

**CAPE COD COMMERCIAL**

# **FISHERMEN'S ALLIANCE**

**Small Boats. Big Ideas.**

August 28, 2024

Ms. Janet Coit  
Assistant Administrator, NOAA Fisheries  
1315 East-West Highway  
Silver Springs, MD 20910

Comments were sent via email to: [Nmfs.ebfm.roadmap@noaa.gov](mailto:Nmfs.ebfm.roadmap@noaa.gov)

Dear Ms. Coit:

The Cape Cod Commercial Fishermen's Alliance submits the following comments in response to the draft Ecosystem-Based Fisheries Management (EBFM) Road Map. We support many of the revisions and updates to the EBFM Road Map and appreciate the opportunity to provide additional perspective in this process. At the heart of our community, we are seeing climate change impact our fisheries, and it is important that the revised Road Map prepares for and adapts to climate change in terms of climate-ready fisheries management and decision making. We are grateful that NOAA Fisheries is prioritizing Inflation Reduction Act funding to support our marine resources and coastal communities in the face of climate change, and that some of those funds include supporting Climate-Ready Fisheries, a management approach that aims to ensure healthy fisheries and build a dynamic fisheries management system that incorporates climate and ecosystem data. As a result, this Road Map presents an opportunity for NOAA to clearly define its vision for "climate-ready fisheries" both in terms of fishing communities and fisheries resources and we suggest the addition of that term below to some of the guideline language.

#### **General Comments**

We appreciate and support NOAA fisheries intent to engage with scientific and management partners to ensure these priorities align with resources available, but also meet the needs of the scientific and management community as well as the fishing community. However, we do want to highlight the use of many acronyms throughout this Road Map that can make it difficult or inaccessible for stakeholders to properly understand or engage. We recommend the addition of a list of acronyms or full written descriptions within the Road Map framework, so that it can be more readily understood and accessible to all stakeholders.

Regarding the Road Map, we support the New England Fishery Management Council's comments and want to make sure NOAA Fisheries clearly defines what is a marine ecosystem. We encourage NOAA Fisheries to clearly define Ecosystem Production Units (EPU) that are biologically based, including what their boundaries are, and species that are included in them (e.g., sea birds, fish, marine mammals, and invertebrates), and designated Essential Fish Habitat (EFH). The Road Map should also address how or if Ecosystem Production Units (EPUS) could evolve in the face of a changing climate.

The Fishermen's Alliance offers the following suggestions to build upon the draft guidelines listed below:

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## Guideline 1: Implement ecosystem-level planning

We support NOAA fisheries engagement with partners and interested stakeholders to implement EBFM and ecosystem-level planning. As described, regions will vary in terms of interest and knowledge of ecosystem-level planning, so it is crucial that Regional Fishery Management Councils are involved to understand the interactions between our human activities and the environment. We strongly support Goal 1.a and would like NOAA Fisheries to ensure that documents developed by Councils are incorporated and acknowledged to fulfill this guideline. In terms of Action Item 1.c.1 “Establish and maintain joint staff EBFM and or climate teams for each major US Management region to ensure planning and coordination across Headquarters Offices, Regional Offices and Science Centers”: we encourage staff from regional management councils be included because they are often well versed in ecosystem approaches to fisheries management, and their expertise should be included at the national level. NOAA Fisheries staff should also be included in any working groups or other advisory groups that are created to develop Fisheries Ecosystem Plans (FEPs) that support the mission and goals of this guideline.

Some recommendations:

- Edit Goal 1b to read: “NOAA Fisheries will incorporate EBFM and climate-ready fisheries goals and objectives, including anticipate climate impacts, into NOAA Fisheries operational and strategic planning and prioritization at all agency levels.”
- Edit Goal 1c to read: “NOAA Fisheries will facilitate EBFM and climate-ready fisheries coordination across all elements of NOAA and its partners.”

## Guideline 2: Advance our understanding of ecosystem processes

We are supportive of scientific efforts that include an understanding of the human dimensions of fisheries as well as fishery dependent communities who rely on healthy living marine resources. Climate change is creating more extreme weather events, and we are witnessing changes to our ocean environment, making our small-scale and community-based fishermen feel the impact the hardest.

This Road Map provides an opportunity to describe how NOAA Fisheries intends to work more closely with communities and utilize their knowledge in the decision-making process. We encourage NOAA Fisheries to clearly describe in the Road Map how they can leverage working with fishing communities through collaborative research, citizen science, or other research fleets to support EBFM.

We support the utility of the “State of the Ecosystem Report” and “Ecosystem Status Reports’ mentioned in NOAA Fisheries’ goals for guideline 2 (b), for the Northeast region. As we consider ways to advance our understanding of ecosystem processes, we encourage the incorporation of ecosystem and climate data into stock assessments and reference points. Ecosystem Status Reports and State of the Ecosystem Reports should address and provide clear information for decision-makers and meet resource management objectives. As described in the Road Map, ESRs can also be important for essential fish habitat (EFH) consultations on non-fishing actions, and for addressing species managed under multiple jurisdictions.

Some recommendations:

- Edit Goal 2.a to read: “NOAA Fisheries will conduct science under a diverse suite of disciplines and work in collaboration with stakeholders that possess local and traditional ecological knowledge (e.g., fishermen) to understand ecosystem processes, drivers, and threats, including work from the Climate, Ecosystems, and Fisheries Initiative and other, ongoing and anticipated science innovations.”
- Edit Action Item 2.a.1 to read “Advance resources and build capacity to conduct science in support of EBFM, including through collaborative research and citizen science.”
- Edit Action Item 2.a.2 to read: “Expand, develop, and maintain data streams and the production of information, utilizing relevant electronic technologies and modernized data management systems, and review archived data streams to update where appropriate.”

