FISHERY ECOSYSTEM PLAN (FEP) FIVE-YEAR REVIEW – FINAL ACTION

The Ecosystem Advisory Subpanel (EAS) appreciates the draft Fishery Ecosystem Plan (FEP) Chapters 3 & 4 Report and the proposed Guidance Document on Offshore Non-fishing Activities (Agenda Item I.3.a, EWG Reports 1 and 2) developed by the Ad-hoc Ecosystem Workgroup (EWG) and valued the "open house" provided by the EWG on March 3 to discuss these items. Below we offer comments on these documents as well as overarching comments on the FEP.

FEP Chapter 3

The new Section 3.4.3 provides helpful insights into the socio-economics of sections of the California Current Ecosystem (CCE).

FEP Chapter 4

The overall structure of this chapter linking to FEP goals is helpful and the EAS endorses this organization.

Section 4.1, *Effects of Climate Variability and Change on the CCE:*

- Section 4.1 offers one of the most in-depth discussions of climate change impacts to come before the Council. Are there beneficial synergies with the National Oceanic and Atmospheric Administration California Current Integrated Ecosystem Assessment program?
- On page 93, first paragraph, regarding the phrase "Novel ocean conditions can bring new species...", we recommend substituting "different" for "new."
- On page 93, fourth paragraph, regarding the word "catchability." Can the authors confirm that this term is used to reflect the efficiency of a particular fishery (standard definition) or if it is used in some other way?
- Overall, Section 4.1 is a helpful discussion of interactions and dynamics that arise with climate and other changes in ecosystem drivers.

<u>Section 4.3, *Effects of Human Activities and Marine Habitats* (We note this Section is very likely mislabeled as 4.1 in the draft. We treat it as 4.3 in this document)</u>

• On page 96, last paragraph, regarding the language "Aside from the direct consequences of mortality to the target populations themselves, the effects of fishing gear on marine habitat, particularly benthic marine habitat, is thought to be among the most significant impacts of fishing on the marine environment." We note the strength of this assertion and recommend a citation or further elaboration to support it.

- On page 98, paragraph 1: This paragraph addresses the state of a marine ecosystem following human disturbance. We note that disturbed habitats differ in value and recommend that citations be added for this section.
- On page 98 paragraph 2: We recommend striking "or discarded" because gear is rarely if ever purposely discarded at sea. We also question the language "…may affect populations behaviorally" and request clarification and the addition of U.S. West Coast references for this statement.
- Table 4-2:
 - We recommend that the term "artificial propagation" be clarified.
 - We note that while some activities may disrupt essential fish habitat (EFH) for some species, they can create habitat that is used by the same or other species. For example, anchoring of offshore wind energy platforms could disrupt habitat for some species and create habitat for others.

<u>Section 4.4, *Interactions between Fisheries and Protected Species* (We note this section is very likely mislabeled as 4.2 in the draft. We treat it as 4.4 in this document)</u>

• Excellent discussion of the increasing challenges of managing fisheries and protected species interactions.

Section 4.5, *Effects of Fisheries Management, Ecosystem Services and the Well-being of West* <u>Coast Communities</u> (We note this section is very likely mislabeled as 4.3 in the draft. We treat it as 4.5 in this document)

- This section could be strengthened with an expanded discussion of ecosystem services including the importance of wild fisheries and the ocean ecosystem to the arts, sciences, and humanities. A more holistic treatment of society's benefits from sustainable fisheries will provide a greater context for the multifaceted importance of Council actions.
- The EAS questioned whether the discussion on ecosystem services should be expanded to include valuation beyond monetary.
- This section is an excellent discussion of cross-FMP interactions and the complexity of responses to shifts in ecosystem dynamics. We appreciate that it highlights the likelihood that the Council will face an increasing number of "ecological surprises" and "novel predicaments."

Proposed Guidance Document on Offshore Non-fishing Activities (former FEP Chapter 5)

We recommend for readability that undefined acronyms are defined and that internet hyperlinks are provided to access information about Council-managed species. We also recommend including a section that provides a brief overview of Council process to highlight when and how interested parties can become involved in Council activities or provide comment. We found the last three paragraphs of the document helpful in providing broader context and suggest they be moved to the introductory portion.

We endorse this document as a stand-alone document as opposed to a chapter in the FEP.

In Section 4 we recommend noting that different communities have different levels of dependencies on fisheries.

Overarching Comments

The EAS recognizes the importance of these documents in guiding the implementation of ecosystem management. Some members questioned whether the FEP in its current state provides such guidance and suggested that assessment of the risks facing fisheries and the ecosystem would be useful for planning future FEP initiatives and other Council processes. In addition, it could be helpful to specify how progress towards goals can be measured. One suggested pathway was linking initiative choice more directly with the goals of the FEP.

Regarding Council process, the EAS questioned the time-line for finalization of the plan, noting a discrepancy between the Council's Year-at-a-Glance and the pace of proposed revisions to the plan.

PFMC 03/09/21