



## North Pacific Fishery Management Council

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Simon Kinneen, Chair | David Witherell, Executive Director  
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February 24, 2021

Scott de la Vega  
Acting Secretary of Interior  
1849 C Street, NW, MS 5311  
Washington, DC 20240

Dear Acting Secretary de la Vega:

On behalf of the North Pacific Council, I am writing to offer our assistance and perspective as you develop a report to the Climate Change Task Force, as required by Executive Order 14008 [Tackling the Climate Crisis at Home and Abroad](#), which was signed on January 27. Section 216 of the E.O. (Conserving Our Nation's Lands and Waters) requires consultation with key stakeholders in developing recommended steps that should be taken, and in identifying strategies that will encourage broad participation in achieving the goal of conserving 30 percent of our lands and waters by 2030. We request an opportunity to be involved in the implementation of the E.O., in determining how 'conserving' the marine environment is defined and measured, and to share detailed information about conservation areas established by the North Pacific Council to ensure they are properly categorized.

The Regional Fishery Management Councils have direct authority in conserving marine waters off of the United States and take that responsibility very seriously. The eight regional councils were established in 1976 by the Magnuson-Stevens Fishery Conservation and Management Act to conserve and manage fisheries resources in the U.S. EEZ, through a regionally-driven, science-based, participatory, and transparent public process. The councils, working with NOAA Fisheries, have established a system considered to be the gold standard for sustainable fisheries and marine conservation throughout the world. The council process would provide broad stakeholder participation in the efforts to identify strategies to achieve the goals and intent of the Executive Order.

The North Pacific Council develops conservation and management measures for the fisheries operating in the EEZ off Alaska; the foundation for our fishery management is preservation of the healthy, productive marine ecosystems in our EEZ. The EEZ in our region is expansive, covering over 1 million square nautical miles, and includes the large marine ecosystems of the Gulf of Alaska, Bering Sea, Aleutian Islands, and the Arctic. These areas support subsistence, sport, and commercial fisheries, and subsistence harvests of marine mammals. The Council develops management plans to achieve ecosystem-based management goals and envisions sustainable fisheries that provide benefits for harvesters, processors, recreational and subsistence users, and fishing communities, which (1) are maintained by healthy, productive, biodiverse, resilient marine ecosystems that support a range of services; (2) support robust populations of marine species at all trophic levels, including marine mammals and seabirds; and (3) are managed using a precautionary, transparent, and inclusive process that allows for analyses of tradeoffs, accounts for changing conditions, and mitigates threats.

The North Pacific Council has a successful record of science-based, sustainable fisheries management, including identifying and managing thousands of nautical miles of conservation areas. Critical to our success has been identifying a specific conservation objective and tailoring a closure or restriction to that particular objective, while analyzing and considering the tradeoffs to the affected fishing community.

We adopted an ecosystem policy, including an ecosystem vision statement in 2014, and ecosystem considerations are incorporated into the analysis and development of all fishery management measures. In addition, the North Pacific Council approved a Bering Sea Fisheries Ecosystem Plan in 2018, which includes a Climate Change Taskforce undergoing a five-year effort with the goal 'to facilitate the Council's work towards climate-ready fisheries management that helps ensure both short- and long-term resilience for the Bering Sea'.

The North Pacific Council has invested in this approach and process while continuing to support the fishermen, processors, and communities dependent on fisheries under its jurisdiction. Nearly all of the fisheries in the North Pacific are certified as sustainable by the Marine Stewardship Council and the Responsible Fisheries Management Certification Program. Each year, vessels homeported in coastal communities in Alaska, Washington, and Oregon harvest over 2,200,000 metric tons of groundfish in the North Pacific, worth approximately \$2.5 billion first wholesale. This is a fraction of the biomass that could be harvested sustainably in the Alaska EEZ. Fish harvests off Alaska annually account for about 60% of the total U.S. catch, and are critical to ensuring food security for the nation. These fisheries support over 90,000 jobs and provide economic opportunities in coastal communities that are particularly vulnerable to the effects of climate change. The abundance of groundfish stocks is high, and most stocks are well above the abundance levels that produce maximum sustainable yield. In the past 40 plus years, no groundfish stocks have been overfished or have been subject to overfishing.

To achieve this conservation success, the Council relies on a mix of conservation tools that provide flexibility to adapt to environmental change. Some of the major tools include:

- Precautionary harvest limits – Scientifically established annual limits on harvests that incorporate ecosystem concerns provide food security and economic activity for the long-term, while protecting marine ecosystems from adverse impacts. The total annual catch of all species in the Bering Sea is also capped as an ecosystem conservation measure.
- Ecosystem policy – An explicit policy that fisheries management take into account environmental variability and uncertainty, changes and trends in climate and oceanographic conditions, and fluctuations in productivity for managed species and associated ecosystem components, such as habitats and non-managed species, and relationships between marine species.
- Conservation areas – Over 65% of the Alaska EEZ is closed to some or all fisheries to conserve habitat, sustain fisheries and coastal communities, and protect marine mammals. These closures were carefully established through the Council's public process to protect ecosystem productivity and integrity while still providing for sustainable fisheries and viable coastal fishing communities. These areas can be modified as new scientific information becomes available, fish stocks shift their distribution, the environment changes, or other reasons as needed to adapt to unforeseen events.
- Effective monitoring, accounting, and enforcement – A comprehensive observer and electronic monitoring system ensures that all harvesters follow the requirements for fishing in areas protected by Council action, catch is accounted towards the annual catch limits to prevent overfishing, and potential impacts on seabirds and marine mammals are monitored.
- Strong scientific base and adherence to scientific advice – Scientific information underpins all management decisions. Fisheries surveys and environmental data collection are critical and used for stock assessments and development of models to understand, prepare for, and be resilient to climate change in the North Pacific.

Our experience demonstrates that conservation of the productivity, diversity, and integrity of marine ecosystems can be achieved without establishing extensive areas with “no commercial extractive use.” Marine scientists have noted many times that, in the context of climate change, adaptive and flexible management is critical. A policy that creates large-scale permanent marine reserves will greatly restrict the ability of managers to react to changes in the marine environment, which does not promote resiliency for the marine or human environment. By contrast, the conservation areas established by the North Pacific Council achieve important conservation objectives while providing management flexibility and a public process to modify actions in the future in response to new information. We look forward to ensuring that this proven approach to area-based conservation is fully recognized as part of the Administration’s 30x30 process.

In sum, we recommend that the steps developed to implement the EO include enlisting the North Pacific Council as a partner, and that some of your recommended strategies are modeled on the process the North Pacific Council has used successfully to provide conservation measures for over 65% of the Alaska EEZ. The North Pacific Council has experience and expertise in preparing for and adapting to climate change, and we would be very interested in providing immediate advice on how to implement the Executive Order.

Thank you,



Simon Kinneen  
Council Chair

Cc:

Benjamin Friedman, Deputy Under Secretary for Operations and Acting Administrator, NOAA  
Paul Doremus, Acting NOAA Assistant Administrator for Fisheries  
Regional Fishery Management Councils