

COUNCIL STAFF COMMENTS ON PROPOSED REVISIONS TO
NATIONAL STANDARD 1 GUIDELINES

Council staff has the following comments on the National Marine Fisheries Service (NMFS) draft codified text for National Standard 1 (NS-1) guidelines (Attachment 1):

Sec. 600.310 (c)(2)(iv) middle of page 4: An analysis of environmental, economic, and social impacts should be required for a Fishery Management Plan (FMP) amendment, including establishing Maximum Sustainable Yield (MSY) or related values, or the methodology for determining such values. However, an impact analysis should not be required for setting annual management measures as long as the measures meet the conservation and allocation objectives established in a framework FMP, and follow the process for establishing management measures in the FMP. Completing an Environmental Assessment (EA) or Environmental Impact Statement (EIS) to implement annual or biennial management measures requires excessive lead time for notice and comment, resulting in decisions being made prior to availability of the best available science, such as current stock assessments and abundance forecasts.

Sec. 600.310 (d)(4)(ii) middle of page 7: The next to last sentence suggests that although “long-term” cannot be precisely specified, it is expected to be at least as long as the average life span of individuals in the stock. The “average life span” is an equally ambiguous term, since it would depend on what life stages are included, and whether it is calculated for an exploited or unexploited stock. In addition, for some stocks (e.g., squid) the maximum life span is less than a year, which is likely not the intent of NS-1. Perhaps a more easily definable term such as mean generation time would be better as an example, but the description is too vague: “at least as long as the...” could be anywhere from 1 to 100 years, depending on the species and definition of “average life span”.

Sec. 600.310 (e)(4)(i)(B) top of page 10: Insert “During the phase-in period” at the beginning of the sentence

Sec. 600.310 (e)(5)(iii)(A and B) bottom of page 12: (A) specifies three possible considerations for allowing revision the rebuilding plan to increase fishing mortality - change in rebuilding criteria, change in stock abundance, and change in fishing mortality. (B) specifies only one consideration for requiring the revision of a rebuilding plan to reduce fishing mortality- change in rebuilding criteria. It seems logical to consider the same factors in both instances.

PFMC
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