



August 27, 2018

Barry Thom  
Regional Administrator, NOAA Fisheries West Coast Region  
1201 Northeast Lloyd Boulevard, Suite 1100  
Portland, OR 97232

[Submitted via email to: nmfs.westcoast-ebfm@noaa.gov]

Copy sent to:  
Mr. Phil Anderson, Chair  
Pacific Fishery Management Council  
7700 NE Ambassador Place, #101  
Portland, OR 97220

**RE: Ecosystem-Based Fishery Management Draft Implementation Plans – West Coast**

Dear Mr. Thom:

Ocean Conservancy<sup>1</sup> commends NOAA Fisheries West Coast Region for their commitment to implementing Ecosystem-Based Fisheries Management (EBFM). A changing ocean environment has and will lead to unpredictable impacts on our valuable fisheries and the ecosystem upon which they depend. Consequences for coastal communities have already been felt as a result of natural variability in the California Current, and increasing variability due to climate change will likely exacerbate existing pressures and add to uncertainty.

EBFM provides a framework to plan for this future, explicitly considering environmental change and weighing tradeoffs across all of our Fishery Management Plans (FMPs). We believe that the six guiding principles included in the EBFM Road Map provide NOAA, the Pacific Fishery Management Council (PFMC), and others with a framework to implement that planning process. The items included in the West Coast Regional Implementation (WRIP) plan demonstrate the steps taken towards integrating EBFM into decision making in the region. Synthesizing the action items, timing, and milestones in the WRIP is a positive step towards solidifying those items and making them transparent to Council and partners.

While this is a valuable catalogue of information of ongoing activities that link to the Road Map Guiding Principles, the document generally lacks the specifics to make these action items operational or provide

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<sup>1</sup>Ocean Conservancy is a non-profit organization that educates and empowers citizens to take action on behalf of the ocean. From the Arctic to the Gulf of Mexico to the halls of Congress, Ocean Conservancy brings people together to find solutions for our water planet. Informed by science, our work guides policy and engages people in protecting the ocean and its wildlife for future generations.

benchmarks of accountability. Further, this document should more clearly delineate the timing of each action item, emphasizing medium and long terms goals, and target completion dates for preexisting and future activities. Disappointingly, some action items were excluded altogether from the WRIP.

In order to improve this document and make it actionable and accountable we recommend the following:

- 1) Add important action items that were not included from the Road Map
- 2) Improve action items that were included to be more specific and actionable
- 3) Restructure the implementation plan to clearly delineate milestones that have been completed, are in progress, and are planned
- 4) Increase public participation

### **1) Add important action items that were not included from the Road Map**

We identified a total of 21 Road Map action items that were excluded from the WRIP. While not every item identified in the national Road Map will be necessary or appropriate for action via the WRIP at this time, excluding these items risks them being dropped from future consideration. We recommend instead that the WRIP include all action items, even those not currently in progress, within the document and in the summary tables. Where those items are potentially redundant to other action items they should be cross referenced.

The following list is a partial selection of items included in the national Road Map but excluded from the WRIP. We believe these highlighted items would be particularly beneficial and applicable to the West Coast region and the PFMC; for many of these, work is already ongoing:

- *1a6: Continue to explore tradeoffs in the context of EBFM issues and relevant statutory mandates.* Given that exploring tradeoffs is the central purpose of EBFM, we recommend that this is included in the WRIP. Included here as part of the engagement section of the Road Map, this especially highlights the need for stakeholder participation as a central tenant of EBFM.
- *3a3: Ensure more integrated, systematic risk assessments, which could be used to coordinate regional NEPA analysis.*
- *4a2: Development of an EBFM analytic toolbox that includes ecosystem modeling tools and best practices.* NOAA is making strides to better understand our ecosystem through new science and advanced modeling. Compiling these tools in a toolbox is an important effort to drive usage of these models by both scientists and managers and to share science and best practices nationally.
- *5a1: Delineate, evaluate, and explore best practices for estimating and using system-wide or aggregate group harvest limits, ecosystem production measures, and other ELRPs, to inform management decisions.* West Coast region scientists and managers are national leaders in the exploration of Ecosystem Level Reference Points (ELRPs) and how to apply these types of EBFM approaches to management.
- *5b1: Develop and track fishery stock status indices that denote when ecosystem considerations are used.* Tracking the use of ecosystem considerations within stock assessments and/or other single species stock status indicators is low-resource and high-value. Knowing how and when how ecosystem information is being used will help monitor implementation and facilitate sharing best practices within and across regions.

