

CALIFORNIA WETFISH PRODUCERS ASSOCIATION

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March 4, 2015

Ms. Dorothy Lowman, Chair And Members of the Pacific Fishery Management Council 7700 NE Ambassador Place #200 Portland OR 97220-1384

RE: Agenda Item E.3. NOAA Draft Climate Science Strategy

Dear Ms. Lowman and Council members,

The California Wetfish Producers Association (CWPA) represents the majority of coastal pelagic species 'wetfish' fishermen and processors in California. We appreciate your consideration of the following comments and recommendations relative to Agenda Item E.3 – NOAA Draft Climate Science Strategy.

On behalf of California's wetfish industry I reviewed the NOAA Fisheries Draft Climate Science Strategy (Agenda Item E3b_NMFS_Rpt_MAR2015BB.pdf). We appreciate NMFS's recognition that the climate and oceans are changing. We suggest that the introduction emphasize this fact by noting that changes in the ocean (ocean acidification) are occurring at an unprecedented rate.

We understand that the intent of this document is to lay a framework for a national strategy to address climate change impacts on living marine resources (LMR), ecosystems and communities. We agree with the finding that each region will have a unique combination of climate-related challenges, and strategic plans will thus differ region by region, and even within regions.

We appreciate consideration of the following points, which should be shared by all regions:

Standardized data collection is key to understanding regional impacts, but also essential is a coastwide network of <u>nearshore</u> monitoring stations in each region, collecting both <u>biogeochemical and biological</u> data in a systematic way to assess regional differences in ocean chemistry and related issues, such as low oxygen / hypoxic zones, which precipitate differing impacts on regional and even subregional ecosystems and fisheries. <u>Partnerships with ocean-dependent fishery interests will be beneficial</u> to expand local knowledge.

In Chapter 2, we agree with the statement that priorities are highly interdependent; however, management objectives are listed before science objectives. We suggest that these priorities should be reversed: i.e. there is a need for monitoring network(s) and science infrastructure (objective 7) to track trends (objective 6) and identify mechanisms of climate impacts (objective 5) to identify POTENTIAL future states of ecosystems, living marine resources (LMR) and human communities (objective 4), which will facilitate identifying appropriate reference points (objective 1), identifying strategies for managing LMR (objective 2) and designing adaptive decision processes (objective 3). **Fishermen, fisheries and fishing communities need the best science to inform management.**

In that regard, it is important to acknowledge that any projections will need need to consider <u>regional space and time</u> to achieve a robust projection of status of LMRs under future conditions. (Oceanic or global averages won't produce accurate results.)

Re: strategies to deliver climate-smart projections:

It is important to coordinate and partner with other groups. On the west coast, other groups are already engaged in study, for example the Pacific Marine Environmental Laboratory (PMEL), the OA-Hypoxia Panel, California Current Acidification Network (C-CAN), the Washington State Blue Ribbon Panel, and the west coast IOOS (Integrated Ocean Observing System) agencies, in particular NANOOS, the Pacific Northwest regional observing system, which is now developing a list of assets and web portal to serve data collected by OA research groups and others. Coordinating with and facilitating existing efforts will be both helpful and strategic in developing a modeling toolbox. And we reiterate, partnerships with ocean-dependent fishery interests also will be beneficial to expand local knowledge.

NOAA Fisheries should articulate the need for process-based research, but funding should not be at the expense of existing field surveys focused on developing biomass estimates for fished stocks, which are essential to develop management measures such as OFL, ABC etc. Additional funding should be allocated for the "climate" mission without taking it away from stock assessment surveys and assessments.

We very much appreciate your consideration of these points, along with your efforts to advance true collaboration between scientists, resource managers and the fishing industry.

Best regards,

Diane Pleschner-Steele Executive Director

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