

PACIFIC FISHERY MANAGEMENT COUNCIL

12
Feb 19 1978

CHAIRMAN
John W. McKean

526 S. W. Mill Street
Portland, Oregon 97201
Phone: Commercial (503) 221-6352
FTS 8-423-6352

EXECUTIVE
Lorry M.

January 23, 1978

Mr. Terry L. Leitzell
Assistant Administrator for Fisheries
National Oceanic and Atmospheric Administration
Rockville, Maryland 20852

Dear Mr. Leitzell:

We are forwarding our comments on the Procedural Guidelines for Determining and Reevaluating Optimum Yield submitted to us by Dave Wallace. At its January meeting, the Council asked the Scientific and Statistical Committee to evaluate the procedure. Their recommendations were adopted by the Council and are attached for your consideration.

Thank you for this opportunity to provide input.

Sincerely,



John W. McKean
Chairman

Enc.

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9:30 am

The Scientific and Statistical Committee has reviewed the "Procedural Guideline for Determining and Reevaluating Optimum Yield." While this document does not help a great deal, it is generally consistent with the common outline which was submitted to the Council in December, 1977. We do not see much reason for the Council to be concerned with most of the document if these are guidelines, but this would not be our view if the document was written as "Rules and Regulations."

Our specific concerns are:

First, the requirement under point two (page two) to begin with MSY in all cases is required under FCMA. Nonetheless, MSY is not a useful calculation in many fisheries, particularly fisheries with large year-to-year variability, and fisheries such as crab which harvest only surplus males. The guidelines should not be read to require exact specification of MSY or elaborate justification of departures from MSY in such cases.

Second, the requirement under point seven (page 5) to indicate preferred options in draft plans seems to subvert the public hearing process and the intent of the law to have the Council make a choice based on public input. Some of the necessary socio-economic data may only be available through the public hearing process.

Third, the concluding section under Policy Criteria includes details which the Council has continuously opposed, but keeps cropping up in Washington, D.C. documents. Building the specific environmental impact, economic impact, and other social criteria listed into all OY calculations is unnecessarily binding. We recommend the following statement be substituted for the last section:

"The completed plan must show what considerations were given to the relevant aspects of the fishery in determination of OY including, but not limited to, the national standards."