Comments and notes received during the data, assessment, and review for SEDAR 25

SEDAR25-RW01

Date Submitted: 5 May 2011

To Whom It May Concern:

I am a 65 year old charter head boat fishing captain. I have fished many different boats in the south Atlantic area off Daytona since 1964. Today, I am the captain of the 125 passenger head boat Pastime Princess out of New Smyrna. On an almost daily bases, the passengers are catching between 1000 and 2000 Black Sea Bass plus other variety of fish., From all my years of fishing experience the Sea Bass are more plentiful now than ever before. We do not target the Sea Bass because of the inability to keep these fish, however, the fish are so abundant that each fishing spot we arrive on has a plethora of Sea Bass biting our hooks.

Your scientist have stated that the Sea Bass Population was much greater in the 1980's than today's population. I have to take exception to this data and would like to be informed of the captains and the name of the boats that this information was gathered from during that time. I was never made aware of or given any log books to record my catches in the 1980's and I know of no other captains who were recording catches before 1992.

Each day of fishing, all the captains are in radio contact comparing their catches and discussing the temperament of different fishing spots. To the man, each one of us say, "The Sea Bass are here and they are very abundant"!

Respectfully,

Captain George Locke

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05/04/11

Wednesday May 18, 2011

Issues for discussion with Index WG Report

Jimmy Hull, fisherman / SEDAR 25 Panelist

These comments are specific to the Report Cards recommended-for-use indexes but could apply in general to the other black sea bass indexes

1. The SA stock boundaries are from Cape Hatteras to south Florida. At the beginning it was pointed out that the landings and biological life history information suggest the stock might not respond as a single unit to fishing and to management measures. This issue is still unresolved.

2. Pooling: In general the indexes and modeling use the assumption that there is a single, completely mixed stock for the entire area. The suggested alternative is that the areas north and south of the South Carolina-Georgia border (approx. 32° N.) should be assessed separately. No attempt has been made to test which better describes the situation. This needs to be done where possible.

3. The indices do not consider interactions. Interaction are either ignored or said to not be considered because of confidentiality issues. If confidentiality is a concern it should be specific as in the past data have been combined to avoid the issue. For example, landings data have been reported with Georgia and Florida combined. There are no confidentiality issues with the MARMAP chevron trap data.

4. The available data are in almost all cases too uncertain to allow accurate comparisons among areas. The exceptions are the headboat index and the MARMAP chevron trap index. The headboat index indicates a significant difference existed between the northern and southern area that still needs to be explained.

5. The Headboat Report Card states:

Justification for Working Group Recommendation

The black sea bass headboat index was included in the 2005 update of the SEDAR 2 benchmark assessment. There were some filters applied to the data input to improve the quality of the data input to the model. These changes were approved by the group as improvements to the resulting index. No issues were raised that prevented the working group from including the black sea bass headboat logbook index as input to the SEDAR 25 assessment model. The SEDAR 25 DW panel ranked the headboat logbook index second to the MARMAP Chevron Trap index and

deferred the method to scale the CVs to reflect model and process error to the SEDAR 25 AW panel.

The fact is that discussion of the area differences was not allowed at Plenary. A proper reporting for the audio tape needs to be provided.

6. The MARMAP Chevron trap Index uses numbers trapped, which is not the same as weight trapped and the two measures and average weight should be examined for the index.

7. The number of age samples for the MARMAP chevron trap survey was sufficiently numerous for 2009 and 2010 that a statistical comparison of average age between the north and the south areas can be used to test the difference or lack of difference in age structure and recruitment between the two areas for these two years.

Wednesday May 18, 2011

To the SEDAR 25 Panelists,

In this comment you will find a summary of some of my main concerns.

First, my concern after the discovery of the 2005 black sea bass case study Virginia Tech project is twofold. [See SEDAR 25 DW RD-45][1]

It bears directly on a problem identified during the SEDAR 25 Data Workshop (DW), yet it was written five years back. It should have been addressed then; perhaps it was and there was a research recommendation for next time? I do not think it is unreasonable to expect that at the very least the document could have been offered to the SEDAR 25 panel for their consideration, but that did not happen. Had it been, it might have provided more "traction" to the discussion of the headboat index during the plenary.

The second concern I have is the Dr. Louis Daniel interview from the Virginia Tech study that offered an explanation to the apparent difference in the GA/FL index and the NC/SC index in the early years. It was suggested that this argues for a difference in catchability among the areas. Certainly, the reported landings pre-2005 was very different between the north and south, although we do not have the later numbers. Catchability, maybe so, but that means that abundance is more or less equal in the two areas while catchability managed to decrease many times over only in the north. This cannot not be explained by technological improvements as suggested at the data workshop. I suggest that the hook index could be split and see what it shows. That might be valuable and revealing.

Another explanation might be that the GA/FL fish were depleted in the early years. But how? Who caught them? I think that the more simple explanation is that these fish, as all fishermen well know, become mostly stay-at-homes after they are a year or so old, except for a major inshore movement during spawning. Also, they were targeted more up north than down south, so the abundance up north declined faster than down south. That in turn means that the quotas need to be area adjusted and I suggested that to the DW that two management units should be considered. Also, does the model account for density compensation for when the stock was fished down to low levels off of the Carolinas?

There is another part to this problem. It has been mentioned the value of fishery independent data. We do have fishery independent data: MARMAP. These may not be highly prized but they can be used to look at the question of one or two management units. There are enough MARMAP age samples for 2009 and 2010 available to allow for a good comparison of the age structure between the two areas. So if MARMAP fishery independent chevron trap data is correct, then there should be no statistical difference in the average age between the two areas in 2009 or in 2010. I divided the area at 32° N on the suggestion of MARMAP. This simple comparison indicates there are differences for both years. The majority of MARMAP and Headboat samples and data were taken from NC and SC, and do not reflect the black sea bass stock off Florida.

