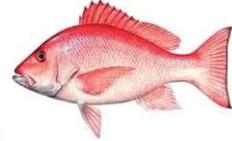
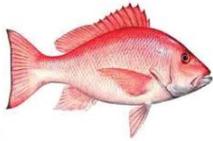


SOUTHEASTERN FISHERIES ASSOCIATION (SFA)



EAST COAST FISHERIES SECTION (ECFS)

February 27, 2015

South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Council Members:

The SFA ECFS believes it is long past time for a stock assessment update of the South Atlantic **Golden Tilefish** (SEDAR 25) benchmark assessment, performed in 2011. Indeed, SEDAR 25 stock assessment projections, supplied by the NMFS-SEFSC to the SAFMC's SSC, only extend to 2015. The majority of the 2015 Golden Tilefish ACL has already been caught, and the commercial long line fishery was closed on 19 February 2015. Clearly, a Golden Tilefish "update" stock assessment is overdue.

As SEDAR 25 indicated that the Golden Tilefish stock status was Not Overfished, and No Overfishing, and the trends in both SSB, and CPUE of the commercial fishery were positively increasing, we believe that an "update" of SEDAR 25 would provide significant increases in stock biomass (SSB) and maximum sustainable yield (MSY) for fishing exploitation. Indeed, the SEDAR 25 Review Panel was quoted in the SAR that "A new [Golden Tilefish] assessment could improve information on MSY and biomass status indicators." We are also aware that the incoherent spawner-recruitment curve and inability to calculate steepness, from the SEDAR 25 model, caused an unnecessary P-star penalty on the MSY value, providing the fishing industry with a much lower ACL from the MSY value of ~638 thousand lbs./ year.

We are also aware of the problem with stock boundaries, recreational landings (MRIP) and climate-induced changes in stock structure that may confound Biomass and MSY calculations with the more prodigious Mid-Atlantic Golden Tilefish stock. The Golden Tilefish stock managed by the MAFMC has a biomass (SSB) estimated to be ~10 times larger than the South Atlantic stock at ~11.36 million lbs.; where over 16 million lbs. of Golden Tilefish have been harvested over the past decade, at an annual fishing removal rate of ~ 1.5 to 2.5 million lbs. Alternatively, SEDAR 25 estimated that the South Atlantic stock biomass (SSB) is only 1.45 million lbs., and over the past two decades the commercial ACL has hovered around 300 thousand lbs. of annual fishing removals. Indeed the SEDAR 25 Review Panel recommended that "the South Atlantic stock could be included in an assessment in a wider stock structure to include the Mid-Atlantic and Gulf of Mexico." We encourage the SAFMC to recommend such an assessment, particularly in light of widely recognized issues that confounded the Blueline Tilefish northern stock boundary in the SEDAR 32 stock assessment model.

We look forward to the SAFMC's support in compelling the NMFS-SEFSC to expeditiously complete an "update" of the SEDAR 25 Golden Tilefish benchmark stock assessment.

Sincerely,

Jimmy Hull, Chairman, SFA ECFS

Cc: Roy Crabtree, NMFS-SERO
Bonnie Ponwith, NMFS-SEFSC
Richard Merrick, NMFS-Chief Scientist