



February 29, 2016

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

RE: Agenda Item D.2: Update on Coordinated Ecosystem Indicator Review Initiative

Dear Chair Lowman and Council Members:

Ocean Conservancy, Natural Resources Defense Council, the Pew Charitable Trusts, Wild Oceans, and Audubon California are writing in support of the Fishery Ecosystem Plan (FEP) Coordinated Ecosystem Indicator Review Initiative. In particular, we support the selection of the best possible suite of ecosystem indicators for inclusion in the California Current Integrated Ecosystem Assessment (CCIEA) State of the California Current Report (annual report). This initiative will strengthen the annual report and lay a foundation for better linking ecosystem indicators to management decision-making. Management that incorporates ecosystem information, including ecological, economic, and social factors, can help promote greater resiliency of managed species in the face of climate change and human pressures. This will allow the Pacific Fishery Management Council (Council) to better meet stated Fishery Management Plan (FMP) and FEP goals and objectives, including fishery stability and sustainability. **We thank the Council for voting to start this initiative last September and urge the Council to continue work on it with an eye towards connecting indicators to stated goals and objectives and linking indicators directly to future decision-making.**

We first would like to express our appreciation to the Council's Ad-hoc Ecosystem Workgroup (EWG) and the National Oceanic and Atmospheric Administration (NOAA) Integrated Ecosystem Assessment (IEA) team's work on this initiative, in particular for the webinar series recently

presented.¹ Representatives from our organizations attended the webinars and found them informative and relevant. They were a good starting point for public input into the initiative process, and we look forward to additional input from the advisory bodies – such feedback will be valuable to the Council and to the IEA program in their work to further elucidate the different needs of specific fisheries. We hope this public and advisory group engagement continues not only through the initiative development process, but as the report is improved and presented annually into the future.

We also applaud the IEA team for its efforts in reaching out to the Council, stakeholders, and the public. Dialogue between the IEA team and the Council is critical as tools and products created by the IEA team can help improve not only the annual report, but help the Council fulfill other responsibilities, for example improving single-species stock assessments through inclusion of ecosystem information.

Identifying a Preliminary Preferred Alternative and a Final Preferred Alternative for this initiative are agenda items on the current Council “Year-at-a-Glance” calendar for June and September. Looking ahead to these meetings, we recommend the following:

Connecting indicators to Council goals and objectives

We encourage connecting potential indicators to existing goals and objectives of the Council’s FMPs and FEP. This was suggested by the Scientific and Statistical Committee Ecosystem Subcommittee and outlined by the EWG in its report to the Council last September.² Doing so offers a logical starting point for discussion by advisory bodies and the Council, and provides a vehicle for better achieving optimum yield by explicitly recognizing and weighing trade-offs between the physical ecosystem, social factors, and economic factors included in each FMP and the FEP. Indicators that are tied to goals and objectives also provide an opportunity to gauge management performance and measure progress towards those goals and objectives.

Indicators that inform management decision-making

We agree with the EWG that “...the informational value of the annual reports is beneficial for building general ecosystem awareness and literacy that may lead to new applications of the information in the future.”³ This initiative will further cultivate a strong annual report that can inform management on an annual basis in a manner that is both scientifically rigorous and

¹ Pacific Fishery Management Council Webpage, Ecosystem-Based Management: Coordinated Ecosystem Indicator Review Initiative, Webinar Series on Ecosystem Indicators. Available at <http://www.pccouncil.org/ecosystem-based-management/coordinated-ecosystem-indicator-review-initiative/>

² PFMC March 2015, agenda item E.1.c, *Review of the CCIEA State of the California current Annual Report by the Scientific and Statistical Committee Ecosystem Subcommittee*, pg. 4. Also see 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*.

³ PFMC March 2016, agenda item D.2.a, *Ecosystem Workgroup Report on Fishery Ecosystem Plan Initiative 2: Coordinated Ecosystem Indicator Review for the Annual California Current Ecosystem Status Report*.

informs the policy needs of the Council. The annual report is an important tool that can improve literacy and understanding of ecosystem-based management, and we are pleased that the Council values this process.

Looking beyond this phase, however, we also agree with the EWG that “...while the Council may be able to use many of these indicators for *informational* purposes, drawing clear connections to *management decisions* may require additional, more focused analysis.”⁴ Linking indicators to management decision points will ultimately be needed in order to utilize the best ecosystem information available to help make managed fisheries more resilient to a changing environment, and provide increased stability and sustainability for the ocean and for people. We therefore encourage the Council to formally express its intent to link the indicators chosen through this process to actionable management in the future.

In closing, we appreciate the hard work of the EWG, the NOAA IEA program, and the Council for undertaking this important initiative. We urge the Council to continue work on this initiative, focusing on the connection of possible indicators to Council goals and objectives, and looking ahead to the linkage of chosen indicators with management decision points.

Sincerely,



Corey Ridings
Ocean Conservancy



Seth Atkinson
Natural Resources Defense Council



Anna Weinstein
Audubon California



Theresa Labriola
Wild Oceans



Steve Marx
The Pew Charitable Trusts



Ben Enticknap
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⁴ *Id.* (emphasis in original).