[1] http://www.sefsc.noaa.gov/sedar/download/SEDAR25-RD45%20Camblos%20et%20al%202005.pdf?id=DOCUMENT

I realize that recommending two management units is easy to do. However, doing it is another matter. First, there is the resistance from SEDAR leadership that was voiced during the meeting to any consideration of changes to this "standard" assessment. My concern with it is that after five years we were looking for a full benchmark assessment as recommended by the previous black sea bass assessment panel in 2005, but instead the stakeholders get to be the first experiment for a "new" type of standard assessment, which is simply a glorified update that lacks real flexibility. Second, there is the amount of work that would have to be done to re-do the indices and re-age the catches to prepare the AW panel for a split assessment. On the other hand, if the fish in the north and in the south do not react in the same way to the fisheries exploitation and they are separated in distance enough that recruitment success may not coincide equally in the two areas, managing the stock as a single unit seems to be riskier than managing as two units.

Furthermore, does the computer model know the following; that black sea bass live out to 300 feet of water and that the stock south of Brunswick, GA does not get fished beyond 120 feet because of the current. Just ask MARMAP about fishing in the Gulf Stream current, it is almost impossible and they do not have the time or funds to wait until the current slows or stops for a few hours in those offshore depths. That is why most of the MARMAP samples are done in the northern area. The area between Savannah and Jacksonville is basically unfished by the commercial sector for black sea bass (the pot fishery has only evolved recently) and the area has very little pressure from the headboat sector.

Of the 3 million acres of hard, "live bottom" outside of 88 feet of depth, nearly all of it holds black sea bass. Also, black sea bass do not need hard bottom to live. They do inhabit the sand fringes as shown by the results of the trawl survey discussed at the indices work group. And in fact most of the stock never gets targeted outside of 120 feet of water. There is no way to calculate the total biomass and the prolific magnitude of this black sea bass stock from just landings data whether it is fisheries independent or fisheries dependent alone.

The decline in headboat landings in the index from the early years has absolutely nothing to do with the overall abundance of black sea bass in the entire region. Instead it had more to do with the headboat mates being paid to fill out the daily logbooks, sometimes after falling behind a month or two with those daily reports. Even worse, new mates not on previous trips sometimes filled out the daily logs for those past events. This fact is based on local knowledge from several active headboat captains who have fished since before this survey began and knew that the logbooks in those early years were unreliable as per the reported catch. Targeting of species like red snapper, gray snapper, vermilion snapper, amberjack, triggerfish, grunts and other fish species further complicated the ability of the mates, coupled with tending to large numbers of customers, made it nearly impossible to accurately fill out the daily landing log, particularly when they were weeks behind. North Florida participated in the survey beginning in the later 1970's and so any information from the headboat index prior to 1986 should not be used at all or should be weighted to effectively show the lack of reliability as a model input. Almost all headboats in the early period for black sea bass fished inside of 30 miles and still do today. The black sea bass stock has a range out to 100 miles in some areas (Savannah to Jacksonville) out to depths of 300 feet. The area inside of 30 miles is the area that has the most fishing pressure across time in the southern region.

The unreliable nature of the MRFSS data from 1981-1985, a period where duplicated headboat landings were contained and subsequently removed during the SEDAR 25 DW may be an issue that needs further examination. The MRFSS data from 1981-1985 was worked up but was not included for use in plenary for the SEDAR 25 DW. This further convolutes the historical catch from before 1986 since those years were deemed unreliable in the MRFSS data set for black sea bass. The idea of discarding 20% to 50% of black sea bass with no size limits to begin with nor any bag limits during that time period are unrealistically high discard rates.

I believe that many of the indices are wrong in that they have significant statistical interactions that need to be explained. However, the hook and line and trap indices claim that interactions cannot be examined due to confidentiality issues. The interaction problem for the headboat index you are well aware of, but the score card says that the index received high marks and had been recommended in plenary without any dissent. I disagree. I dissented loudly. The MARMAP chevron trap index has an interaction that can be explored without stepping on confidentiality issues since there are none. I believe this interaction should be explored. Concerns over the headboat index, plus the recreational discard issues that were raised need to be brought back before the panel for new considerations. Or better yet convene a full benchmark data workshop, followed by a full benchmark assessment workshop.

I believe all of the issues above need to be reviewed and presented to the DW and possibly the AW for review and consideration so we can produce the most accurate assessment of the black sea bass stock possible to produce the best available science and then have the optimum yield for the coastal communities that rely on this resource for their existence. I think that with the greater participation between fishermen and scientists we are having a better understanding of how to produce accurate stock assessments that reflect reality. However, if industry goes through the effort to hire scientists, they need to be on the data and assessment workshop panels. It is unfair to the stakeholders to not allow this request. I very much appreciate your response and interest to my concerns.

Jimmy Hull
Fisherman/SEDAR 25 Panelist

Tuesday May 24, 2011

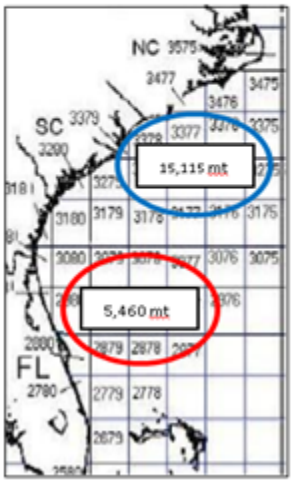
To: SEDAR 25 Panelists & Dr. Erik Williams (EW) May 20, 2011 email questions to Jimmy Hull (JH), responses back to EW.

