

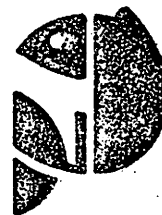
# SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

1 SOUTH PARK CIRCLE, SUITE 306

CHARLESTON, S. C. 29407

TELEPHONE (803) 571-4366

AGENDA #12 (c)  
February 1978



EDWIN B. JOSEPH, CHAIRMAN  
J. ROY DUGGAN, VICE CHAIRMAN

ERNEST D. PREMETS, EXECUTIVE DIRECTOR

February 7, 1978

Mr. David H. Wallace  
Acting Assistant Administrator  
for Fisheries  
Office of Fisheries  
National Oceanic  
and Atmospheric Administration  
U.S. Department of Commerce  
Washington, D.C. 20235

Dear Mr. Wallace:

This is in further response to your letter of December 2, 1977, soliciting comments of the Regional Councils on the "Procedural Guideline for Determining and Reevaluating Optimum Yield."

The proposed procedure was reviewed by the Council at its January meeting. Although the Council feels that the development of guidelines for determining OY would be extremely beneficial, it is of the opinion that finalization of a procedure at this point in time is premature. This opinion is based on the following considerations:

1. At this time, we are all woefully ignorant of the contributing factors and ramifications of optimum yield determination.
2. This ignorance has tended to spark a great deal of creative thought and debate as to the factors and ramifications of OY determinations.

Therefore, it is the Council's belief that if NOAA were to settle on a recommended OY procedure at this time, this very productive thought and debate would decrease before the various Councils had arrived at a fuller understanding of the critical factors and ramifications of OY determination.

The South Atlantic Council has developed and is using an alternative OY procedure in the development of its Snapper-Grouper Plan. We would be pleased to share this procedure with anyone who is interested. Nevertheless, we view this procedure as tentative and expect it to change as we further develop the Snapper-Grouper and future plans. In short, we view our procedure as one possible method and not as the recommended method.

FEB 9 1978

FEB 16 1978

We would look with favor upon NOAA collecting, and possibly developing, a number of alternative OY procedures to serve as discussion devices among the various Councils. At this time, however, we would view the issuance of a single recommended OY procedure to be counterproductive.

I hope these comments have been useful, and please feel free to contact us if you wish to further discuss these points.

Sincerely,



Ernest D. Premetz  
Executive Director

cc: Members, SAFMC  
Members, Scientific and Statistical Committee, SAFMC

bcc: Dr. Michael Orbach, F31  
Executive Directors, Regional Fishery Management Councils  
with copy of earlier response

# SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

1 SOUTHPARK CIRCLE, SUITE 306

CHARLESTON, S. C. 29407

TELEPHONE (803)571-4366



EDWIN B. JOSEPH, CHAIRMAN  
J. ROY DUGGAN, VICE CHAIRMAN

ERNEST D. PREMETS, EXECUTIVE DIRECTOR

December 29, 1977

Mr. David H. Wallace  
Acting Assistant Administrator for Fisheries  
National Oceanic and Atmospheric Administration  
U.S. Department of Commerce  
Rockville, Maryland

Dear Dave:

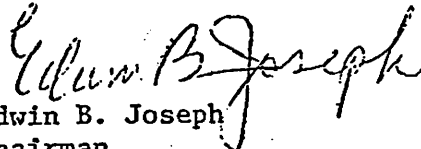
This is to acknowledge your recent letter transmitting for Council review and comment a "Procedural Guideline for Determining and Reevaluating Optimum Yield." The document is currently under review and the Council will finalize its comments at its January 24-26 meeting in Charleston.

In the way of preliminary comment, we feel that the development of guidelines for determining OY would be extremely beneficial. In laying out the plan development process and the attendant Council decision points, we have concluded that there are three separate and distinct phases, i. e. (1) the descriptive phase - assembly and analysis of relevant technical information. (Items 5-11 of the standard format for fishery management plans), (2) the Policy Determination phase - OY determination (Item 12), and (3) the Management Implementation phase - development of relevant regulatory, coordinative and monitoring mechanisms (Items 13-16). We feel that phase 2, which is addressed in the document under review, is the most critical Council decision point in the entire plan development process. We are currently in process of OY determination as it relates to the Snapper-Grouper FMP. This provides a unique opportunity to test the proposed procedural guidelines and hopefully to assist refinement of the process.

In a related Council action, we asked our Scientific and Statistical Committee to organize a workshop to specify the economic and social factors that should be considered by the Council in its OY decision process. We are hopeful that the workshop, which will be attended by about a dozen economists and about a dozen sociologists/social anthropologists, will provide advice as to what minimal economic and social information should be gathered and how it might be used by the Council in its decision process. The workshop will be held in Charleston, February 22-23, with a final report to be presented to the Council sometime in April. We plan to ask the workshop participants to consider the proposed procedural guideline, particularly as it relates to the economic and social factors treated in steps 3 and 4.

Thank you for the opportunity to comment on the proposed guideline. You will hear further from us after our January Council meeting.

Sincerely,

  
Edwin B. Joseph  
Chairman

cc : Members, SAFMC  
Members, Scientific and Statistical Committee, SAFMC, w/copy incoming  
Dr. Michael Orbach, F31  
Executive Director, SAFMC