

SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

FULL COUNCIL: ABC CONTROL RULE

COMMITTEE OF THE WHOLE

Webinar

November 6, 2017

Summary Minutes

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Observers and Participants attached.

The South Atlantic Fishery Management Council convened via webinar, Monday morning, November 6, 2017, and was called to order by Chairman Charlie Phillips.

MR. PHILLIPS: I will call the Committee of the Whole to order, and then we'll have Approval of the Agenda. I think the only change that I know of is Gregg wanted to talk about some stuff in the CCC call under Other Business. Are there any other changes to the agenda? Hearing none --

MR. WAUGH: Charlie, we were going to give a brief update on -- Chip is going to give a brief update on red snapper and where we stand and what has occurred.

MR. PHILLIPS: Okay.

MR. CARMICHAEL: Charlie, we have the SSC strawman on the Red Snapper ABC Working Group that we were hoping to get some feedback on their terms of reference. There are the five terms of reference at the start of that document.

MR. PHILLIPS: All right. With those changes noted, anything else? Hearing none, then we will have an approval of the agenda, and I am going to turn it over to my most able comrade in arms, Ms. Michelle, and let her run the meeting.

DR. DUVAL: Thanks, Charlie. If everybody recalls, in September, we talked about this briefly. We talked about the portion of the ABC control rule that really focuses on the council's risk tolerance, and John walked us through a discussion document that is still in your briefing materials, and it's Attachment 5, but I just wanted to remind folks that we had expressed some support for I believe it was Alternative 4 that was in that document under the particular action that deals with the council establishing risk tolerance, and so we decided that we wanted to have an opportunity to weigh-in again after the SSC had a discussion on this, and so I am going to turn things over to John to walk us through what the SSC's comments were and kind of the history of how we got here and why you have some of the briefing materials in the book that we have and what our goal is here for today.

MR. CARMICHAEL: Thank you, Michelle. I will transfer over here to the PowerPoint, and what this will just serve as is a tool to go through the topics related to the ABC control rule, and I will review what the background documents are, and then we'll go through each of the potential actions and alternatives. When we get to the SSC recommendations of their meeting of just two weeks ago, I have folded them into that discussion, so we won't have to pop around quite so much.

Our background documents we had were the current ABC control rule that we have amended and modified and dealt with in the past. We have the SSC workshop report, where the SSC has talked about the ABC control rule a couple of times in the past, trying to get a sense of how it's working and what the issues are.

Attachment 3 is a sub-committee that they have formed to look some more into the ABC control rule, and this really comes from some of their discussions when they review an assessment and their concerns with the rule as it exists now being so prescriptive, and they don't feel like they've really been able to capture the true differences between assessments when they go in and apply the existing rule. It also included this document we've talked about quite a bit, which is the productivity-susceptibility documents, generically called PSA.

When this was first done, there were two PSA evaluations on the table. One was done by MRAG as an overall review of the precautionary approach in setting risk levels and things of that nature, and they were evaluating stocks for some of the other regions, and I believe there was a contract through somebody to do that, and, while they were at it, they went ahead and did South Atlantic stocks, and so we had a document which was the MRAG and their expert working group's view of how South Atlantic stocks ranked.

Then, at about the same time, NMFS was working on an evaluation of this, and theirs was published in a Fishery Bulletin article, and the SSC had presentations on both, and one of the biggest differences between the two came down to some of the judgment calls on the information about a stock, particularly where maybe there wasn't good information on growth or reproduction traits, and then how the two documents used the uncertainty and lack of information.

MRAG, as I recall, tended to take a precautionary view when say the age at maturity wasn't known, whereas the NMFS approach tended to treat it as an unknown, and then that, of course, can have some impact on where your stocks fall and the rankings, and this was done, gosh, nearly ten years ago, I suppose, and the SSC's concern now is certainly that there is potential for new information, and opinions may have changed on some of the things which weren't as well defined and were based more on judgment, and they have changed some of those ratings in the past, but the MRAG thing being kind of a package has been a little more difficult for the SSC to fully understand how all the scoring was done, and it's more difficult for them to get in there and change individual pieces of it.

There is a thought that, if this is somehow retained in the next control rule, that this will need to be updated and potentially revised and maybe even modified a bit more to really suit the South Atlantic approach, and so I want to just go ahead at this point and give the council the full background documentation that we have, knowing that, as we work on this amendment, we may change those.

Then 4C was a risk policy roadmap from the New England Fishery Management Council that they developed a couple of years ago, first working on their control rule, and it's useful, because it does lay out philosophy for evaluating risk and how they generally went about it, which maybe helps as a good background to set in people's minds as we work on our control rule.

What we want to do now is start to get into Attachment 5, which is the actual ABC control rule discussion document that we have looked at a number of times actually, and we continue to let this document serve as a record of what we've discussed and the SSC has discussed, which is helpful, as this has played out over quite some time now.

The first part of that document is the background and timeline, and what that does is it goes through and talks about the different discussions and decisions related to the control rule over time, and we'll just continue to update that and get you a version in December which includes the results of this meeting and the SSC's review, but one of the first questions that really comes up here that we need to talk about is what is the general approach for dealing with the control rule?

The question is do we do this with this multiple amendments, or do we do this as an overall comprehensive amendment? Right now, we have some actions proposed that modify the control

rule in say Dolphin Wahoo 10 and Snapper Grouper 45 and then the potential to consider a comprehensive amendment, and so I think I want to pause here, Michelle, and just get some discussion on this, because it's very critical to what we do in terms of the next steps.

DR. DUVAL: Thanks for that, John. I think, when we had some discussion about this in September, my sense of the committee was that folks would prefer a comprehensive approach as opposed to multiple amendments, just so that we did not get things all catawampus, I guess, between something that might be going on in a species-specific amendment versus something that might be going on in a comprehensive amendment.

I guess I would be looking for some input from the committee if this is the approach that we want to maintain. It's certainly the approach that I would recommend, and I think it would behoove us to address all of the tools that we might want to use through the ABC control rule in one amendment, recognizing that this might delay, I think, some of the things that we were considering for a particular species, and so I don't know if anyone else wants to weigh in on that.

MS. MCCAWLEY: I would like to see a comprehensive, overall amendment. Number one, I think it's less confusing. Number two, I think that it's going to prevent us making changes for some species and not others and then we're waiting until we open up another amendment on those species in the future to try to make the changes. I would just rather see one amendment that makes changes across the board. I do understand that it might slow down the timing of a couple other things we're working on, but I am willing to do that, because I think that this overall amendment is needed, as well as I think we want to try to incorporate some of the new items from the update to the National Standards.

DR. DUVAL: Great. Thanks for that, Jessica. Is there anyone else who would like to weigh-in on a comprehensive approach versus trying to piecemeal this?

MR. HARTIG: I appreciate what you and Jessica said, and I agree with that way to do it. It seems like it would be a much more efficient way to do this and get it done for everything.

DR. DUVAL: Great. Thanks, Ben.

MR. BELL: I think Jessica summed it up nicely. I think a comprehensive approach is better for just making sure that we don't get kind of strung out over different amendments and cause the potential for some confusion and things, and so I would prefer the comprehensive approach, myself.

DR. DUVAL: Thanks for that, Mel. I don't see anyone else with a hand raised, and so, unless I hear anything from any other committee members, it looks like the comprehensive approach is the way that we're going to move forward, John.

MR. CARMICHAEL: All right. Thank you very much. We appreciate the feedback. Then the next big topic is the purpose and need, and this was reviewed by the SSC as well, and they supported the approach we're taking here, and I just want to see if anybody else has thought of any other things to add to the purpose and need, and I think this is the same as what we had at our last meeting, and so, if someone thought of anything on that version, then now would be a good time to bring that up.

DR. DUVAL: Is there anyone who had any -- Obviously, the purpose and need tends to get tweaked a little bit as we move through the amendment development process, but, at this point, I think the purpose is pretty clear and simple, and the needs are many, and they have been listed. They're on PDF page 6 of Attachment 5, for folks to look through, and so is there anything that's missing, I guess, from that need at this point?

MS. MCCAWLEY: I see, in the documents that John sent us this morning, that the SSC is suggesting to use "data-limited" in place of "data-poor", but I actually don't see that in any of these purpose and need bullets. I see that they mean that throughout the document, but, in the summary that John Carmichael sent this morning, it says it's in the purpose and need, but I am not finding it in the purpose and need.

DR. DUVAL: I think that's just because that was hot off the presses, and so Attachment 5 was part of the original briefing materials, and so the SSC's input occurred after that was put together, and so, if we agree with "data-limited" instead of "data-poor", we can direct staff to make sure that "data-limited" is the term that's used.

I confess that I shamelessly lobbied for the use of "data-limited" as opposed to "data-poor" during the public comment period at the SSC meeting, simply because I think that, often, when we use the term "data-poor", it implies that, while we may not have a lot of data for a particular species, I think that implies or is seen by the public as being data that are not of high quality, and that's not always the case. The data that we do have may be very limited, but they may be high-quality data, and so I think we can include that. Is that right, John?

MR. CARMICHAEL: Yes, definitely, and I think maybe the SSC comment is probably referring just to the whole introduction of the document and is a little bit of a misspeaking there on their behalf of the comments to bring in the purpose and need, in particular.

DR. DUVAL: Okay. Any other comments on the purpose and need at this point? I guess we'll be sure to make that change in terms of reference to "data-limited" instead of "data-poor". Thanks, John.

MR. CARMICHAEL: Yes, and I will get that comment to the SSC's report, to clear up the reference to the purpose and need in their report. All right. Now is really getting into the meat of the discussion. Action 1 that addresses the categories, and, as you know now, we have levels and tiers and various -- It's a rather complex system laying out for dealing with different situations.

The SSC has talked about this a couple of times, and what we realized in the most recent discussion in October is they were kind of going full circle from talking about categories based on assessments to then they had talked about categories based on data, and then they were back to talking about categories based on assessments, and so the realization was that it's just simply challenging to define stocks, because there are stocks with pretty good data that we think have rich datasets that have either no assessments or, in some cases, what would be characterized as data-limited assessments, and there is stocks with sometimes less data, which maybe have more of a data-intensive type of assessment applied to them, and an awful lot of things in our stocks that are right on the line. They may have a lot of data, but they're perhaps missing a key piece or something

that really stands in the way of getting a real what you would think of as an intensive, quantitative, data-rich type of assessment.

What came out of it is that the real thing that matters is how you're dealing with uncertainty, because that's what crossed over into what determines how you should consider your risk as well as how you apply your control rule to your actual assessment outcomes, and the general interesting discussion that they had in October was to note that, as you get into establishing categories, you can have unintended consequences, and whether you call them 1, 2, 3 and 1 is high or 3 is high, or call them A, B, and C, you have the sense that some things are better than others, quantitative assessments with lots of uncertainty in evaluations that are ranked as Number 1 or A or what have you, become considered the better place to be. That is something to strive for.

We certainly heard this in the earliest discussions of ABC control rules across the country, where there was a sense that one of the overall goals should be to move stocks from data-limited levels up into more data-intensive levels, from DCAC and DBSRA at the time, the data-limited toolbox now, into production models and then maybe into index approaches and then to catch-at-age models, but what this tends to do is create this caste system that some assessments are better than others, and that may not always be the case, particularly because data are greatly variable across stocks.

It was noted that, in some regions, there has been a sense of, if a scientist is assigned a number of these data-poor stocks which aren't the high profile with the full catch-at-age type assessments, that they kind of feel like what did I do wrong, and I got assigned all these stocks that don't have these great assessments, and it can cross over into other things, and we've certainly seen it, from advisor's opinions and such about which stocks are important, and that can translate over into the type of assessment, and that's certainly not something that we want to do.

The thought should be to rate stocks based on their data, and I think also the overall management priorities. It shouldn't just be this idea of all stocks should be moved up a notch, but what are the stocks that really will -- That moving up the stocks will give us the payoff, and that was an interesting discussion at the SSC. I think it really affected the way that we're starting to look at this idea of Action 1 and categories and being careful not to maybe number them or letter them in any way, but just to focus in on the uncertainty and how it's characterized.

With that said, that kind of long precursor, the SSC recommendation is toward revising those categories in Action 1, and this is the avoiding the "data-poor" usage and use "data-limited" and be aware of those unintended consequences in creating this perceived benefit from moving everything up some hierarchal scale of assessment information and to focus on the uncertainty and how it's evaluated and how it's reported in the assessment.

