



**Western
Pacific
Regional
Fishery
Management
Council**

Agenda Item G.3.a
Supplemental Attachment 3
June 2012

June 18, 2012

Eric Schwaab
Assistant Administrator for Fisheries
National Marine Fisheries Service
1315 East West Highway
Silver Spring, MD 20910

Dear Eric:

I am writing on behalf of the eight Regional Fishery Management Councils (Councils) to seek an extension of the closing dates for comments on the advanced notice of proposed rulemaking (ANPR) for revisions to Magnuson Stevens Act National Standard 1 (NS1) Guidelines. The current closing date for comments in the federal register notice (FR 77. No 86, May 3, 2012, 26238-26240) is August 1, 2012. We request that this comments deadline be extended to September 15, 2012.

Most, if not all Councils, are about to hold their mid-year meetings and the proposed rule will be on their agendas for discussion. However, all Councils will need to hold extensive discussions with their fishing industries, Plan Teams and Scientific and Statistical Committees to formulate comments. The Councils will also want to coordinate and consult with each other.

The topics under consideration in the proposed rule are ten key elements of NS1, namely:

1. Stocks in a fishery
2. Overfishing and multi-year impacts
3. Annual catch limits and optimum yield
4. Mixed-stock fisheries and optimum yield
5. Scientific uncertainty and management uncertainty
6. Data poor stocks
7. Acceptable biological catch control rules
8. Catch accounting
9. Accountability measures
10. ACL exceptions

Each of these ten issues individually could be the focus of substantive discussion and comment from the Councils: we are being asked to comment on all ten. Moreover, modifications to any of these ten issues could have far reaching consequences for the Councils, including modifications to fishery management plans and attendant documentation such as NEPA requirements. The Councils thus request sufficient time to consult with their advisors, fishing industries and among themselves in order to provide comprehensive and significant comments to NMFS on the NS1 guidelines ANPR.

Sincerely



Kitty M. Simonds
Executive Director

CC:

Council Chairs

Council Executive Directors

Sam Rauch, Deputy Assistant Administrator

Alan Risenhoover, Director of the Office of Sustainable Fisheries