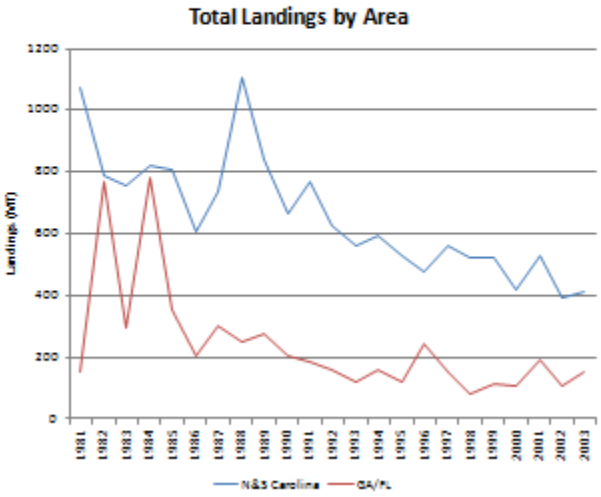
EW: (1) In your item 1. you state "landings and biological life history information suggest the stock might not respond as a single unit to fishing and to management measures." Specifically what data do you think supports your notion and how does it relate to the known population dynamics of black sea bass?

JH: This "notion" was based on the previous SEDAR assessments that indicated from tagging data that showed there was no evidence for coastwise migrations and the landings data (only available through 2003) that showed that most of the landings were from the two northern states. To me the question was: is there enough movement by the fish to equalize abundance north and south fast enough for effective management as a single management unit.

I raised the question in my Power Point presentation to the group at our first webinar.

Distribution of Landings 1981-2003





EW: (2) In your item 2. you suggest "No attempt has been made to test which better describes the situation", the situation being your notion of separate North and South stocks. What is the scientific/data evidence for this split? Specifically what "test" do you propose beyond the genetic test that was completed?

JH: I never suggested that the split was to be based on genetic differences.

The analysts were acting on the assumption that there was complete and rapid interchange through coastal migration when in reality the fishermen know that there is little coastwise movement for BSB. The assumption of a single management unit has never been tested and should be.

The way the data have been assembled, aggregated, do not allow for such testing. That is why I asked that the data be kept separated by area so that some testing might take place. However, the actual data (age data for instance) are so scant that uncertainty will be very large.

As it turns out the Life history Group did look at some biological parameters for age and growth and did find some differences between areas. Also, MARMAP collected a large number of otoliths samples for ageing for 2009 and 2010. These numbers are large enough to allow a meaningful statistical comparison between the age distribution of fish in the northern area and those in the southern area. Since these are MARMAP data MARMAP people should have the opportunity to do the analysis for the DW. However, preliminary testing as I stated in my posts indicates that a significant difference in age structure exists between north and south with a geographical division at 32° N. Moreover, the fishermen report an increased abundance of fish in 2009 that I did not see in my area off Florida. The MARMAP data indicate what appears to be a strong year class in 2009 and 2010 in the north, and not in the south. Taken together I think the assumption of a single uniform pool of fish for the SA is not supported by the science.

[See comparison pasted below for 2009-2010 MARMAP data from both areas using 32 degrees North latitude as dividing line]

Results for: 2010

Two-Sample T-Test and CI: Calendar Age, Region

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Two-sample T for Calendar Age

Region    N  Mean  St Dev  SE Mean
North   957  3.20   1.19    0.039
South   692  3.01   1.04    0.039


