



**Western
Pacific
Regional
Fishery
Management
Council**

March 15, 2011

Samuel D. Rauch III
Deputy Assistant Administrator for Regulatory Programs
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20901

Dear Sam,

The Western Pacific Fishery Management Council (WPFMC) appreciates the Pacific Fishery Management Council's (PFMC) work related to recommending Amendment 2 to their Highly Migratory Species Fishery Management Plan (HMSFMP). However, the WPFMC does not agree with PFMC's currently proposed potential designation of the HMSFMP having primary or shared responsibility for several pelagic management species in the Pacific Ocean, as identified in Table 2-4 (enclosed) of Amendment 2. The WPFMC, which considered this issue at its 150th meeting held last week in American Samoa, concluded that the PFMC's proposal as indicated in Table 2-4 is unsupportable given that several of species identified are either not targeted or harvested in much lower levels by fishermen on the West Coast as compared to fisheries managed under the WPFMC's Pacific Pelagic Fishery Ecosystem Plan (FEP). As stated in Amendment 2, an important principal in determining the primary FMP/FEP is the importance of the species or stock for the fisheries managed under the respective FMP/FEP.

Amendment 2 also indicates that the division of responsibility between NMFS Southwest and Pacific Islands Regions and Science Centers is another important consideration in designating a primary FMP/FEP. Table 2-4 is not consistent with the current division of responsibility between the Southwest and Pacific Islands Centers, which established that PIFSC is the lead on yellowfin, bigeye, skipjack tunas, South Pacific albacore, swordfish, blue marlin, and blue, oceanic, and silky sharks. SWFSC is the lead on North Pacific albacore tuna, Pacific bluefin tuna, and thresher sharks.

We understand that Amendment 2, which is currently under Secretarial review, does not establish the primary FMP/FEP for Pacific pelagic management unit species, but that it allows for the establishment of a process for the WPFMC and PFMC to designate the primary FMP/FEP. By way of the PFMC's potential designations as listed in Table 2-4, it is clear that the WPFMC and PFMC need to formally begin this process and have detailed consultation on these issues. Included is a table that indicates the WPFMC's suggested primary FMP/FEP designations, which also mirrors the PIFSC/SWFSC division of responsibility.

Sincerely,

A handwritten signature in black ink that reads "Kitty".

Kitty M. Simonds
Executive Director

Cc: Michael Tosatto
Sam Pooley
Don McIsaac
Rod McInnis
Enclosures



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WPFMC suggested primary FMP/FEP for Pacific Pelagic MUS

Species	Primary FMP/FEP Designations
Tunas	
Albacore tuna, <i>Thunnus alalunga</i> (NPO)	HMS FMP
Albacore tuna, <i>Thunnus alalunga</i> (SPO)	Pelagics FEP
Bigeye tuna, <i>T. obesus</i> (EPO, WCPO)	Pelagics FEP
Skipjack tuna, <i>Katsuwonus pelamis</i> (EPO, WCPO)	Pelagics FEP
Bluefin tuna, <i>T. orientalis</i> (NPO)	HMS FMP
Yellowfin tuna, <i>T. albacares</i> (EPO, WCPO)	Pelagics FEP
Billfish	
Striped marlin, <i>Tetrapturus audax</i> (NPO, EPO)	Pelagics FEP (EPO, WCPO) / HMS FMP (local stock)
Swordfish, <i>Xiphias gladius</i> (NPO, EPO)	Pelagics FEP (EPO, WCPO) / HMS FMP (local stock)*
Sharks	
Bigeye thresher shark, <i>Alopias superciliosus</i>	May be classified as EC species under HMS FMP
Blue shark, <i>Prionace glauca</i> (NPO)	Pelagics FEP (EPO, WCPO)
Common thresher shark, <i>A. vulpinus</i>	HMS FMP (local stock)
Pelagic thresher shark, <i>A. pelagicus</i>	May be classified as EC species under HMS FMP
Shortfin mako shark, <i>Isurus oxyrinchus</i>	Pelagics FEP (EPO, WCPO) / HMS FMP (local stock)
Other	
Dorado (dolphin), <i>Coryphaena hippurus</i>	Pelagics FEP (EPO, WCPO) / HMS FMP (local stock)
Opah, <i>Lampris guttatus</i>	Pelagics FEP (EPO, WCPO) / HMS FMP (local stock- possible additional MUS)

