



Pacific Fishery Management Council

7700 NE Ambassador Place, Suite 101 Portland, OR 97220-1384
Phone 503-820-2280 | Toll free 866-806-7204 | Fax 503-820-2299 | www.pcouncil.org
Herbert A. Pollard II, Chair | Charles A. Tracy, Executive Director

September 30, 2016

Dr. Jason Link, Senior Scientist for Ecosystems
National Marine Fisheries Service
Northeast Fisheries Science Center
166 Water Street
Woods Hole, MA 02543

Re: Pacific Fishery Management Council Comments on the Ecosystem Based Fishery
Management Road Map

Dear Dr. Link:

At its September 2016 meeting, the Pacific Fisheries Management Council (Council) and its advisory bodies were briefed on the Ecosystem Based Fishery Management (EBFM) Road Map by Ms. Heather Sagar, Senior Policy Analyst, NMFS Office of the Assistant Administrator. On behalf of the Council, I would like to again thank Ms. Sagar for coming to the Council meeting and for providing a series of presentations to accommodate our many stakeholders. The Council offers these comments based on reports from its advisory bodies, public comment, and Council discussion. I have attached the advisory reports for reference.

The Pacific Council has led in implementing EBFM through our 2013 Fishery Ecosystem Plan (FEP). Through the FEP, the Council is addressing the first of the six Guiding Principles enumerated in the Road Map, which is to implement ecosystem-level planning. The California Current Integrated Ecosystem Assessment (CCIEA) process has helped the Council to address the second principal, advancing our understanding of ecosystem processes, by providing an annual State of the Ecosystem Report. The CCIEA has previewed ecosystem-level risk assessment tools for the Council, which will help address the third principal, to prioritize vulnerabilities and risks to ecosystems and their components. As these tools are developed the Council will consider how they may be used to support EBFM decision-making. The Council is committed to framing its responsibilities through the lens of EBFM; to this end, the Guiding Principles and associated Action Items can help the Council develop its long-term strategy for managing trust resources.

While the Council has made significant progress in implementing EBFM we note that this does not come without costs both in terms of staff time and periodic meetings of our two FEP advisory bodies. The Road Map does not identify any new resources for the Council to continue addressing the Road Map's Guiding Principles, nor for our partners in the two West Coast Science Centers to support CCIEA products vital to Council implementation of EBFM principles. The Council is not in a position to divert resources from other fishery management obligations and priorities so available resources will naturally limit our capacity to implement the Road Map. We need to consider the possibility of increased workload for our advisory bodies and the need for more expertise in ecosystem science on these bodies, especially our Scientific and Statistical Committee.

Finally, when integrating EBFM into decision-making we want to avoid post-hoc evaluations of the degree to which an action is consistent with NMFS's EBFM policy, especially if this were to add more time to the already lengthy timelines required for Fishery Management Plan amendments and Federal rulemaking. Ideally, ecosystem considerations can be seamlessly integrated into Council decision-making. This is probably one of, if not the biggest, challenge to effectively implementing EBFM. One avenue for integration is to give more thought about linking EBFM to the optimum yield concept that is a foundational principal in the Magnuson-Steven Fishery Conservation and Management Act.

We fully support the idea of the Road Map as a living document, which is consistent with our FEP and our adaptive management philosophy. We also recognize that EBFM, being in its early stage, is a learning enterprise. We applaud periodic (five-year) review of the Road Map. At the same time we think the Road Map is overly prescriptive when generically identifying tools to advance EBFM. For example, the establishment of ecological reference points and thresholds may not be warranted for all ecosystems or needed to achieve EBFM objectives.

Several concepts and terms used in the Road Map could be better explained. This is especially important to make the document accessible to a diverse audience. The term "data-poor" is applied to stocks, species, modeling methods, and potential new approaches to stock assessments without enumerating the tasks needed to address this issue. The term "resilient" and the goal to "maintain resilient ecosystems" is repeatedly emphasized in the document but is only defined in a footnote in Policy Directive 01-20 (NMFS Ecosystem-Based Fishery Management Policy). Resilience should be defined in the Road Map itself with a description of its use in connection with both social and ecological systems. Ecosystem reference points may be one way to assess resilience but they are likely to take some time to develop. The concept of "risk" needs to be more clearly defined and differentiated from impacts.

Large marine ecosystems, such as the California Current, span multiple jurisdictions and different scales (international, interstate, local jurisdictions). The Council serves as a forum for Federal and interstate coordination and interacts indirectly with international organizations (e.g., Pacific Salmon Commission, International Pacific Halibut Commission, Tuna Regional Fishery Management Organizations) and local jurisdictions (mainly through its public processes). The Road Map could provide more guidance on how to coordinate management responses across these overlapping jurisdictions. More specifically, the Road Map should clearly define how NOAA will identify and engage with partners such as states, tribes, industry, and nongovernmental organizations.

Several of the Road Map initiatives are likely to involve complex analytical techniques that have not yet been well documented in the scientific literature. It would be valuable to prepare one or more Technical Memoranda in conjunction with the Road Map that provide guidance on how to 1) implement an ecosystem level risk assessment, 2) establish ecosystem level reference points, and 3) conduct a tradeoff analysis, which presumably would involve an ecosystem-level management strategy evaluation.

The Road Map needs to explicitly acknowledge and prioritize the vital role of physical habitats in mediating ecosystem responses. The Road Map could be strengthened by acknowledging the need to acquire species-specific habitat information and fund the long-term research necessary to do so. Such efforts would also support the Council's obligation to conserve essential fish habitat.

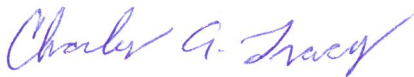
There could also be significant interactions between EBFM and Endangered Species Act recovery plans. The Road Map should provide guidance on how single species legal requirements are addressed in EBFM.

We think that the FEP Coordinator/Analyst position (under Task 1b) should help ensure that councils have input into setting ecosystem science and policy priorities.

The Road Map says that each NOAA Fisheries region will develop a regional EBFM implementation plan with specific milestones within 18 months of the release of the Road Map. In doing so, the region will work with appropriate Councils and stakeholders to address the milestones enumerated in the document. Ideally, the development of the West Coast Region implementation plan would dovetail with our own five-year review of the FEP in 2018. Our five-year review may be an opportunity to identify specific EBFM goals and objectives linked to those in our fishery management plans. In turn, the Roadmap offers a framework for considering FEP goals and objectives.

I hope these Comments are helpful and contribute to a final EBFM Road Map that serves as a useful framework for the implementation of EBFM in the West Coast Region and at the Pacific Council. If you have questions or comments, feel free to contact me or Dr. Kit Dahl, our Ecosystem Staff Officer.

Sincerely,



Charles A. Tracy
Executive Director

KRD:rdd

cc. Ms. Heather Sagar, NMFS Office of the Assistant Administrator
Pacific Council Members
Dr. Cisco Werner
Dr. John Stein
Regional Fishery Management Council Executive Directors
Ecosystem Advisory Subpanel
Ecosystem Workgroup
Groundfish Advisory Subpanel
Groundfish Management Team
Habitat Committee
Scientific and Statistical Committee

Attachment: Advisory body reports on the NMFS EBFM Road Map from the September 2016 Pacific Council meeting