Based on that, we have a recommendation that we define the categories based on the uncertainty levels, which now you look at say Action 4, Alternative 3, and you see that expressed, and then the next one is kind of my thought, after mulling over what the SSC said as they went through these, and seeing that there's a lot of overlap between Action 4 and Action 1, and that is to consider combining those into a single action and something that we could work on and have for a more thorough review, certainly, in December. Michelle, I will pause here before the next one, to get some thought certainly on defining the categories this way and what people may think about this combining these two actions.

DR. DUVAL: What do folks think? Is there any input on defining categories based on uncertainty or in combining Action 4 and Action 1? Action 4 is actually where, if you go to Attachment 5, Action 4 is the one that deals with the approach used to evaluate and quantify assessment uncertainties, and so this -- Like John is saying, instead of dividing stocks by level of data or the type of assessment, you would really take a different approach in looking at level of uncertainty, and I guess maybe the one question I had, John, is are there any other regions, and I don't recall, off the top of my head, that sort of categorize or establish categories for their stocks based on uncertainty?

MR. CARMICHAEL: I think, if you look at the Mid-Atlantic's approach, that's kind of the gist of it, because the key traits they pulled out have to deal with the CV and the distribution of the overfishing level estimates.

DR. DUVAL: That's right. I certainly don't have a problem with defining categories based on uncertainty. It seems like that might actually be the most appropriate approach, given that there are different ways to treat that uncertainty and that there are different levels of buffers that you would establish based on that uncertainty, certainly different buffers that the SSC would consider based on scientific uncertainty between the ABC and the OFL, and so it certainly makes sense, to me, to define categories based on uncertainty.

MR. CARMICHAEL: Okay.

MS. BECKWITH: This is always just a tiny bit above my sort of educational paygrade, but, in general, I would say that, to me, a goal would be encouraging sort of -- We keep talking about some of these assessments that we have on these species, and they are extraordinarily complicated assessments, and, occasionally, we feel like they are too complicated for the appropriateness of the data, and so, where we can get to the point where we are encouraging even more simple data-poor-type limited assessments to be done on some of our species, so we're not constantly having to kind of dig into these species and try and understand the results of these assessments and have these kind of crazy discussions between Roy and John at the table, where the rest of us are sort of floating in a little bit of gray area, that, in very simple layman's terms, that would be my goal, and so how we can make that happen would be what I would be supportive of.

DR. DUVAL: Thanks, Anna. I think we all agree that this is complicated stuff, but it's also really important, because this is how we are able to establish our annual catch limits, and so good discussion.

MS. MCCAWLEY: I am fine with seeing what that looks like when we squish Action 1 and Action 4 together. One thing that I did want to point out is Alternative 3 under Action 1 -- I read what the SSC had to say about it, and I don't think we need to look at this, and so I don't know if that's just going to automatically go away when these two actions are combined, but I don't think it needs to be analyzed.

MR. CARMICHAEL: Thanks, Jessica. I think it would go away, and we would keep it as, I guess, considered but rejected, to show that we did talk about it and consider it. I have pulled up the kind of discussion there of the Alternative 2, and you see those words there of "data-rich" and "quantitative" and "comprehensive" and what it has, and the SSC has gone back and forth, and

they're trying to figure out what really defines each one of these. What is data-rich versus data-moderate? Is it poor or is it limited? When you combine the data with the assessment, it's kind of a mess, and so maybe this alternative of combining these different pieces and dealing with the uncertainty will make it more, as Anna said, simple and layman's terms will come to bear more.

DR. DUVAL: I think, also, the goal that we should have is trying to reduce uncertainty, right? With categories that are based on data-rich, data-moderate, or data-limited, just because you have limited data, it doesn't necessarily mean that there is a high level of uncertainty in those data, and so I agree with what the SSC was saying, in terms of creating this -- That using categories such as data-rich, data-moderate, and data-limited unnecessarily creates a little bit of bias, in that I think scientists might feel like they're getting the short end of the stock when they're working on data-limited stocks, whereas I think taking an approach based on levels of uncertainty is going to -- I think it will result in a greater effort to address those uncertainties and move stocks into less uncertain categories.

MR. PHILLIPS: I am interested to see how it looks. I get nervous when we start basing things on uncertainty, because, to me, that equals buffers, and I am skeptical of what happens when we start putting buffers on top of buffers, but, yes, I am definitely interested in seeing how it looks and maybe some examples on how it might play out when we look at it again.

DR. DUVAL: Thanks, Charlie. I almost think that this type of approach might mitigate that, where you're addressing uncertainty at the outset, but we'll have to see what it looks like, I guess, in December. John, it sounds like there is support around the table to move forward with defining categories based on uncertainty and to see this squished version of Action 4 and Action 1 in December.

MR. CARMICHAEL: All right. That sounds good. The way this was done, I have brought in Action 4 here, to remind us. In Action 4, as we said, that is where the rubber really meets the road for the SSC's component of this, for how you evaluate the uncertainty, and where they have leaned, and where I think the council would like to see them go as well, is that they're leaning towards using the assessment information that we have, as much as possible, to get the CV, the coefficient of variation, which is the quantitative measure of what the uncertainty is, and to also get the overfishing level distribution, and so they would then use those together to decide what your ABC is, given your particular risk tolerance for overfishing.

It's kind of a simpler approach than what we had, because we either use it from an assessment, or, if you didn't think that the assessment captured all the uncertainty, you could expand the CV, or you could perhaps use an assumed distribution to OFL, if you didn't think that covered everything, and the SSC is supporting that.

As we said, we talked about combining this Action 1 with Action 4, and so I took just a little stab here at what this would look like, and I know this is kind of a complicated slide, but it brings in that idea of talking about the uncertainty characterization for how you would characterize the stocks and categorize the stocks and then how the ABC would be set.

Just to sort of show you what this tells you, here at this first level is, if you have an accepted assessment and it has a complete CV and the SSC think the assessment brought in all the pieces of the uncertainty and they are reflected in its estimates and it gave you that distribution of the

overfishing level, then you could simply apply that P^* with that OFL and choose your ABC right off the chart. Then that would be our normal assessment circumstances.

Then, on the next level, it would be stocks where we have -- If we have an assessment and the CV is potentially somewhat incomplete, and maybe there were key parts of uncertainty which were not carried through, or the distribution of OFL did not carry through the way you would like to see, then that would just give the SSC the ability to modify the CV or the distribution, and that is what is shown there in the -- That would be Action 4, Sub-Alternative 3 coming in here under one of these.

Then, if you have an assessed stock and no OFL, then that too would be sort of 3b, and the so the SSC could develop a CV and a probability distribution function, and that's the PDF, of the OFL to derive the ABC, and now I'm really having this thought of what Anna is talking about, about all of these terms and how complicated it gets. When you see PDF, that's the distribution of the OFL, and so they run it a thousand times, and how the different OFL levels come out. We do use these terms kind of tossed about at times, and that's a problem.

Then, finally, it would be unassessed stocks. There is no OFL, and we have no uncertainty about that OFL. There is no CV, in which case we bring in these other pieces of Action 4, Sub-Alternative 4a and 4b, which is our existing tree and ORCS, and then potentially a Sub-Alternative 4c, which would be what's the expert judgment, and the SSC might just set the ABC directly. This is where I am thinking to try and flesh these out a bit more in December and bring in the pieces from 1 and 4. Michelle, I will hand it back over to you.

DR. DUVAL: Thanks, John. One thing, and this is just an aside, but I'm wondering if -- When we review this in December, I think it might be great to have a John Carmichael special presentation as sort of like a primer of PDFs and OFLs and CVs before we would get into a discussion of this, I think, in recognition of what Anna's comments were and just making sure that everybody is up to speed on that, and that would just be one aside. I mean, I like the way that these are laid out, and I would look forward to seeing something additional in December.

MR. HARTIG: I agree with that. Thank you for that, too. It's certainly always helpful when John is able to give an explanation of some of these things early on, so we have a better idea of what we're actually dealing with and how that actually works, and I like this. The conversation has been interesting, over time, how we've changed with the SSC discussion, and I am certainly cognizant of what Charlie said about buffers and things, but I am certainly willing to look at this and see how we move forward on it and how it works.

DR. DUVAL: Thanks, Ben, and I think Charlie's comments about being conscious of buffers upon buffers is a comment that we can take back to the SSC and perhaps ask them for a little bit of input as to how this type of structure for the ABC control rule might actually be a better way to deal with uncertainty, scientific uncertainty, as opposed to the existing method, to maybe allay some of those concerns. Anybody else? Any other thoughts or first impressions about this type of strawman that John has laid out here? I don't see anybody's hands up, and it looks like Mike Errigo has a question.

MR. CARMICHAEL: He just had a comment about how we could do that for the presentation, and we looked at some examples of like different shapes of distributions.

DR. DUVAL: Right.

MR. CARMICHAEL: If folks want to get kind of an early look at that, there was an Excel spreadsheet included with the SSC's briefing materials, and it showed how different distributions and CVs could affect the ABC, and so you can see say a normal distribution versus a lognormal distribution and set different CVs, to get a sense of how the ABC changes, and so, yes, we can use something like that to give you some good examples, and I think that would really be helpful, and I agree, giving kind of a review of the terminology and what are the components that are critical to determining the ABC from the assessment information, because that's kind of rolling through all of this discussion.

DR. DUVAL: I agree, and the spreadsheet, again, I would encourage anybody who has the opportunity to go to the SSC briefing book and take a look at the Excel spreadsheets that Mike put together. It's pretty cool to see how the distribution of the OFL changes when you change the CV, and so it's an instantaneous response on that curve, and so, if folks have time to check that out, that would be great, and, if not, we can do it in December. Anything else on this slide before we let John move on?

MR. HARTIG: I was just thinking about, when we talk about the different buffers in the different species, and we look at golden tilefish, which is a commercial fishery, predominantly, and doesn't have a lot of uncertainty in the data and things of that nature, and then we look at red snapper, which has a major portion of that fishery is recreational, and also we have the discard uncertainties as well, and so, for comparison, it would be nice to look at those two somehow, to see how this would work with them, because we know it doesn't really work very well, because -- Since we have a large buffer in golden tilefish, which doesn't have near as much uncertainty as does red snapper, which has a smaller buffer, and so, somehow, to look at those two species might be informative.

DR. DUVAL: I think that's an excellent idea, Ben. John, do you think between you and Mike E. that we could have those sort of ginned up as examples?

MR. CARMICHAEL: Yes, I think so. That's what we're hoping, to have some examples.

DR. DUVAL: Okay. Anything else on this slide? All right. Let's let John move on.

MR. CARMICHAEL: I will move on to our next slide, and so, getting back in order here, on Action 2, Action 2 is just proposing that the council has the ability to set risk levels, and the reason we're bringing this up is because the current rule combines the risk levels and the assessment uncertainty kind of all into one overall package, and this gives us a different way of going about it, and it makes it clear that the risk level is actually province of the council and they will be setting that, and the SSC has supported this.

One recommendation that came out, and this was kind of triggered by some useful advice from our legal counsel, Shepherd Grimes, who was there, and so we considered an alternative that would have the risk level set in consultation with the SSC. The SSC liked that idea, and they also felt that it should be clear that the council does have the final say. They may want to set the risk tolerance after the SSC reviews an assessment, because there are traits about that assessment that

could affect the risk tolerance, and that will be something that we'll talk a bit more as we go through this, but keep that thought in mind.

With that, we have a recommendation to add an Alternative 3, where the council will consult with the SSC in setting its risk tolerance, and I think we have to actually then think about the timing of how that's done, particularly if it's something that maybe is somewhat informed by what comes out of the assessment, and I will pause there.

DR. DUVAL: Thanks, John. Are there any questions or comments about that, the in consultation with the SSC part as well as the timing of setting the risk tolerance? I think that was a particularly interesting piece of the discussion, because my sense was that the SSC as a whole probably felt that the council should be setting its risk tolerance in general prior to the results of an assessment coming out, but there was a really great point being made that there are social and economic considerations that might cause the council to modify or to reconsider what its risk tolerance would be based on the results of an assessment, and so that's kind of where that issue of timing comes in. Any comments or questions on that?

MR. PHILLIPS: I guess I am trying to figure out how this would work, because, if we get a recommendation from the SSC and then it goes to the council, and we are deciding one level of fishing over another, then do we pick something and then send it back to the SSC and ask them if that falls within how they feel about it? That, to me, would slow things down.

