



March 2, 2015

Ms. Dorothy M. Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, #101
Portland, OR 97220

RE: Agenda Item E.2: Review of Fishery Ecosystem Plan Initiatives

Dear Chair Lowman and Council Members:

Ocean Conservancy¹, Natural Resources Defense Council, Audubon California, and Wild Oceans are writing in support of a scoping process to continue work under the Fishery Ecosystem Plan (FEP). We appreciate the Pacific Fishery Management Council's work to better incorporate ecosystem considerations in its management of U.S. West Coast fisheries. The Council is a demonstrated leader in ecosystem-based fisheries management (EBFM) approaches, including developing a FEP, and a record of science based decision-making. The Council has a proven tradition of adopting best practices and leading with new ones. **We urge the Council to continue this tradition by approving a public scoping process to consider new initiatives under the FEP.** Continuing to actively consider and address the health of the California Current large marine ecosystem is critical in supporting productive fish stocks and thriving fishing communities.

¹ Ocean Conservancy is a non-profit organization that educates and empowers citizens to take action on behalf of the ocean. From the Arctic to the Gulf of Mexico to the halls of Congress, Ocean Conservancy brings people together to find solutions for our water planet. Informed by science, our work guides policy and engages people in protecting the ocean and its wildlife for future generations.

The Council has shown leadership and a desire to incorporate EBFM principles and practices,² and is currently in closing deliberations around implementing protections for unmanaged forage fish species (CEBA-1)³, recognizing the important role that forage species play in maintaining a resilient food web. We thank the Council, the States, and the National Marine Fisheries Service (NMFS) for their efforts, and urge final action to approve this suite of Fishery Management Plan (FMP) amendments at the upcoming meeting. This is a meaningful step forward in achieving EBFM, and demonstrates the utility and value of the FEP at large.

To build on this success, we ask that the Council continue work under the FEP and begin scoping new initiatives. The FEP at creation identified nine initial issues that merited investigation,⁴ and the objectives section of the FEP illustrates the need for further work on a large body of cross-FMP and ecosystem issues spanning ecologic, economic, and social topics. The FEP provides a very real, meaningful, and deliberative way to continue this work, and beginning a scoping process is a vehicle to accomplish this. The current process laid out in the FEP and realized during CEBA-1 development was transparent and considered, and allowed for not only appropriate advisory body consideration but also public inclusion. This process is a good one, and should be continued in an effort to meet the stated objectives of the FEP, FMPs, and the goals of the Council generally.⁵

Regarding which issues to scope next, **we recommend continuing the momentum and discussion around the use of indicators in management.** The Council has indicated the importance of indicators by including them as an Objective (1.b) in the FEP,⁶ standing interest in ecosystem reporting, and by the decision to host a forage indicator workshop.⁷ The importance of ecosystem reporting and usage of indicators was underscored by the December 2014 meeting of the Scientific and Statistical Committee’s Ecosystem-Based Management Subcommittee (SSCES) with the National Oceanic and Atmospheric Administration’s California Current Integrated Ecosystem Assessment (CCIEA) Program. At this meeting the use of ecosystem indicators was explored in-depth along with how the CCIEA Program could better assist and work with the Council. The group concluded:

“The Council and its advisory bodies should have a stronger role in selecting indicators for the report. Indicator selection involves both technical considerations and policy issues...a workshop or series of workshops could solicit input from management teams and advisory subpanels on indicators that

² PFMC meeting minutes, November 2006, pp 46-49.

³ Ecosystem Working Group of the PFMC, *Comprehensive Ecosystem-Based Amendment 1: Protecting Unfished and Unmanaged Forage Fish Species*, March 2015 Agenda Item E.4.a Attachment1 (Feb. 2015), available at http://www.pcouncil.org/wp-content/uploads/E4a_Att1_EA_CEBA1_MAR2015BB.pdf.

⁴ PFMC, *Ecosystem Initiatives Appendix to the Pacific Coast Fishery Ecosystem Plan for the U.S. Portion of the California Current Large Marine Ecosystem*, Appendix A. (July 2013).

⁵ PFMC, *Pacific Coast Fishery Ecosystem Plan for the U.S. Portion of the California Current Large Marine Ecosystem*, pp. 1-5 (July 2013).

