

COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT
ON THE NATIONAL MARINE FISHERIES SERVICE STRATEGIC PLAN

The Coastal Pelagic Species Advisory Subpanel (CPSAS) offers the following comments on the 2019 National Marine Fisheries Service Strategic Plan (NMFS Plan) and the West Coast Geographic Draft Strategic Plan 2020-2024 (West Coast Plan) for your consideration. We offer these comments specifically in regards to achievement of the NMFS Plan's first listed goal "*Amplify the economic value of commercial and recreational fisheries while ensuring their sustainability.*"

We believe the goal to *amplify economic value* to be laudable. As expressed above and elsewhere in the Plan, this must be achieved in a manner that ensures sustainability. This is not only a legal requirement, but also protects our long-term commercial investment strategy, and safeguards that fisheries resources will also be available for the benefit of the recreational sector as well as to maintain healthy ecosystems.

Our questions to NOAA Fisheries and the Council at the national and regional levels are, what and how specific components of the NMFS Plan and West Coast Plan will be executed to facilitate amplification of value? Which milestones and metrics are going to be utilized to measure this amplification achievement against performance of the existing value proposition?

There are many well-thought out passages in the Western Region's draft beginning on page 5 with issues and challenges. On page 10 the regional Plan does speak to "*optimizing commercial harvest, [and] ensuring recreational opportunities....*" Most of what is stated in these plans is either covered under National Standard 1 and/or in individual Fishery Management Plans (FMPs) under their goals and objectives. What specifically will be done differently from past actions to amplify value? Do we have definitive constructs as to what is needed that goes beyond the extraction of more resource? Is this aimed at fulfillment and possible recalibration of the FMP objectives and Optimum Yield, or is the intention to also recognize infrastructure and supply chain function and the roles these play as economic multipliers?

We offer a few suggestions here:

1. There needs to be scheduled time allotted at the Council and within NMFS to understand how value actually is manufactured and perpetuated. The economic health and well-being of our fisheries need to be a focal point as important as any of the other FMP objectives to fully achieve the balance mandated in the Magnuson-Stevens Fishery Conservation and Management Act between ecosystem conservation and sustainable fisheries. On the commercial (and recreational) side, the focus begins with resource extraction. But this is only the first step of what needs to be an integrated process. Markets are essential. How do we remain competitive in a global market? Predictability and the reliable continuity of supply are at least two key components that should be examined. Infrastructure capacity and supply chain performance can have dramatic effect on value equations.
2. Costs that are not borne by other supply chains will give that chain a competitive advantage. Are we placing unnecessary cost burden on our fisheries, both commercial and recreational?

Do we accurately predict and measure the impact of our management cost structure, both the real costs and those imbedded in our regulatory frameworks?

3. Stock assessments and surveys are critical. So is the confidence in the merit of the assessment itself. We believe cooperative work with industry helps instill confidence.
4. We need economic analysis that develops conclusive solutions to address underperformance. This requires understanding of underlying market principles and dynamics. Analysis needs to be more than a collection of data points.

Again we commend the authors of both the National and Regional plans. They are replete with worthy content. We believe these plans are a step forward. We can work with you to help achieve an amplification of value. However, to achieve these goals to their fullest potential there exists a requirement for specific focus, scheduled time, executable targets, and periodic comprehensive economic review.

Thank you.

PFMC
9/13/2019