Difference = mu (North) - mu (South)
Estimate for difference:  0.185131
95% CI for difference:  (0.077003, 0.293259)
T-Test of difference = 0 (vs not =): T-Value = 3.36  P-Value = 0.001  DF = 1592
```

Results for: 2009

Two-Sample T-Test and CI: Calendar Age, Region

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Two-sample T for Calendar Age

Region    N  Mean  St Dev  SE Mean
North   611  2.70   1.19    0.048
South   129  3.30   1.27     0.11


Difference = mu (North) - mu (South)
Estimate for difference:  -0.598561
95% CI for difference:  (-0.839294, -0.357828)
T-Test of difference = 0 (vs not =): T-Value = -4.91  P-Value = 0.000  DF = 178
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EW: (3) In your item 3. you mention "interactions." Please be more specific here, because I am confused as to what is being referenced here. Specifically what interactions?

JH: My concern with interactions is twofold. First is the issue is there a division between the North and South and I did not think that in the analysis presented for the indices that any attempt has been made to explain why area effects appear to be highly significant. Second, interactions themselves do not seem to have been examined in many instances. For example, in the index scorecards notations such as 3A to E could not be included due to confidentiality concerns occur. Since these items are quite specific to the question of area differences it would be interesting to know what confidentiality issues are involved. Further, in the scorecards, in many instances any questions of interactions seem to be avoided. And in the case where significant interactions do occur in the working papers the cause for the interaction and its effect on the main effects are not investigated.

EW: (4) In your item 4. you state that "the available data are in almost all cases too uncertain." Specifically what data are you referencing here? And, what is meant by "too uncertain"? Certainly we have uncertainty in our data, all data have uncertainty at some level. Are you suggesting some data have too much to be used? If so, specifically what data and how are you defining "too uncertain"?

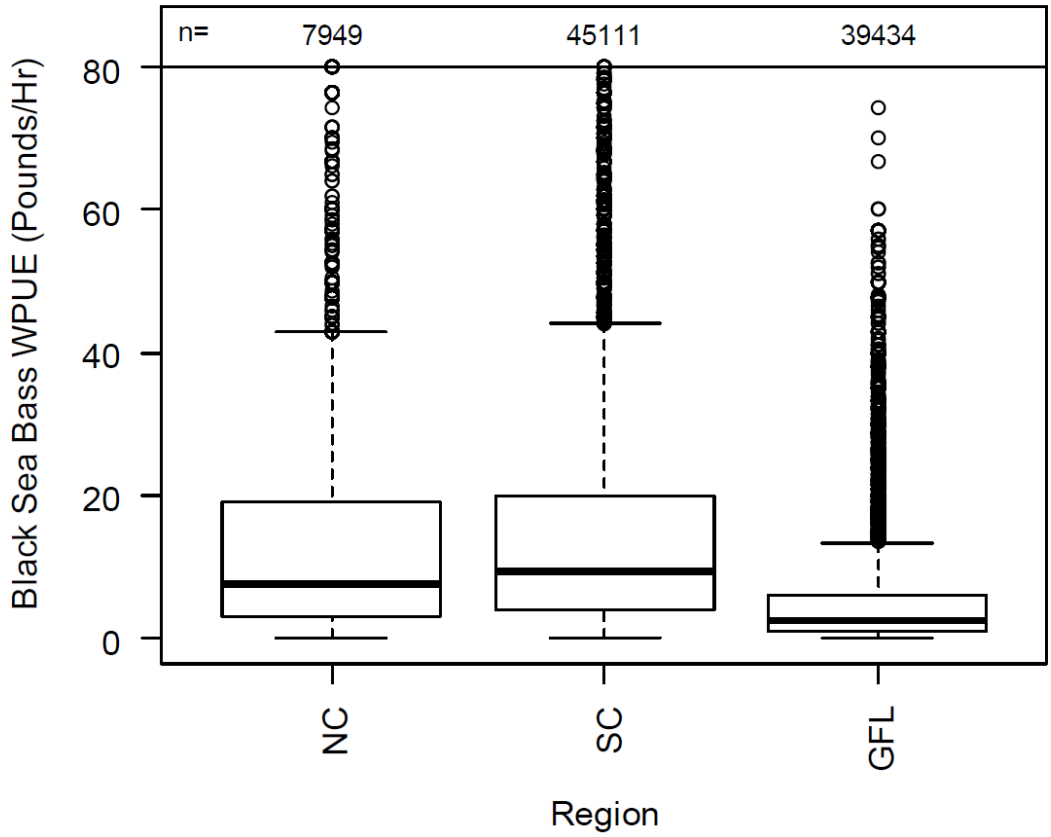
JH: As I mentioned above, much of the data such as length frequencies and ages are too few to allow meaningful statistical comparisons by area with in any year. Since this issue seems to me of paramount importance and since the data are inadequate to properly address the issue I feel that the available data are in many cases quite too uncertain.

EW: (5) In your item 5. you state "the headboat index indicates a significant difference existed between the northern and southern area." Specifically what data are you basing this statement on? And, what difference are you referring to?

JH: I am referring to the differences between the north and the south as illustrated in figure 5 from S 25-DW 14 revised. [See Below for Figure 5]

SEDAR25-DW-14

Figure 5. WPUE of black sea bass by region.



EW: (6) In your items 6 and 7, you are suggesting some alternate ways of analyzing or handling certain data sources. This is fine, I would just ask that you consider how your suggestions would be put in the model, being mindful that this is a standard assessment set up by the SAFMC (beyond the panel's control).

JH: It is not beyond the panels control to test the one unit two unit issues. Nor is it beyond the panel's control to recommend to the AW that they might consider two management units. If they did of course this would require two models one for the north and one for the south. The importance is that we want to know if there is a single group of BSB from VA to Key West that reacts annually as a unit to fishing mortality and recruitment from a singled SSB, or if there is a difference because the fish do not migrate north and south and there are two groups that should be assessed separately. There does seem to be a natural geographic division at 32 degrees where the bottom topography and possibly composition change. This question is being avoided and should be addressed.

EW: (7) Your second concern makes several assertions that I would be interested in understanding the basis for. Dr. Daniel's comment appears to be about angler skill, rather than about geography. Can you point to some specific data to provide evidence for your assertions?

JH: Dr. Daniel makes many points as to why the Head boat survey should not be used. He states that in the 1970's and 1980's the head boats in N.C. were fishing with electric reels and commercial fishermen were using the head boats as a platform. Furthermore I know that the crews working on headboats on a normal for hire trip would sell their catch to the fish market. I own a fish market and that was a major source of product. I use to deal with dozens of fisherman who sold me their catch while riding on headboats. Any of the fish caught by paying customers left behind were also sold and divided between crew. Everyone in the fishing industry from the 1980's back who was a headboat/for-hire/commercial fisherman fished with no limits and no requirement for a reef fish permit to sell your catch the incentive was to catch as much as possible and sell it. What he states about NC was true for Florida also. In 1983 with the start of management and size limits and regulations this headboat/commercial method of operation changed. I believe that the head boat index from before the mid 1980's cannot be compared with the headboat index since the mid-1980's because of these reasons and many more.

Dr. Louis Daniel quotes:
"… In an abundance index, you need to be consistent; you now you've got to be consistent in the way that you collect your information. … So over the course from 75 to 05, you've had this huge change in the headboat industry. But yet the index is treated as if nothing's ever changed. The index treats it as if the catch per angler hour of 1975 is comparable to what it was in 2005." "… So that's what's happened with the headboat index and why you see this dramatic decline and you talk to any of the headboat guys, and they'll tell you, 'you know the clientele has changed dramatically."

Dr. Daniel argues that in the late 1970's and early 1980's, commercial fishermen would use the headboats to catch fish. Commercial fishermen were very skilled at finding and landing fish because of their experience. In the past, the fishermen were also allowed to use electric reels, which allowed the fishermen to haul up fish far more quickly. Dr. Daniel's argument is that they caught far more in the past than typical recreational fishermen do now aboard a headboat. After a time, the licensing was changed and this practice ended. Dr. Daniel claims that this practice and its abrupt end account for the sharp decline in the headboat index rather than an actual decline in the fish population.

The SEDAR 25 coordinator by email shared the following information with me on May 04, 2011;
