



U.S. Regional Fishery  
Management Councils  
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November 5, 2020



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**South Atlantic**  
John Carmichael  
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Mel Bell  
Chair



**Western Pacific**  
Kitty Simonds  
Executive Director  
Taotasi Archie Soliai  
Chair

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

Dear Chris,

The Council Coordinating Committee (CCC) convened via virtual conference on September 23-24, 2020 and endorsed a recommendation regarding the National Standard 1 (NS1) Technical Guidance, requesting the NMFS to circulate draft reports of the NS1 Technical Working Groups through the Regional Fishery Management Councils (RFMC) for formal review and comment by their respective Scientific and Statistical Committee (SSC). The review should provide sufficient time for each RFMC SSC to fully evaluate these documents and develop recommendations to their respective RFMCs. Coordination and guidance through RFMCs SSCs is important given the technical nature of these guidance documents and its implications on Council fishery management decisions.

Further, the CCC requested NMFS Office of Sustainable Fisheries form a working group comprised of NMFS and RFMC staff in determining alternative approaches, including but not limited to, fishing mortality rate-based, length-based, or trip limit, etc., in managing data limited stocks pursuant to 50 CFR 600.310(h)(2) stemming from the Technical Guidance memorandum by NMFS Subgroup 3. Nearly every RFMC struggles with obtaining reliable weight-based catch estimates through established data collection programs for data limited stocks as required by the MSA. Alternate approaches should be used for data limited fisheries to produce more representative estimates of stock status in place of relying on highly uncertain catch-based information known to have excessive error. Managing stocks based on proxies from such incomplete or uncertain information disregards likely harvest rates relative to stock productivity. The CCC seeks to further explore alternative approaches to better manage fisheries with data limited stocks in each region and to engage NMFS-OSF in the development of any policies that would stem from this Technical Guidance.

Sincerely,



Taotasi Archie Soliai, Chair  
Western Pacific Fishery Management Council



Marc Gorelnik, Chair  
Pacific Fishery Management Council



Dr. John Quinn, Chairman  
New England Fishery Management Council



Simon Kinneen, Chair  
North Pacific Fishery Management Council




Mike Luisi, Chair  
Mid-Atlantic Fishery Management Council



Marcos Henke, Chair  
Caribbean Fishery Management Council



Mel Bell, Chair  
South Atlantic Fishery Management Council



Dr. Thomas Frazer, Chair  
Gulf of Mexico Fishery Management Council