



Gulf of Mexico Fishery Management Council

Managing Fishery Resources in the U.S. Federal Waters of the Gulf of Mexico

2203 N. Lois Avenue, Suite 1100

Tampa, Florida 33607 USA

Phone: 813.348.1630 • Toll free: 888.833.1844 • Fax: 813.348.1711

June 20, 2016

Heather Sagar
Office of Policy
NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

Dear Ms. Sagar,

Thank you for providing the Ecosystem-based Fisheries Management Road Map (roadmap) for the Gulf of Mexico Fishery Management Council (Council) to comment on. After reviewing your document, the Council has a couple of comments and suggestions.

The Council appreciates that you have delineated each of the tasks for NOAA to work on. However, the order of these tasks seems to be nonlinear. For example, we suggest moving Guiding principle 1 after Guiding Principle 3. In the Gulf of Mexico (Gulf), we need to advance our understanding of ecosystem processes (Guiding Principle 2), prioritize vulnerabilities and risks to ecosystem components (Guiding Principle 3) before we can credibly implement ecosystem-level planning. There is currently a lack of understanding about ecosystem processes, though there are currently efforts to address this such as Ecosystem Based Fishery Modeling. At best, our current level of data allows for an ecosystem approach to fisheries management (EAFM), and the Council is currently working on incorporating more ecosystem components into management decisions.

The Gulf is one of the few systems that has an Integrated Ecosystem Assessment (IEA) report. In the IEA, there are several climate drivers of the system that have yet to be incorporated into many of the Gulf species assessments or into management scenarios. The Council encourages more collaboration between fisheries scientists and ecosystem scientists to help facilitate better incorporation of climate and other drivers of the Gulf for stock assessments that could eventually lead up to multi-species assessments (a goal of EBFM). Outlined in Figure 2, there are many agencies that are simultaneously working on issues germane to EBFM. The Council acknowledges the complexity of the problem presented in this figure and recommends that effort redundancy be eliminated whenever possible. The Council encourages collaboration so that these agencies are working in synchrony and are not duplicative.

Outlined in Guiding Principle 1 of the roadmap are components that are critical to fishery ecosystem plans (FEPs). These components of physical, chemical, biological and socio-economic structures and functions are already critical components of our fishery management plans. The Council appreciates that an FEP would have the components that are outlined on

page 11 and page 12 (population dynamics, trophic relationships, etc). The Council feels that this FEP would be a significant undertaking that would need to be developed in collaboration with NMFS staff and is not anticipated to result in development of management actions. Instead, we anticipate that FEP would be type of reference document that should be updated as plan amendments are constructed. We suggest that ecosystem status reports be incorporated into the FEPs that can help facilitate EAFM eventually leading to EBFM.

The Council encourages NOAA Fisheries to put climate change at the forefront of identifying risk and cumulative risk in large marine ecosystems. Additionally, climate change science should be incorporated early on into management strategy evaluations for scenarios to be presented at different management nodes. Climate change has the potential to have the greatest effect on the fisheries, fisherman, stakeholders, and coastal communities. One of the ecosystem needs of the Gulf Council is to understand how the carrying capacities of our fished populations have changed over time due to the cumulative anthropogenic impacts since the 1940s during which we experienced dramatic alterations of our coastline due to coastal development

The Council agrees that an analytical toolbox (outlined in Guiding Principle 4) with ecosystem modeling tools and best practices; data-poor qualitative and semi-quantitative tools; and related decision support tools is critical to the progress toward EBFM. Until this toolbox is developed, the Council feels it will be difficult to implement any meaningful EBFM as our understanding ecosystem processes is still tenuous. The Council agrees that the tools should be used in conjunction with both protected species assessments and fisheries. Additionally, the Council would appreciate the development of interactive technologies and tools that will allow stakeholders to understand different decision points and mimic different scenarios. These types of stakeholder involvement activities and outreach programs will help inform the public and will also allow stakeholders to potentially provide alternatives to the Council during the scoping process for management actions. Additionally, an interactive website would be beneficial when there are multiple decision points that are being considered in a management document.

The Council appreciates that the roadmap acknowledges that not all managed species need to be managed using ecosystem considerations and that those that are more risk prone in changing environments should be the priority species for monitoring (Guiding Principle 5). Again, the Council feels that an EAFM in many instances would be most appropriate given our current understanding of ecosystem intricacies.

In Guiding Principle 6, the Council would like to stress that the social and economic data play a key role in the management of fishery resources. The community level data in the Gulf is outdated and there is little funding to update this information. This critical component and the paucity of data needs to be addressed and should be a priority in the roadmap as it addresses a significant portion of the human element of ecosystems and the evolution towards EBFM.

Lastly, the Council agrees that the roadmap will need frequent updates and agrees that the 5 years proposed would be an appropriate amount of time for updates to the roadmap. It would be beneficial if the roadmap and the essential fish habitat updates for each Council could coincide since habitat is one of the key components outlined in the document and would like reduce effort for staff. The roadmap that you have outlined is ambitious and will likely take staff (both NMFS and Council) time in an already understaffed arena; therefore, the Council encourages streamlining these processes in any way possible.

Thank you for the opportunity to comment on the roadmap.

Sincerely,

Kevin Anson
Gulf Council chair

cc. Gulf Council
Jason Link
Gulf Council Staff