Table 1: Summary of HMS Programmatic Role Designations

Programmatic Area	Lead	Supporting Center(s)
HMS Scientific Studies		
Yellowfin tuna, bigeye tuna, skipjack tuna, South Pacific albacore, swordfish, blue marlin and blue, oceanic whitetip and silky sharks	PIFSC	SWFSC
North Pacific albacore, Pacific bluefin tuna, thresher sharks	SWFSC	PIFSC
HMS Monitoring and Data Management		
Longline, Purse Seine, and American Samoa, Guam, Hawaii, Northern Mariana Islands, and Pacific remote island areas	PIFSC	SWFSC
California gillnet, North Pacific albacore trollers, PSMFC fisheries	SWFSC	PIFSC
HMS Conservation Advice and International Agreements		
WCPCF Scientific Committee	PIFSC	SWFSC
IATTC Scientific Advisory Committee	SWFSC	PIFSC
South Pacific Tuna Treaty	PIFSC	SWFSC
ISC	Shared SWFSC/PIFSC	
WCPCF Northern Committee	PIFSC	SWFSC
Canada-US Albacore Treaty	SWFSC	PIFSC
MexUS-Pacifico Agreement	SWFSC	PIFSC

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FMP will be made in consultation with the WPFMC, allowing changes to primary FMP designations without the need to again amend the FMP.

Although MUS would be identified at the stock level for the purpose of identifying reference points in the respective FMPs, the PFMC would continue to maintain a Pacific-wide management interest in the species, and therefore report reference points for WCPO stocks based on what is reported by the WPFMC.

Table 2-4. Potential primary FMP for HMS MUS.

Species	Potential Primary FMP Designations
Tunas	
Albacore tuna, <i>Thunnus alalunga</i> (NPO)	HMS FMP
Bigeye tuna, <i>T. obesus</i> (EPO, WCPO)	EPO: HMS FMP / WCPO: Pelagics FMP
Skipjack tuna, <i>Katsuwonus pelamis</i> (EPO, WCPO)	EPO: HMS FMP / WCPO: Pelagics FMP
Bluefin tuna, <i>T. orientalis</i> (NPO)	HMS FMP
Yellowfin tuna, <i>T. albacares</i> (EPO, WCPO)	EPO: HMS FMP / WCPO: Pelagics FMP
Billfish	
Striped marlin, <i>Tetrapturus audax</i> (NPO, EPO)	Pelagics FMP (NPO) / HMS FMP (EPO)
Swordfish, <i>Xiphias gladius</i> (NPO, EPO)	Pelagics FMP (NPO) / HMS FMP (EPO)*
Sharks	
Bigeye thresher shark, <i>Alopias superciliosus</i>	May be classified as EC species under HMS FMP
Blue shark, <i>Prionace glauca</i> (NPO)	HMS FMP
Common thresher shark, <i>A. vulpinus</i>	HMS FMP (local stock)
Pelagic thresher shark, <i>A. pelagicus</i>	May be classified as EC species under HMS FMP
Shortfin mako shark, <i>Isurus oxyrinchus</i>	HMS FMP (local stock)
Other	
Dorado (dolphin), <i>Coryphaena hippurus</i>	HMS FMP (local stock)
Possible Additional MUS	
Opah, <i>Lampris guttatus</i>	HMS FMP (local stock)

* The HMS FMP identified EPO swordfish as the managed stock. IATTC conducts stock assessments on EPO swordfish. Recent genetics studies, fishery and demographics data conclude that the NEPO and SEPO stocks may be distinct. The latest IATTC swordfish assessment was conducted for the SEPO only. Due to uncertainty about stock structure, the primary FMP for the NPO stock would be the Pelagics FEP while responsibility for reporting on EPO assessments would be covered under the HMS FMP.

2.5 Establishing Reference Points, ACLs, and Accountability Measures

2.5.1 Process for Revising Numerical Estimates of MSY and OY

The methods for determining MSY (or proxies), OY, and SDC, including the overfishing limit (OFL) are described in the FMP. Existing numerical estimates of MSY and OY in the FMP (shown in FMP Table 4-3) will be retained. Upon the receipt of any new information based on the best available science, the Council may adjust the numerical estimates of MSY, OY, and SDC periodically. Two options are considered:

Option 1: The HMSMT proposes MSY and OY estimates based on the best available science, which are included in the draft Stock Assessment and Fishery Evaluation (SAFE) document submitted to the Council in June of the biennial management cycle described in Chapter 5 of the HMS FMP. The SSC