

August --, 2024

Jenni Wallace
Director, Office of Policy
NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

Dear Ms. Wallace:

Thank you for providing the draft Ecosystem-Based Fisheries Management Road Map (Road Map) update for review and for extending the comment period to allow for more thorough review of the changes to the guidance document. On behalf of the Gulf of Mexico Fishery Management Council (Council), the following are comments and suggestions on the updated Road Map.

The Council recognizes the many accomplishments achieved by NOAA Fisheries resulting from the 2016 Road Map, and appreciates the efforts in the updated Road Map to explicitly address the challenges of climate change and to integrate consideration for communities and human dimensions throughout the Road Map goals. The Road Map update acknowledges the need for cooperation with management partners, and we particularly appreciate the built in support for the regional councils to continue development of Fishery Ecosystem Plans (FEPs, Goal 1.a). The shift in emphasis from Large Marine Ecosystems in the 2016 Road Map to recognize smaller scale ecosystem management challenges in the updated document is a welcome consideration and aligns with the Council's plans to build the Gulf FEP around an array of individual Fishery Ecosystem Issues which aim to provide a tangible and targeted approach to ecosystem management.

Overall, the Council encourages and supports NOAA Fisheries efforts to prioritize data collection and monitoring information on a diverse suite of disciplines to inform stock assessments and management advice as efficiently as possible (Goal 2.a). More specifically, the Council commends the prioritization of timely ecosystem status report (ESR) updates, development and dissemination of ecosystem indicators, and efforts to involve management partners in developing products to inform decision making (Goal 2.b). Further the Council supports the necessary resources required to update the ESRs on a more refined spatial and temporal scale while leveraging other ongoing funding sources outlined on page 6 as well as others. Currently, replacing fishery management plans with FEPs (page 9) is not a realistic goal for the Council. However, the Council supports the collection and development of near real-time ecosystem data and monitoring products such as those from the ESRs to drive progress toward developing FEPs that are actionable. The Council also supports continued development of the climate vulnerability assessments (CVAs) that began as a result of the 2016 Road Map, and would like to encourage partnership with regional councils to develop management onramps for information about vulnerability and risk to species, habitats, and communities (Goal 3.a). We

look forward to the development of a habitat CVA for the region, and hope that the fishing community CVA for the region that was completed in 2022 will be updated to include the recreational sector, which plays a large role in Gulf fisheries dynamics.

While the Council remains enthusiastic and supportive of national EBFM initiatives, we remind Road Map developers that many regions including the Gulf still rely on single species stock assessments for management, and as such caution that progress toward EBFM must not hinder present management needs. The Road Map recommends use of research-track stock assessments (Goal 4.a) and whole-ecosystem MSEs (Goal 4.b) to test incorporation of climate and ecosystem information and to evaluate ecosystem-scale management trade-offs. Given the limited staff resources available to conduct the necessary stock assessments in the region, the SEFSC has effectively discontinued research-track stock assessments in order to increase throughput. The Road Map describes coordination between EBFM and the NOAA Climate, Ecosystems, and Fisheries Initiative (CEFI) but does not make clear whether there are funds through CEFI or elsewhere to support NOAA Fisheries' Next Generation Stock Assessment Enterprise to develop holistic and ecosystem-linked assessments, and we are concerned that lack of resources will cause the Gulf region to fall behind either on current assessment needs or on assessment-based climate initiatives. Although CEFI supported, we have similar concerns about devoting resources to whole-ecosystem MSE in the Gulf when MSE is currently in developmental phases for very limited situations in this region.

The Council recognizes that the management landscape must adapt alongside the changing climate, and we strongly support the Road Map action to review the internal regulatory processes that could increase NOAA Fisheries responsiveness to climate uncertainties (Goal 5.b). We plan to review Council processes in a similar manner, and hope that increased efficiency from both sides will result in nimble and climate-ready fisheries management. Goal 5.b of the Road Map also suggests potential updates to the National Standard Guidelines to reflect EBFM goals and approaches to climate change. We would like to urge caution when considering this action, and stress that single-species management is still standard procedure for many regions, and the current language is likely flexible enough to continue to develop ecosystem approaches while maintaining current management operations.

Thank you for the opportunity to review and comment on the draft Ecosystem Based Fishery Management Road Map update. We look forward to working with you to realize many of the proposed action items outlined in the Road Map. Do not hesitate to contact Dr. Verena Wang on staff should you have any questions.

Sincerely,

Kevin Anson
Council Chair