

#### COASTAL TRIBES' COMMENTS ON ECOSYSTEM PLAN DEVELOPMENT

The Coastal Treaty Tribes support the Council's ongoing effort to incorporate broader knowledge of ecosystem processes into fisheries management. Something similar to an advisory Fisheries Ecosystem Plan (FEP) as described in the Ecosystem Plan Development Team's report (Agenda Item H.1.b, Attachment 1) is preferable to an Ecosystem FMP because of the flexibility that it would provide (i.e. an FEP would not be required to designate Fishery Management Units under the Magnuson Act). We would like to see the Plan contain some regulatory authority for refined spatial management – the Coastal Treaty Tribes have long stressed the need for management to reflect regional and local differences in biological community structure, species availability, productivity patterns, etc. This type of spatial management authority should also help align the FEP with national, regional, and local Marine Spatial Planning efforts. We stress, though, that spatial management regulations should not be enacted without sufficient scientific information and justification to support them. Additionally, the Coastal Treaty Tribes would support any recommendations for regular Council briefings or updates of potential indicators of ecosystem status. The Council lacks such updates currently and we believe they would be a good beginning towards viewing our fisheries management from an ecosystem perspective.