

725 Front Street
Suite 201
Santa Cruz, CA 95060



831.854.4630 Telephone
831.425.5604 Facsimilie
www.oceanconservancy.org

April 5, 2021

Mr. Marc Gorelnik, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, #101
Portland, OR 97220

RE: H.3 Legislative Matters

Dear Chair Gorelnik and Council Members:

Ocean Conservancy¹ appreciates the opportunity to provide our input on the Council's draft letter to NOAA Fisheries in response to Executive Order 14008: Tackling the Climate Crisis at Home and Abroad (Agenda Item H.3, supplemental attachment 4).² Section 216(c) of the Executive Order (E.O.) places fishery managers, including the Councils, in a central position to provide input on achieving climate-ready and resilient fisheries. We applaud the Council's decision to submit comments on 216(c) given its valuable perspective and experience with preparing fisheries for climate change, and thank NOAA Fisheries for engaging Councils early and often in collecting input in response to the E.O.

In the draft letter, the Council highlights the work done under its Fishery Ecosystem Plan (FEP) and related ecosystem-based fishery management (EBFM) initiatives. These are informative as examples of approaches to address climate change in U.S. fisheries. For example, the Climate and Communities Initiative, the Coordinated Ecosystem Indicator Review Initiative, and the use of the annual California Current Ecosystem Status Report are all important steps towards considering ecosystem information in management, including climate change impacts. In particular, the Climate and Communities Initiative process is instructive for other Councils and for NOAA Fisheries as a tool that could be used more broadly in preparing our fisheries nationally.

We recommend that the Council consider some additional elements in its letter:

- First, the Council should share challenges experienced in conducting EBFM and climate-ready management and identify needs and barriers to manage sustainably in the context of climate change. For example, the Council could highlight needs related to capacity, funding, cross-agency communication, scientific and technical capacity and products, decision support tools, and data and information availability. The Councils are uniquely positioned to provide this valuable input to the agency, which could help address bottlenecks that are preventing climate-information from being integrated into management.
- Second, we recommend the Council encourage NOAA Fisheries to put a transparent, equitable and inclusive process in place for implementing the E.O. and climate-ready fisheries. NOAA

¹ Ocean Conservancy is working to protect the ocean from today's greatest global challenges. Together with our partners, we create science-based solutions for a healthy ocean and the wildlife communities that depend on it.

² NOAA Fisheries, *Recommendations for More Resilient Fisheries and Protected Resources Due to Climate Change*, 86 Fed. Reg. 12410 (March 3, 2021).

Fisheries should be transparent with how the process of carrying out the E.O. is conducted by reporting on actions it takes using the input gathered. The agency should also evaluate and report on progress made in relation to goals and objectives for climate-ready fisheries. For equitable and inclusive management, all stakeholders must have meaningful access to the decision-making process and managers must consider and account for diverse stakeholder needs.

- Finally, we urge the Council to reemphasize its commitment to sustainability of fish stocks and to achieving, ecological, social, and economic goals even as management becomes more challenging in the face of change. Sustainable management is a first line of defense for maintaining resilient fish stocks. The Council has demonstrated commitment to the core tenets of sustainability by preventing overfishing in most stocks and successfully rebuilding 13 stocks. Preventing overfishing and rebuilding stocks are pillars of good stewardship generally, but they are also central to a climate-ready fishery management strategy.

Fundamentally, the successes of the U.S. management system, the sustainability of our fish stocks, and the livelihoods and cultures of Indigenous and fishing-dependent communities are at risk unless action is taken soon using the information we have to adapt our fisheries for significant change.

Sincerely,

Corey Ridings
Ocean Conservancy