



SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

4055 Faber Place Drive, Suite 201, North Charleston SC 29405
Call: (843) 571-4366 | Toll-Free: (866) SAFMC-10 | Fax: (843) 769-4520 | Connect: www.safmc.net

Dr. Michelle Duval, Chair | Charlie Phillips, Vice Chair
Gregg T. Waugh, Executive Director

July 1, 2016

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

RE: Ecosystem Based Fishery Management Road Map

Dear Heather:

The South Atlantic Council appreciates the opportunity to comment on the draft road map. While we would like to have more time to prepare these comments, we understand the pressure to move forward. The conference call yesterday to obtain further input was effective and we appreciate the effort. The Council's initial approach to EBFM is to track our fishermen as they move through our ecosystem and document what they consume (landings & discards with the associated length, age, and reproductive data) and how they impact the environment (habitat). We are still a long way from accomplishing this initial step but feel this baseline is a must for us to achieve EBFM. Specific comments on the draft roadmap are as follows:

1. Timing

More time would have allowed the Council to discuss and develop our informal comments at our September 12-16, 2016 meeting. This is a huge task and should not be rushed. We do request that the public comment period be timed to allow our SSC to review and develop comments at their October 18-20, 2016 meeting. If possible, we would also request that our Council be provided the opportunity to review the SSC comments and provide our final comments after our December 5-9, 2016 meeting.

2. Resources and Council Workload

The Council is very concerned about the significant amount of work and funding required to complete the tasks outlined, which would put a severe strain on our existing fiscal resources and staff workload. It is the Council's intent that in completing our Fishery Ecosystem Plan II, expected to be approved at our March or June 2017 meeting, we would have met our "obligation" to get as far down the path towards EBFM as is possible with the data available for our Council's jurisdiction. We will include identification of data/research gaps in our management area.

The draft road map makes clear that there is no new money available now and that means funding to begin this work will be diverted from existing NOAA/NMFS work. We remain concerned about funding cuts to our existing fishery independent data collection programs (SEAMAP and MARMAP) that are critical to moving ahead with EBFM and the lack of adequate landings and discard data. More specifics on funding are below.

3. Scope (Section 1.3 on page 6).

“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 should be tempered or rephrased to indicate that this is a partnership approach; the Councils and NMFS have to work together – EBFM isn’t (or shouldn’t be) something that is “done” to us, it should be something we engage in together. We need to have both east coast regional offices (GARFO and SERO) and science centers (NEFSC and SEFSC) talking and working together as we move to EBFM and as South Atlantic Council managed species become more abundant in the Mid-Atlantic and New England areas.

We look forward to working with the Agency to develop an Integrated Ecosystem Assessment for the South Atlantic Council’s jurisdiction.

4. Implementation of EBFM Guiding Principles

On page 8, the following statement appears: “Upon finalization of this document, the aforementioned programs will determine whether additional funding will be needed for this important work and develop suitable requests, if necessary. Until these requests have been funded, the action items below will be done where current funding permits.” This should be modified to change “whether” to “what level of” because we know significant new money will be needed. The second part of the above statement gives great concern because there is no excess of funding available now; existing data collection programs are not sufficiently funded, fishery independent programs are being cut, and the Agency lacks sufficient resources to adequately work up age/reproductive samples in a timely manner. We are concerned that the resources applied to executing EBFM will be pirated from existing efforts to the detriment of our ongoing data collection programs and stock assessments.

On page 9, 2.1.2 Support development of FEPs (Guiding Principle 1b), the Council would like to take this opportunity to thank the Agency for the many staff members that participate in our various FEP II workgroups. These individuals are drafting sections and doing this work on top of their existing duties. Our efforts would not be possible without their dedication and hard work.

On page 11, 2.2.1 Conduct science to understand ecosystems (Guiding Principle 2a), the Council requests that language be inserted to indicate that data available to support EBFM varies considerably across regions, and to acknowledge the extreme lack of basic data in specific regions, particularly in the South Atlantic. For all of the Council’s managed species, complete and adequate basic data are still lacking on landings, discards, size/age/reproductive information,

and indices of abundance (fishery dependent and fishery independent). Staff resources (people, equipment, etc.) to collect and process age/reproductive data are not sufficient to allow for timely stock assessments. The South Atlantic region also needs ongoing collection of economic and social data to incorporate into EBFM. However, limited personnel with expertise in fisheries economics and social science will continue to restrain any advancement towards EBFM. Additional economists and social scientists, along with funding and resources for ongoing data collection and analysis, are necessary to fully meet the goals in the EBFM Road Map. Regional differences must be acknowledged and the basic data gaps described above should be among the first to be addressed in the South Atlantic. We do not want to see extensive resources devoted to advanced modeling without resolving our existing data gaps.

On page 12, middle of the page, the following statement “NOAA Fisheries will evaluate current investments in system-level research, utilize existing mechanisms to support an appropriate balance between traditional stock oriented research and more interdisciplinary end-to-end studies, and develop budget initiatives to bolster this research,” gives us concern because it indicates funds will be “balanced” between basic data and complex data, and that is not acceptable in our region. Basic data are the foundation of EBFM; fixing our existing data gaps must be addressed first in order to build a successful framework for this approach in the South Atlantic.

