

HIGHLY MIGRATORY SPECIES ADVISORY SUBPANEL REPORT ON THE  
WESTERN REGION CLIMATE CHANGE ACTION PLAN

The Highly Migratory Species Advisory Subpanel (HMSAS) has not had enough time to completely review the NOAA Fisheries Climate Science Strategy (NCSS) Western Regional Action (WRAP). We are very concerned with what we have discovered so far about this plan.

According to this plan, Management Strategy Evaluation (MSE) will be used to identify policies that may be limiting under a changing climate that will include multi species, multi fleet and spatial economic models. It appears that ecosystem based fisheries management (EBFM) will be supported and implemented. Science staff from the science centers will, of course, be necessary to implement this proposal. Taking more staff off of their current projects to work on NOAA's climate change science strategy is suggested in this plan which does not seem appropriate.

In addition, we have noted that many partners such as the NW and SW Science Centers, the PFMC, NGO's, California Universities, OSU, Scripps Institute, the University of Washington, etc. are listed as contributing to this effort to build a new management regime, using ecosystem based management, driven by climate change assumptions and guided by new a type of management (MSE). Fishermen and the fishing industry are not mentioned in this document, so it appears that their advice as the most knowledgeable users of the ocean will not be used. (Interesting note: Fishermen use climate and geographical indicators, both natural and electronic, every day to help them locate fish.)

Furthermore, the HSMAS requests an annual updated report from NMFS's Climate Science Strategy Western Regional Action Plan (WRAP), to the Council and subcommittees on their progress to date with the understanding that our review process should also include the ability to provide feedback.

The HMSAS hopes to have time to better understand this action plan and give a more detailed response to it in September. Thank you.

PFMC  
06/25/16