⁶ PFMC, *Pacific Coast Fishery Ecosystem Plan for the U.S. Portion of the California Current Large Marine Ecosystem*, pg. 4 (July 2013).

⁷ PFMC meeting minutes, page 58 (Sept 2013).

represent the ecosystem objectives expressed in the Council’s FMPs and FEP, and are relevant to Council decision-making.”⁸

We are very gratified to see how seriously the Scientific and Statistical Committee (SSC) is taking this, and agree that it is not only important to have a robust ecosystem reporting system in place, but tools and processes to respond to ecosystem issues confronted, especially in the face of a changing environment.

Scoping the use of indicators in management could additionally encompass other issues identified in the FEP as potential initiatives, including addressing climate change, accounting for stock demographics, and strengthening socio-economic considerations.⁹ It would also address the Council’s desire to explore a forage status indicator and continue the work of CEBA-1; we recommend this as a natural starting point if an indicator initiative is scoped. And as stated in the SSCES/CCIEA meeting report, such a process would offer a foundation and provide information towards selecting FEP initiatives in the future.¹⁰

The Ecosystem Workgroup (EWG) proposed at their February 2015 meeting an initiative draft¹¹ that would address the SSCES/CCIEA’s recommendations by creating a process of discussion and feedback between the Council, its advisory bodies, the public, and the CCIEA program. It would bolster the utility of the Annual Report by creating a tighter linkage between it and identified policy and management needs. Such an effort would also facilitate closer ties between the CCIEA program and the Council,¹² help both parties articulate and share needs, and allow for closer and more direct communication between IEA scientists and Council advisory bodies.

In addition to scoping the use of indicators in management, we also encourage the Council to consider scoping an initiative proposed by the Ecosystem Advisory Subpanel (EAS). In their draft report to the Council for the upcoming meeting, they propose reviewing the OY factors (ecologic, social, and economic) considered under current management by each FMP, and then

⁸ PFMC March 2015, agenda item E.1.c, *DRAFT Review of the CCIEA State of the California Current Annual Report by the Scientific and Statistical Committee Ecosystem Subcommittee*, recommendation number 2.

⁹ PFMC March 2015, agenda item E.2.b., *PFMC Ecosystem Advisory Subpanel Report on Review of Fishery Ecosystem Plan Initiatives*.

¹⁰ PFMC March 2015, agenda item E.1.c., *DRAFT Review of the CCIEA State of the California Current Annual Report by the Scientific and Statistical Committee Ecosystem Subcommittee*, pg. 14.

¹¹ Forthcoming in March PMFC Briefing Book – original draft presented during EWG webinar on February 11, 2015.

¹² PFMC meeting minutes, page 11 (March 2014). *See also*, PFMC March 2015, agenda item E.1.b., Letter from John Stein, Director, Northwest Fisheries Science Center, and Francisco Werner, Director, Southwest Fisheries Science Center, to Dr. Don McIsaac, Executive Director of the PFMC, dated February 12, 2015 (“...enhance the relationship between the IEA and the Council.”).

linking these factors to indicators.¹³ We believe this strongly supports the above indicators work, and agree with the EAS that this has “large potential to improve FMP decision making.”¹⁴

In closing, **we strongly encourage the Council to begin a public scoping process focused on a new FEP initiative, including consideration of ecosystem indicators.** The Council is a proven leader in adopting EBFM approaches through the development and application of the FEP, and we hope to see this tradition continued.

Sincerely,



Corey Ridings
Ocean Conservancy



Seth Atkinson
Natural Resource Defense Council



Anna Weinstein
Audubon California



Theresa Labriola
Wild Oceans

¹³ PFMC March 2015, agenda item E.2.b., *Ecosystem Advisory Subpanel Report on Review of Fishery Ecosystem Plan Initiatives*. See Table 1. Preliminary EAS review of the initiatives, New - Optimum Yield (OY) and Ecological Considerations. pg. 5.

¹⁴ PFMC March 2015, agenda item E.2.b., *Ecosystem Advisory Subpanel Report on Review of Fishery Ecosystem Plan Initiatives*, pg. 5.