



September 2, 2015

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

RE: Agenda Item D.1: Fishery Ecosystem Plan Initiative Scoping

Dear Chair Lowman and Council Members:

Ocean Conservancy, Natural Resources Defense Council, Wild Oceans, Audubon California, Oceana, and The Pew Charitable Trusts are writing in support of the Fishery Ecosystem Plan (FEP) Initiative scoping process to strengthen the annual State of the California Current Ecosystem Report (CCES Report). Implementing the Coordinated Ecosystem Indicator Review initiative will increase the CCES Report's relevancy to the Pacific Fishery Management Council's (Council) management process, and help secure sustainable fisheries into the future. Improved and systematic consideration of the ecosystem in management is critical for the long-term health of managed fish populations, the ocean ecosystem, and the fishermen and coastal communities that depend on both. Unprecedented environmental change is being observed in the California Current,<sup>1</sup> and a stronger and timely reporting system that registers this change and delivers information that can be used to inform management action will help managers and stakeholders secure healthy, resilient, and stable fisheries and a healthy ocean ecosystem into the future. **We therefore urge the Council to advance work on the Coordinated Ecosystem Indicator Review initiative, including a process that allows for ample public participation and incorporates Council goals and objectives.**

---

<sup>1</sup> PFMC March 2015, Agenda Item 1.E.b. 2015 State of the California Current Ecosystem Report, Supplemental IEA PowerPoint 2.

This initiative is another key step towards realizing ecosystem-based fisheries management (EBFM), an area where the Council has shown leadership, and interest is growing nationally.<sup>2,3</sup> It will also assist the Council in meeting optimum yield requirements of the Magnuson-Stevens Fishery Conservation and Management Act by providing information to better consider trade-offs between social, ecological, and economic factors across fishery management plans.

Beyond applying EBFM and bringing the ecosystem into management, the CCES Report also provides an opportunity to bring information about the effects of management on the ecosystem back to the Council; ecosystem reporting can both inform managers about key changes in the ecosystem that will affect managed species, and provide information back to managers about the effects of their decisions in relation to established goals and objectives. For example, annual tracking of a social indicator can provide the Council information about whether it is meeting stated goals around minimizing adverse impacts on fishing communities,<sup>4</sup> or a forage indicator can provide information about meeting the goal of providing adequate forage for dependent species.<sup>5</sup> These examples illustrate the value of better connecting the CCES Report and Council goals and objectives.

Given existing resource limitations, it is important to prioritize the collection and analysis of information most valuable to managers. Stated Council goals and objectives provide a good starting place for this prioritization exercise. They also provide the basis for development of performance measures to assess progress. The Ecosystem Workgroup (EWG) report offers a thorough analysis of FMP goals and objectives, as well as those found in the Fishery Ecosystem Plan, and provides recommendations for information the CCES Report should include to meet them; we appreciate the EWG's attention to this critical piece, and suggest that the Council should take the same approach.<sup>6</sup>

We also support the processes laid out by the EWG report for moving forward with this initiative.<sup>7</sup> The proposed three-meeting public input period is sufficient, and allows stakeholders ample time for participation. We anticipate providing more in-depth recommendations at a later meeting, and strongly support the time and resources set aside to engage with advisory bodies and seek their recommendations.

In closing, we appreciate the hard work of the EWG, the National Oceanic and Atmospheric Administration Fisheries (NOAA Fisheries) Integrated Ecosystem Assessment team, and the

---

<sup>2</sup> PFMC meeting minutes, November 2006, pp 46-49.

<sup>3</sup> NOAA Fisheries proposed Ecosystem Based Fisheries Management Policy. See PFMC September 2015, agenda item C.6.a., NMFS Report 2.

<sup>4</sup> Groundfish Fishery Management Plan, Goals and Objectives, Section 2.1, Objective 16. Also see HMS FMP, Management Goals and Objectives, Section 2.2, goal/objective 3; Salmon FMP, Overall Fishery Objectives, Section 5.1, Objective 3.

<sup>5</sup> CPS Management Plan, Goals and Objectives, Section 1.6.

<sup>6</sup> PFMC September 2015, agenda item D.1.a., *Ecosystem Workgroup Report on Potential Fishery Ecosystem Plan Initiatives: Coordinated Ecosystem Indicator Review Initiative and Climate Shift Initiative*. Sections 2.2 and 2.3.

<sup>7</sup> PFMC September 2015, agenda item D.1.a., *Ecosystem Workgroup Report on Potential Fishery Ecosystem Plan Initiatives: Coordinated Ecosystem Indicator Review Initiative and Climate Shift Initiative*.

Scientific and Statistical Committee Ecosystem Subcommittee in moving this initiative forward and providing an excellent foundation from which to explore a stronger and more management-relevant CCES Report. Climate change is rapidly altering the physical and biological ocean environment in ways that are unpredictable, and making sure that we have the right systems in place to monitor and understand, as well as deliver this information to appropriate management channels, will better prepare us to more effectively deal with this uncertainty. We therefore strongly encourage the Council to move forward with this important initiative.

Sincerely,



Corey Ridings  
Ocean Conservancy



Seth Atkinson  
Natural Resource Defense Council



Anna Weinstein  
Audubon California



Theresa Labriola  
Wild Oceans



Steve Marx  
The Pew Charitable Trusts



Geoff Shester  
Oceana