



# North Pacific Fishery Management Council

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**DRAFT**

Mr. Roger Griffis  
NMFS/Office of Science and Technology  
1315 East-West Highway  
Silver Spring, MD 20910

Dear Mr. Griffis:

On behalf of the North Pacific Fishery Management Council (Council), I am pleased to provide comments on the three Draft Climate Science Regional Action Plans (RAPs) developed for the North Pacific that are designed to increase the production, delivery and use of climate-related information needed for fisheries management and management of protected species. The North Pacific is at the forefront of ecosystem change and we rely on these efforts to continue to produce the majority of the nation's seafood. Our comments are focused on the clarity of the goals and activities in the draft Plans, how to strengthen the draft Plans and activities, and what additional goals and activities need to be addressed.

Overall, the Council is pleased that NMFS has updated the RAPs for the Eastern Bering Sea and Gulf of Alaska regions and developed a new RAP for the Arctic region. In October 2021, the Council's SSC made recommendations to improve the draft plans (see attached), which were supported by the Council. We request that the writing teams review and incorporate these comments to the extent possible. Given the SSC's efforts on this topic, we submit this letter with only three overarching comments.

## Survey priorities

For the North Pacific, the draft Plans must prioritize fisheries independent and dependent surveys. NOAA Fisheries surveys are the foundation of our sustainable management approach and continue to be essential to ensure that sustainable harvests are maintained in the North Pacific. These surveys are the fundamental data source for groundfish stock assessments and ecosystem assessments and are the most critical responsibility of the Alaska Fisheries Science Center to meet its mission of monitoring the health and sustainability of living marine resources and their habitat. As a plan to increase resilience to climate driven changes, groundfish, crab, and ecosystem surveys must be recognized as the highest priority. Relatedly, the Council is concerned that Action 1 in the draft Eastern Bering Sea RAP to maintain infrastructure and track change does not recognize the need for fish survey efforts in the northern Bering Sea (though Action 6 on ecosystem surveys does). We suggest revising the draft Eastern Bering Sea RAP to recognize the importance of surveying the northern Bering Sea to understand both changing productivity and changing distributions of groundfish and crab stocks. The Council would also like to stress the importance under Action 1 of re-evaluating survey designs as conditions and stock distributions change.

## Funding

As stated in the Federal Register notice, the draft Climate Science Regional Action Plans are intended to guide efforts to provide decision-makers with timely, actionable information to help reduce impacts and increase resilience of living marine resources and the many people, businesses and communities that depend on them. We find the draft Plans for the North Pacific focus on identifying and describing existing and planned climate related research activities and highlighting new projects to address gaps that will require additional funding. It might be helpful to identify the audience for these Plans, whether it be Congressional staff, NOAA budget staff, NOAA Fisheries leadership, Science Center Directors, or the Councils.

The draft Plans indicate negative impacts under scenario 1 (baseline funding) that have real repercussions for the data-driven management in the North Pacific and the federal (and State) fisheries and communities that rely on this information. The draft Plans should clearly spell out that funding at existing baseline levels means that the agency cannot fully implement the RAPs, and tradeoffs will need to be made. With increasing costs, baseline funding under scenario 1 will result in less scientific research than today at a time when we should be increasing survey and stock assessments across the nation. The Bering Sea and Aleutian Islands RAP already notes that *“The agency will continue to rely on temporary funding for multiple projects, particularly those that advance NOAA Fisheries’ ability to build fishery and climate decision support systems into the future.”* With reduced funding for research, the Alaska Fisheries Science Center has already had to drop critical surveys of the slope region and is unable to regularly sample the Northern Bering Sea, which should be part of the core survey effort as discussed above. With fish and crab moving deeper and northward due to ocean warming (e.g., pollock, Pacific cod, opilio), it is imperative to secure permanent funding necessary to provide comprehensive and consistent data for stock assessments and research projects to track the impacts of climate change.

**Without significant increases to the base funding for NOAA Fisheries Science Centers, the Climate Regional Action Plans appear to be a decision tool to prioritize what research can be cut, rather than a strategic plan for new efforts and research that need to be funded to address management needs in the face of climate change.** Already, we are hearing that some standardized surveys in the North Pacific are on the chopping block, and stock assessment scientist positions at the Alaska Fisheries Science Center are being unfilled/reduced due to lack of funding. Fewer assessment biologists necessitate longer intervals between assessments, which will potentially have adverse effects on the sustainability of marine resources and reduce the U.S. seafood supply.

## Consistency

Finally, the three draft Plans for the North Pacific were prepared by different and independent writing teams, and thus each draft Plan has different formatting, content, structure, emphasis, and approach to summarizing the information. This makes it challenging for a reader to understand what is being planned in the North Pacific as a whole, even if there are different timelines associated with each region. It would be very helpful if the three teams discussed best practices and revised the Plans accordingly, perhaps providing an executive summary for the North Pacific as a whole. In addition, consider that the table of projects cross-linked to the National Climate Science Strategy Objectives contained in the Gulf of Alaska Action Plan made it easier to understand what actions were being taken. The Council and NOAA have made recent efforts to be more transparent and accessible to the public, and these documents could be revised slightly with that objective in mind. The hundreds of acronyms contained in the Plans make it difficult for the public to read and understand the information; a list of acronyms would help immensely.

Thank you for the opportunity to provide comments on these important Climate Science Regional Action Plans. We thank the authors very much for their work. It seems imperative however, to address a glaring issue. Funding at baseline levels will not fully allow NOAA Fisheries to implement the draft plans for Alaska and reduces our ability to monitor and understand the impacts of climate change in regions of the U.S. where we know change is occurring at the highest rate.

Sincerely,

Simon Kinneen

Council Chair

Enclosure(s)

cc: Dr. Robert Foy, Director AFSC