

## Comments on Blueline Tilefish SEDAR 32 projections

The conservative benchmarks from SEDAR 32 South Atlantic Blueline Tilefish have inappropriately resulted in a stock status of **overfished** and **undergoing overfishing**. We are well aware that the conservative benchmarks that resulted from SEDAR 32, such as the MSST value (where MSST is set too close to  $B_{msy}$ ), were set at unrealistic levels where the stock status will oscillate between overfished and not overfished in any given assessment. This has put the SSC and the SAFMC in a precarious position of developing rebuilding plans that may be quickly met, and then just as quickly re-assessed as overfished. These regulatory constraints, which have again resulted from overly-conservative model benchmarks, hurt both the recreational and commercial fishing industry, as well as the coastal economies of the SE US. Meanwhile, the SAFMC and staff have been put in a frenetic mode to produce rebuilding plans for fisheries that are sustainable by more realistic metrics.

### *SEDAR 32 must be updated with a realistic MSST value*

Using contemporaneous methods of evaluating MSST, the stock status of South Atlantic Blueline Tilefish should be: **not overfished**. Accordingly, after Snapper-Grouper Amendment 21 is approved, stock status should be adjusted to the new MSST level of 75%  $SSB_{MSY}$ , and projections made accordingly. We support expeditious approval of SG Amendment 21 that would set MSST at 75%  $SSB_{MSY}$  for Blueline Tilefish, as well as other long-lived snapper-grouper species. Following approval of SG Amendment 21, the SEFSC and the SSC should re-evaluate the findings of SEDAR 32, and produce realistic fishery stock projections.

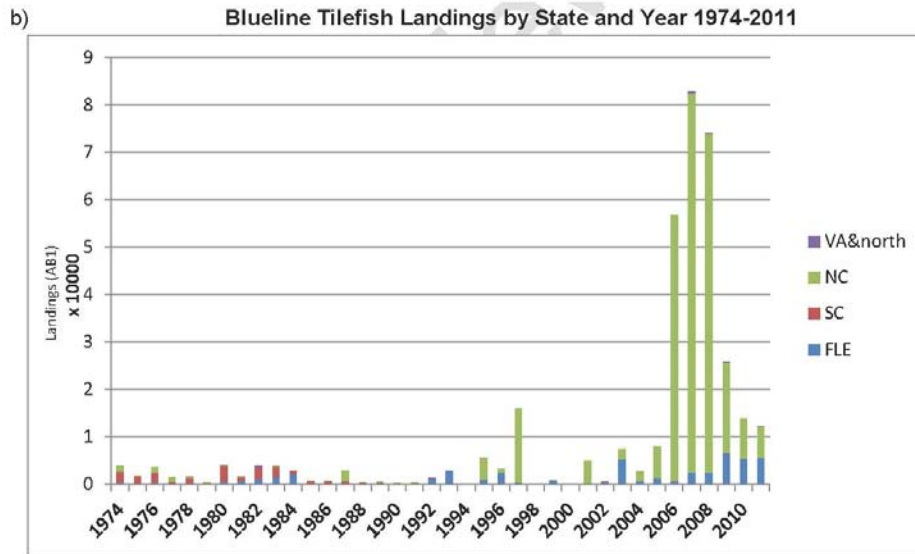
### *The NMFS-SEFSC continues to have problems creating spatially explicit models*

We have the same concerns with SEDAR 32 as with SEDAR 36 snowy grouper, that the NMFS-SEFSC BAM model did not rigorously and adequately assess developing fisheries north of Cape Hatteras. In SEDAR 32, the analysts did not evaluate CPUE above 35 degrees N latitude, where a significant portion of the fishery has developed over the past decade. The SEDAR 32 CIE reviewers (see Melvin review in SEDAR 32 SAR) recognized this, and established that the CPUE north of 35 degrees N latitude was much higher than the southern zones. As SEDAR 32 only considers CPUE between 28 & 35 degrees N, the significant landings to the north are not being indexed accurately in the assessment. This again suggests that the NMFS-SEFSC's BAM model is not accounting for a now widely recognized climate change factor that is resulting in range extensions of South Atlantic species, and recent development of fisheries north of Cape Hatteras. This is important as a significant fishery has developed north of Cape Hatteras, whereas historically, the Blueline Tilefish was largely a bycatch species during directed trips for snowy grouper in the South Atlantic region.

### *Problems with recreational landings data*

The independent reviewers at the SEDAR 32 RW questioned the validity of MRIP recreational landings data used to construct a record of recreational fishing landings. The RW was addressed by fishing industry representatives that cast serious doubt over the veracity of the MRIP Blueline Tilefish landings history (see DW figure

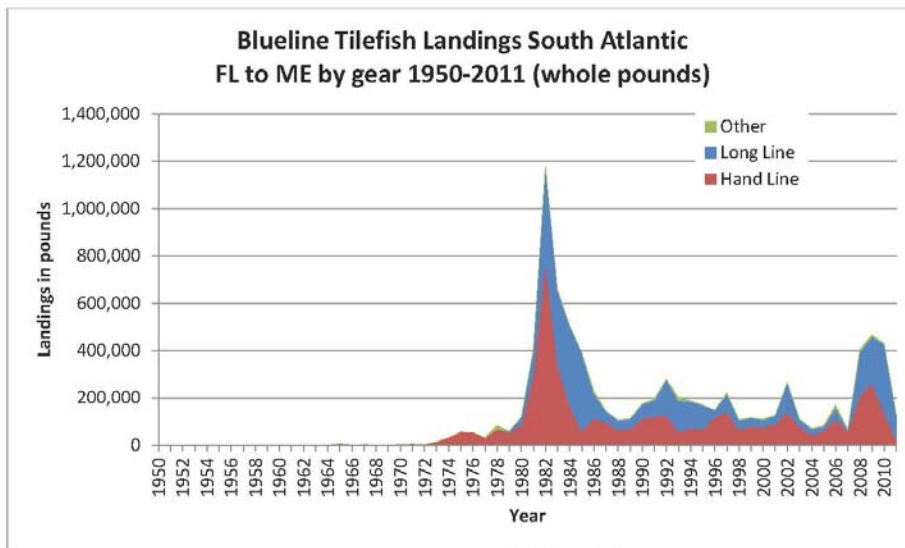
4.11.1 below). The unreliability of MRIP estimates is particularly concerning during the recent expansion of the fishery north of Cape Hatteras from 2006 to 2008, including some elevated discard data from 2007. Further, we believe that SEDAR 32 did not effectively address anomalous annual commercial landings records during the 1980's where Blueline Tilefish were likely confused with Golden Tilefish in reporting, before institution of the Trip Ticket reporting system (from DW Fig. 3.4).



**Figure 4.11.1.** Estimated number of Atlantic blueline tilefish landings from MRFSS/MRIP (1981-2011) and SRHS (1974-2011) by state (a), by state and year (b), and by state and mode (c). Florida landings from east coast only, including Florida Keys. Due to confidentiality concerns SRHS landings for GA and FLE are grouped and shown as FLE.

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South Atlantic Blueline Tilefish



**Figure 3.4** Blueline tilefish landings, in whole weight pounds, for all states (FL-ME) by gear.