I would be more -- I would feel more comfortable if, when we got a recommendation from the SSC, if they just told us that we feel that this level is -- We feel pretty strongly that you shouldn't go over this or you may have some wiggle room in here, because of X, Y, or Z, but I don't want to run the risk of sending things back and to, and maybe that's not the way this is set up, but I just want to make sure.

DR. DUVAL: Thanks, Charlie. I am going to go to Ben next and then maybe have a little bit of discussion about that.

MR. HARTIG: I appreciate Charlie's concern about the timing, and it certainly could add time to the process. One of the things about that risk tolerance -- You know, we got into it with golden tilefish, and, I mean, it's really specific to each of the assessments you get on where you might vary your risk tolerance.

I don't know exactly how you add all that flexibility in. I know, down the line, we'll talk about it, but, golden tilefish, the fishermen have seen that extra recruitment we saw, and it actually showed up in the assessment, although it didn't carry into the last year of the assessment, but it is in there, but, in different species, there are different considerations, as far as your risk tolerance goes, and so I don't know. I was just pointing that out.

DR. DUVAL: Right, and I think, in terms of timing and concerns about having something go back and forth between the council and the SSC and that delaying setting of an ACL, I think certainly, Charlie, we could ask for the SSC to provide a recommendation as part of that in consultation alternative upfront and provide a rationale for that before something comes to us, and I think, again, that sort of idea that the council has the final say would allow us to address some of those

social and economic components that are not always easily or readily addressed in other parts of the control rule, and so that might be a way around it, but I'm going to let the IPT do their work.

MR. CARMICHAEL: I think Charlie definitely hit the nail on the head with that, because that's exactly what I was thinking as the SSC was bringing this up, but I have a slide a bit later, because this sort of timing thing comes up when you deal with the multiyear specifications and potentially phasing in.

They gave recommendations about consulting with the advisors and others and laying out the pros and cons of these things, and so, yes, we're going to have to really get our heads together on the IPT, and certainly within staff here, to figure out a way of doing this that doesn't add a whole other six-month period to getting the ABC done. I think that's -- I expect that's what the council's concern is, is don't let this continue to play out and we need to get the information more timely.

MR. BELL: Sort of following up on Charlie's thinking and Ben's, my questions are kind of about process and timing and how this works. Then, in terms of we have sort of the final say-so in setting the risk tolerance, but are we setting up a situation where we -- Say that we're comfortable with a certain level and then the SSC looks at that, in consultation, and they don't necessarily agree, and we're kind of back and forth, and that's what I just -- I mean, I like having them involved in the discussion or whatever, but I'm just, I guess, concerned about process and timing and how this actually plays out and the potential for kind of setting up potentials for disagreement or something.

When they look at tolerance, are they looking at the same -- They would have to look at the same things we're looking at, I guess, because we're making our decision based on -- Like you said, it could be socioeconomic considerations or other things, and I guess they would just simply look at that and say, okay, yes, we follow you and we understand that rationale and that makes sense to us, but they tend to approach risk maybe from some other things, and so I guess the devil is in the details with this.

DR. DUVAL: I would agree. Charlie and then Ben, and then we'll move on.

MR. PHILLIPS: I really appreciate this conversation, and if the SSC can give us, in some way, shape, or form, what they feel and how they feel about a number or a recommendation when they send it to us, then obviously we see a lot of things and hear a lot of things that they don't necessarily hear from fishermen and things like that is -- In a way, it's very, very difficult for them to put that information into their interworking, for lack of a better phrase. Then, if we get it from them and then we can go on with our business and it doesn't slow down the process, I would feel -- I think that would probably be the best way to run it, but work it out with the IPT, and thanks for the conversation.

DR. DUVAL: Thanks, Charlie. Ben, last word.

MR. HARTIG: Move on.

DR. DUVAL: All right. Excellent. We're going to let John move on then.

MR. CARMICHAEL: Will do. Action 3 is the risk tolerance criteria, and so this is where the council is going to set its actual risk level, and it is kind of a complicated one for the council, just

as the Action 4 and dealing with the uncertainty is a complicated one for the SSC. What we have discussed, as Michelle mentioned, is support for bringing in the idea of what now is Alternative 4, which ties the risk level to a combination of stock biomass levels and some sense of a risk rating for the stock.

The SSC has supported that, and they made some good comments, I think, along those lines about what the appropriate range is for the biomass levels and how you might go about categorizing their risk. They noticed that the assessment results can influence risk decisions, and I certainly think that has been a big part of the discussion lately in, as Ben mentioned, tilefish, as well as other stocks, where the current rule doesn't really consider that so much, but issues like biomass levels, and the SSC brought this up, what's the rate of change of the stock? That's getting at the idea of how fast could a stock go from being at a biomass above BMSY to being overfished, and how long is that relative to how often you get an assessment?

There was good discussion about this idea that you have a volatile stock that could go from above BMSY to overfished perhaps in fewer years than may happen before you have your next assessment, and I thought that was a really great way of looking at it and something that I think might be a lot more informative to us in the long run than just these simple PSA ratings, which -- They're not simple, in terms of how they're put together, but they don't really bring that kind of information in, and so I think that's a really good piece of advice that we're going to be able to improve what we're doing here by considering that.

That brings in the idea of the council considering that risk assessment when you set the overfishing risk level, which adds this timing concern, and the SSC also brought up what is the appropriate minimum and maximum risk levels, and there was some concern that there could be stocks that, even if the biomass is above BMSY, you may not want to fish them at the highest possibly overfishing risk, which is the P^* of 0.5, which is a 50/50 chance that that given level of harvest will result in overfishing, and so we thought, if it's volatile or if the assessments don't come very often, if it's had very high uncertainty, you may want to consider a different maximum risk for that one.

They also noted that the council must consider any social and economic consequences, which I thought was a good realization, and is charged with optimizing yield, and that just brings in kind of the philosophy of what we're doing here. There is a question of the management uncertainty and where does the SSC comment on this, and we had some discussion at the SSC meeting about, well, should that come in more in setting the ACL as a council role, and we probably want to keep that clean from the evaluation of uncertainty of the stock assessment, but there was some question of where does the SSC comment on this, and particularly with providing a social and economic viewpoint on the management uncertainty and its consequences.

Of course, as we've said a couple of times, the PSA analysis, if we keep it, it needs to be updated. The SSC noted that reviewing the PSA approach when they do the assessment terms of reference, and also perhaps when they review the assessment when it's done, because there might have been new information brought to bear during the assessment, which would change that PSA analysis.

A couple of recommendations to mull over, based on what we've discussed the last few months, and one is perhaps we develop a South Atlantic Council stock risk rating, which would go say in the where it's now shown as PSA as low, medium, and high in the alternative table, and that could

bring in the PSA concepts, but also this assessment info, the experience, and the expert judgment, because I feel like there's been dissatisfaction expressed by the SSC a number of times with some of the just straight-up PSA risk ratings that maybe show a stock as being as high risk, but the SSC, based on what they know of the stock and based on what we've seen of an assessment, don't really think that that's a justified rating.

I think bringing in all of those components would be good, and then I think using -- What I will get into next, Michelle, is kind of the new Alternative 4 that was laid out in this document with some different stock categories, but slightly modified to capture some of the SSC's suggestions as well, and so that will be the next slide, but we'll pause here and get some sense of folks' thoughts on the risk tolerance.

DR. DUVAL: Thanks, John. That's kind of a lot to chew over, in terms of setting our risk tolerance criteria, and I think especially the issue of timing. We're working on -- One of the things that the SSC discussed was an approach that John has been working on with the Science Center to try to have some greater throughput in our assessments, or at least in information that the SSC could then use to examine its ABC recommendations and modify those, in namely sort of an annual projection update, and we can talk a little bit more about that in December.

We've sort of been talking about this, and it's previously been referenced as an index-based approach, but that's one thing that might allow for more timely consideration of catch advice, and so taking into account the timing between assessments in our risk tolerance and use of a modified PSA, and I don't know if folks had time to read the two attachments dealing with both the NMFS version of the PSA as well as the MRAG approach to the PSA.

I think one of the things that was interesting to me in there, John, was that the MRAG approach really -- It was interesting in that they said that the council -- The language in there implied that the council would have some risk tolerance for exceeding the overfishing level, which is certainly different than how we do things, in that the SSC sets the buffer between the OFL and the ABC. Anyhow, something for folks to ponder between those two approaches.

I think you could have -- I mean, I am comfortable with incorporating, as part of that recommendation, all of these things, the timing of the assessment, having some level of productivity-susceptibility type of information, and I do think that's a great place for the SSC's expert judgment. I am wondering if there's an opportunity to pull in our on-the-water experts in some fashion, our advisory panels, something like that, and so is there thoughts or feedback on components of how we're going to assess what the council's risk tolerance is?

MR. PHILLIPS: What is going through my mind is, if we can get those yearly updates or SAFE reports or whatever we want to call them, so we can track what our species are doing, then we are going to feel more comfortable setting fishing levels possibly higher than we would if we don't get them or we believe there is long intervals between assessments, and so we're going to -- I would see the stakeholders pushing us to get those yearly updates, and I am kind of -- I am trying to think out how the table is getting set here, because we obviously can't do it on all the species. We can probably do it, I think, on twelve of the most fished species, but I am trying to set out the table in my mind on how this works, but it does seem like, the less often we're going to do an update or an assessment, the more uncertainty we may have, which would affect fishing levels.

DR. DUVAL: I think you're right, absolutely. Some of our assessments are getting pretty old, and so, if we were to do things over again, would we have set the same -- Would we have approached it with the same level of risk tolerance, I guess, and so trying to learn from what we've done in the past as we think about how we want to construct our control rule for the future. John, can you move forward to the next slide that had the additional -- I am focused on that second bullet of where does the SSC comment on the role of management uncertainty, and I think that might be in the alternative that we added where the council would develop its risk tolerance in consultation with the SSC. It seems like, to me, that is an ideal place for the SSC to comment on management uncertainty, and I don't know how other folks feel about that.

I would like to get a little feedback on looking at some type of PSA analysis. Do we want to update the one that we have? Just certainly, in looking at the one that was done for the South Atlantic by MRAG Americas, it seems like a few of those might need to be updated. Some of those species are no longer in the complex, and I might be the only one who feels this way, but it seems like some type of productivity-susceptibility analysis would be necessary, really, and I would be looking for some recommendations from the SSC on which approach to take and if there are modifications to those two approaches that they might recommend and then how do we work through that.

MR. CARMICHAEL: Michelle, that's a good point, and we talked about -- The SSC has talked about this a lot, and you mentioned the tolerance for overfishing that was in there, and I think that just reflects that that's a pretty old document and things have changed. Things came together in the Act in some ways, and maybe they were different than they were anticipating when that document was done, and so, yes, there should be some way of updating that, or maybe that just serves as a reference document and the SSC develops a new way of looking at it. That might be a good way to go, and they won't feel like their hands are tied by an analysis that someone else had done and getting in there and trying to modify bits and pieces of something that someone else has done.

DR. DUVAL: I guess maybe that would be one thing that I would put out there as potential tasking for the SSC. I mean, do they have time to look at the PSA that's been done and consider modifications to that, whether it's expert judgment modifications to the existing analysis or if there might be additional categories under productivity or susceptibility that they think need to be included, and I would look to the SSC for some input on that, but that's just me.

MR. CARMICHAEL: I think we can handle that. Maybe we do another workshop style thing at our April meeting and try to really dig into this, and, I think, as mentioned, also consider what the role of our advisory panels could be in looking at this as well.

DR. DUVAL: Okay, and so how do folks feel about the recommendations we have received thus far, in terms of components of our risk tolerance, the PSA plus assessment information plus experience and expert judgment? Are we okay with that for now? Silence means yes.

MR. HARTIG: A couple of things. I mean, I went through that PSA analysis and looked at the different species and where they fell in that, and, going through that before, that needs to be totally revamped and more appropriate for the species that we manage. I see a much simpler PSA analysis, possibly.

Then the other thing that I wanted to talk about was the game-changer of these assessment updates that are going to occur on a yearly basis, possibly the index-based approach, and that I see as a real game-changer for the council, to be able to look at ups and downs of the fisheries in concert with -- Now, that's in concert with your APs, to be able to have your fishery performance evaluations and get both of those pieces of information together, and so you ask your APs, and, if you see something going down, what's going on? If you see something going up, what's going on? What is causing this? What do you guys think is causing these kinds of variabilities in our fisheries? I think, long-term, that will be a really good way that the council manages fisheries.

