

NORTHWEST INDIAN FISHERIES COMMISSION (NWIFC) STATEMENT ON THE MODEL EVALUATION WORKGROUP VACANCY

The Northwest Indian Fisheries Commission provides the following perspectives on the Model Evaluation Workgroup (MEW) to inspire thought on how best to serve the needs of the Council relative to reviews of Fisheries Regulation Assessment Model (FRAM) and related salmon modeling to ensure that they reflect the best scientific information available. The comments are about the function of the MEW and provide some of the rationale for why the NWIFC has not filled the vacant seat on the MEW, and not a reflection on the workgroup members or staff involved. The MEW is a body that did not fulfill its original mission and currently does not have a defined function as an advisory body to the Council. The MEW was originally established with a focus on one task, which was to produce documentation for the Chinook and Coho FRAM models. That is a task that has never been completed. Recent work to develop documentation for FRAM has been done outside the Council process led by analysts with WDFW, who are not part of the MEW, and supported by other members of the state and tribal co-managers' Salmon Modeling Analytic Workgroup (SMAWG) ¹.

Besides the original task of providing documentation for the FRAM, the MEW is tasked with participating in the annual Salmon Methodology review with the STT and SSC Salmon Subcommittee. This leads to the inadvertent misrepresentation of who is conducting the reviews or producing the material. In fact, many of the work products that have recently come to the Council from the MEW are co-manager staff work products that are developed outside the Council process, which are then repackaged or presented to the Council through the MEW. Similarly, recently assigned work is being done not by the MEW but by the SMAWG, such as additional FRAM documentation and analyses to support proposed changes to the Chinook salmon thresholds. The work on the Southern Resident Killer Whale abundance modeling to support development of a management threshold was done primarily by co-manager analysts who are not part of the MEW (i.e., only one of the analysts from NMFS who developed the modeling is on the MEW).

The proponents of any new FRAM methodologies should present their proposed changes to the Council's Scientific and Statistical Committee (SSC) and Salmon Technical Team (STT) (i.e., for scientific review and consideration of technical aspects of implementation, respectively) for review prior to adoption for use by the Council. This would better meet the need for a thorough and defensible independent scientific and technical review. This also would be more in keeping with the fact that the "ownership" of the FRAM resides with the state and tribal co-managers and not PFMC.

If the MEW is to continue, then its membership structure, responsibilities and tasks, as well as its operating procedures require careful consideration, review, and revision. It needs to be populated with a more diverse membership that have the appropriate skill sets and develop work products based on a defined need that is not redundant to co-manager efforts or the SSC and STT's reviews. It would benefit from work sessions to complete assigned tasks, so that members who are not part of the SMAWG can be more involved. The MEW in its current form falls short of this.

¹ The Salmon Modeling Analytical Workgroup is comprised of state, tribal, and federal FRAM experts who meet regularly to improve the FRAM and discuss other analytical matters related to salmon as needed.