"Catch per unit effort can change over time for reasons other than abundance, which is one reason fishery independent abundance indices are often preferred (some catchability variables are easier to control in a designed survey). It's possible that the headboat index will never reach previous levels if fishing practices have changed, even as biomass reaches target levels."

I agree with the quotes I have provided as a response to question 8.

EW: (8) In your last paragraph on pg. 1, last sentence, did you mean to include headboat data in that statement? If so, what data are you basing this statement on?

JH: Yes, I believe the head boat data from the mid 1980's back was from NC and SC this was discussed at DW indices group. From what I have learned from the head boat Captains (experts) who were

operating from the early years of the index and still are today is astonishing and is more evidence as to the incorrect unreliable, unusable data from the 80s back in this index.

Please read statements pasted below titled "Headboat Experts Comment Section".

EW: (9) pg. 2, 3rd paragraph, last sentence. Criticism of how assessments are done or what is being calculated should be supported by an alternative. What alternative means do you propose for this stock assessment?

JH: We have produced 9 indices of abundance at SEDAR 25 DW all of these are full of uncertainty and have their own individual faults. However as a whole they could provide a better picture of the BSB biomass. My criticism is that the choice of only using 2 indices in the base run is a mistake and however the modeler does it, that all of the indices should be used. Each index provides a different method of sampling the stock. By themselves are weak but together stronger and more believable. Since SEDAR 15 the credibility of reef fish stock assessments produced by SEDAR to the fisherman and industry stake holders is at an all time low. I believe that if we use all the indices and data produced in the assessment the accuracy, believability and credibility will rise.

Of the 3 million acres of hard, "live bottom" outside of 88 feet of depth, nearly all of it holds black sea bass. Also, black sea bass do not need hard bottom to live. They do inhabit the sand fringes as shown by the results of the trawl survey discussed at the indices work group. And in fact most of the stock never gets targeted outside of 120 feet of water. There is no way to calculate the total biomass and the prolific magnitude of this black sea bass stock from just landings data whether it is fisheries independent or fisheries dependent alone.

EW: (10) pg. 2, last paragraph. Please provide some specific data to support your assertions in this paragraph.

JH: The decline in headboat landings in the index from the early years has absolutely nothing to do with the overall abundance of black sea bass in the entire region. Instead it had more to do with the headboat mates being paid to fill out the daily logbooks, sometimes after falling behind a month or two with those daily reports. Even worse, new mates not on previous trips sometimes filled out the daily logs for those past events. This fact is based on local knowledge from several active headboat captains who have fished since before this survey began and knew that the logbooks in those early years were unreliable as per the reported catch.

Please read statements pasted below titled "Headboat Experts Comment Section".

EW: (11) pg. 2, last paragraph. As FL has been reporting since the 1970s, why did you choose 1986 as a proposed start date for the headboat index?

JH: The Snapper Grouper FMP was effective August 31, 1982 and it took during the next several years for fisherman to begin to realize the importance of reporting data accurately and on time. Also the state and federal government started mandating reporting as a requirement of obtaining permits and licenses such as the Florida trip ticket system from the mid-1980's. I chose 1986 as a proposed start date since reality began to set in, but during the early 1990's when I saw most user groups become better monitored as was the case when commercial logbooks being mandated that may prove to be a better start date yet. As you have read from the statements of the head boat experts, daily reporting was not taken seriously prior to mid 1980's. And if and when it was reported the data was guess work

at best. I believe that from the mid 1980's until today the accuracy and reliability of data has been improving and the method of fishing operation has stayed the same. After learning how the reporting was done from reading the statements from the headboat captains of the time you may want to move the start date into the 1990's.

The entire SEDAR 25 panel needs to see and please read statements pasted below titled "Headboat Experts Comment Section".

Furthermore, the MRFSS had headboat data included from 1981-1985 in the database that had to be removed during SEDAR 25 DW. The MRFSS had and lost their 1979 & 1980 data I learned that was used in early analysis of landings but not in the SEDAR 25 DW. The MRFSS discard levels of black sea bass with no minimum size limits for some of the years and no bag limits for all these early years made the remaining MRFSS data from 1981-1985 unreliable according to the SEDAR 25 data workshop recreational working group. These type of issues create red flags about potentially "fatally flawed" MRFSS data being used in assessments as reported recently.

In the April 1997 original Atlantic red snapper stock assessment final report by Manooch et al, is a statement about MRFSS data from 1986-1995 in the following quote which raises more issues;

"Using 1986-1995 data, we found that recreational (MRFSS) landings were frequently not as often sampled as they should have been. Samples were inadequate for 1989, 1990, 1991, 1992, and 1993. They were essentially inadequate for 1994, therefore six of the 10 years evaluated (Table 3). The problem identified here for red snapper probably holds true for other species of reef fish as well. Conversely, headboat and commercial landings were sampled sufficiently for stock descriptive purposes."

The maximum age of black sea bass was increased during SEDAR 25 from age 10 to age 11. Basically speaking with a 2010 terminal year, all the oldest black sea bass alive today were age zero from 1999 or more recently. The youngest black sea bass from 1986 that lived to age 11 were dead by 1997.

Most MRFSS data, headboat data and commercial data become more reliable by the mid-1990's and catch trends tend to be pretty close to each other. I still have a very tough time with the MRFSS discard levels for black sea bass when bag limits were not required before February 1999, which is also when the minimum size was raised from 8 inches to 10 inches. No bag limits and the 8 inch minimum sizes since August 1982 (and we rarely ever saw a black sea bass under 8 inches) did not create a climate for massive discards on charter and private recreational boats. Virtually all black sea bass from the recreational fleet were retained for consumption since the 1970's. On headboats they were common stringer fish that were either filleted for the passenger or were sold by the captain and crew. The charter boats and some private boats also sold their catch of black sea bass.

