

North Pacific Fishery Management Council

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PFMC

Dr. William Hogarth
Assistant Administrator for Fisheries, NMFS
1315 East-West Highway
Silver Spring, MD 20910

Dear Bill:

Thank you for the opportunity to comment on the proposed revisions to the Guidelines for National Standard 1. A workgroup, consisting of our Scientific and Statistical Committee members Drs. Terry Quinn, Rich Marasco and Anne Hollowed, along with Dr. Grant Thompson and Dr. Jim Ianelli of the AFSC, met to review the proposed guidelines and provide comments on behalf of the North Pacific Council. The workgroup's comments are provided below.

Part 1: Previous Comments

Overall, the proposed revision is responsive to the concerns raised by the Council a number of years ago in a letter to NMFS. The following is a summary of the major concerns raised in that letter and the extent to which they are addressed or otherwise resolved in the proposed revision:

- 1) The Council had expressed concern over the current guidelines' lack of flexibility regarding the $\frac{1}{2}$ BMSY reference point in the definition of minimum stock size threshold. The proposed revision addresses this concern by allowing adjustments upward or downward from $\frac{1}{2}$ BMSY based on the expected range of natural fluctuations in stock size.
- 2) The Council had expressed a desire to provide for accelerated rebuilding of depleted stocks by building this feature into its standard harvest control rules, as opposed to waiting until a stock is depleted before considering how to rebuild it. The proposed revision allows for this.
- 3) The Council had asked a number of questions pertaining to the relationship between the limit and target fishing mortality rates, but these are no longer pertinent in light of (4) below.
- 4) The Council had expressed concern over the current guidelines' requirement to base projections on the limit fishing mortality rate rather than the target fishing mortality rate when determining whether a stock was below its minimum stock size threshold. The proposed revision addresses this concern by removing the requirement for projections from the status determination process and by removing the requirement for a minimum stock size threshold in cases where the existing target control rule results in fishing mortality rates that are at least as conservative as those that would result from use of a minimum stock size threshold.

In addition, the Council letter made several suggestions for future revisions to the guidelines, some of which are adopted in the proposed revision:

A) The Council had suggested that the guidelines include provisions specific to the management of stocks characterized by extreme fluctuations in stock size. The proposed revision does this to some extent by allowing the biomass limit (formally known as the minimum stock size threshold) to be based on the natural range of fluctuations. Furthermore, in the case of short-lived species, the proposed revision allows status determinations to be based on stock abundance in more than one consecutive year.

B) The Council had suggested that the guidelines use $\frac{1}{2}$ BMSY as a default in computing the minimum stock size threshold rather than as part of the definition thereof. The proposed revision does this.

C) The Council had suggested that the fixed 10-year time horizon for rebuilding be removed from the guidelines in the event that Congress removed this requirement from the Act. Because the Act remains the same, the requirement remains in the proposed revision of the guidelines. However, the proposed revision includes an improved interpretation of the Act's description of the circumstances under which the 10-year time horizon can be exceeded.

D) The Council had suggested that the guidelines include additional direction regarding treatment of uncertainty. The proposed revision describes several quantities explicitly in terms of probability statements.

E) The Council had suggested that the guidelines allow flexibility in choice of fishing mortality rates. The proposed revision does this.

F) The Council had suggested that the guidelines use a different term for the condition referred to as "overfished" in the current guidelines. The proposed revision does this, substituting "depleted" throughout.

Part 2: New Comments

Throughout: Notation should be consistent to the extent possible. In particular, Btarget should be the long-term expected stock size resulting from fishing at Ftarget, as opposed to the long-term expected stock size resulting from fishing at FMSY. Likewise, Blim should be the long-term expected stock size resulting from fishing at Flim, as opposed to the biomass level below which the stock is determined to be depleted. The biomass level below which the stock is determined to be depleted should be labeled "Bdep" instead of "Blim."

Throughout: Replace "OY control rule" with "target control rule," with the understanding that the target control rule does not *define* the annual OY but rather sets an *upper bound* on the annual OY (see comment on (f)(4)(i) below). The reason for this suggestion is that the OY specification must consider all relevant social, economic, and ecological factors, the entire array of which would be extremely difficult, if not impossible, to encapsulate in a harvest control rule.

(b)(2)(iii): Replace "proxy" with "default value."

(d)(2)(ii)(C): Strike the phrase "as a proxy for Blim" and the surrounding commas. Text should be added to clarify that specification of Blim is not required under these circumstances.

(d)(2)(ii)(D): Replace "extremely short-lived" with "certain." Some long-lived species can have extreme year-to-year fluctuations in stock size, too.

(e)(3)(v): Replace "use appropriate fishing mortality rates as proxies" in the first sentence with "rely solely on appropriate fishing mortality rates." Also, delete "running" in the last sentence of the paragraph. Finally, text should be added to explain what will happen in cases where two generation times exceeds the maximum permissible rebuilding time.

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(e)(5)(ii)(B): Maintaining the fishing mortality targets and lengthening the time horizon should not be an option. A reduction in fishing mortality rates should be required in all cases.


(f)(4)(i): Replace everything after the first sentence with the following: "Each FMP must include a target control rule for each core stock and for each assemblage or indicator stock within an assemblage. The harvest level associated with the target control rule must be less than the harvest level associated with the fishing mortality limit. The target control rule serves as an upper bound on the annual OY. The probability of exceeding the OY in any given year should not exceed 50 percent."

In summary, the revised guidelines are very responsive to our previous comments, and appear to offer increased flexibility in our status determination criteria. The main comments that we have are that there should be better consistency in notation, greater clarity, and some additional flexibility.

Thank you for this additional opportunity to comment on the revised National Standard 1 guidelines.

Sincerely,



 Chris Oliver
Executive Director

cc: Jim Balsiger
Regional Councils