



North Pacific Fishery Management Council

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November 3, 2021

Secretary Gina Raimondo
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Dear Secretary Raimondo:

At its October meeting, the North Pacific Fishery Management Council (Council) received presentations on ongoing climate initiatives at the National Oceanographic and Atmospheric Administration (NOAA) and the National Marine Fisheries Service (NMFS), such as the NOAA Climate and Fisheries Initiative (CFI), the Regional Action Plans (RAPs) for climate, and also the Climate Integrated Modeling research projects for the Bering Sea (ACLIM) and Gulf of Alaska (GOA CLIM). We are writing to request ongoing, stable funding for these types of critical climate research programs, and additionally to ensure that these initiatives do not divert funding from core fisheries surveys and ecosystem surveys that form the fundamental basis of fisheries management in the North Pacific.

The North Pacific Council works closely with NOAA Fisheries to develop fishery management plans and regulations for fisheries off Alaska using a precautionary ecosystem-based approach. This approach has proven successful in maintaining abundant fish stocks and providing sustainable fisheries for decades. Under the Magnuson-Stevens Fishery Conservation and Management Act (MSA), with strong management and scientific support from NOAA Fisheries, the Council system provides an effective mechanism for ensuring that fisheries and protected resources are sustainable and resilient to climate change, based on science and using a public, collaborative process to engage State and Federal agencies, Tribal representatives, fishermen, and other key stakeholders. Through this process, the Council actively identifies data needs and promotes stock resilience, and is developing adaptive, climate-ready fishery management and resilience tools through initiatives such as its Bering Sea Climate Change Taskforce for its Bering Sea Fishery Ecosystem Plan. The Council's proactive efforts to incorporate climate resiliency into our conservation and management process is part of our long-term sustainability objective.

The Council very much supports the development of climate research programs in the Arctic and throughout the North Pacific, as well as advanced models of climate and ecosystem responses, such as the initiatives underway at NOAA and the NMFS Alaska Fisheries Science Center. Such work is essential to inform sustainable management in the context of environmental change. At the same time, the Council is concerned that these initiatives largely rely on soft money, and ongoing funding for these critical and long-term projects has not been secured. In particular, the Council is concerned that funding for these initiatives may need to compete with other, critical programs that generate the baseline data both for current management and development of adaptive tools. The Council continues to prioritize the need for consistent funding and support for our core fisheries surveys and ecosystem surveys. These surveys serve as our fundamental data source to support groundfish stock assessments and ecosystem assessments, and are of critical importance in collecting scientific information to ensure we provide for the sustainability of Alaska's fisheries and living marine resources, especially in light of the rapid environmental changes we are witnessing in our region. The surveys, however, also contribute the baseline data that allows for the development, validation, and advancement of climate adaptation tools.

If funding is diverted from the surveys and other core activities to instead support the new climate research initiatives, NOAA will simply have replaced effective tools that are currently being used each year in favor of speculative research whose value is promising but unproven.

We cannot emphasize strongly enough that rapidly changing distributions and populations in recent years increase the importance of adequate, stable funding for baseline survey efforts, development of new monitoring capabilities, and the importance of process studies that are informed by changing climate research. We look forward to your engagement.

Sincerely,

A handwritten signature in blue ink, appearing to read "Simon Kinneen".

Simon Kinneen
Chair

Cc: Ms. Janet Coit, Assistant Administrator for Fisheries
Dr. James Balsiger, NMFS Alaska Regional Office
Dr. Robert Foy, NMFS Alaska Fisheries Science Center