



June 3, 2015

Ms. Dorothy M. Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, #101
Portland, OR 97220

RE: Agenda Item D.10: Rebuilding Revision Rules

Dear Chair Lowman and Council Members:

Ocean Conservancy¹ supports the Pacific Fishery Management Council's (PFMC) consideration of rules for determining when to revise groundfish rebuilding plans in order to meet the requirements of the Magnuson-Stevens Fishery Conservation and Management Act (MSA). Established rules governing revisions to rebuilding plans have the potential to make the process more predictable and efficient for managers and stakeholders. We therefore support the consideration of rebuilding revision rules that will guide the PFMC in their approach to rebuilding with the recommendation to display both the probability of meeting the rebuilding deadline and the rebuilding target of each alternative for clarity.

Formal rebuilding revision rules that guide the Council in their approach to rebuilding provides transparency and a uniform approach across species. They will also require less workload from the Council, allowing more time for other important issues such as those highlighted in the Council's Groundfish Workload Priorities document.²

We especially support and applaud the use of Management Strategy Evaluation (MSE) to provide an initial range of alternatives for the PFMC and the public to consider. MSE is particularly well suited for use in this type of deliberation as it provides managers performance measures on a range of management alternatives. This information allows for more informed

¹ Ocean Conservancy is a non-profit organization that educates and empowers citizens to take action on behalf of the ocean. From the Arctic to the Gulf of Mexico to the halls of Congress, Ocean Conservancy brings people together to find solutions for our water planet. Informed by science, our work guides policy and engages people in protecting the ocean and its wildlife for future generations.

² Groundfish Workload Priorities, Agenda Item F.5, Attachment 3, April 2015. http://www.pcouncil.org/wp-content/uploads/2015/03/F5_Att3_GFworkload_APR2015BB.pdf

decision making and increases transparency.³ We support and look forward to broader application of MSE by the PFMC. This MSE allows not only finer resolution examination of the trade-offs in revisions to rebuilding timelines, but enables evaluation against PFMC management goals. Initial assessment of this MSE by the Scientific and Statistical Committee at the April 2015 meeting indicated a well-founded product that is applicable and useful.

Generally, we support the strawman range of alternatives provided in the briefing book⁴ given the results of the MSE. However, as the PFMC moves forward to refine this list, we recommend adopting the convention of displaying both the probability of meeting the rebuilding deadline and the rebuilding target for each considered alternative to clarify compliance with the MSA.

We appreciate the PFMC taking this step to improve and strengthen the rebuilding process.

Sincerely,



Corey Ridings
Ocean Conservancy

³ Smith, A. D. M. (1994). Management strategy evaluation: the light on the hill. *Population dynamics for fisheries management*, 249-253.

⁴ Rebuilding Revision Rules Range of Alternatives, Agenda Item D.10, June 2015. http://www.pcouncil.org/wp-content/uploads/2015/05/D10_Att2_RebRevRules_ROA_JUN2015BB.pdf