The other thing that I wanted to talk about was the volatility that John mentioned, and, for me, it's critical to look at where that volatility is coming from, if it's coming from real changes in the fishery, or is it coming from mathematical changes in the way things are done in the assessment, and that's a critical think that needs to be verified when you talk about how volatile a fishery is. Golden tilefish is a great example of that. You had mostly mathematical changes that caused -- Of course, you had the change in recruitment, which was essentially a mathematical change, and then, of course, your fitting algorithms and things of that nature need to be focused on in these volatility questions.

DR. DUVAL: Ben, I think I would add to that. It's not just volatility in the assessment, but it's volatility -- It's in the data stream as well, and so I would back it up even one step further, in terms of volatility in the data stream, and certainly, for some of our fisheries that are dominated by recreational harvest, that can be a real concern. I feel like we might have discussed this as much as we're going to. John, is there anything specific that you're looking for in here before we move into that new Alternative 4?

MR. CARMICHAEL: No, I think this is good. I think support for developing our own stock risk rating that brings in more criteria is good, and I think getting -- I like the discussion on volatility that you guys just had, because I think that's something that would be important to capture in the discussion, that, when we say volatility, we're not just talking about the dynamics of the population and how fast they're changing, but, as Ben mentioned, with the model and with the results that come out, and, as you mentioned, with the data. Those are all important characteristics that should be considered when we set that, and so I think that was helpful, and we can probably move on to the next one, which should get your attention a little bit.

I think this really is capturing where this may go, in terms of setting the risk tolerance, and, in your document now, you have a new Alternative 4, which is just a way of assigning levels of overfishing based on stock biomass and this perceived overfishing risk rating. The one you had in Alternative 4, for example, the original one has, for the BMSY -- Where the biomass was greater than BMSY, it was a risk rating of 0.5 across the board, and that's where the SSC raised some concerns. That got me thinking about that table since then and as a way to maybe bring in some of these other concepts.

What I have highlighted here is you have a couple of ways of dealing with your risk, and one is what is the different inflection points, the different biomass levels, that are going to determine the level of risk, and so you could adjust that, and you could raise the threshold for this highest P* level, and that may help with the idea of not going to 0.5 on a stock, you know if it was at 100 percent, and there is no reason that it has to be just biomass is greater than BMSY. You could

throw in some uncertainty there and say, well, maybe, if the biomass is 110 percent of BMSY, we're more comfortable with a higher risk level.

Maybe, if you set that to 100 percent, you could change the risk level to 0.5 across the board, perhaps. I mean, there may still be some stocks where you wouldn't want to do that, because of the volatility and the things we've discussed, but that may give the SSC perhaps a little more comfort in letting you push that highest maximum that you would allow up a little bit more.

The other thought is so then there is -- Our current rule has a change in overfishing, and it has an adjustment for if the stock is overfishing or not, and it has an adjustment for the biomass level, and so the reasons we want to change that is, one, the fact that you're overfishing shouldn't affect your risk tolerance for overfishing, necessarily.

That is, I think, one of those double-jeopardy type of situations that Charlie mentioned and is widely recognized, and the biomass level though definitely does, because, as your biomass approaches the MSST, your overfishing is going to have greater consequences, because there is a greater chance that you could become overfished and trigger the rebuilding plan, and so it does make sense that the overfishing tolerance should be tied to the biomass, but what bothered me with the original Alternative 4 was that they really didn't change until you got far down and into your MSST levels, whereas I thought maybe there should be an inflection point along the way.

Somewhere between BMSY and reaching MSST, you should say, well, our biomass has kind of gone into a little more uncomfortable range, and we need to adjust our overfishing risk accordingly, and that's where this one comes in, and so we have three levels now that we're looking at. This brings in 110 and 110, as opposed to say just 100 percent, and what this one says is, if my biomass is anywhere between 10 percent over MSY to say halfway to MSST, then I would have risk tolerances from 0.5 to 0.35, depending on the risk level.

Then, of course, the thought there is -- What I think you have to really consider, from the council perspective, is this lower level and what are going to be the high-risk stocks and what does like a risk tolerance of 0.35 mean to your ABC buffer? That is going to be the critical point and where the examples will certainly help, but I do myself think sometimes that 0.35 is -- That's getting down there, and that's being pretty conservative for most of our stocks, in a lot of cases.

A lot of our stocks have ended up somewhere between there and 0.4, or maybe 0.3 and 0.4, but we know the buffers have varied greatly between the different stocks, and so you would have to think, if I'm at BMSY, do I really want to be fishing at say 0.35? Well, if I have high-risk stocks that everyone agrees are high risk, then I think perhaps you would accept that, and then the other part is getting at the lower level, where you're really getting close to MSST, and, as I kind of thought of a balanced way to put this together, you know this drops by 1 and this drops by 1 and this drops by 0.2, 0.4 to 0.3 or 0.2, for different risk levels, this is the one that kind of got me, because it kind of fits in with where the table was headed, but I thought, wow, a 20 percent risk of overfishing, that's extremely conservative, but, if I'm at a high-risk stock and my biomass is getting close to my overfished level, that may be appropriate.

Then our thought was, well, of course, and then how tolerant the council is of something like this really depends on how long is that low P* in effect, and, if you're not going to have an assessment

for a long time, then you might have a concern that, with this very low P^* , you're giving up a lot of yield over time.

On the other hand, you might set something up here, but, if you don't have an assessment for a long time, after five or six years, you might really get concerned with this 0.4, and so I do think this discussion of the assessment frequency is going to be critical and it really needs to be considered in this alternative, and so I think, Michelle, on this one, if folks like this general approach and if they like the sort of three levels, depending on biomass above BMSY, say somewhere between BMSY and halfway to the overfished threshold and then on the other side of the halfway point, with the different risk tolerances, then we can start thinking about the appropriate numbers that we put in these and whether it's for the actual risk tolerances for the biomass levels.

DR. DUVAL: Thanks, John. Again, this is a little bit different than what we saw in September and a little bit different, again, than what's in your briefing materials.

MR. BROWN: Yes, I did have a couple of questions. I agree with what Charlie and Ben were saying too about the input from the stakeholders and the AP and everything, and I think that's a good point to make, because there's a lot of times that we do see things that I think is important, but one of the things that I wanted to mention, and it's been brought up before, is that we had a stock assessment not too long ago on gag grouper, and it came back as relatively positive, with not overfishing or being overfished, but we continue to hear input from a lot of the stakeholders that they're not seeing the grouper in the size and the quantity, and I am kind of concerned about the risk factor on some species that actually comes back with a positive result from the assessment, but yet the risk tolerance somehow is not associated with it in the manner that it should be from what the stakeholders are saying they're seeing.

DR. DUVAL: That's a great point, Mark, and I know that -- This type of approach would actually, where we're pulling out the council's ability to set its risk tolerance from the SSC's assessment of uncertainty, and so this is where we'll have more control, in terms of making those types of decisions, and obviously this is where those fishery performance reports are really valuable. There is a couple more on the schedule for the Snapper Grouper AP this week as well, I think, for vermilion and one other, and I can't remember off the top of my head, but I agree with you that this would allow the council to adjust something because we have concerns that perhaps the risk of overfishing is a little bit higher than what maybe the numbers say.

MR. HARTIG: I think one of the things, John, in explaining this is, when you explain this table, is write out everything, that biomass is greater than 100 percent of biomass at MSY. Yes, those little greater-than things are great, but, if you get too many of them, they tend to be a little bit difficult to follow at times. Are you following me there? If you can write out what each of those means in words, instead of just the little greater-than symbols.

MR. CARMICHAEL: Yes, I do. I follow you, and I think that would be good, just to give a descriptive category for each column.

MR. HARTIG: The other thing I was wondering is if there's a way to go back and look at like black sea bass and maybe gag, and, if we had made different decisions on P^* and our risk tolerance, would that have made any difference in the fishery, and I know that's probably a -- There's a lot

that goes into what caused the declines, but, if you left more fish in the water, would that have been a benefit?

I see these things when our biomass is greater than MSY, and we seem to want to be able to take that biomass, in most cases, but it seems to me, as we do that, we're causing problems in some of our fisheries, especially in groupers, with that hermaphroditic and harem-type reproductive strategy, and it seems to me that that difference is causing a problem, possibly, in rebuilding, but I'm not sure, and I'm just asking. Do you think there might be a way to go back and look and see from example-based information?

MR. CARMICHAEL: Yes, I think that's something we can look into. Certainly not for December, but maybe for March or April, yes.

MR. HARTIG: I was looking at more of a longer-term, because this is evolving as we speak. Every time we look at this, it evolves, and so, as we talk about some of these things later on, it would be nice to have some examples to maybe sink our teeth into.

MR. CARMICHAEL: Yes, and especially with the assessment coming out on black sea bass. That may give us some good information to try to get a sense of what has happened with that stock and the volatility table and the rate of change and what's been going on, and that could be a real good case study.

DR. DUVAL: I think that was, Ben, one of the things that the SSC members had touched on, I think, in some of their comments as well, and I forget. It might have been one of the earlier reports from the ABC Control Rule Working Group, but to take -- Once the control rule is revised, to take a couple of stocks and sort of run them through the new control rule versus the old control rule, to see how they would perform. Similarly, taking a couple of our stocks as examples and perhaps running them through another council's ABC control rule, just to get a sense of what the spread looks like, I guess. Anybody else?

My sense is that folks are supportive of continuing to develop this approach with a little bit more explanation and additional consideration of how we work in assessment frequency into this table and that we would look forward to seeing an updated version in December, and I see, Mr. Chairman, you have your hand up.

MR. PHILLIPS: Thank you. If we're going to look at a couple of examples, I would also want to see an example of a fishery that seems to be doing well, or at least stable, and not just look at a couple of fisheries that may not be doing well, just so we can kind of see how the whole suite may look, and that's the only comment I would make.

DR. DUVAL: Thanks, Charlie. Again, we're probably not going to have -- We wouldn't necessarily have examples for December, unless John spends his Turkey Day holiday working those up, but duly noted that we would like to see some examples of how this could play out for stocks that appear to be stable, a stock maybe that we thought was doing really well, but then, just a couple of years later, maybe not so much, and then the reverse, where we got some positive assessment information, as Mark noted with gag, yet, sort of anecdotally, we're not really hearing that from some stakeholders on the water. I am not seeing any more hands up, and so, John, do you feel like you have the information you need from the committee?

MR. CARMICHAEL: Yes, pretty much. I think one thing to ask is just are there any of these numbers on the table that give people extreme pause? If you look at those and just think, no way, I wouldn't want to be in that situation with the stock or I wouldn't want to set my overfishing tolerance that low or that high, and anything like that would certainly help us hone in on what maybe is the appropriate range to consider.

MR. HARTIG: I don't have any heartburn with the numbers. 0.5 is the highest we can go, and 0.2 is a little bit low, but, other than that, the way they fit into -- I guess you could change it to 0.25 or -- I don't know, but I don't have any heartburn. I mean, this will evolve as we look at it and go through it.

DR. DUVAL: John, I think it's probably going to be a little bit tough for folks to see what that would mean, that 0.2, until we're able to see an example, and so I guess that could be a range of 0.2 or 0.25, but I think it's going to be tough until people can have something of an example to chew on. I don't know if there are any other regions that we could look to that have established a similar risk tolerance of 0.2 for any species, and that might be interesting to know, or at least be helpful.

MR. CARMICHAEL: I think our existing rule could go down to 0.1. The overall adjustment could be 0.4, and so it could go from 0.5 to 0.1.

DR. DUVAL: Okay. I think, in the Mid-Atlantic, they only go down to 0.4, if I remember correctly.

MR. CARMICHAEL: They only go up to 0.4. That's their max for biomass of like -- Biomass above BMSY, they would be at 0.4. They never go to 0.5. Then they go down to basically zero as your biomass approaches -- As your B over BMSY approaches zero, their tolerance goes down to zero, and I think they have quite a few that fall into there. I think their 0.2 range falls at about 0.5 on the biomass scale, and so half of BMSY would be at 0.2, and that's probably where you're into the overfished level, and so, for a not overfished stock, it looks like they roughly end up somewhere around 0.2.

