

# 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, due to the fact that we received it just prior to the recent meeting of the Council Coordination Committee (CCC). We are now in the midst of our June Council meeting and, due to an already established, packed agenda, will be unable to conduct an appropriate review of the document at this 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, many of the Councils, in partnership with NOAA Fisheries, have long been 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 would seem 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. 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 creating what appears to be, in essence, a new National Standard for EBFM.

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”*. This statement underscores 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. 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/Aleutian Islands 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.

We will be in a much better position to assess these 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. Again, the potential significance of this roadmap to the Councils’ ongoing management efforts warrants the opportunity for an extended comment period for the Councils.

Sincerely,

Chris Oliver

Dan Hull

Executive Director

Chairman

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