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Dr. Jake Kritzer, chairman
New England Fishery Management Council, Scientific and Statistical Committee
50 Water Street, Mill 2
Newburyport, MA 01950

Dear Dr. Kritzer:

I regret that I cannot participate in the August 21 SSC meeting. Unfortunately, we scheduled an interview for a new faculty position in our Department, which is a priority for me. However, I also recognize the importance of the SSC's recommendation for Georges Bank yellowtail flounder. Therefore, I hope that my perspectives can be considered in the SSC deliberations to develop recommendations for Acceptable Biological Catch of Georges Bank yellowtail flounder.

Based on the 2013 TRAC summary report for Georges Bank yellowtail flounder, the draft 2013 TRAC assessment document as well as the 2005 TRAC Benchmark Workshop proceedings, there is neither the scientific nor procedural basis to support the 2013 TRAC recommendation for Georges Bank yellowtail catch advice. The 2005 TRAC Benchmark concluded that: "*management advice be formulated after considering the results from three (3) approaches:*

- 1. projections from a model that adopts assumptions towards reconciling the fishery and survey observations;*
- 2. projections from a base case model with due consideration for the magnitude of the retrospective; and*
- 3. trends in relative abundance and relative mortality rates derived from survey and fishery data."*

TRAC process dictates that catch advice should be based on a combination of information from the split model (with no retrospective adjustment), the single series model (with consideration of the retrospective pattern), and survey data. The 2013 TRAC conclusions and catch recommendations are not based on the benchmark formulation; they are based on results from the split-series model with retrospective adjustment, which was not the consensus method developed at the 2005 benchmark workshop.

Scientifically, I cannot support the use of either the split series or single series models because of the severe retrospective patterns, estimates of survey catchability greater than 1, other model diagnostics that suggest the models are invalid, and independent estimates of abundance that are substantially greater than the TRAC estimates (see TRAC Working Papers attached). Therefore, I cannot accept the 2013 TRAC assessment of Georges Bank yellowtail flounder as a reliable basis for fishery management decisions.

I propose that the SSC recommend a new benchmark assessment as soon as possible to develop a more reliable stock assessment. Until new benchmark methods are developed, I propose that catch advice be limited to unintentional bycatch, similar to previous recommendations from the SSC for Georges Bank yellowtail flounder and other stocks. There is insufficient basis for more restrictive recommendations in the 2013 TRAC assessment.

Sincerely,

Steve Cadrin

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