Please read statements pasted below titled "Headboat Experts Comment Section".

Last, the partially documented impacts of the fish trawl fleet that fished from NC to central Florida caused quite an impact beginning in the late 1970's until 12 January 1989 when they were banned from Cape Hatteras, NC to Cape Canaveral, FL. The "live bottom" got tore up it was documented in earlier SAFMC FMP amendments that led to the ban and took some unknown time for the "live bottom" to regenerate from that damage. How is that interaction qualified in the modeling across those years the fishery existed?

EW: (12) pg. 3, 2nd paragraph. What "interaction problem(s)" are being referenced here? Need more specifics to properly address your concerns.

JH: In these CPUE analyses the model looks at what are called the main effects such as year, area, number of hooks, vessel size, etc. The ones that have significant effect on the model result - usually contribute more than 5% - get included in the model. However, the main effects may also influence each other. That is they interact. Thus the area fished and the year may interact. If that interaction results in a significant change in the model results it should be examined to see what is happening. But instead, the index has ignored these interactions, some of which were as significant as the main effects. That is what has happened with the HB index and the vertical line index and probably most of the others.

The task of the DW is to provide the AW with advice on what is the best available scientific data to use in the assessment. My concern is that this is not being done.

- **The question of area differences has not been addressed.**
- **The validity of pooling all the data from Virginia to south Florida is not established**
- **The problems with the data in the early years (in general before 1990) is not reported.**
- **In particular the early headboat data reporting problem is not considered.**
- **The use of MRFFS discard estimates for years when there were no appreciable discards is accepted without any scientific support being offered.**
- **No honest appraisal of the value of the early landings data has been given by the DW.**

I believe that many of the indices are wrong in that they have significant statistical interactions that need to be explained. However, the hook and line and trap indices claim that interactions cannot be examined due to confidentiality issues. The interaction problem for the headboat index you are well aware of, but the score card says that the index received high marks and had been recommended in plenary without any dissent. I disagree. I dissented loudly. The MARMAP chevron trap index has an interaction that can be explored without stepping on confidentiality issues since there are none. I believe this interaction should be explored.

All of the concerns I have raised above, including the headboat index, plus the recreational discard issues need to be brought back before the panel for new considerations. Or better yet convene a full benchmark data workshop, followed by a full benchmark assessment workshop to work out the data and assumption problems that now exist with SEDAR 25.

Jimmy Hull, Fisherman and SEDAR 25 Panelist

"HEADBOAT EXPERTS COMMENT SECTION"

05/04/11

To Whom It May Concern:
I am a 65 year old charter head boat fishing captain. I have fished many different boats in the south Atlantic area off Daytona since 1964. Today, I am the captain of the 125 passenger head boat Pastime Princess out of New Smyrna. On an almost daily bases, the passengers are catching between 1000 and 2000 Black Sea Bass plus other variety of fish., From all my years of fishing experience the Sea Bass are more plentiful now than ever before. We do not target the Sea Bass because of the inability to keep these fish, however, the fish are so abundant that each fishing spot we arrive on has a plethora of Sea Bass biting our hooks.
Your scientist have stated that the Sea Bass Population was much greater in the 1980's than today's population. I have to take exception to this data and would like to be informed of the captains and the name of the boats that this information was gathered from during that time. I was never made aware of or given any log books to record my catches in the 1980's and I know of no other captains who were recording catches before 1992.
Each day of fishing, all the captains are in radio contact comparing their catches and discussing the temperament of different fishing spots. To the man, each one of us say, "The Sea Bass are here and they are very abundant"!
Respectfully,
Captain George Locke
1883 Magnolia Av.
South Daytona, Fl. 32119
(386)547-8478

5/15/11

To: SEDAR 25 Assessment Panel
My name is Captain Paul Nelson II and I have been fishing northeast Florida since 1955 and mostly on headboats from 1968 to 2009. I worked from 1971 to 2009 aboard the headboats out of the Critter fleet dock in Ponce Inlet.
The data sheets that were filled out starting in the late 1970's were not taken very seriously at first. In fact it was common practice to fill out sheets weeks and even months after trips had taken place. This fact should be given careful consideration as far as it being used to create information about sea bass before the 1990's.
As regulations came into effect in the late 1980's and 1990's the information was taken more seriously and I would say became much more credible.
Thank you,
Captain Paul Nelson II 386-767-0745

5/16/11

To: SEDAR 25 Assessment Panel

My name is Captain Bob Stone and I have been fishing northeast Florida since the 1940's beginning with my father the late Captain Jake Stone. The majority of my experience is aboard for-hire headboats out of Ponce Inlet and I currently run a charter boat. From 1973 to the early 1990's I was the captain aboard the various Critter Fleet headboats. During this time there were data sheets that were supposed to be filled out each trip by the first mate or captain. Unfortunately, these sheets were not taken seriously at all and I have firsthand knowledge of mates filling them out who were not even aboard the day that the trip took place. In fact, it was very common practice to fall behind by a month or more and then fill them out all at once, making up landings from 3-4 weeks prior to filling out the report.
There should be no credibility given to these early data sheets, as the information contained in them was gathered in a suspect manner.
Thank you,
Captain Bob Stone 386-767-3041

CAPT. STACY IV, INC.
CAPT. STACY VII, INC.
CAPT. STACY FISHING CENTER
416 ATLANTIC BEACH CAUSEWAY
ATLANTIC BEACH, NC 28512
800.533.9417

May 18, 2011

TO WHOM IT MAY CONCERN,

This letter is in reference to the Black Sea Bass Fishery.
I have been in the headboat, charter, and commercial fishery for over 50 years.