DR. DUVAL: Okay.

MR. CARMICHAEL: So maybe 0.2 is reasonable.

DR. DUVAL: Anything else on this? Okay. If not, I think we can perhaps move on.

MR. CARMICHAEL: All right, and this was, I think, the most intensive and toughest part of this discussion, was this Action 3. The rest gets a little bit easier, but the timing issue continues to pile on as we go through this.

DR. DUVAL: Yes.

MR. CARMICHAEL: We're going to skip over Action 4, because we talked about that. Action 5 deals with the multiyear specifications. Some of the things that the SSC has noted is a simple average of the yields will not achieve the P^* each year, and I think we know that. If your trajectory

is -- If the yields are increasing, then, if you just average that across time, then you're going to fish a little bit harder in that first year and a little bit less in that last year, but, if we know that we're going to do this, there are projections that can be provided with a fixed yield that will achieve the appropriate P^* over those years, and so that's more of a technical issue than anything. It's just something to be aware of. It's not as simple as averaging.

The SSC said that it would be helpful to have a retrospective evaluation of projections, and that just means looking back at how well our projections have performed. If we have a projection and we have a number of assumptions in there, if we think that we're going to be able to achieve a certain yield, and then we get an assessment and we get a chance to see whether or not that happened, and so they thought looking back at that might help us understand better the risks of multiyear specifications.

There are advantages to this, they have noted, a reduced management uncertainty, and it could have a lot of social and economic benefits, and the consistency for the fishermen is recognized as being very helpful, and then I think, to the council process, you get your stocks kind of staggered, and you're managing your workload a little bit better. You're going to set some regulations for a couple of years and see how they play out and not have to reconsider it each year and take more actions.

In this one, again, the SSC felt the stock trajectory and the rate of change was another important characterization and that three to five years is an appropriate range, but there may not be a single number for the multiyear which is appropriate for every stock or for any given stock, depending on where it is at any time, and so, for some stocks, five years may be fine. For other stocks, three years might be a little bit risky, depending on which way is it headed and how fast is it going there.

I thought those were all really good things to consider, and how they lend themselves to actually writing alternatives and such is a little more difficult, but I think the idea of getting the SSC and AP consultation is maybe the best way to achieve that, and, when we think AP, we definitely started thinking of these fishery performance reports coming up more and more as a way to get information from the AP that might help the council decide how to deal with these.

DR. DUVAL: I think, when I think about this and the ability to have multiyear specifications -- I will just note that, right now, when we have an assessment and we receive projections from that assessment, we usually set ACLs that are either -- They either go up a little bit or they go down somewhat, depending on what the outcome of that assessment is, and so we are setting ACLs for multiple years in a row, but it's just not the same ACL for multiple years, and so that's what this would be, is maintaining the same ACL for a period of three to five years, taking into account these other considerations.

We have done that in the past, John, and I think black sea bass comes to mind previously. We opted for a fixed quota, or a fixed ACL, over some number of years, rather than like a certain F rate, and so we were willing to take the pain more on the backend, as the stock was rebuilding, rather than have severe cuts to quotas upfront. I think those are just all things I would throw out there for folks to think about when we think about setting multiyear ACLs that are fixed for some period of time. Does anybody have any comments on that?

MR. BROWN: I was just chewing it over and thinking about it, and the thing that comes to my mind, Michelle, is some of these fisheries closing early. It seems like, the last couple or three years, we've had different stocks close early that don't have an assessment on them, and it concerns me that -- I am not sure how far out in the future some of them are going to be assessed and how this can play into somehow maybe we can evaluate it in a way to where it can kind of give some sort of a better trajectory on what's going on with the particular fishery that's closing. I don't know how to explain it, but it just concerns me a lot when we see fisheries like the vermilion too, and, when I go out there and all I can catch is vermilion, and I'm hoping that we can see the ABC increase on that.

DR. DUVAL: I think that might be where some of this retrospective evaluation of projection performance comes in and use of both the index and sort of a re-running of projections on an annual basis, or a biannual basis, to kind of check in and see where we are, so we can feed a little bit more information into those catch level recommendations, might be helpful.

MS. MCCAWLEY: I have a couple of questions on this particular action. First of all, this is kind of a technical question, the way the sub-alternatives are set up. The Alternative 2 said that there would be multiyear ABC specifications when it's requested by the council, and so I guess the sub-alternatives kind of confuse me, because it seems like the council would request it for a particular species and then they would request it for a particular timeframe, and I am wondering why, if we're developing an amendment, you would have to go ahead and specify three, four, or five years. Why do we have to lock that in in this amendment? Why couldn't the council choose the species and then choose the duration with which the fixed ABC would be provided? That's my first question.

MR. CARMICHAEL: I think they could, and that's where the comment there of considering a range is. Instead of having the sub-alternatives of three years or four years or five years, do we just say to set a fixed ABC for up to five years, to give you the flexibility? Would that be a better alternative?

MS. MCCAWLEY: Yes, I like that.

MR. CARMICHAEL: Okay.

MS. MCCAWLEY: My other question is so I feel like this action is for specifying a fixed ABC for a number of years, and so one of the things that I thought that the National Standards talked about, and where I would like to see the council have the ability to do this, would be to set a multiyear ACL, and I don't know if this is possible, and so let me try to explain where I'm going, and then maybe this is covered by this action, or maybe it isn't, or maybe we can't even do this, but so let me give you an example.

Let's say, for red snapper, we know, on the recreational side, maybe we can't track the landings like we would want, and so maybe you could set a two or three-year, some type of multiyear ACL, and it wouldn't necessarily have to be the same number every year, but basically you would have this multiyear ACL, and you would fish it, and then, maybe by the time that you're into year two, you realized in year one that the recreational landings, now that we have that back, that they were a lot bigger than what we anticipated and we didn't realize the effort was going to be that much, and then you could make changes in year two to ratchet it back, based on the effort in year one,

but you wouldn't have any paybacks, if you will, until after you completed the three years, and so you're kind of floating among those three years and making adjustments within that three-year timeframe. I don't think that's what this action allows, but I thought, in the changing of the National Standards, that this was something that we could discuss.

DR. DUVAL: That sounds like the ASMFC Cobia FMP to me, or very similar to it. John, doesn't that sound very similar to what was just approved by ASMFC for cobia?

MR. CARMICHAEL: Yes, it does, and this isn't -- I think this action potentially helps with that, because the council can do -- My understanding is the council can do whatever it wishes with the ACL as long as it stays below those annual ABCs each year. This is more getting at the idea of, if the projected annual ABCs were increasing over time, then you could pick -- You could set it at the average of that over three years, and that would be the ABC that the council could then have that fixed ACL, and you wouldn't get into that situation where, in the first year, your ABC is technically below what the average of those three years is going to be, and so this kind of gets at that.

Then I think, in terms of the multiyear ACL evaluating, that sounds like, to me, something you guys could address with accountability measures, which is what do you do when you're over the ACL and how do you evaluate whether or not you are over the ACL. There's a little overlap with this action, but I think this might take a step in the right direction, in some cases, to let you deal with it better.

DR. DUVAL: Jessica, does that make sense, in terms of the council having the ability to say set a static ACL, as long as it doesn't exceed that ABC, and then address the other portion of what you were talking about, the evaluation of the actual catch within the accountability measures?

MS. MCCAWLEY: Almost. What I am really wanting us to have the ability to do is to have a multiyear ACL, and this is something that we've been talking about for Gulf red snapper, and it's my understanding, from discussions with Luiz, that, just the way these rules are structured in the Gulf and in the South Atlantic, that, right now, we don't have the ability to adopt a multiyear ACL.

I do agree with the part about how, on the backend, there would be this accountability measure that wouldn't kick in until after this three-year timeframe, and so it's not so much maintaining a static ACL that I am concerned about as it is allowing a three-year kind of multiyear ACL. That's what I was hoping for, and it's my understanding, from Luiz and Roy Crabtree, that we currently don't have the ability to do that, and so I was hoping, with this amendment, that whatever needs to be changed, and I think it's more than just an accountability measure, to allow that to occur.

MR. CARMICHAEL: I think now the ACL on a lot of stocks is the -- Don't the plans state that the ACL equals the ABC?

DR. DUVAL: Yes, but I think what Jessica is getting at is that, over a three-year period, you have some maximum level of harvest that you are allowing, and you're evaluating it over that three-year period, and so any accountability measures would not kick in until after that three-year period when you had the opportunity to see if, due to environmental conditions, volatility of the fishery, the way that recreational data come in, for example, that maybe you're under one year and above one year and right on the line the following year. When you add all those things together, you're

right at or just below your ACL, and so you would not necessarily need to modify any management measures. Am I explaining that properly, Jessica?

MS. MCCAWLEY: Yes, and I would say that's a good example and stating it another way, yes.

DR. DUVAL: I guess maybe that would be something to take into consideration as we're discussing multiyear specifications, because it seems to me to be -- It's not really an annual catch limit, but it's a multiyear catch limit, right?

MS. MCCAWLEY: Exactly, and I guess that, based on discussions with Luiz, it doesn't appear that we have the ability to do this, and, with this amendment, I would like to make whatever changes are needed so that we could do that multiyear ACL.

MR. HARTIG: I appreciate what Jessica said, because she got at what I was considering in that first question she had, and so, when I look at this multiyear specifications, I am looking at it as a way to have single-year catch recommendations, but allowing overage from a year to be carried into the next year, and this is the only way I see that to be able to do that, because, even if you allow carryover, if you don't have a multiyear specification, you won't be able to do it, and so that's how I am coming at this. Am I wrong in that?

DR. DUVAL: I am just looking at --

MR. CARMICHAEL: I think you could do carryover without doing the multiyear, the way it's written, because, if you went over, you would have the ability to carryover some of that, right? Well, no, the carryover is about the underages, and so you're right, Ben. The only way to get over to not have the payback immediately is to do something like this.

The other part of it is what you're really getting at is what do you use to evaluate were your landings over your ACL, and that's where I was thinking accountability measures is an important part of this. If the ACL equals the ABC, then you can't have a constant ACL over X number of years unless you have a constant ABC over X number of years, and I'm thinking that might be where Luiz is thinking of this, and, in that case, that would be correct.

As long as you said ACL equals the ABC, then they're going to track together, and then, to me, it's a separate issue of how do I evaluate the accountability measures, and do I do that on an annual basis or do I do that over time. Michelle mentioned the cobia, and they're looking at evaluating that over time. We have always evaluated them and set our accountability measures up on an annual basis, and so I think, in our accountability measure discussion, we should bring up this idea of a multiyear geometric mean for deciding if you are over, and maybe you put that idea of a cumulative three-year type of situation and bring that in as well to provide an additional safeguard.

MR. PHILLIPS: I am trying to follow this, and it sounds like we may have the ability to go over an ACL, but I thought I heard that we couldn't go over the ABC, but, if the ACL is equal to the ABC, then we're stuck, unless we can have a multiyear ABC that tracks a multiyear ACL, and then we may have that wiggle room to cover spikes or changes in the fishery or something, and so I'm not sure how we run the rabbit with ABCs equal to ACLs and trying to cover these spikes.

If we can get our yearly fishery performance reports and we look at year one and then we look at year two and then we adjust stuff for year three, if we think we're going one way or the other, then that seems to work, but I'm not sure how we do it if the ACL is equal to the ABC.

DR. DUVAL: Thanks, Charlie. That's something to take into consideration. I mean, I do think that what Jessica is talking about is a slightly different alternative under this action, and I hesitate, because I think we're starting to get into one of the other actions dealing with carryover, and that's not really what we're talking about here. It's really more of a multiyear evaluation period, but I know that John understands what we're trying to get to, and hopefully we can maybe, in consultation with some folks, bring that type of alternative into this Action 5 as a combination of a multiyear specification combined with a multiyear evaluation period under our accountability measures.

MS. BECKWITH: I just wanted to make sure that Jessica's idea wasn't sort of going back into this averaging concept that we got away from when we were dealing with cobia, where, if you go over one year dramatically, like we did with cobia, it does start to impact the following years. I know, with the multiyear evaluations, I think the way that ASMFC has set it up is that there is not a payback, and so, if we do an accountability measure at the end of the period, it's to potentially readjust season lengths or whatever during the next period of time, but not an actual payback scenario that gets us into this hole that we can't dig ourselves out of, and so that's my comment.

