North Pacific Fishery Management Council

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Mr. Chris Oliver
Assistant Administrator
NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

Dear Mr. Oliver:

On behalf of the North Pacific Fishery Management Council (Council), I would like to thank you for the opportunity to provide preliminary comments on the revised Stock Assessment Improvement Plan (SAIP). At its June meeting, the Council and its Scientific and Statistical Committee (SSC) received a presentation on the revised SAIP from Drs. Francisco Werner (NMFS Chief Scientist) and Patrick Lynch (NMFS, National Stock Assessment Program Leader).

The Council fully appreciates the work done to update the SAIP, which provides a comprehensive summary of the stock assessment enterprise, as well as the challenges that NMFS faces to provide the scientific information necessary to support sustainable management of our nation's marine resources. The Council notes that the stock assessment enterprise in the North Pacific is a model for the nation, in that it is at the forefront of incorporating innovative science into stock assessments and provides for timely, efficient, and effective scientific advice for fisheries management. Many ongoing activities illustrate that the AFSC is meeting or exceeding the goals of the SAIP, including the recent release of a multi-species stock assessment (CEATTLE) as part of the pollock assessment report, and the Alaska Climate Integrated Modeling (ACLIM) team's efforts to evaluate performance of alternative harvest strategies under changing climate. The attached SSC report on the SAIP provides additional details on progress to date in the North Pacific.

The Council further appreciates that the SAIP is a not a "top-down" approach, but instead provides general recommendations that can be tailored to each region as required. Additionally, we want to thank you for reaching out to the Council early and often in the process of developing the SAIP.

The Council raised a few concerns in its review of the SAIP. First, the Council asks that development of the SAIP be transparent and accountable to allow progress to be tracked both regionally and nationally. Second, the Council expressed serious concern that this not be a zero-sum game, whereby additional efforts are exerted to address assessment challenges in one region of the nation at the expense of others. We have a very efficient and effective assessment process here in the North Pacific that meets all the SAIP objectives of throughput, timeliness, thoroughness, and transparency, and we want to keep it that way. Lastly, the Council requests additional information be provided on how the SAIP dovetails with the stock prioritization exercise.

The Council and its SSC look forward to receiving future updates of the progress towards achieving the goals of the SAIP. Thank you again for keeping the Council apprised of this important agency initiative.

Sincerely,

Dan Hull
Chairman

cc: Dr. Cisco Werner
Dr. Doug DeMaster

Excerpt from the June 2017 NPFMC SCC Report

Stock Assessment Improvement Plan (SAIP)
Drs. Francisco Werner (NMFS Acting Chief Scientist) and Patrick Lynch (NMFS, National Stock Assessment Program Leader) provided an overview of the revised SAIP.

The SAIP updates and expands the original SAIP that was published in 2001. The 2001 SAIP was successful in expanding the stock assessment enterprise nationwide, and effective at both reducing cases of overfishing and rebuilding of overfished stocks. The SAIP improved the quality of many of our nation's stock assessments, and each of the regional fishery management councils adopted a rigorous peer review process. This revised SAIP builds on the previous successes of the original SAIP. It provides a comprehensive summary of the stock assessment enterprise, as well as the challenges that NMFS faces to provide the scientific information necessary to support sustainable management of our nation's marine resources.

The document lays out the steps needed to produce the holistic ecosystem-linked assessments needed to implement an ecosystem approach to fisheries management. **The NPFMC's stock assessment enterprise stands at the forefront of this effort.** Tangible evidence of our readiness lies in the recent release of a multi-species stock assessment (CEATTLE) as an appendix to the EBS pollock SAFE. The new Species Profiles and Ecosystem Considerations (SPEC) sections at the end of each NPFMC groundfish SAFE chapter will provide a roadmap to the future implementation of climate enhanced stock assessments and stock projection models. The Alaska Climate Integrated Modeling (ACLIM) team's focus on evaluating the performance of alternative harvest strategies under changing climate and the recent formation of the Bering Sea Fisheries Ecosystem Plan Team should deliver climate-ready Management Strategy evaluations to the NPFMC.

The SAIP tasks the Science Centers with the development of timely, efficient and effective stock assessment advice. The Agency recognizes that the great demand for high quality stock assessments necessitates some prioritization of how frequently assessments are conducted and what level of complexity is needed to inform managers of their options for sustaining fisheries into the future. **The NPFMC's recent completion of the stock assessment prioritization exercise illustrates that our region is carefully adhering to the goals of timely, efficient and effective assessments.**

The SAIP describes a vision of the future that focuses on four Ts: Throughput, Timely, Thoroughness and Transparency. The guidelines recognize that the system adopted by the NPFMC provides efficient throughput.

The document's discussion of peer review notes that the NPFMC/AFSC approach to reviewing research assessments allows the authors to seek comment and advice on their models prior to use for stock assessments. The SAIP is designed as a guide for each region and the SSC was assured that the NPFMC's approach to peer review was consistent with the goals of the SAIP.

The document describes a future that embraces technological innovation in modeling. Again, the AFSC continues to play a leadership role in this arena. Emerging avenues for technological innovation are expected to include: expanded use of ADMB/TMB in stock assessments, use of distributed assessment model development environments such as cloud-based systems, and continued efforts to accelerate sharing innovations through national working groups/task teams and workshops. The development of the

GMACS model for Alaskan crab stocks is a good example of a distributed model development environment.

Throughout the document there is a strong emphasis on the importance of continued data collection to support stock assessments and identifies the challenges associated with data poor stocks. It identifies opportunities for expanded use of advanced technology including innovative ways to collect data from ships of opportunity. The AFSC and ADF&G, together with North Pacific Research Board (NPRB) and Saltonstall-Kennedy funding, continue to ensure that the NPFMC's stock assessment enterprise incorporates new technological advancements when they become available that make for more efficient data collection.

Finally, AFSC's efforts to improve communication of results in a standardized manner are well aligned with the updated SAIP. The groundfish and crab plan teams have endeavored to standardize the formats for outputs through the use of R-interfaces for the production of a common suite of tables and figures and R-markdown for document development.

In summary, the SAIP outlines a national status and vision for stock assessments that align well with NPFMC regional practices and directions. Moreover, the presenters indicated that, rather than "top-down" rules, the document outlines NMFS recommendations that can be discussed and tailored to each region as required.