



Atlantic States Marine Fisheries Commission

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Vision: Sustainably Managing Atlantic Coastal Fisheries

May 19, 2014

Richard Methot, Ph.D
Science Advisor for Stock Assessments
National Marine Fisheries Service
2725 Montlake Boulevard East
Seattle, Washington 98112

Dear Dr. Methot,

On behalf of the Atlantic States Marine Fisheries Commission (ASMFC), I am submitting comments on the National Oceanic and Atmospheric Administration's (NOAA) Fisheries Draft Protocol for Prioritizing Fish Stock Assessments. ASMFC recognizes the need for an objective process to determine which stocks are priorities for assessment and supports NOAA Fisheries' effort to ensure assessments are conducted in a timely manner for all managed species.

The proposed process as described in the document "Prioritizing Fish Stock Assessment_Feb2014_final draft.pdf" provides a constructive and transparent framework for objectively prioritizing our nation's stock assessments at the Council level. This process would help to focus scientific attention on the most appropriate stocks given limited assessment science resources and increasing management demands. The process also includes several innovative concepts, including the exploration of management strategy evaluations to test the expected performance of this prioritization system.

The ASMFC respectfully submits the following questions and concerns:

1. The proposed process concentrates on Council-managed species for which the Fish Stock Sustainability Index is calculated (Table 1, Page 29). The ASMFC would appreciate the opportunity to include our species in the prioritization database because several of our assessments (e.g., Atlantic menhaden, American lobster, and Atlantic striped bass) involve NOAA Fisheries stock assessment staff. Similarly, several of our stock assessments are reviewed in the SARC and SEDAR venues (e.g., Atlantic striped bass, red drum, Atlantic menhaden, Atlantic croaker).
2. The document proposes that each Center adopt a tiered approach for prioritizing stocks, placing "state/commissioned managed stocks" into the second tier (Page 10). The Commission is concerned that this process would assign low priority to assessments for several of our most valuable species that are not jointly managed with NOAA Fisheries, but rely on involvement of Northeast or Southeast Fisheries Science Center staff.
3. The proposed process appears to rely on species-specific stock status and life history information contained in the NOAA Fisheries Species Information System. However, ASMFC-managed species have not been updated in this database in recent years due to database design constraints (e.g., multiple river system assessments for river herring not accommodated). If ASMFC-managed species are to be included in this process, we would appreciate the opportunity to update the database before the draft assessment prioritization database is developed and circulated this fall.

4. The scoring structure is designed to favor more frequent assessment of stocks in poor condition. Although the number of years a stock assessment is overdue will be a primary factor in setting assessment priorities, the ASMFC is concerned that this scoring system may still result in the diversion of resources away from stocks in good condition despite the need to set proper specifications to maintain the health of the stock.
5. The document proposes each region annually update priorities for conducting assessments using a portfolio approach that allocates assessment capacity among first-time, benchmark, and update assessments (Page 11). We question how each assessment category will be allocated in this portfolio and if allocation will vary annually or remain constant. We also question when the database will be updated relative to each Council's specification-setting schedule.
6. The outcomes of past assessments and reviews would be valuable to consider in determining future assessment level and frequency. However, we saw no mention in the report or metric in the prioritization formulas characterizing each stock's assessment review history or model performance.
7. The fishery importance metrics take into account value and some special conditions, but no metrics on discards. A qualitative +1/0 metric could be included as a special condition if information is available for species with high discard magnitudes and associated mortality.
8. The table title on Page 29 states that "The MAFMC and NEFMC could be covered by the same prioritization process, as occurs now with the Northeast Regional Coordinating Committee". The wording is unclear and indicated to some readers that the new prioritization process described in this document might not be adopted by the NRCC because they already had a process in place.

Thank you for the opportunity to comment.

Sincerely,

Robert E. Beal

cc: ISFMP Policy Board

Atlantic States Marine Fisheries Commission

Habitat Committee

Spring Meeting

May 1, 2014

Annapolis, Maryland

Meeting Summary

On May 1, 2014, the Habitat Committee (HC) met in Annapolis, Maryland to discuss fish habitat issues and review its 2014 work plan. The HC welcomed new members from the New England, Mid-Atlantic, and South Atlantic fisheries management councils.

