

North Pacific Fishery Management Council

Dan Hull, Chairman
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Mr. Chris Oliver
Assistant Administrator
NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

Dear Mr. Oliver:

On behalf of the North Pacific Fishery Management Council (Council), I would like to thank you for the opportunity to provide preliminary comments on the proposal for treatment of Best Scientific Information Available (BSIA). At its June meeting, the Council and its Scientific and Statistical Committee (SSC) received a presentation from Drs. Francisco Werner (NMFS Chief Scientist) and Patrick Lynch (NMFS, National Stock Assessment Program Leader) that provided an overview of BSIA.

The Council and SSC noted that, in general, the NPFMC's review process conforms to the proposed BSIA determination process, but wishes to highlight a few differences. Figure 11 of the presentation suggested that the SSC will review the Final SAFE chapters at one meeting and set the OFLs and ABCs at another meeting. Likewise, the figure suggests that the Council will set the ACLs at a different meeting. In the NPFMC process for establishing annual harvest specifications, the final review of SAFE documents and setting of biological reference points and ACLs all occur during the same meeting for relevant crab and groundfish stocks. The SSC inquired about this issue and was assured by Drs. Werner and Lynch that our process was acceptable and consistent with the process outlined in the draft BSIA document. Nevertheless, we suggest that the final document note these differences.

The Council also expressed concern that rigid requirements for determining BSIA may impede incorporation of ecosystem modeling results and traditional ecological knowledge into our stock assessments and determination of catch limit specifications. We suggest some discussion be added to the report to describe how this type of information is incorporated into the process and meet the BSIA threshold.

The Council and its SSC look forward to reviewing the full BSIA report when it becomes available. Thank you again for keeping the Council apprised of this important agency initiative.

Sincerely,



Dan Hull
Chairman

cc: Dr. Cisco Werner
Dr. Doug DeMaster