

**DRAFT**

**Tab Q, No. 4c**

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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. These deliverables are the primary goals of the Council's proposal for Inflation Reduction Act funding for the regional management councils.

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 and elsewhere. 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.

Despite the Road Map’s plans to strengthen understanding of ecosystem processes, data to support EBFM will continue to vary widely across regions and managers must be prepared to make informed decisions regardless of data limitations. The Council recommends that the Road Map emphasize development of management strategies that are not only robust to rapid environmental change and extreme conditions (Goal 3.c) but also to data uncertainties that are commonplace in many regions. The Council also recommends that the Road Map more clearly outline linkages between EBFM and the data to be produced through the NOAA Climate, Ecosystems, and Fisheries Initiative (CEFI) and Inflation Reduction Act (IRA) efforts. Further, the Council encourages that regular updates across these initiatives be provided to management partners so that they may be best positioned to plan for use of decision-support products.

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). In general, the Road Map requires more direction for management partners to utilize products developed from EBFM efforts (including CVAs and risk assessments) for decision making. While the Council recognizes that flexibility is necessary to account for differences among regional ecosystem dynamics and management strategies, a general framework for incorporating ecosystem information into management decisions could be helpful, particularly for management partners who are still largely focused on single species management.

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 undertaken a large effort to streamline the current stock assessment processes in the Southeast, which includes effectively discontinuing the research-track stock assessment process<sup>1</sup>. The Road Map describes the 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. 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 undertaking whole-ecosystem MSEs in the Gulf based on previous MSEs in other regions taking numerous years to complete without producing tangible management advice at the end of the process. Absent additional and substantial resources to operationalize MSE goals, these concerns

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<sup>1</sup> [https://gulfcouncil.org/wp-content/uploads/I-4-SEDAR-Process-and-Data-Provision-Improvements\\_GMFMC-Aug-2024.pdf](https://gulfcouncil.org/wp-content/uploads/I-4-SEDAR-Process-and-Data-Provision-Improvements_GMFMC-Aug-2024.pdf)

are particularly heightened for the Southeast as the MSE process is currently in developmental phases for very limited fisheries 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.

The updated Road Map is extremely ambitious in scope and the Council suggests that the Road Map attach general timeframes and staffing or funding needs to each action item to increase transparency and pragmatism surrounding NOAA's EBFM planning. The 2016 Road Map labeled action items as short/mid/long term, which the Council found to be useful for planning. Given the substantial work detailed, the Council suggests that the Road Map consider opportunities to leverage academic partnerships and citizen science initiatives to increase research and data collection capacity. Finally, the Council requests that NOAA's social science staffing capacity for EBFM work be integrated more clearly into the Road Map, along with linkages to NOAA's Equity and Environmental Justice Strategy. Social science initiatives are ubiquitous throughout the Road Map and are essential for understanding fishing industry response to climate and ecosystem drivers and developing equitable fisheries management, and the Council wants to ensure that these initiatives are appropriately accounted for in EBFM planning.

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