- *5c3: Evaluate the ecosystem effects of offshore aquaculture.* Aquaculture has emerged as a top priority of the Department of Commerce. As science and policy develops, ensuring that the implications on wild fisheries and other trust resources are explored is crucial. Taking an ecosystem approach to aquaculture, one that considers the environment and people, should be non-optional.
- *6a1: Evaluate and track ecosystem level reference points to assess change in ecosystem resilience.* The West Coast region currently tracks and reports on a number of ecosystem indicators. As part of this work, reference points associated with indicators can serve as warnings to managers about the changing state of the ecosystem and its components, and West Coast scientists are working to find these points. As they emerge, they should be incorporated into management.

Excluding these items has the combined effect of leaving out important components of EBFM, effectively deprioritizing their importance and risking them being passed over in future documents. Including all of the items, even those that are not currently being prioritized by the region, provides a measure of accountability for the public by providing a formal document that explains the intentions of the NMFS West Coast Region, and is helpful in identifying future work.

## **2) Improve actions item that were included to be more specific and actionable**

### *Action Item 1a3 – Developing best practices where there are overlapping jurisdictions*

The West Coast region should be commended for their existing coordination with states and tribes. As new challenges like climate change and shifting stocks affect our fisheries, new approaches and protocols may need to be established to ensure jurisdictional barriers do not impede our existing system of precautionary management and growing ability to implement EBFM. As such, we recommend this section better reflect these coming challenges by proactively committing to address them, not on an “as requested” basis, as outlined in the WRIP.

### *Guiding principle 2 (action items 2a1, 2a2, 2a4, and 2b2) – Advance our understanding of ecosystem processes.*

This directive is perhaps the most pertinent as it embodies the current state of EBFM as we aim to understand how ecosystem processes link to the fisheries management actions. Action item 2a1 calls for “advancing resources to conduct scientific investigations to answer such questions and inform EBFM. However, this call for advancing resources occurs during a trend toward level or decreasing budgets and declines in federal staffing.” We acknowledge that resources are limited; yet, the EBFM policy serves as a directive to implement the guiding principles contained within it. Transitioning to an ecosystem approach will require balancing short-term resource demands with long-term planning, a central tenant of EBFM and ultimately to ensure healthy fisheries and a healthy ecosystem in the future.

Beyond providing resources to have “robust, innovative, Internationally-recognized science programs to support management” (the stated goal of guiding principle 2) developing and maintaining core data and information streams as well as capacity building for end-to-end ecosystem studies is critical (action items 2a4 and 2a2). We support the maintenance of these data streams as outlined by the WRIP; however, conducting a gap analysis is not a sufficient plan

to address building end-to-end ecosystem studies. We recommend a commitment to conduct an appropriate number of such studies during the lifetime of the WRIP.

*Guiding principle 3 (action items 3a1, 3a2, 3b1, 3b2, and 3b3) – Prioritize vulnerabilities and risks to ecosystem and their components.*

Again, the Fishery Science Centers should be commended on their current work to identify vulnerabilities and risks associated with habitat, climate change, and communities. However, the milestones presented in the WRIP represent work that is currently being done, or projects that are vague and/or only minimally address their corresponding Road Map action item. Evaluating risks to managed species and the ecosystem is important and continues to be highlighted by NOAA IEA as a critical part of EBFM. We recommend providing specifics across these milestones, and enhancing this section with additional milestones that help achieve the action items and the overarching stated goal of evaluating the majority of main risks, including climate change, and for all of our managed species.

