



North Pacific Fishery Management Council

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Alan Risenhoover
Director of Sustainable Fisheries
1315 East-West Highway
Silver Spring, MD 20910
Via Email: nmfs.ak-ebfm@noaa.gov

Dear Alan,

On behalf of the North Pacific Fishery Management Council, I am pleased to offer the following comments on the Draft NOAA Fisheries Alaska Ecosystem Based Fishery Management (EBFM) Implementation Plan, dated April 23, 2018. We appreciate the work that the Regional Implementation Team has undertaken to write the Draft Implementation Plan. In preparing this response, the Council has received input from its Ecosystem Committee, and this letter also includes a brief review of the NMFS Headquarters EBFM Implementation Plan draft dated May 17, 2018 as it relates to the North Pacific Council.

Generally, the Draft Implementation Plan addresses most of the important aspects of the efforts to utilize EBFM in North Pacific fishery management, including the implementation actions that are envisioned with the Council's adoption of a Fishery Ecosystem Plan (FEP) for the Bering Sea. While we understand that the intent of the document is to focus initial implementation on the Bering Sea through the FEP, and in future iterations to address the GOA and the Arctic, this choice needs to be described and justified in the implementation plan. The document could perhaps reference the ongoing EBFM implementation actions that are already in place in the management of fisheries in those areas to avoid creating the appearance that implementation efforts in the GOA and Arctic cannot proceed until the Bering Sea efforts are fully implemented.

We also recommend that the document include a more detailed discussion of partners in fishery management, and how NMFS will work with partners in EBFM implementation. The Council has a definite commitment to engagement with stakeholders and coordination among science and management bodies. Some of the key agency partners are listed in Section 1 on page 1, and examples of engagement with partners are listed in Section 4, especially Figure 7 on page 10. There is insufficient discussion, however, about two aspects in particular. First, the State of Alaska is a key partner for fisheries management, and its role should be described more completely. Second, one of the critical needs that should be acknowledged for action is recognition of the important role of local and traditional knowledge. The Council is actively working to engage with those who hold traditional and local knowledge, and actions related to this intent should be represented in the text of the document in addition to the milestones table.

Finally, given the high value and volume of the Alaska fisheries, it is imperative that significant investments are made in ecosystem-level research to understand fisheries trends and those physical and biological factors driving the ecosystems. This goes beyond the year-to-year approach that is outlined in the Draft Implementation Plan, and there does not seem to be a way in this document to highlight the ecosystem-level research needed to answer major Council concerns about ecosystem futures.

These include questions such as how is climate change affecting the base of the food web, and how will this translate into impacts on fisheries production? The North Pacific fishing fleet is reaching the lifetime edge of many vessels. How can ecosystem information be used to guide investment in vessel replacements? Additionally, the big ecosystem surprise this year is that the thermal curtain that has consistently separated the Northern Bering Sea and the Chukchi and Beaufort Seas has disappeared, as a result of decreased sea ice formation and early melting. This requires investigation to understand the rapidly emerging phenomenon. Council decisions have buffered this key area from fishing as a precautionary measure, but what is the near-term expectation, and how will this affect distribution of fish and crab in the boundary areas between the United States and Russia?

Detailed comments on specific sections

1. In the Background section, the text emphasizes that EBFM is necessary to understand tradeoffs between and among fisheries and other factors. In fact, the primary purpose of EBFM in the experience of the North Pacific Council has been to understand how better to manage and conserve fish stocks. Recent EBFM considerations have also focused on the role of humans in the ecosystem, and the importance of maintaining healthy fishing communities. We recommend rewriting this section to include these broad concepts.
2. In Section 1, North Pacific Fishery Context, subheadings should be inserted to distinguish the overall description of current EBFM practice in the North Pacific from the long-term vision for and benefits of EBFM in the region. This break appears to occur after the first full paragraph on page 6. Including subheadings would help with distinguishing the region's current EBFM practice that extends across all regions, from the vision, which at this stage, is limited only to the Bering Sea.
3. The description of partners in Section 1 should be expanded to describe their role in effecting EBFM. In addition to management agency partners, this should reference research partners as well, such as the North Pacific Research Board. In particular, reference to the role of the State of AK in joint management of crab, scallops and salmon (page 2) should be properly described, as well as their role in parallel management of groundfish fisheries occurring in State waters.
4. The description of current EBFM practice in Section 1 should also reference the very important roles of stakeholders as management partners and participants in the Council process. This would include Community Development Quota entities, fishing cooperative entities, and coastal fishing communities and associations. This should also include local and traditional knowledge partners. In particular, the CDQ program should be described as an example of community-based management.
5. Figure 2 on page 2 does not match the text description where it is referenced, which speaks of five distinct marine ecosystems. The figure caption describes fishery management areas, but is also at odds with the graphics which remove the northern Bering Sea from the Bering Sea fishery management area, which is incorrect, and the caption does not identify that the Arctic includes multiple ecosystem areas.
6. Figure 4 should reference additional measures:
 - Ecosystem-based limits on total groundfish removals in the Bering Sea/Aleutian Islands and Gulf of Alaska.
 - Accounting of fisheries bycatch against total allowable catch
 - Industry-funded observer programs for groundfish and halibut fisheries
 - Development of Fishery Ecosystem Plans for the Aleutian Islands and Bering Sea