Fishermen's experiences, knowledge and network make them an incredibly valuable resource for scientists and for the successful stewardship of our oceans. When fishermen are empowered to participate in collaborative research, more data is collected which can advance our understanding of a changing ocean environment and make stock assessments more reliable. Fishermen and other marine users are an important source of real-time data, and the Road Map should highlight ways to include integration of this valuable information and data source.

### **Guideline 3: Prioritize vulnerabilities and risks to ecosystems and their components**

The Road Map update suggests it builds on the work conducted in 2016 on climate vulnerability assessments for fish and invertebrate species, marine mammals, sea turtles, fishing communities, and marine habitats. We support climate vulnerability assessments and support Action Item 3.a.1 to update and conduct climate vulnerability assessments given that the last time they were updated was 2016 (almost a decade ago), and our marine environment has experienced rapid changes since then. Climate Vulnerability assessments need to also include the susceptibility of fisheries and communities dependent on key fisheries resources to climate change and other anthropogenic effects, such as offshore wind development.

Temperature is one of the most prominent forces driving many aspects of life history including development, maturation and growth. The changing climate also can alter both productivity and spatial distribution of several species. Shifts in distribution and abundance of the fishery resource have resulted in changes in where the fishery operates. As a result, we want to make sure climate vulnerability assessments consider effects such as changes in geographic distribution as well as productivity.

It is critical that we identify new emerging and existing stressors, opportunities, vulnerabilities, and cumulative impacts that will impact NOAA Fisheries ability to meet management goals and objectives. We therefore, support the expansion of a more adaptive or flexible fisheries management framework and support NOAA Fisheries analyzing cumulative effects of different management actions.

### **Guideline 4: Explore and address trade-offs within an ecosystem**

This guideline aims to explore the intersection between ecosystem science and management priorities while exploring and evaluating the trade-offs between activities and components within the ecosystem. We find it important to note that Guideline 4 is currently hindered by existing laws focused on single-species management. Therefore, there will need to be efforts made in guideline 5 that can support Guideline 4. Goal 4b, emphasizes the need for trade off analyses to support multi-species catch limits. The ability to shift harvest levels is constrained by current Federal and state permitting regulations and processes. The goals to support trade-offs must consider ways to align permitting across different jurisdictions, as well as consider the different management structures that are created specifically for different permit type categories. As discussed in Action Item 4.a.3, there is a need to identify and assess fishing fleet behavior, including fishing location choices, and changes in shoreside support sectors, to support fisheries management planning and account for other marine users (e.g. offshore wind development).

While supportive of scenario planning, we want to make sure that fisheries stakeholders are a part of this process, alongside management partners to discuss how future marine resource management challenges under climate change could be addressed. NOAA Fisheries Social Indicators for Coastal Communities is useful in identifying specific communities impacted, however this tool requires regular updates and maintenance to make sure engagement and reliance continue to apply in a changing ocean environment.

We encourage NOAA Fisheries to apply the best practices of the national Equity and Environmental Justice Strategy when addressing Road Map action items in this guideline and throughout the Road Map draft. Social and economic drivers need to be included, in the context of EBFM, to understand human interests, needs and wellbeing of communities. As discussed above, fishing fleet behavior over time, has become increasingly important as climate change has begun to affect fish stock distribution and abundance, and fishermen are encountering new marine users such as offshore wind energy development and aquaculture.

## **Guideline 5: Implement ecosystem considerations into management**

We support incorporating ecosystem considerations, and climate uncertainties into resource management decisions. For decades, NOAA Fisheries has focused on a single-species management approach. We support a shift from single-stock to ecosystem-based fisheries management that considers the entire ecosystem of a species, and a more holistic management approach that understands the trade-offs between different stakeholder priorities, and balances both social and ecological needs.

Managing fisheries for resilience and sustainability depends on timely, reliable and accurate information. Due to lags in data collection, antiquated infrastructure, and inconsistent policies, fisheries managers often have to work with decades-old data collection and information systems that limit their ability to make data-driven decisions. By strategically, updating fishery data and collection systems, NOAA Fisheries can help address new and emerging challenges, and improve profitability and sustainability of U.S. fisheries. We support a national strategy for data modernization to improve data infrastructure and expand the use of electronic technologies so that fisheries scientists and managers can provide better consistency and clarify for fishermen operating in a rapidly changing ocean environment.

Regarding action item 5.c.2, which aims to build habitat (Essential Fish Habitat and critical habitat) mapping and designation capacity: we recommend that this action item also encompass development of habitat suitability maps. These will be useful to fisheries managers and Regional Fishery Management Councils as habitat projections can account for potential shifts in stock distribution in response to climate drivers, which could lead to shifts in suitable or preferred habitat types.

## **Guideline 6: Support ecosystem resilience via monitoring and adjusting of management actions**

One of the goals of this guideline is to evaluate coastal fishing community well-being (Goal 6.b.) As a result, we recommend that the Road Map should include ways to incorporate input and information from the commercial fishing industry, to develop and report on metrics for human well-being in fishing communities, and ways to identify how these communities and seafood systems are affected by ecosystem change. It is important that throughout this process, stakeholders are given ample opportunity to participate and engage.

Thank you for the opportunity to provide comments, and your consideration. We look forward to seeing the final EBFM Road Map and ways it incorporates input and information from the commercial fishing industry, other marine stakeholders, and from the Regional Councils to support better monitoring and promote adaptive management in response to climate change and ecosystem considerations.

Sincerely,



Aubrey Church  
Fisheries Policy Director  
Cape Cod Commercial Fishermen's Alliance