*Guiding principle 4 (4a1, 4a3, 4a4, 4b1, and 4b2) – Explore and address tradeoffs within an ecosystem*

Generally the milestones included in this section are not milestones but rather a note to continue ongoing work. While this work is valuable, important, and should be continued, the lifetime of the WRIP provides an opportunity to do more. Additionally, most do not achieve the goal of the section – exploring and including tradeoffs within an ecosystem. Only one milestone, *Continue developing and exploring productivity-based control rules in the California Current Atlantis ecosystem model*, could potentially consider tradeoffs across FMPs. Considering tradeoffs is a key principle and purpose of EBFM and the intent of this section. We recommend further focusing on actions that help managers do this by prioritizing modeling efforts that facilitate analyzing trade-offs, and committing to developing system-level MSEs as envisioned by action item 4b1.

*Guiding principle 5 (action items 5a2, 5b3, 5b4, 5c1, and 5c5) – Incorporate ecosystem considerations into management advice*

Similar to the above, the milestones presented are useful but not sufficient to meet the stated Road Map actions items. NOAA science is interesting on its own but only becomes meaningful when used. Managers, especially on the West Coast, are interested in using ecosystem science and approaches to manage their fisheries, thus these action items should especially be prioritized and enhanced. For example, action item 5b3, *Identify best practices for incorporating ecosystem considerations into management decisions*, is currently only addressed by a milestone to continue participating in a working group and to incentivize partnerships between ecosystem scientists and stock assessment authors. These are useful but an unacceptably low bar for a five-year plan if the action item is to be met.

**3) Restructure the implementation plan to clearly delineate milestones that have been completed, are in progress, and are planned.**

Generally the milestones included in the report lack concrete next steps, products, or deliverables. Each milestone should be associated with designated programs or people, and note when and where this work will be presented – especially as it relates to the Council process. It is not clear whether some work noted as ongoing is nearing completion or is still in development. For example, under guiding principle 2.3, products may include some prioritized list of habitat, fisheries, or communities, but the timing of the final products and linkages to the Council process are unclear. Ongoing activities should include a target completion date and clearly note which activities have already been completed and are awaiting Council considerations or SSC review. Additional columns could be included in the tables which delineate key process milestones and their outcomes. For example: (1) SSC review, (2) Council review, (3) Considered for management, (4) Incorporated into management. Establishing this system will significantly increase the utility and accessibility of this document by ensuring users can track ongoing progress and accomplishments, and identify priority areas that may be lagging behind.

#### **4) Opportunities for Public participation are lacking throughout**

Public participation is a critical component of EBFM, especially in defining and meeting economic and social goals. The first guiding principle in the EBFM roadmap noted that “NOAA Fisheries cannot fully implement EBFM without significant engagement from its partners and interested stakeholders”. However, none of these items knowledge the need for public participation in any of these processes. Communication materials are an important product but communicate only in one direction. Incorporating clear milestones and linkages to the Council process or noting which action items will be available for public review will ensure the public concerns are incorporated.

In summary, we commend the NOAA Fisheries West Coast, the PFMC, and others for the proactive steps taken toward planning for the future through the implementation of EBFM in the region. We strongly support all of the ongoing work embodied throughout this document. However, as written the WRIP lacks many of the actual Road Map recommendations, and specifics that would lay a foundation for successful implementation. We hope the recommendations included in this letter will better link Council actions to ongoing research at the Science Centers and help focus and prioritize medium and short term action items.

We thank the Council for reviewing the document, and appreciate the Council’s on-going commitment to science-based management.

Sincerely,



Corey Ridings  
Ocean Conservancy