7. The long-term vision subsection of Section 1, which begins on page 6, should begin with a strong explanation of why the implementation plan is focusing exclusively on the Bering Sea, and discuss what EBFM work is in progress for other areas. The Council and NMFS have taken many precautionary, ecosystem-based actions in the GOA and Arctic, without a formal Fishery Ecosystem Plan in place for either area. There is a statement in italics about the GOA and Arctic Integrated Ecosystem Research Programs being underway but not reported on page 8 in Section 2, which gives short shrift to these very important EBFM implementation actions. This section should also include a reference to the Aleutian Islands FEP.
8. The title of Section 2 is to identify expected outcomes and benefits, presumably of implementing EBFM. While the section contains interesting and informative text, it does not represent a discussion of the outcomes and benefits of these actions.
9. Section 3, documenting Milestones by Guiding Principle (page 9), references only Table 1, which is a cumbersome table that is difficult to read and absorb. It would be helpful to include a synthesis of intended Alaska actions and milestones in the text as well.
10. Referencing the previous comments about focusing exclusively on the Bering Sea for the implementation plan, the Council suggests that that similar milestone tables could be attempted for these areas, even if the initial focus remains on the Bering Sea.
11. The engagement strategy described in Section 4 should identify how local and traditional knowledge contributes to the engagement process. The diagrams in Figure 7 show existing EBFM engagement opportunities, and it is possible that the authors of this Draft Implementation plan intend that the terms “partners” and “stakeholders” to encompass the role of Native Alaskans and local knowledge holders. It would clarify the document, however, to represent explicitly that the Council’s intent is to actively improve the incorporation of local and traditional knowledge in the fishery management process as an EBFM measure.
12. Abbreviations used in the implementation plan should be defined, including those in the milestones table.

Comments on the Draft NMFS Headquarters EBFM Implementation Plan

The Council also offers the following comments on the Draft NMFS Headquarters EBFM Implementation Plan.

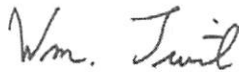
- Section 1. We suggest that attention be given to “support cutting-edge EBFM research and initiatives,” and creating a competitive process for identifying and supporting this cutting-edge EBFM research. This approach would be over and above the efforts currently outlined in Section 1.
- Section 2. Note that while it is highly important to encourage the development and use of EBFM throughout fisheries management, this is not a substitute for providing significant attention to shifts in ecosystems with high value impacts on fisheries management.
- Section 3. Consider including a Section 3.7 that acknowledges ecosystem surprises that create need for rapid response to understand ecosystem change, and develops a well laid out plan for how to respond to ecosystem emergencies and opportunities.
- Section 4. The Engagement Strategy should prioritize developing a more robust way to include local and traditional ecological knowledge into the fisheries management process. This is a critical missing element in the current management approach and it is a vital step toward obtaining observations and assessments from those who occupy the nation’s marine ecosystems on a daily and year-to-year basis. This is not the same thing as engagement with stakeholder perspectives but should be one of the key partnerships between regional Councils and NMFS headquarters.

- Section 5. Measuring effectiveness. This section should be strengthened to identify the metrics and mechanisms for tracking progress with identified milestones. The most important metric is one that is able to assess the effect on the ecosystem itself as opposed to whether identified actions were completed. It is important to identify clearly articulated goals and objectives for EBFM policies and plans by which indicators and targets can be identified that quantify and measure the effectiveness of NMFS and Council management.

Lastly, it appears that all of the regional implementation plans have developed quite differently. While this perhaps provides insight into the pressing EBFM issues in each region and accommodates the variety of ecosystem challenges that each Council faces, the NMFS Guidance Document for the implementation plans appeared to emphasize a uniform outline in order to give some consistency across the regions with respect to structure and content, while respecting regional differences. Without this consistency, we note that it will be difficult to use the implementation plans for a nationwide comparison of current practice and long-term vision for EBFM; we encourage NMFS to consider approaches for comparing the benefits and successes of the diverse array of approaches that the Councils will take to implementing EBFM.

Again, thank you for the opportunity to provide comments. Please contact Diana Evans on the Council staff if you have any further questions.

Sincerely,



Bill Tweit
Interim Chairman

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