

North Pacific Fishery Management Council

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Dr. Jennifer Lukens
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Thank you for this opportunity to provide comment on the agency's draft Ecosystem Based Fishery Management (EBFM) Roadmap. The North Pacific Fishery Management Council (NPFMC) has previously submitted comments on the draft EBFM roadmap in (July 12, 2016), and these comments should be considered supplementary to those original comments. The NPFMC's Ecosystem Committee has reviewed the EBFM roadmap and that review informs our supplementary comments.

As a recognized leader in the application of ecosystem principles in fishery management, the NPFMC has already taken many of the steps identified in the EBFM roadmap, and notes that other regional fishery management councils (FMCs) have done the same. The NPFMC remains concerned that the EBFM policy and roadmap appear to be a more centralized program that does not consider regional differences and needs that are best addressed through the regional FMC process. We remain concerned that the roadmap may impose, or at least imply, unnecessarily rigid obligations and expectations that stretch the limits of our financial and personnel resources (both Council and agency resources at the regional level). Furthermore, the roadmap lacks specific prioritization of the numerous activities, functions, and personnel (FTE) obligations and it does not identify necessary funding sources for any of these activities. Therefore, we remain very concerned that funding would be diverted from other important activities to fund this additional layer of bureaucratic infrastructure within the agency.

We encourage the agency to consider ways to include public-private partnerships to fund these initiatives, and encourage the agency to prioritize funding regional staff and activities before funding additional staff at the national agency level. We note that private organizations in Alaska such as the Bering Sea Crab Foundation (ABCF) and the Pollock Conservation Cooperative Research Center (PCCRC) are already funding a great deal of research that addresses the questions identified in the roadmap, and encourage the agency to encourage these sorts of partnerships as an important element in EBFM.

Because the NPFMC occupies a unique niche in fishery management in the U.S., we are mindful of the potential impacts that management actions have on rural, recreational or subsistence fishery dependent communities in our region. Many of those communities in Alaska depend on subsistence harvest of animals protected by the Marine Mammal Protection Act and the Endangered Species Act. The roadmap provides very little information about how the proposed activities and policies interact with protected resources laws, other regulations that affect subsistence harvests, and how the roadmap integrates the single species management of the ESA with an EBFM approach. We encourage the Agency to explicitly describe the integration of the EBFM Policy and roadmap with existing authorities.

In addition to these general comments, I would also like to offer a few, more specific comments for your consideration:

- Filling existing data gaps should take priority over development of advanced modeling techniques
- Connections among related initiatives and authorities should be clarified; for example, there is considerable overlap with existing process such as climate science strategies, regional action plans, Fishery Ecosystem Plans, Integrated Ecosystem Research Programs, Essential Fish Habitat reviews, and other provisions of the Magnuson-Stevens Act which are on parallel tracks.
- Definitions of some terms used in the roadmap must be explicitly defined; for example, what is the agency's definition of resilience, risk, data-poor, etc. Without further definition these terms can be very subjectively interpreted.

We appreciate this opportunity to provide these additional comments on the agency's EBFM roadmap. The potential significance of this roadmap to the NPFMC's ongoing management efforts warrants close consultation and cooperation with the regional FMCs as this roadmap is implemented.

Sincerely,



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Executive Director

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