DR. DUVAL: Thanks, Anna. I think that's correct, if I am understanding what Jessica is putting forward correctly. It's not a three-year moving average of evaluating annually against an ACL, but really a multiyear ACL with a multiyear evaluation period, as sort of an accountability measure.

MR. CARMICHAEL: Right.

DR. DUVAL: Okay. It sounds like everybody is interested in that type of approach, and, John, it's really a matter of trying to craft that alternative, because it sounds like it's going to bleed into a couple of different actions, and so it's not just a multiyear specification, but it's also very strongly connected to accountability measures.

MR. CARMICHAEL: Right, and I think it is, because the concern is, if you go over your ACL, and if your ACL equals ABC, what do you do about it, and you can go over the ABC, and you're not even overfishing until you go over the OFL. Remember we have that buffer, and so I think that certainly seems like a plenty risk-averse approach, because keep in mind there is a buffer between ABC and OFL and the overfishing. We should be able to set a multiyear evaluation for deciding what you do when you went over, and Anna made the point, and I think that was similar to cobia, where if you went over it cumulatively over those years -- At the ASMFC, we had like two out of three years or something.

Then you would adjust accordingly to get yourself back on track without payback, and that seems to be key. People like that, and I think certainly that comes in when you're not in a rebuilding stock situation. Then we have these accountability measures without paybacks. If we wanted to look at annual things, or even a three-year average, we would use a geometrical mean, instead of we used to talk about arithmetic means, but it looks like the geometric mean has a lot more promise for moderating a single year's giant spike, but I think, between sort of the geometric means and

the two to three, we have some alternatives we can come up with for a multiyear evaluation of the ACL.

DR. DUVAL: Okay. I want to grab a few more comments here, and I'm going to go back to Jessica and then Mark and then Ben, and then we will wrap this one up.

MS. MCCAWLEY: I just wanted to say that, like you mentioned, Michelle, I would like to see this added in this action, and it also sounds like we would need an alternative inside the accountability measure action and maybe in the one where you could carry over unused quota, and I'm not sure exactly what actions would need to be modified, but, yes, I would like to see some alternatives that would cover what we're talking about here on this discussion.

DR. DUVAL: Thanks, Jessica. Ben, did you have another comment?

MR. HARTIG: Move on.

DR. DUVAL: All right.

MR. CARMICHAEL: All right. Are you ready for the next one, Michelle, Action 6?

DR. DUVAL: Yes, sir.

MR. CARMICHAEL: Action 6 addresses the phasing-in, and so, when there is a big change in the ABC, can we phase-in those reductions and not take such a big hit in the first year. The SSC made the comment in their recent discussions of considering how much ABC change is necessary before you allow the phase-in, and so, if you look at Alternative 3a, we allow phase-in if the new ABC is less than 80 percent of the existing, and so it would be, if there's a 20 percent reduction or greater, then you would have the chance to do the phase-in.

That is certainly a number that could be adjusted, based on different sub-alternatives, and the SSC recommended considering the biological and socioeconomic impacts and seeing phase-in as a way of moderating social and economic issues, and they noted that the impacts will change across stocks and fisheries, and so a given percentage of landings is certainly going to be an entirely poundage from one stock to another, and it could have different consequences on different fisheries, and so I think that sort of argues maybe for a bit more flexibility and maybe a range of numbers or something that the council can then select the appropriate situation. This is another one where the SSC and the AP consultation on how this is implemented and the specifics of a plan would be useful, and, again, fishery performance reports is a good way to bring in that AP perspective.

DR. DUVAL: All right. Any comments or feedback on that? I think including a range of percent ABC changes would be helpful. The SSC made some great points about the impacts of a particular percentage across stocks and fisheries, and so it seems like these are all appropriate recommendations to fold into this approach. I am not seeing anybody with hands raised, and so silence means that you agree, and I think, John, maybe we can move on to the next action. I guess maybe is there anything else you need from us on this?

MR. CARMICHAEL: No, I think this one is pretty straightforward and people know what we should be doing, and so I'll just move along.

DR. DUVAL: Okay.

MR. CARMICHAEL: The next point I will go into, because we've talked about these timing issues, and a lot of these involve this feedback, but just to highlight this a bit, and I think we kind of have. I wasn't sure, as we went through this presentation, if we would, but I think that we know that the general process is the council is going to set the P*, that overfishing risk tolerance, but there are some big caveats.

The SSC recommended that the council should have the last say in setting that, and the SSC recommended that assessment information should be considered, and so that means it's very difficult to set a P* and feed it to the SSC and let them evaluate the assessment and apply it and give you back an ABC all within the course of one SSC meeting where they review an assessment, because it would argue for the SSC looking at the assessment and developing their assessment recommendations and giving the council approved results, and then the council could maybe consider those assessment findings when they turn around and tell the SSC the risk tolerance.

Under our current process, we will have to give some thought to do we let that wait another six months, to another SSC meeting, or is there some way that we can get that ABC recommendation then back to the council quicker? Certainly another SSC meeting -- Maybe they have a webinar just to follow up after the council has set its risk tolerance or reviewed the assessment, where we get the projections, appropriate projections, done and the SSC could review them and give you the actual ABC. Maybe get that done between council meetings.

Another alternative is maybe the SSC could provide a range for the risk tolerance and then give a range of ABCs and then the council could -- As long as the council stayed within that, then, theoretically, they would be okay, as far as legal requirements and not exceeding the ABC. Again, we also had the SSC and AP consultation for the phase-in and all of that, and so all of that is fitting in there, and I also think there is probably a difference between a benchmark and an update assessment timeline.

Certainly, in a benchmark, we're looking at it the first time, and we know that a lot of these characteristics may change, versus we're doing an update, and, unless there is major changes in something that would affect risk tolerance, they have the information they need. If we know a stock falls within a particular risk category, it's just a matter of picking the risk tolerance off of a table, based on the biomass level, and some of those may be straightforward.

What I'm thinking is we may need to have a timeline that says here's a benchmark versus here's an update, and we're probably going to have to think about how we want to handle this to make sure that we don't get ourselves creating a lot of unnecessary delay, and I'm not sure that I know all the answers yet, but I think a good chance now to talk about what are some of the concerns, so we can certainly set the IPT loose on trying to map out a process by which all this happens.

DR. DUVAL: I think certainly we don't want to add layers that are going to make things cumbersome and delay receiving catch level advice, and so we're going to have to be a little

creative about how to do this and incorporate some of these recommendations, in terms of having the council have the last say in setting that risk tolerance.

MR. HARTIG: I think the range might be a good way to go. I mean, we used to have those, back in the day, a range based on our risk tolerance levels between which we would and would not go.

DR. DUVAL: I think, John, I'm wondering if -- Let's see. To incorporate that assessment information be considered in setting the risk tolerance, that's a post-hoc kind of thing, and so we -
- There is a couple of alternatives. We could provide some initial sense, based on fishery performance reports and what we know about our initial risk tolerance, and then we could provide that to the SSC and get their recommendations for a potential range of risk tolerances, based on the assessment information. I am just trying to think of ways to make it a little more streamlined.

MR. PHILLIPS: That may work. We really want to make sure that we don't slow the process down any, because, a lot of times, as soon as we get an assessment, we've got fishermen needing us to change the catch levels ASAP, and even moving it back one meeting is sometimes going to be -- I will use the term "critical".

If we let the SSC know ahead of time what we're feeling, then maybe, when they look at the assessment, they give us everything we need and then we finalize it at our meeting, and so that may be a good way of doing it or the range that Ben talked about, but I would like to be able to do it one time and it not go back and forth.

DR. DUVAL: Thanks, Charlie. Anybody else?

MR. CARMICHAEL: Michelle, I think the idea of whether we're getting say a first-time benchmark or an update or one of these key stocks and the evaluations -- In a benchmark, we would probably be getting a lot of new information. Certainly a first-time stock assessment is a lot of new information, and we may need to have a bit longer process with more SSC and AP consultation and back and forth. Then we have assessed that stock in the council, and we've evaluated the volatility and the trajectory and all the things that we're going to consider about the assessment, and the council sets its risk tolerance and the stock is characterized.

When you go to do an update, it could be something where the SSC considers if any of that has changed, and, if none of the opinions on that have changed, then they could set an ABC based on what the council had previously established, and, assuming that there is nothing considered to have changed by the AP or the council itself, then you would have that number. Then, if you left the door open a little bit, so that, when the assessment came to the council, if there were some concerns that were raised and they said, no, actually, we think our risk tolerance could change, that would at least preserve the council's ability to respond, and it may take an extra meeting, in that case, if they did, but perhaps that would be rare.

I think we've seen enough stocks that have dragged out three and four and five council meetings and more, as we try to get different things evaluated and considered, that we kind of know how to handle it, and this may be an improvement over that type of situation.

DR. DUVAL: I agree. I think having sort of two trajectories, one for a benchmark and one for an update, is definitely advisable, and an update could be -- I think maybe if we just make sure that,

in advance of an update, we're getting sort of a refreshed fishery performance report, then that could certainly help the council in determining whether or not its risk tolerance would need to be modified.

MR. CARMICHAEL: Yes, that would help.

DR. DUVAL: Any other thoughts or input on this? Obviously, this is very much still a work in progress.

MR. CARMICHAEL: Yes, but I'm feeling better about a lot of this stuff.

DR. DUVAL: Well that's important. Okay.

MR. CARMICHAEL: Action 7 is the carryover, and that's dealing with underages, and that's how that's talked about within the Act, and the SSC recommendations were to consider potential biological constraints and risks and not to allow it during rebuilding or if a fishery is consistently below the ACL. Those are addressed within the alternatives we have.

They mentioned that it was important to determine why the ACL is not being met, and they felt that that really affected whether or not you wished to carry over, and they noted that the impacts will change across stocks and fisheries. That's another place where the AP and socioeconomic impacts could be brought in and considered, when you determine how to do the carryover and how much that you're going to use. A recommendation, I think, to look at a range of percent of ABC change in which you allow it. Right now, we have specific alternatives of 85 percent, 90 percent, and 95 percent of the OFL and different percentages of the OFL that could be carried over, different percentages of the ABC, when we have an ABC.

I think here, at this point, if there is a sense of other bookends to add into there or other values to put in there or if you want to put kind of up-to language, as opposed to specific numbers, to give yourselves more flexibility.

DR. DUVAL: This is one that we have tackled in the past. This is basically the dolphin and yellowtail actions, pretty much, or I guess the dolphin action that we've seen in the past, and so is there -- Hopefully folks have had a chance to look at this action and the alternatives. Are there any other sub-alternatives or any up-to language, as John has suggested, that folks might want to include?

I think the SSC's comments with regard to allowing for carryover are certainly well taken. I think red grouper is an example of a stock where obviously we were not meeting or achieving the annual catch limit, and there were certainly good reasons for that, and that would certainly be a stock that we would -- Based on a closer look, we would not recommend carryover of ACL, should we have been in a position to do so.

MS. BECKWITH: I like the carry up to language. It would simplify it and maybe work well, but I would also say to make sure that there is something written in where we are allowed to carry over for one sector, but not necessarily another, so that we have that additional flexibility and it's not sort of an all or nothing for the entire fishery.

DR. DUVAL: Can you explain that again? I just want to make sure that I understand that, when you say that we would allow carryover for one sector but not another.

MS. BECKWITH: Using dolphin as an example, if we decided that it would be appropriate to allow some level of carryover for the commercial from their previous year's unused harvest, that might be great, but we don't necessarily need to carry over a percentage of the unused dolphin from the recreational, because that would make fifteen-million or thirteen-million pounds that much more, sort of unnecessarily, if the concerns of why that ACL is not being caught in the first place, and so I just want to sort of keep as much flexibility as we can possibly have to assess each individual issue appropriately.

DR. DUVAL: Okay. I get it. It's just, if there's going to be a carryover, it's not applied blanket across all sectors in the fishery. Anything else on this action? I am hearing support for the inclusion of the up-to language in those sub-alternatives, to give us a little bit more flexibility, and certainly consulting with the SSC and the AP, through fishery performance reports, would be an ideal way to go about doing this.

MR. CARMICHAEL: Would you consider a carryover that went as high as the OFL? The options that are there now are 85 to 90 percent of the OFL. Remember the ABC is reduced from the OFL, and so you have the OFL out there at the higher level. It's a potentially risky situation, because, if they caught more than that, you could find yourself, in that year, that you were overfishing.

