UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Fisheries Science Center
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Dr. Donald McIsaac
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Dear Don,

Thank you for sending the Pacific Fishery Management Council list of Research and Data Needs for 2006-2008. The SSC document was useful in elucidating the Council's priorities and how they are set and did a good job in documenting progress with research and data needs prescribed in the 2000-2002 plan. My staff reviewed the current document and we agree with much of its prescriptions, but wish to share with you some comments and concerns. Namely, the FMP-by-FMP approach used by the Council in assembling the document omits over-arching requisites for successfully acquiring critical data and information. These fundamentals – listed below – should be addressed to ensure quality science and scientific advice for all FMPs. Each requires strong Council action to ensure that it is addressed.

1. Collection of fishery data across the board – recreational and commercial, and biological and economic – must be substantially bolstered for all managed fisheries and for all species-stocks that are included in the FMPs. This specifically includes age/growth sampling, catch-effort by year, location and gear, and cost-earnings surveys. Without improvements in the current collection format and emphasis, for groundfish, CPS or HMS, data limitations will continue to weaken the reliability of stock assessments and scientific advice.

2. Ship-time must be adequately allocated to ensure that critical surveys are conducted and to support better survey methods for accurately measuring stock abundance independently from fishery data. Continued rationalization of ship-time, without concern for stock assessment requirements, jeopardizes survey data. Furthermore, without adequate support for developing better survey techniques, especially for current survey techniques known to be inadequate or marginally accurate, we can not reduce the large uncertainty in stock assessments that rely on data from those techniques.

3. We must remove barriers, diplomatic or budgetary, that inhibit international cooperation and exchange of scientific data for assessing the status of shared and highly migratory fish stocks. Improving the level of international cooperation well above its current level is required to significantly improve stock assessments for CPS and HMS or advice for Council management actions on those stocks.

Many of the research and data needs outlined in the PFMC document align with the priorities outlined in the SWFSC Coastal Pelagic Species, Highly Migratory Species, California Anadromous Species, and California Demersal Species Research Plans. There are, however, some notable discrepancies and a few omissions. It should be noted that where the SWFSC does not plan to or can not address the needs listed in the PFMC plan, there is a lack of resources (funding, people, ship time, etc.) or prerequisites (an overarching need as listed above) for successful execution. A few of the discrepancies between the SWFSC research plans and the PFMC 2006-2008 Research and Data Needs are listed below.

SWFSC Priorities not identified in the PFMC Research and Data Needs document

Groundfish

- Develop genetic methods to identify larval fish in plankton samples for accurate species identification
- Explore use of genetic tags in population size estimation
- Evaluate relationship between fish distribution and role of invertebrates in the structure of demersal habitats
- Maintain and expand CalCOFI sample processing
- Develop an acoustical-optical survey for abundance index of groundfish off southern and central California

Salmon

- Describe environmental variability in the California Current regional ecosystem on seasonal to decadal time scales for use in understanding the impact of environmental variability on the distribution and population structure of salmon and sturgeon, and develop and distribute tools to describe the environmental state and potential habitat utilization for near-shore anadromous fishes
- Characterize and map the ocean habitats for anadromous species in the California Current ecosystem using data from satellites and electronic tags
- Characterize climate variability in the northeast Pacific and its relation to salmon production
- Evaluate impacts of ocean fisheries on ESA listed ESUs
- Evaluate data needs and modeling approaches for improved assessment of Central Valley Chinook

Highly Migratory Species

- Continue collecting albacore length data through port sampling for stock assessments
- Modernize albacore data collection in the form of electronic fish ticket system on U.S. West Coast
- Develop new indices of abundance particularly from fisheries that regularly catch recruitment age albacore (age 1), e.g. the USA recreational fishery

- Conduct comprehensive shark for stock assessments of shortfin mako, common thresher and blue sharks
- Assess life history and stock structure of bycatch (turtles) in HMS fisheries

Coastal Pelagic Species

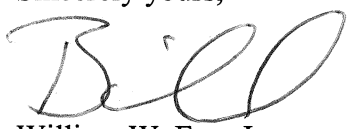
- Develop and test microsatellite DNA markers for Pacific sardine to examine DNA variation throughout the range to test for stock structure
- Assess changes in early life history information from CalCOFI samples to evaluate the response of the fish community to climate change

Economic components

- Assess the economic impact of Marine Protected Areas
- Assess the impact of protected species regulatory policy on trade flows, bycatch and the economic value of U.S. fisheries

The Council should also note that the document focuses on needs for 2006-2008, but is not timed to have the best chance of influencing annual NMFS operating plans and budget requests for those years. It is too late to influence draft budget plans for Fiscal Years 2007 and 2008. Work on Fiscal Year 2009 plans and budget has commenced with a completion date in May 2007. Council needs for 2006-2008 can be incorporated into this planning cycle, but funding for the needs will be available well past the period desired. We look forward to meeting with the Council Chair as the Council procedures indicate to be the next step to discuss these overarching concerns and this Center's contribution to the Council's high priority needs.

Sincerely yours,



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