

North Pacific Fishery Management Council

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Dr. Jennifer Lukens
Director, Office of Policy
NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

Dear Dr. Lukens:

Please consider these initial comments from the North Pacific Council regarding the agency's draft Ecosystem Based Fishery Management (EBFM) roadmap. Our immediate area of concern is the ability to provide meaningful comment on this important implementation plan for EBFM, prior to it being released for an additional 45-day public comment period. We first received this document just prior to the recent meeting of the Council Coordination Committee (CCC), and were unable to schedule review of the roadmap by our Council at its most recent (June) meeting. Our next opportunity to do so, and include review by our Ecosystem Committee and SSC, will be in the September/October timeframe (our Ecosystem Committee meets in September and our next Council meeting is early October).

Because of the potential importance of this EBFM implementation roadmap, we feel that it is imperative to allow adequate review by our Council, including our Ecosystem Committee and SSC. Therefore, we request that the agency extend the initial Council comment period to allow for such review by our Council, as well as other Councils. We feel that this stage of Council review and comment should be accommodated prior to the document being released for an additional 45-day public comment period. Such an approach would allow the agency to make appropriate adjustments to the draft, based on Council review, prior to releasing a version for public review; otherwise, the point of allowing an initial review by the Councils, prior to public review, would seem to be mooted.

Notwithstanding this primary request, we do have some general comments to make, based on our initial look at this document and based upon discussions at the recent CCC meeting. As is recognized in both the EBFM Policy Directive and the roadmap, all of the Councils, in partnership with NOAA Fisheries, are developing and employing an ecosystem-based management approach, based upon the circumstances unique to each of our fisheries. We are concerned that the roadmap may impose, or at least imply, unnecessarily rigid obligations and expectations which will stretch the limits of our monetary and personnel resources, at the Council as well as at our Regional Office and Science Center. The roadmap appears to create a significant, additional layer of bureaucratic infrastructure within the agency, including new, high-level FTE positions, which will require substantial resources at the regional level to maintain. In reviewing the recommended actions and milestones associated with the six guiding principles, we see no less than 14 different workgroups (or workshops) and approximately 15 new FTEs to be created within NOAA Fisheries, all within the first few years following adoption of the roadmap.

It is unclear how the agency intends to fund these activities, and of great concern regarding the potential implications to fully subscribed Council resources. Our entire Council staff is less than 15 FTEs, and simply tracking the activities associated with the roadmap would require an additional, dedicated staff

person at each Council. We fully support the further development of an ecosystem-based management approach, and we appreciate the intent of the agency with the Policy Directive and associated roadmap. However, we believe that we can continue our progress in this area without subsuming substantial existing resources in the current climate of flat budgets.

Quoting from section 1.3 (scope) of the document, *"The primary emphasis and focus of the Road Map is on the regional Fishery Management Councils (FMCs) and the associated Large Marine Ecosystems (LMEs) in each region"*. Further, the roadmap contains the statement *"Implementation of EBFM activities will therefore be an integral part of the annual allocation of appropriated funding for each Region"*. These statements underscore our concern that the roadmap as drafted could create significant additional workloads for the Councils, and could inadvertently hinder our current, ongoing efforts to implement the EBFM approach, as well as detract from critical ongoing activities, including baseline stock assessments, for example. Our Council and our partners at the Region and Science Center are currently expending major resources to develop an explicit Fishery Ecosystem Plan (FEP) for the Bering Sea management area. While the roadmap could be complementary to those efforts, it is possible that it could divert our efforts in order to satisfy the various action items and milestones specified in the roadmap.

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 precedence over the development of advanced modeling techniques.
- It may be prudent to eliminate time-specific milestones from the roadmap, given the general concerns expressed above (resource and budget constraints).
- The interconnections among related initiatives needs to be clarified; for example, there is considerable potential overlap with ongoing processes such as climate science strategies, regional action plans, FEPs themselves, IERPs, and EFH 5-year reviews.
- While a focus on sustainable fisheries is obviously paramount, the roadmap needs more explicit consideration of habitat conservation aspects, and protected resources.

We appreciate the opportunity to provide these initial comments, but we will be in a much better position to assess the potential interactions between the roadmap and our ongoing efforts once we are able to thoroughly review the roadmap with input from our Ecosystem Committee and our SSC, during the September/October timeframe. Again, the potential significance of this roadmap to the Councils', and to NMFS', ongoing management efforts warrants the opportunity for an extended comment period for the Councils.

Sincerely,



Chris Oliver
Executive Director

cc: Mr. Sam Rauch
Mr. Alan Risenhoover
Ms. Eileen Sobeck
Dr. Richard Merrick
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