DR. DUVAL: So you're suggesting just inserting that language within the language of those sub-alternatives?

MR. CARMICHAEL: Yes, and I'm just wondering if we should put the max up to just carryover up to the OFL, for example. That would be the most flexible, but it does offer some risk, if you were to take one all the way to the OFL.

DR. DUVAL: I am not sure we want to go there.

MR. CARMICHAEL: I think 95 percent is maybe a good max.

DR. DUVAL: Yes, and I'm not hearing any -- Charlie, do you have your hand raised?

MR. PHILLIPS: Yes, and this is a yearly thing, and so having some flexibility is probably good, but I don't have a problem in limiting it at OFL or 95 percent of it or something like that.

MR. HARTIG: From the commercial fishery standpoint, we try to manage these ACLs or these quotas within 4 or 5 percent, and what does that -- If you could carry over 5 percent or less, how does that fit into the characterization of the OFL and things of that nature?

MR. CARMICHAEL: 5 percent probably keeps you below your OFL, in most cases.

DR. DUVAL: 5 percent is different for different fisheries, certainly.

MR. CARMICHAEL: That's a different alternative though.

DR. DUVAL: Yes, and so you would potentially add an alternative that would allow for -- I mean, it's very similar to Alternative 5, but it's just that you know the OFL, right?

MR. CARMICHAEL: Yes, and, instead of Alternative 4, where you carry over up to a percent of the OFL the next year, in this one, you would carry over a percent of the ACL.

DR. DUVAL: Right.

MR. PHILLIPS: I guess what I am hearing is we can go say up to 90 percent of the OFL or 95 percent of the OFL or 5 percent over, whichever may be greater. I'm thinking that's what I am hearing.

MR. CARMICHAEL: You're hearing carryover of 5 percent of the ACL.

DR. DUVAL: Yes.

MR. CARMICHAEL: We tie it to the ACL, as opposed to the OFL.

DR. DUVAL: If you only harvest 95 percent of your ACL, Charlie, and you want to carry over that 5 percent, you may not need to -- It may not fit neatly in those 85, 90, and 95 percent of OFL alternatives, but it is a fairly -- It could be a fairly precautionary alternative.

MR. PHILLIPS: Yes, and I guess that's what I was thinking. You could do 5 percent, and it may not fit into 90 percent, and so let's say we did 90 percent OFL, or, if we decided that we were 5 percent short and we went over, then that number actually might be 92 percent of the OFL, but that would still be acceptable.

MR. CARMICHAEL: Yes.

DR. DUVAL: Yes, and I think John understands what we're talking about, and I think we can move that forward for development.

MR. CARMICHAEL: Yes, and, for December, just think about what makes more sense to you guys, in terms of how you manage this carryover. Does it make more sense to consider it from a proportion of what you allowed them to harvest, a percentage of the ACL, or does it make more sense of up to a level relative to the OFL, and so just give that some thought, and maybe we'll have a better idea of how we want to word this for December.

DR. DUVAL: Yes.

MR. CARMICHAEL: It's getting easier, Michelle. Action 8 is rebuilding ABC, and, the way we have it now, it's kind of been inferred and not really clearly stated within the control rule. It's mentioned in the discussion leading up to when we built the control rule, but, in a rebuilding plan, the ABC is based on the rebuilding plan set by the council, which is the specifications you choose based on your rebuilding approach, fixed landings versus fixed F, and the time in which you intend to do it.

This action would just clarify that within the control rule, to make it clear that this is the way we do it for rebuilding stocks, and the SSC has supported it, and the only thought I had is does this justify a separate action, or could it just be a sub-alternative in Action 1, where we just say, in the case of a rebuilding stock, here's where you get your ABC?

DR. DUVAL: It seems like it might be easier to include it as a sub-alternative in Action 1, but my thinking on this one is that staff and the IPT can probably work that out as to where it makes the most sense.

MR. CARMICHAEL: Sure.

DR. DUVAL: Do other committee members have any thoughts on that? I am not seeing anything, John.

MR. CARMICHAEL: Then I will move on to Action 9, the next-to-last one. This is, again, just a bit of housekeeping. The National Standard 1 allows the SSC to deviate from the rule, and so we would like to do that, and the SSC has certainly supported it. One thing that I have thought of is should we have some language or criteria that defines when it's appropriate, and National Standard 1 brings in some stuff, and so we need to look at that.

Then the other thought is there's been discussion around the SSC some about this idea of remanding, and that's when a council sends an ABC back for further consideration by the SSC, and I think John Boreman has brought this up, because I think the Mid-Atlantic Council has some language about circumstances when they would remand. I think, in considering allowing the SSC to deviate from the ABC control rule, are we, in a way, actually getting a situation where the council could also be the one that says, okay, we would like to initiate a deviation from the ABC control rule, for these reasons.

DR. DUVAL: I think both.

MR. CARMICHAEL: Anyway, I'm done.

DR. DUVAL: I think clarifying criteria would be helpful, and I think having both of those alternatives certainly -- If the SSC feels that it needs to deviate from the control rule, obviously, the way the Guidelines are now, they have to provide a justification for doing so. They may want to consider criteria for deviation, so that it's confined, and I like the idea of having some criteria under which the council could request the SSC to reconsider that, based on information that perhaps the SSC has not been privy to or is not something that they might normally consider, which might get into some of those social and economic considerations, but those are just my thoughts.

MR. PHILLIPS: Social and economic considerations are almost always part of the equation, and I would be really surprised if that was not one of the criteria we used, which meant we almost always would have the ability to remand it back to the SSC. I am just thinking. Do we want to make criteria when we know the criteria are going to include things that give us almost a 100 percent possibility of sending stuff back?

DR. DUVAL: I don't think we want criteria like that. Certainly not, and so I think -- John, do you know what the Mid-Atlantic has used in this regard?

MR. CARMICHAEL: I think kind of like you mentioned, some new information or concerns over consequences or lack of clarification in the justification for the recommendations that were made, and I think they have somewhat of a process, and so maybe, as well as criteria, we just need to establish a bit of a process. I feel like we've sent things back for clarification in the past, and maybe just shoring up how we do that would help.

DR. DUVAL: Yes, I agree, and just because we might choose to send something back or ask for additional clarification does not mean that the SSC is going to revise its ABC recommendation. I mean, I certainly think that we've seen that. I don't think -- Like Charlie said, we don't want to set something up that is going to result in a 100 percent opportunity of doing this.

MR. HARTIG: It's just I don't want to get stuck in criteria where we don't have enough flexibility to address a problem when we see it, and that's all. Have a list of criteria, but then even allow that some flexibility.

MR. CARMICHAEL: So sort of some e.g. criteria, examples.

DR. DUVAL: Yes.

MR. CARMICHAEL: Not binding.

MR. HARTIG: That would work.

MR. PHILLIPS: What I'm hearing is kind of a rule-of-thumb criteria list and then other, and so we kind of stay in between the ditches, but we still have the flexibility that Ben was talking about.

DR. DUVAL: Okay. We can ask staff to provide some e.g. criteria that we could look at in December and decide if we want to refine those in any way or add any, and I think it would be helpful to get the SSC's input on this as well.

MR. CARMICHAEL: Yes, I think that works.

DR. DUVAL: Okay. Anything else on this action? If not, Action 10.

MR. CARMICHAEL: Action 10 is what was added in September, and it gets into the idea of adding accountability measures in this. As a comprehensive amendment, it would give us a chance to make those more consistent across our FMPs. The SSC didn't provide any comments on these at their last meeting in October, and that was the first time that they saw them.

As it is now, this action is coming together by looking at things that are in existing accountability measures as they are written, such as monitoring landings during the year following an overage, which we do in some cases, and reducing fishing seasons in following years to address overages, which is, in some cases, only if the total is exceeded or only if the stock is overfished. There are options to establish a predetermined season and options to have an overage payback. In some

cases, like recreational black sea bass has, if the ACL is exceeded, independent of stock status, they can reduce the sector ACL in the following year by the overage.

I guess, in this case, what we need to be thinking about for December is specific things that would like to be done for when landings exceed an ACL and then how we go about evaluating whether or not the landings actually exceed the ACL, because we're always evaluating these with an estimate of landings, and we know there's a lot of uncertainty in some of those estimates, particularly recreational, and so we need to keep track of that, and we should have some way of accounting for that uncertainty when we decide, okay, did I really exceed my ACL and are there potential consequences to the stock and how should we respond with the fishery.

DR. DUVAL: This has come from sort of our letters that we've written recently to the folks at the MRIP program with regard to methods, alternative methods, of calculating recreational harvest estimates specifically for this reason, to be sure that we are actually triggering accountability measures when they need to be triggered and not because of maybe a statistical aberration, so to speak.

I think a couple other things, John. With Framework Amendment 4 for coastal migratory pelagics, the accountability measures were changed such that we considered modifications to the vessel limit before considering a shortened season, and I think here is where we would want to look at an alternative that describes what Jessica brought up previously in conversation, and so I think that would be sort of a multiyear evaluation period as an accountability measure. I'm not quite sure how you write that, but I think we have, as an example, what has just been passed by ASMFC for cobia.

MR. WAUGH: This came up on the CCC call on October 27. Chris Oliver made clear that the administration does not have a position yet for reauthorization, and I asked specifically about this idea of trying to get away from ACLs for the recreational sector, and his feeling was that that was not something that the administration would be supporting, and indeed that's not even something that all the councils support.

I think, here, I know our interest is to get away from having in-season closures on the recreational sector. We are the only council that does that, and so it seems to me that we should have a clear alternative that removes any in-season closures on the recreational sector. With that, we have to understand that then we need to set the bag limits, trip limits, and season to achieve that recreational ACL.

It seems to me that Alternative 3 could be changed some. Rather than saying "reduce", say "adjust the fishing season to address overages or underages", and have a similar alternative that applies to bag limits as well. It seems to me that Alternative 5 we don't want to include. That is a part of the no-action alternative, because that's already in place, but I'm not sure we want to have overages, paybacks, giving the uncertainty in the recreational catches. Thank you.

DR. DUVAL: Thanks, Gregg. This harkens back to the conversation that we had in December about the data that we have available to manage particularly recreational fisheries versus the management paradigm and trying to align those, and certainly this is not about unrestricted or unmanaged recreational harvest. It's really more ensuring that we're not -- That our accountability

measures are not penalizing folks when there isn't a need to penalize and take into account the uncertainty in recreational catch information.

I think the one thing that I'm going to throw out here is that, when we had that conversation in September, we talked about how we have large year classes that will hit the fishery, particularly the recreational fishery, and so that results in higher catch rates, which results in possible exceeding of an annual catch limit, but I would also say that I think those large year classes also end up hitting commercial fisheries as well as recreational fisheries, and we see that in just higher burn rates, in terms of going through the commercial annual catch limit, where, in some years, we have earlier closures than others, and so I think this -- In terms of the abundance of fish out on the water, this applies to all sectors, and it's not just recreational, and so I will just leave that there, but I agree with Gregg's suggestions for the alternatives here. Any other thoughts or input on that? Silence means everybody agrees. Very good. You're all so agreeable this Monday morning.

MR. HARTIG: That's good.

DR. DUVAL: I think that takes us to the end of our ABC control rule discussion document, and I think that then takes us to Other Business, but before we turn things back over to you, Mr. Chairman, John, is there anything else on this document that you need some input on?

MR. CARMICHAEL: No, and I got great input, I feel like, and I can push this a little bit further for December and certainly start thinking about the longer-term tasks we need to work on. I definitely appreciate all the good feedback. If anybody thinks of anything, just let us know.

DR. DUVAL: Awesome. Thank you very much, and so I guess, Mr. Chairman, I am going to turn it back over to you for Other Business. It sounded like we were going to get additional updates from the CCC meeting, and then it sounded like Chip was going to give an update on red snapper, and so back to you.

MR. PHILLIPS: Thank you very much and a job very well done. Thank you. We will go to Gregg and our list for Other Business.

MR. WAUGH: I will give a more detailed report at the December meeting, but I did want to just update you all on a few items. As far as the budget goes, the President's request was slightly down from our line item. Both the House and Senate marks were slightly up. The Senate has wording in there that all of the increase goes to the commissions, and so the feedback we got was that level funding would be about the best we could hope for, and we'll see how that shakes out once those bills are put together.