On the headboat from the early sixties to the mid eighties we used electric reels and targeted the offshore deep water bottom species of the South Atlantic. These fish included Red snapper, Grouper, Trigger Fish, Vermilion Snapper, and Silver Snapper.
It was not feasible to fish inshore because our customers wanted deep water fish. We did not target Black Sea Bass.
After regulations started to get tighter we took the electric reels off and started to fish
More inshore bottom and target the Black Sea Bass. I have seen an increase in the size and number of sea bass coming to shore.
The Black Sea Bass is our main target species for our half day trips and when
The snapper and grouper season is closed it gets us through that season.
Since the recent closure of the Sea Bass fishery our half day business has been cut by 75%. This is a loss that cannot be made up. We still have boat payments, insurance, repairs and maintenance, dock rent and not to mention the lost income to our employees.

Capt." Sonny Davis"
Capt. Leslie Maurice Davis Sr.

From: captgeorgejr@pastimeprincess.com
Sent: 5/20/2011 2:12:24 P.M. Eastern Daylight Time
Subj: Re: Black sea bass questions

"We have found that in many cases the daily reports were filled out by crew members rather than the captain and that they sometimes did not get filled out for weeks if not months, and then the crew would try to catch up from memory. In some cases the mate filling out the material may not have made some of the earlier trips but still filled out a report. "
That is a 100% accurate statement based on my 5 years here on the East coast of Florida running a headboat.
Captain George Richford
Pastime Princess
New Smyrna Beach, Florida

Subject: Re: Black sea bass questions
Date: 5/20/2011 11:11:20 P.M. Eastern Daylight Time
From: fishzack@comcast.net

The one point that I would like to make is that for charter/head boats off Georgia, I don't feel the discard percentages are even close to being accurate because of the way we fish.
When we pull up on a reef to catch sea bass, the bigger ones usually bite first and when the size of the fish goes down we move to another reef to keep from 'killing' the reef. Therefore the discards are very low and sometimes even zero.
Again, just my thoughts and I hope this helps.

Zack Bowen

Subject: Re: Headboats and black sea bass
Date: 5/20/2011 11:13:22 P.M. Eastern Daylight Time
From: ocpolk@bellsouth.net

Hi, my name is O.C. Polk I have fished the coast of S.C. since 1968, both on private and worked head-boats. My first head-boat was the Gulfstream II out of Shem Creek Mt. Pleasant in 1969. I worked as a mate then in 1975 as Captain aboard it and later in the 80's on the Carolina Clipper. The vessels were licensed for 49 and 65 persons. While in the early days we caught lots of fish, there was no survey or paper work that I remember filing out. We either did not bother or were not approached to do so. In the 80's at some point it became part of the permit process to fill those reports out, they were due monthly and it was usually up to the mate to fill them, sometimes weeks later or the end of the month before they were done. They were thought of as a bother and were not a very accurate catch record. When limits were put on the different fish the owner/ captain wanted the maximum allowed fish per person to be recorded. Easy book keeping but not a true sample of the catch.
I hope this info will help if you have any questions feel free to call or mail me.
O.C. 843. 718. 8793

Sent: 5/23/2011 12:42:20 P.M. Eastern Daylight Time
Subj: Boat Statement Captain George Strate

I ran a party boat for the Navy from 1973 to 1979. During this time I never filled out catch records. I started running the Miss Mayport in 1979. I never filled out catch records until 1983. They would pay us one dollar per sheet. I let my crew fill them out and give them the money. Sometimes they would go weeks then fill them out. Many other Captains did the same thing. Several years ago a new NMFS representative was inconsistent in collecting the headboat survey records, sometimes waiting for over two months. I heard he left the NMFS for another job a few years ago. So we would sometimes go months before filling them out. Now we have a new guy who comes once a week. My records are filled out by myself every day. We feel that the headboat catch records are correct now during the past two years. During this transition phase of employees the NMFS representatives supervisor called me and checked the veracity of dates of when the headboat had been fishing. I told them that the several dates asked about were days the headboat was at the dock and did not go fishing.

Captain George Strate 904-821-1301

May 23, 2011
To: SEDAR Assessment and Data Workshop Panelists

My name is Captain Lee Carver and I have been running headboats since 1979 from Ponce Inlet, Florida. From 1979 to 1985 I was the captain with the Snow White headboat fleet. Between 1985 and 1998 I operated miscellaneous headboats, and charter boats. From 1998-2011, I have been a captain with the Critter Fleet, which operates large headboats out of Ponce Inlet.

During my time I operated headboats my crew was tasked with filling out the headboat daily logbook surveys. In the earlier years the crew got paid a small amount for each logbook sheet filled out. Commonly they would wait several weeks before filling out the daily logbook sheets. They would fill in the days fishing by actual date, but their memory of what was really caught each day was not accurate.

More recently the headboat observer program was implemented. Florida state employees funded by the National Marine Fisheries Service (NMFS) would take a trip on my headboat about once a month. As an observer they do an accurate job.

For many years other NMFS representatives were responsible on a regular basis (at least once a month or more) for meeting the headboats upon return to the dock. Their job was to take biological samples (otoliths etc.) from the fish species landed, measure the fish sampled and collect the headboat daily logbook sheets.

Unfortunately the NMFS did not take the samples, measurements and surveys in a timely way as required for several years. During one year in particular the NMFS representative did not even show up for most of the spring and summer season to collect the samples and surveys. I understand the NMFS area for the sampling that includes Ponce Inlet headboats is from Brunswick, Georgia to Sebastian, Florida. Since 2010 the NMFS problem was fixed to gather the samples and survey sheets as required in a timely way.

Because of the voluntary nature of the headboat survey in the early years and the recent failures of the NMFS to collect samples and the logbooks in a timely way, I feel very troubled by the headboat information being used for the black sea bass stock assessment. Parts of the headboat survey were inaccurate in how the logbooks were filled out and the NMFS failures described above caused serious problems.

Black sea bass fishing in recent years has been as good or better than I have ever seen since I began running headboats.

Captain Lee Carver
