRIP estimates did not exert much effort on the management program, as the “MRFSS” program (as it was then called) was widely accepted as meeting its stated goal of providing accurate information on overall trends of recreational fishing, with less accuracy and precision expected of individual estimates. That is no longer the case, as management programs must now prevent landings exceeding the ACL. Within the South Atlantic Region, a number of recent, high-profile, unexpected spikes have led to recreational fishery closures that, to many observers, are simply the result of outlier values within the MRIP estimation process, and not indicative of actual landings or fishery trends.

In 2015, NOAA Fisheries closed the recreational hogfish fishery in the South Atlantic on August 24 due to landings exceeding the ACL. This was triggered by an estimate for Wave 2 (March and April) of 228,494 pounds, a value that was 3.8 times the entire annual ACL of 85,355 pounds. Given that average annual hogfish landings reported by MRIP from 1986 to 2014 were only 75,126 pounds, and landings exceeded 100,000 pounds in only 4 of those years, the

2015 Wave 2 seems an outlier – far out of line with the normal and expected values. Moreover, in most recent years landings are highest in waves 3 and 4. Nonetheless, the fishery was closed.

In 2015, NOAA Fisheries closed the Blueline Tilefish fishery on (date not shown on SERO ACL table) due to landings exceeding the ACL. MRIP reported 162,483 pounds of Blueline Tilefish landed in 2016, with 155,293 of these, or 96%, taken in Wave 4. Total annual landings exceeded this single wave estimate in only 3 of the prior 20 years of estimates, and the 2015 landings for Wave 3 were only 373 pounds. Blueline Tilefish appears particularly resistant to MRIP sampling efforts. No values are reported for 1986-1992, 1994, 1998-1999, and estimates are only reported in 1 or 2 waves for the 10 years from 1993 through 2005 that provide any estimate.

Impacts and consequences of abnormal and outlier catch estimates extend beyond the immediate effects of annual fishery closures, because such estimates become part of the databases that provide Best Scientific Information. Management action evaluations required for Council FMPs rely upon time series data, so the impact of an outlier value will be felt every time the dataset is used to evaluate an action. Stock assessments also depend upon the time series of past estimates. Unusual and outlier values, whether unusually high spikes or missing values effectively treated as zeros, add to the uncertainty of assessment estimates. As these values never ‘go away’, their impact on the assessment never goes away. In addition, nearly all Southeast Data, Assessment and Review (SEDAR) workshops devote considerable effort to evaluating outlier MRIP values. Even more importantly, the lack of public confidence in such values undermines confidence in the entire assessment product.

The Council recognizes that fishing effort in the EEZ is not a large component of the overall effort surveyed by MRIP, only representing about 8% of the trips observed in recent years in the South Atlantic Region. Given that total EEZ trips includes effort directed at common South Atlantic targets such as dolphin, billfish, tuna, and mackerels, the number of observed trips interacting, much less directing on, the species in our snapper grouper complex will be even lower. As a result, most, if not all, of the species in our snapper grouper complex can likely be considered ‘rare events’ when it comes to the MRIP sampling effort. The Council further recognizes that no generalized survey, such as MRIP, is likely capable of providing accurate, robust estimates of rare events in a cost effective manner. Unfortunately, there is nothing in the Magnuson Act that relaxes the requirements for management by ACLs when the only accepted monitoring program is simply incapable of providing estimates that meet the accuracy standards demanded for management by ACLs.

MRIP staff provided a presentation to the SAFMC Scientific and Statistical Committee (SSC) in October 2015 that outlined several alternative approaches for estimating catch and effort for rare recreational species for use in comparing to ACLs to determine when closures should take place. The SSC considered the alternatives reasonable and appropriate and able to provide estimates with increased precision. There was also discussion regarding efforts to develop precision standards within the MRIP program. It is our understanding that the alternative estimation methods developed by MRIP can be applied on a regional basis to address the type of rare event estimation issues illustrated in this letter.

Therefore, we request that the MRIP program be provided the necessary resources to work with the Southeast Fisheries Science Center to enable the Center to implement the alternative estimation methods for appropriate rare event species and use those methods to monitor Annual Catch Limits (ACLs).

Sincerely,

Dr. Michelle Duval, Chair
South Atlantic Fishery Management Council

cc: Council Members & Staff
Council Executive Directors
Bonnie Ponwith, Theo Brainerd, Trika Gerard, & Peter Thompson (SEFSC)
Monica Smit-Brunello (NOAA GC)
Dave Van Voorhees (MRIP)
Sam Rauch & Alan Risenhoover (NMFS HQ)