



NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

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July 30, 2024

Ms. Janet Coit
Assistant Administrator, NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910
Via email: janet.coit@noaa.gov

Dear Ms. Coit:

On behalf of the North Pacific Fishery Management Council (Council), I offer the following comments on the draft Ecosystem-Based Fisheries Management (EBFM) Road Map. We thank you for providing a presentation on the Road Map at a special virtual CCC meeting, and providing an extended comment period, noting that the Road Map will be the primary guidance document for NOAA Fisheries and its management partners (especially the regional fishery management councils) to implement EBFM. We are providing these comments based on our current understanding of the draft Road Map.

The Council appreciates the improvements to the 2016 Ecosystem-Based Fisheries Management Policy in that the draft EBFM Road Map:

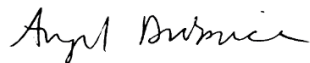
- provides for closer coordination & linkages between EBFM policy and roadmap and climate-related initiatives.
- provides better integration of human dimensions throughout the 6 goal areas.
- provides for more explicit incorporation of climate, communities, habitat, and protected resources as compared to 2016.
- addresses how the proposed activities and policies interact with protected resources laws, including MMPA and ESA.
- provides for development of a framework for identifying seafood systems that have been affected by fisheries, natural disasters, and ecosystem change, particularly identifying and including traditional seafoods and culturally-important fish species and stocks.
- acknowledges that regions will vary with respect to interest in and knowledge of ecosystem-level planning, which will lead to diverse approaches to EBFM and ecosystem-level planning.
- recognizes the excellent and ongoing work happening within regional councils and commits NOAA Fisheries to provide support in developing FEPs and strategic planning documents (such as a climate readiness plan, which the North Pacific Council is developing).

The Council greatly appreciates the Draft Road Map highlighting that *At-sea surveys provide critical data and observations to help us understand current and changing ocean conditions, while also serving as platforms from which to build additional capacity to address emerging stressors directly or indirectly related to climate change (e.g., ocean acidification, harmful algal blooms, and off-shore wind). (p. 15).* As you know, the Council has been very concerned about funding and maintaining the regular marine surveys in the Alaska region. At the recent Climate Scenarios Workshop, participating scientists, managers, and public all emphasized the importance of continuing these surveys and raised concerns about decreasing survey frequency. NOAA Fisheries Chief Scientist Dr. Cisco Werner agreed that core Alaska surveys needed to be fully funded so that these surveys continue to provide critically important data for climate-ready fisheries.

The Council also appreciates that the Road Map includes a need *for better inclusion of Indigenous Knowledge to inform and enrich many aspects of NOAA's work, to better understand Earth and ocean systems, and to fulfill responsibilities for managing culturally-important species (p. 15)*. Diverse knowledge systems are an important component of climate readiness and the North Pacific Council has developed protocols and onramps for inclusion of this information through a collaborative, multi-year effort of our Local Knowledge, Traditional Knowledge, and Subsistence Taskforce. NOAA should consider reviewing this work relative to the Bering Sea, as an example of guidance and best practices for engaging and working with these knowledge systems and expertise in the regional fisheries management process.

The Council fully supports the Road Map *Action Item 6.a.1: Develop operational definitions, measures, and thresholds of resilience that can be used across NOAA Fisheries' range of mandates (MSA, MMPA, ESA, NEPA, Executive Orders and others) and that can be applied to our ecosystems under a future of climate variability and change*. The Council notes that definitions of some terms used in the roadmap (e.g., resilience, risk, data-poor, etc.) have the potential to be subjectively interpreted. At our recent Climate Scenarios Workshop, discussions touched on defining resilience and evaluating progress toward resilience, noting that resilience may be specific to the individual, fishery, and community. The Council suggests that defining resilience should be collaborative and based on regional conditions, values, and perspectives.

In sum, the Council appreciates the development of Ecosystem-Based Fisheries Management Road Map, and requests that NOAA Fisheries continue to coordinate closely with the regional councils on these efforts. Thank you for the opportunity to provide comments.



Angel Drobnic
Chair, NPFMC

Cc:
Dr. Jason Link
Ms. Yvonne deReynier