

PACIFIC FISHERY MANAGEMENT COUNCIL

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Mr. John H. Dunnigan, Director
Office of Sustainable Fisheries
1315 East-West Highway
Room 13362
Silver Spring, MD 20910

Re: Request for comments on consideration of revision to National Standard-1 guidelines

Dear Mr. Dunnigan:

Thank you for the opportunity to comment on an issue of great importance to the Pacific Fishery Management Council (Pacific Council).

The Council supports formal and inclusive reconsideration of National Standard-1 (NS-1) guidelines. As with any policy, periodic review provides opportunity to respond to new information, changes in thinking, or unforeseen consequences since the policy was developed and implemented. Regional councils are on the front line in implementation of NS-1, notably in establishing harvest policies and developing rebuilding plans for overfished species. Thus, the Pacific Council strongly recommends Regional Councils be full and formal participants, especially tapping into the rich expertise provided by Scientific and Statistical Committees.

Existing National Standard-1 guidelines are not a perfect fit for many West Coast stocks (e.g., rockfish, highly migratory species, salmon, Pacific sardine, market squid). This is especially true for several West Coast stocks declared overfished (e.g., darkblotched rockfish and bocaccio). For these slow-growing, long-lived species, the Council is striving to fully comprehend and account for extremely low productivity and affects of unfavorable oceanographic and other environmental variables on these stocks. This difficult task should be facilitated, rather than hindered, by NS-1 guidelines.

For example, in cases where it could take many decades to rebuild certain overfished species, it would be helpful to explore and include mechanisms that ensure rebuilding plans are in accord with and adaptive to environmental and other variables.

In considering revisions to NS-1 guidelines, the Council recommends these specific areas of focus:

- Review of the concept of maximum sustainable yield, in general.
- Uncertainty, risk, precaution. Where and how are these concepts incorporated into stock size estimation, status determination, and management process? How should levels of precaution be tied to a species' life span and productivity, and short-, mid-, and long-term environmental conditions?

- Discontinuity of rebuilding time horizons, particularly in the boundary areas of less than 10 years, 10 years, and greater than 10 years. Under the existing guidelines, a fishery restriction discontinuity exists in that a fishery is less restricted if a fish stock is so poor it takes more than 10 years to rebuild, than if the stock is in better condition and must be rebuilt in less than 10 years; this is the opposite of normal fishery management practices that are more restrictive the worse the condition of the stock. Also, choices among these time horizons depend on very fine distinctions in current biomass, unfished biomass, etc., which are often based on very sparse information.
- Data-poor situations. Under data poor situations, current guidance for determining stock status (e.g., Restrepo *et al.*) can result in very constraining (i.e., precautionary) management, which causes significant economic impacts to the fishery. Given limited scientific and economic information, how should precautionary management be balanced against economic impacts? Some believe economic impacts are rarely given quantitative consideration. Others believe gross biological uncertainty is rarely given adequate consideration.
- Species that can become "overfished" due to oceanographic regime shifts. How are highly variable species to be treated (e.g., Pacific whiting, northern anchovy, Pacific sardine, market squid), especially given their sensitivity to environmental variability and oceanographic regime shifts?
- The process for revising existing rebuilding plans with any changes in NS-1 guidelines that result from the review in questions. Will Councils be asked to redo all rebuilding plans immediately? Will existing (thence obsolete) rebuilding plans be valid during the conversion period? How long will it take to get approval on nearly 100 revised rebuilding plans?

Again, thank you for the opportunity to provide these comments. The Pacific Council will consult with our SSC and other advisory bodies for other specific NS-1 guidelines issues and concerns. At present, our greatest concern is the need for Regional Councils to be full and formal participants in the NS-1 guidelines review process.

Sincerely,



D. O. McIsaac, Ph.D.
Executive Director

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c: Dr. Hans Radtke, Council Chair
Mr. Don Hansen, Council Vice Chair
Legislative Committee
Scientific and Statistical Committee
Dr. John Coon, Deputy Director
Mr. Dan Waldeck, Staff Officer