This year, the continuing resolution is in place until December 8, and they intend to get us our first quarterly portion of the next fiscal year's money, 25 percent of that, by the end of December, and so that was good news, but we still have to see what happens with that continuing resolution after December 8.

One item that was new is that our current grant cycle, five-year grant cycle, runs through 2019, and the next one starts in 2020 through 2024, and they want to have that completed by the end of Fiscal Year 2018, which is earlier than we've done that in the past, and so we'll have to be working on that earlier this time around.

As far as MSA reauthorization, I gave you the input on ACLs for the recreational sector. They requested that the CCC working paper, once that's finished up, and that should be ready to go this week, that the CCC send that to the Secretary, so that the Secretary has the councils' views on reauthorization, and that may help to inform the agency's position.

The final item that I wanted to mention was on regulatory reform. There is two parts of this, that two-for-one, getting rid of two regulations for every new one, and then a general regulatory reform. We have been taking public comments, asking for public comments, at each council meeting, and we haven't gotten any thus far, but, in the agency's response to these two Executive Orders, they want the council to identify a process that describes how we will look and evaluate all of our current regulations.

They want that description of that process by the end of this year, and so we'll talk about this some at our December meeting, but we have to describe the process of how we're going to evaluate all of our regulations by December of this year. Then, by June of next year, we have to evaluate the rules and provide any recommendations for rules that we think should be removed. As I said, I will give a more complete report at the December meeting. Thanks, Charlie.

MR. PHILLIPS: All right. I thought we had something for Chip. Then what else?

MR. CARMICHAEL: Charlie, we have the ABC Working Group from the SSC, and we wanted some feedback on their terms of reference. At the last SSC meeting, they set up a working group to try and deal with the ABC situation on red snapper and find a way to define an ABC and estimate and support an ABC, and so they formed a working group, and you see the members here, and they worked up some terms of reference at the meeting, and we said we would ask the council for any guidance they may have on these terms of reference, and then the idea is for this working group to get rolling on this, and they have a timeline of trying to really get some action on this for the SSC meeting in April, which is great.

Their terms of reference are shown here. They want to collate and evaluate the existing information, and they want to determine if an ABC can be determined from the existing information. Then, if not, come up with a plan of action for deriving an ABC and consider the index-based methods that have been talked about as well as using that for both tracking and determining an ABC. They want to assess newly-developed methods and consider strengths and weaknesses of them and then provide an ABC recommendation and include any alternatives in a priority order for the SSC to then consider.

They really want to put something together that the SSC can use to get an ABC, and so, if there's any -- It would be nice to hear any comments that folks have on the terms of reference and the plan of work that this group has laid out.

MR. PHILLIPS: Are there comments?

MR. WAUGH: Charlie, I had a couple of items. Under Tasks, John, the last line, it talks about providing an ABC "or tracking an ABC", and it seems to me that that should be "and tracking an ABC". Under Terms of Reference, Item 3, I think we should insert, after "if an ABC cannot be determined from existing information provide" and insert "a detailed explanation of why not and

then provide a plan of action”. Then, under a, the second line, “as well as consideration of”, we need to insert “how”. Then the only other item is under Timing. I think it would be helpful to give the council a short status report at the December meeting, and so add that under the first line under the timeline. Thank you, Charlie.

MR. PHILLIPS: Thanks. Are there any other comments?

MR. CARMICHAEL: Gregg, you said “how”, and where were you referring to that?

MR. WAUGH: Under 3a, the second line, “as well as consideration of how the index-based method can be used to determine an ABC”.

MR. CARMICHAEL: Yes.

MR. PHILLIPS: Okay. Any other comments?

DR. DUVAL: I just wanted to say that I really appreciated the conversation that the SSC had in this regard and their willingness to move forward and to move forward quickly on this, and I also agree with Gregg’s recommended edits. Thanks.

MR. PHILLIPS: All good, and, since I was at that SSC meeting, I was -- I really appreciated the way it was run and the input and the discussions there, and so, yes, it was really good, and we ask a lot of them, and so we appreciate them doing what they can do. Are there any other comments?

MR. CARMICHAEL: I would think we would want to ask for a status report for the March meeting, too. We will know a lot more at that point.

MR. PHILLIPS: Okay. That sounds like a good plan. Anything else? Then, Gregg and John, is this our list for Other Business?

MR. WAUGH: We have got Chip to give a status report on red snapper.

MR. PHILLIPS: Okay. Is he ready now?

DR. COLLIER: So, as you guys know, this was our first opening weekend, and we had our website available, and we had thirty-nine fishermen use the tool. Forty-eight trips were reported, and I downloaded this information at eight o’clock this morning, and so it has changed since then. I’ve gotten emails that several trips have been reported since then.

42 percent of the trips were reported as abandoned, and the major reason for abandoning the trip was weather. 92 percent of the trips were from private recreational trips, and that included trips that were abandoned and/or active or completed. 86 percent of the active or completed trips were private recreational. Then I have a percent of the days, or a percent of the trips by day, and I have, once again, the active and completed version and then all, which includes those abandoned trips.

This is the length distribution of total inches for red snapper, and we had thirteen fish that were reported with length, and we had eighteen fish that were released reported with length. Right now,

with the low number, we're not seeing too much, as far as modal classes, but we are getting information on released fish, which we didn't have before, for the private recreational angler.

One of the things that you guys have been asking for is how many fishermen are venting fish or using descending devices. What I have is a pie chart of the number of fish that were descended, number of fish that were vented, and the number of fish that were not treated, and so, in this field, the fishermen have an option to leave it blank, or they can fill it out, and so they filled out -- They can also choose several different things. Items that weren't on here were a combination of descending devices and vented as well as other, and they have selected just these three.

These are the reasons for release, ranging from not desired, over the bag limit, too big, and too small. We were trying to give them a variety of reasons that they can choose. Once again, this is blank, and they have to actively fill it out with one of these options, and there is also an option for other.

This is the location of catches, and it's color-coded by state jurisdictions or however that goes into federal waters, and, up in North Carolina, there were not sufficient numbers to report the information. In South Carolina, we had 29 percent of the fish that has reported where they caught the fish, and they were in South Carolina waters. In Georgia, we did not have sufficient information to report. Then, in Florida, 57 percent of the fish came from Florida waters.

The total number of trips were very similar to the overall number of fish that were reported from these waters. This number is never going to add up to 100 percent. Some of the areas actually end up as actually on land, and so the city where they leave, because they just don't change the location information, and some are actually in state waters.

This is just some crude information that we can gather very quickly. Right now, I have some code written that analyzes the data pretty quickly. If you guys want to see additional information, I can provide that, and, if you have any other questions, please let me know.

MR. BELL: 29 percent of the red snapper reported harvested were from state waters off of South Carolina?

DR. COLLIER: No, that's the -- When you look at the federal, they have different waters assigned to states, and this is the map that the feds have for each of the states, and so you can see the border between South Carolina and North Carolina goes southeast, and then the Georgia/Florida border goes straight across, and I just used those boundaries that come from the feds and used that to calculate if they were South Carolina or North Carolina.

MR. BELL: All right, because that sounded kind of squirrely. Thanks.

MR. WAUGH: Charlie, let me mention that we've had excellent cooperation from ASA, CCA, and Pew, and we've been doing lots of outreach ourselves. Kelsey did a show here at one of the local tackle shops, and so this, to me, demonstrates the utility of this system, and we may still get more reports from this weekend, because they're accessing this on the web, and so they have to wait until they get back to land or to have Wi-Fi to access it, and so this is a pilot of our pilot app that will be available next year, and so, to me, it's very encouraging to see the types of output we can get and how rapidly we can get it, and I thought it was interesting to see that the fishermen

don't seem to have a lot of interest in keeping smaller red snapper. A lot of those were released, and so I think there's a lot we can glean from this, and certainly, as we get the reporting rate up, it will be more useful in the future. Thank you.

MR. PHILLIPS: Yes, and this is a great start, as we start down this path, and the fact that they're using descending devices is really good, too. All right. Any other comments?

MR. HAYMANS: You said there were forty-nine registered app users, and does this current map -- Is it basically 57 and 29 percent users from those states, or what can you tell me about the breakdown? I didn't see that.

DR. COLLIER: You wanted to know the users by state?

MR. HAYMANS: Yes, and is the current map that you're showing relevant to that or no?

DR. COLLIER: I did it based on the trips. Hold on one second and I can tell you what it was for the number of users by state. It's 57 percent of the -- Actually, I didn't break it down like that, Doug. I will have to get that information to you.

MR. HAYMANS: No worries. I was curious to check, and, just so you will know, we had an absolute picture-perfect weekend in coastal Georgia, and this is very, very preliminary, but we intercepted at least sixty-three fish for our sampling program, and none of those came through APAIS, but that was my staff going to docks and whatnot, at least sixty-three fish, and we're still checking our carcass freezers this morning, and it was picture perfect here, and so I will look for some more numbers coming out of Georgia.

MR. PHILLIPS: Thanks, Doug. I know we've started getting a handful of commercial fish in pretty quick too, and I'm surprised that a lot of people couldn't go because of weather, because I thought it looked really good.

MR. HARTIG: Gregg mentioned the small fish, and I saw that in Chip's presentation as well. I made one trip, and I found a spot that had -- I could have caught seventy-five pounds of a half to three-quarter-pound red snappers, but I think I caught eight of them, just hoping they would get sampled through the sampling process, but there's a lot of small fish out there right now, very small.

MR. PHILLIPS: Thanks, Ben. Doug, did you have anything else to add?

MR. HAYMANS: I was just going to say, right before we hang up this phone call, if I could have maybe the last word, I would appreciate it.

MR. PHILLIPS: Done. Okay.

MR. WAUGH: Let me just give a shout-out to our staff. They worked extensively to get this material out, and, the Regional Office staff, a shout-out to them as well, because they cooperated, and we shared press releases and coordinated extremely well, and Roy and his staff did a super job getting this package together and through the review process in Headquarters, and so thanks to everyone.

MR. BROWN: Doug, my port sampler goes down to Tybee, and he said that he intercepted two boats there at Tybee that they had over twenty-five fish between them over the weekend, and so I guess that hasn't showed up yet, but, also, I wanted to let you know that the weather forecast projected for next weekend is not looking good at this point. It's calling for six to ten-foot seas for Friday and Saturday, and so I'm not sure that we're going to have too many landings.

MR. PHILLIPS: Okay.

MR. CARMICHAEL: I think that's all the hands now, Charlie.

MR. PHILLIPS: Thanks, John. Is there -- I think this covers Other Business, but I will double-check. John or Gregg, anything else?

MR. WAUGH: No, I think that's it.

MR. CARMICHAEL: All set, Charlie. Thank you.

MR. PHILLIPS: This has been a really well-run meeting. Thank you all, John and Gregg, and a special thanks to Michelle, again, and we'll go back to Doug.

MR. HAYMANS: Thank you, Charlie. I want to kind of make a small apology that I wasn't able to give this meeting my full and undivided attention. Right before we started this meeting, I got sent a press release, and we're mostly family on here, I think, right? There's a few extras, but I got sent a press release request, and I had to turn a press release around pretty quick, and I thought the overall announcement was going to wait a while, but, in the middle of this webinar, an announcement went out as to CRD's new Director, and so I had to tackle that today, and so I just wanted to let you all know that I apologize for not giving you my full attention.

MR. CARMICHAEL: Who is the new Director?

MR. HAYMANS: That's what I was waiting on. They might have selected me to do it, and so we'll see, and so Spud walks out on November 17, and I'm going to assume the role on December 1. There you go.

DR. DUVAL: Congratulations.

MS. BECKWITH: Congratulations. That is fantastic.

MR. PHILLIPS: Congratulations, Doug.

MR. HAYMANS: Thank you very much.

MR. CARMICHAEL: We will do a virtual applause.

MR. HAYMANS: While this webinar has been going on, my phones, both of them, have been blowing up, and my email has been blowing up, and there are people coming in and out of the door, and so, anyway, I will catch you all on the backend of this.

MR. PHILLIPS: That's very good news. Thank you very much for sharing that. Are there any last thoughts?

MR. HARTIG: Happy Thanksgiving, all.

MR. PHILLIPS: With that, I guess we will adjourn our Committee of the Whole.

(Whereupon, the meeting adjourned on November 6, 2017.)

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Certified By: _____ Date: _____

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Committee of the Whole Meeting

11/6/17

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