The Habitat Committee discussed climate change and management of fisheries resources and habitats. ASMFC staff (Science Coordinator) provided an overview of the Management & Science Committee's task to analyze reallocation schemes for species that are experiencing a shift in their range due to changes in the marine climate. MAFMC staff provided an overview of its recent climate change workshops, then ASMFC staff explained the Commission's participation and highlighted resulting themes and discussion relevant to fish habitats. There is general consensus that climate change is a topic that needs to be addressed. The next *Habitat Hotline* will focus on adaptations to climate change and impacts to fish habitats, and will feature articles on sea level rise, ocean acidification impacts on corals and oysters, and species distribution shifts.

The HC visited three living shoreline projects by Maryland Department of Natural Resources (MD DNR). Following discussions on the definition and goals of living shorelines, project implementation, and monitoring, a working group was formed to review and update the *Living Shorelines* document (Habitat Management Series, 2010).

A biologist from MD DNR gave a presentation on habitat considerations in fisheries management (stock assessments) using a case study of impervious surface and fish distribution in the Chesapeake Bay.

ASMFC staff provided an update on the Fish Passage Working Group (FPWG). The FPWG continues to develop the resource document on the Federal Energy Regulatory Commission's (FERC) hydropower dam relicensing process, which is intended to serve as a guide for state personnel. The FPWG is working with The Nature Conservancy to develop a database tool for managers to use in prioritizing fish passage projects. Currently, the project leader is refining the spreadsheets to facilitate data collection.

The current *Habitat Management Series* issue focuses on the impacts of nearshore and estuarine aquaculture on fish habitats. It presents the beneficial, negative, and neutral perspectives on state-water aquaculture activities, and includes summaries of policies from state to federal levels; the range of species, topics, and purposes; and a resource section for further information. The Habitat Committee reviewed the draft and provided additional comments.

The Sciaenid Habitat Source Document is a compilation of the habitat utilization for each Commission-managed sciaenid species, as well as three kingfish species (Northern, Southern, and gulf). There will be a general sciaenid habitats section that summarizes the typical habitat requirements for this family of fishes. The project is underway, with the template populated by existing habitat information from the FMP documents. Information may be missing or outdated, depending on the species' FMP. At this point, species experts have been identified, including external authors. The target completion date is end of 2015.

The HC discussed the NEFMC's proposed Winter Flounder EFH (draft Omnibus Habitat Amendment 2) and the submission of a Habitat Areas of Particular Concern (HAPC) proposal during the comment period in late summer. The NOAA Fisheries Northeast Regional Office, Habitat Conservation Division is interested in submitting an HAPC proposal.

The next HC meeting will take place during the ASMFC Annual Meeting Week in Mystic, Connecticut during the week of October 27, 2014.

Atlantic States Marine Fisheries Commission

Artificial Reef Committee

February 24-26, 2014

Charleston, South Carolina

Meeting Summary

The ASMFC and GSMFC Joint Artificial Reef Committees (ARC) met in Charleston, SC on February 24-26, 2014.

Discussion Topics

- Fish Aggregating Devices (FADs): The ARC discussed the legality and issues of FADs, specifically interactions with marine wildlife and the use of FADs for an advantage in high-stakes fishing tournaments.
- MARAD's policy on limiting the use of vessels constructed before 1985: The Commission submitted a letter to MARAD on June 2013. MARAD responded in October 2013, citing the repurposing older vessels for reef projects is not as cost effective as scrap metal recycling. The ARC noted this is a policy, not law, therefore states can apply to use a vessel for reef projects on a case-by-case basis. The ARC will be developing a whitepaper to document the long-term economic benefits of artificial reef projects.
- The ARC will be updating the *Guidelines for Marine Artificial Reef Materials*. This will be the third edition. The last issue was updated in 2004.
- Rigs-to-Reefs Policy: After Hurricane Katrina took down about 100 platforms, a moratorium was implemented to stem the numerous applications to abandon unused platforms. In July 2013, a new policy was introduced in to evaluate rigs-to-reefs on a case by case basis. Decommissioned rigs must be toppled, picked up, and cleaned. The policy discourages use of explosives as the means to deconstruct a rig; mechanical deconstruction is preferred.
- Lionfish Activities: Lionfish continue to be a challenge along the Atlantic coast, and is common on artificial reefs. The GSMFC created a toolkit that includes a spear designed for targeting lionfish and an underwater camera to document sightings and density.
- State updates: each state shared an overview of its reef programs. Topics varied from experiences with deployments of reefing materials, Marine Protected Areas and Special Management Zones, permitting, research and monitoring, interactive online tools, and budgets.
- Next meeting will take place in January 2015, jointly with the Florida Fish and Wildlife Conservation Commission's Artificial Reef Summit.
- Elected a new Chair of the ASMFC Artificial Reef Committee: Erik Zlokovitz (MD DNR).