On page 13, 2.2.2 Provide Ecosystem Status Reports for each Large Marine Ecosystem (Guiding Principle 2b), SAFE reports are mentioned. The South Atlantic Council does not received SAFE reports. SAFE reports were produced in the past and the SEFSC provided a trends report (trends in landings, average size, CPUE, and compliance with minimum size limits. However, these resources are fully tasked with other duties and we no longer receive SAFE reports. Rather, we now receive raw catch and effort data that Council staff must analyze. We receive no trends report, no estimates of discards of managed species, nor economic or fishery independent survey information on a regular basis. The recommended actions table on page 13 has an action item to “Develop and maintain core data and information streams.” This would be more informative if it stated “Collect basic data for stock assessments on an ongoing basis”, which would support and provide the necessary information for development of SAFE reports.

5. Prioritize vulnerabilities and risks of ecosystems and their components (Guiding Principle 3)

The Council supports NOAA Fisheries development and evaluation of an initial suite of products at an ecosystem level to help prioritize the management and scientific needs in the South Atlantic region. It is important that the Agency takes a systemic approach to identify overarching, common risks across all habitats, taxa, ecosystem functions, fishery participants and dependent coastal communities.

The Council supports NOAA’s development of risk assessments to evaluate the vulnerability of South Atlantic species with respect to their exposure and sensitivity to ecological and environmental factors affecting their populations. In addition, NOAA should collaborate with the Council and other regional partners to specifically conduct fisheries Climate Vulnerability Assessments, identified as part of the NMFS Climate Science Strategy (NCSS). NOAA Fisheries

should draw on products already developed for the South Atlantic region through a number of past climate workshops that support the regional Vulnerability Assessment. In addition, habitat assessment prioritization similar to those completed for other regions should be cooperatively developed for the South Atlantic.

6. Section 2.4.1 Analyze trade-offs for optimizing benefits from all fisheries within each ecosystem or jurisdiction, taking into account ecosystem-specific policy goals and objectives, cognizant that ecosystems are composed of interconnected components (Guiding Principle 4a)

The Council supports NOAA's enhancement of ecosystem modeling capabilities and development of ecosystem modeling tools and best practices, data-poor qualitative and semi-quantitative tools, and related decision support tools, but not at the expense of basic data collection programs. The Council already coordinates with regional partners including the South Atlantic Landscape Conservation Cooperative (SALCC) to advance regional ecosystem modeling efforts based on available data, but increased resources for our existing fishery-independent, fishery-dependent, and cooperative research programs could enhance these efforts. Similarly, we support efforts to develop ecosystem and risk assessment tools that have broad utility, in recognition of the differences in data richness among regions.

7. Section 2.4.2 Develop Management Strategy Evaluation capabilities to better conduct ecosystem level analyses to provide ecosystem-wide management advice (Guiding Principle 4b)

The Council supports development of management strategy evaluations (MSEs) at the ecosystem level to capture major drivers, pressures, and responses, as well as emergent properties that would be missed if explored under the current species-level approach. The Council recommends NOAA Fisheries coordinate with ongoing regional modeling and tool development efforts to ensure that ecosystem MSEs link to multispecies and single species MSEs, inclusive of economic, socio-cultural, and habitat conservation measures.

8. Section 2.5 Develop and monitor Ecosystem-Level Reference Points (Guiding Principle 5a)

The Council views NOAA's development of ecosystem-level reference points (ELRPs) and thresholds as an important step to informing statutorily required reference points. In addition, these reference points could help identify key dynamics, emergent ecosystem properties, or major ecosystem-wide issues that impact multiple species, stocks, and fisheries. Again, addressing basic data collection gaps will be critical to successful development of ELRPs.

9. Section 2.5.2 Incorporate ecosystem considerations into appropriate LMR assessments, control rules, and management decisions (Guiding Principle 5b)

The Council views development of reference points that incorporate ecosystem considerations as helpful in the management of some fisheries or species, as this can provide a more

comprehensive understanding of the uncertainty associated with estimating biological reference points and stock status to support management advice.

10. Section 2.5.3 Provide systematic advice for other management considerations, particularly applied across multiple species within an ecosystem (Guiding Principle 5c).

The MSA requires the Councils and NOAA Fisheries to end and prevent overfishing and rebuild overfished stocks as well as identify, describe, and protect essential fish habitat (EFH) for managed species in their jurisdictions. NOAA’s continued support of regional efforts to update EFH and habitat areas of particular concern is essential to protect important ecological functions for multiple species and species groups. The South Atlantic Council has a long history of habitat protection, and continued support for efforts to address and refine EFH in the face of climate change is necessary.

11. Section 2.6 Maintain resilient ecosystems (Guiding Principle 6)

The Council views NOAA’s role in development of ecosystem-level measures of resilience and the evaluation of coastal community well-being as equally important to understanding and maintaining a healthy, adaptive ecosystem in the South Atlantic region.

12. Section 3.0 Execution of the EBFM Road Map and Effective Dates

Page 26, the third paragraph states, “Implementation of EBFM activities will therefore be an integral part of the annual allocation of appropriated funding for each region.” Again, statements like this give us great concern in a climate of flat budgets. Without a large increase in fiscal resources to address EBFM, and resolve our basic data gaps, we fear funding being diverted from existing programs that are critical to the future success of EBFM in the region.

Thank you again for the opportunity to comment, and we look forward to working with NOAA Fisheries to advance EBFM in the South Atlantic.

Best regards,

Michelle A. Duval

Michelle Duval
Chair

cc: Council members, staff & SSC
Executive Directors
Richard Merrick and Jason Link
Monica Smit-Brunello
Jack McGovern and Rick DeVictor
Bonnie Ponwith, Theo Brainerd, and Adyan Rios