386-299-1679

Subject: **Re: Black sea bass questions**

Date: 5/23/2011 4:14:40 P.M. Eastern Daylight Time

From: steveamicks@aol.com

Before 1992 I was not required to fill out daily log books since i was only fishing groups of 6 and 10. Although i did keep logs for my personal use.
But starting in 1992 i started running my 20 passenger trips and started the daily fishing log sheets. My routine was to fill out my fishing log daily and then transfer the data to the headboat sheets and send them in to NMFS.
My log sheets are very accurate as far as fish kept due needing to know what went into the fish box because of the bag limits. However as far as the discards of blackseabass there is no way to keep an accurate count of what is being released. I cant do it on a small headboat with 10 to 20 anglers on it. In fact on my reporting i do write in the discard column for blackseabass i write "MANY" . it is unscientific but its the best i can do.
As far as carrying observers, yes I have, but only in recent years. And at a rate of perhaps 5 to 6 times a year. Mostly since we had started working on red snapper. We have a good working relationship with Ga. DNR. IN fact we had an observer on the boat this week
As far as accuracy of what an observer is recording is questionable. I have been counting fish for many years and i am not sure that an observer sees the same thing i do on the same trip with a small group of anglers . I will give you an example. I asked the observer on this last trip how many vermillion snapper did we release today with 10 anglers fishing and his response was that he felt that 5 of the anglers released 3 to 5 vs a piece. so he thought we released about 25 vs.! I was surprised that he had not counted all of them and he said well no we observe only the anglers that are closet and than use expansion to figure out how many were actually released!!!!
This is with 10 anglers. and i was thinking we released as many as we kept which was 50. Imagine the accuracy when trying to count discards with 40 to 50 anglers.
So accuracy is questionable at best under the best of conditions . More so in the early years than now.
I have not studied my fishing logs as far as blackseabass goes like i did with red snapper, but in general terms i feel it safe to say that as far as numbers of blackseabass we were catching off georgia thru the 90,s it was pretty strong. But we did see numbers drop after say 2000 and on. Until the recent increase the last few seasons. This is just seat of the pants comments because i havent looked at it closely
So it surprises me that blackseabass supposedly crashed in 1992?
i hope this helps and if you have any further questions that you think of please let me
thanks steve

Wednesday May 04, 2011

Dear Kari:

We have been having trouble with some of the Terms of Reference for the black sea bass assessment. We do not think we have properly addressed them. They are item 1.) Reviews stock structure and unit stock definitions and consider whether changes are required and 4.) Provide measures of population abundance that are appropriate for the assessment, which includes the available and relevant fishery dependent and independent data sources and the methods and coverage of the sampling and the degree to which the indices represent fishery in population conditions. We list our concerns about these items below, and we ask you to pass this all on to our SEDAR 25 (S25) Data Workshop (DW) panelists for their consideration.

We have checked the FTP site and have not found anything new that address the concerns raised last week on Thursday April 28, 2011 about the Headboat Index. Normally these decisions are suppose to be reached by consensus! It was apparent to most of us hearing the discussion between S25 Panelists and others that the area differences between Georgia/Florida and the two northern states were a serious issue that the plenary was kept from reviewing properly. A few panelists forcefully advocated that the headboat index remain unchanged and be recommended by the S25 DW as the most representative of all the indexes is a wrong choice. The fact is that cutting off discussion and concealing graphs and results from the S25 DW panelists raises questions of transparency with the S25 DW proceedings and the professionalism issues that accompany such choices. We feel that if the additional data and graphs had been shown to the S25 DW panelists for consensus we would have a different headboat index.

The S25 DW Recreational Workgroup should have presented the 1981 to 1985 MRFSS black sea bass landings and percentage discards to the S25 DW in plenary also. The unrealistic nature of the MRFSS results could have triggered a debate about other uncertainties of the MRFSS black sea bass landings and discards in other years, but that slide was pulled out of the plenary presentation. Can you make that slide available on the FTP website?

We were informed that after the S25 DW meeting we obtained the MARMAP chevron trap ages and lengths by area for 2009 and 2010. We did a quick analysis and found that based on these data the age and length structure of black sea bass from the northern area off North and South Carolina is significantly different from the southern area off Georgia and Florida. This is only for 2009 and 2010, but it seems this is something that needs to be considered along with the other information that we received at the data workshop regarding the difference between the headboat index for Florida and Georgia compared with North and South Carolina. We added to that the Life History results showing the differences in the age growth curves for their various areas. We suggest that these differences along with the headboat index matter show that it might be advisable to manage the south Atlantic stock with two management units. At the very least we urge that this matter and the other issues above be considered more carefully by the SEDAR 25 DW panelists before the S25 DW report becomes a final product.

We have checked the FTP site again today and there is nothing new posted effecting our requests so we still do not have commercial or recreational landings numbers which we had asked for several months back from the NMFS SEFSC Miami Lab. Nor have we heard anything about our request for MARMAP chevron trap catches in weights as well as numbers so we will ask again and see if we have better cooperation. Nor have we received the TIP and logbook data we requested from the SEFSC Miami Lab for black sea bass or golden tilefish.

So as you can see there are number of loose ends that we think should be taken care of before the DW Report can be drafted. Most important is the matter of the headboat index and the area differences. We ask again that you pass our concerns on to all of the SEDAR 25 DW panel members for their information and we hope their guidance.

Jimmy Hull and Rusty Hudson, SEDAR 25 DW Panelists

PS: It was our understanding that the proceedings of the workshop in plenary were recorded. Is this correct and if so where is it posted? JH & RH