



August 31, 2024

Kelly Denit  
Director, NOAA Fisheries' Office of Sustainable Fisheries  
1315 East-West Highway  
Silver Spring, MD 20910

*via email: [nmfs.ebfm.RoadMap@noaa.gov](mailto:nmfs.ebfm.RoadMap@noaa.gov)*

Re: DRAFT Ecosystem-Based Fisheries Management Road Map

Dear Ms. Denit:

For more than fifty years, Wild Oceans has worked on behalf of anglers dedicated to an ecosystems approach to conserving salt water fish. Our programs emphasize protecting the ocean's top predators – billfish, tunas, swordfish, and sharks – by preserving forage fish, healthy ocean food webs, and critical habitats essential to the survival of all fish, marine mammals, sea turtles and seabirds. Wild Oceans supports NOAA Fisheries' ongoing work to promote Ecosystem-Based Fisheries Management (EBFM) nationally and at the regional Fishery Management Councils and Atlantic Highly Migratory Species Management Division (collectively Councils).

NOAA Fisheries has played an indispensable role in advancing EBFM. Since the publication of the Ecosystem-Based Fisheries Management Policy in 2016, NOAA Fisheries has furthered the adoption of EBFM by aligning the 2016 EBFM Policy with efforts to address climate-ready fisheries, habitats, and communities, including: NOAA's Integrated Ecosystem Assessment Program, the NOAA Fisheries' Climate Science Strategy, NOAA's Climate, Ecosystem and Fisheries Initiative. In the past decade, direction by NOAA Fisheries on EBFM has led to forward progress on development of new fishery ecosystem plans, ecosystem status reports, climate vulnerability assessments, and formal management strategy evaluation across Councils.

The 2024 Ecosystem-Based Fisheries Management Road Map Draft (Road Map) outlines a path towards more completely integrating EBFM principles to achieve climate-ready

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fisheries. We appreciate the breadth of the ecosystem science and policy projects scoped in the Road Map as well as the intentional focusing of climate change as a key factor affecting fisheries and EBFM implementation.

However, we note that building climate-ready fisheries requires stronger management guidance and science integration in management practices, more urgent action, consistent implementation across regions and across fisheries, and clearer guidelines on protecting ocean habitats, including prey, than outlined in the Road Map. NOAA Fisheries' continued commitment to integrate these policies will move U.S. fishery research and management towards EBFM, towards adequately considering food web dynamics and the impact of fishing on the ecosystem and away from single-species management.

### ***Better Connect the Road Map to Management Action***

We strongly support NOAA Fisheries' work to advance our understanding of ecosystem processes, drivers, threats, status, and trends. The Road Map includes many well thought-out and important Action Items that can help fundamentally change the way we manage by providing managers, advisors and stakeholders with a better understanding of the impact of the ecosystem on fisheries, the impact of fisheries on other fisheries and the impact of fisheries on the ecosystem. But, there is a disconnect between providing managers with the ingredients of EBFM and a recipe to successfully manage fisheries from an ecosystem perspective. The Road Map should more clearly link Action Items to management to achieve EBFM and build climate-ready fisheries.

### ***Define Immediate Actions***

History demonstrates that EBFM is an iterative process and that NOAA Fisheries and the Councils can take action now, and indeed must take action now, to integrate foundational EBFM principles, such as protecting forage fish, into management and “prepare and plan for, absorb, recover from, and more successfully adapt to adverse events.”<sup>1</sup> The Road Map overlooks near-term opportunities to operationalize EBFM and make climate-ready management decisions at the Councils. Climate change is stressing ocean ecosystems and fishing communities. In order to build climate-ready and resilient fisheries, the 2024 Road Map should include stronger guidance on immediate steps the Councils can take to adopt EBFM principles and use ecosystem and climate information to inform management.

For example, the science products will be more useful if they translate ecosystem information into decision criteria that can inform the Council and its management decision-making process of when and under what conditions intervention, preparation

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<sup>1</sup> National Academies of Sciences, Engineering, and Medicine. 2012. Disaster Resilience: A national Imperative. Washington, DC: The National Academies Press. <https://doi.org/10/17226/13457>

and mitigation might enhance progress towards EBFM. Pursuant to Goal 2.b, NOAA Fisheries will *provide and update regular ecosystem status reports (ESR) and similar reports to ensure they inform regional decision-making processes*. While educational, these reports do not prescribe action or ensure the Councils incorporate climate and ecosystem information into management. Current ESRs can inform managers about key changes in the ecosystem and evaluate whether and how these changes may impact managed species. To be useful in a management context, the ESR should not only include indicators of ocean conditions, but also identify targets or “healthy” states to be maintained and “unhealthy” states to be avoided, so that managers can interpret ecosystem health status and trends, and provide feedback to managers about the affect of their decisions on their ecosystem goals.

### ***Protect Prey***

We commend the valuable work that NOAA Fisheries has done in the past to improve forage fish science and management including protections for unmanaged forage fish. Prohibiting commercial fishing on these species before it begins represents the most conservative approach to protecting forage species. To this end, NOAA Fisheries, working with the Councils have implemented protections for krill and new commercial forage species, but gaps remain. The 2024 EBFM Policy explicitly mentions that “efforts to protect important forage species also support and align with this Policy.” However, the 2024 Road Map Draft should provide stronger direction for prioritizing scientific understanding of and protection for critical forage fish species, which are actively collapsing along the Atlantic Coast.

We recommend that the 2024 Road Map explicitly illustrate the connection between EBFM, climate-ready fisheries and strong forage protections and outline the steps Councils can take now to protect forage. Conserving prey or forage species at the ecosystem level requires a change in some of our most basic fishery management concepts. Preventing ecosystem overfishing - that is, fishing to a degree that jeopardizes the integrity of marine communities - means moving away from the goal of maximizing yields to fisheries toward ecologically sustainable yields. To do that, we need to be more forthright about how we are impacting the food web, and then overtly consider these impacts within our conservation and management strategies.

The Road Map should articulate, identify and commit to short-term, single-species actions, such as more conservative single-species reference points (e.g., fishing mortality and biomass targets and thresholds) for forage fish that reduce optimum yield from maximum sustainable yield to better account for ecosystem needs and designation and protection of ecosystem component species. We do not have to wait for advanced understanding of ecosystem processes or and understanding of ecosystem or cumulative risks or vulnerabilities to take meaningful action now to build a strong forage base.

We recommend that NOAA Fisheries consider incorporating specific Goals and Action Items to protect forage fish, provide more specific guidance and activities for reducing risks to forage fish and their role as prey in order to maintain resilient ecosystems, and describe how multiple Action Items work together to achieve a similar goal of protecting forage fish and the ocean food web. For example, ecosystem-level planning under Guideline 1 could include specific guidance on protecting forage fish such as including FEP goals and objectives that maintain adequate forage for dependent predators. The improved understanding of ecosystem processes under Guideline 2 should result in tangible guidance to protect forage such as the development of a forage indicator in the ESR. In addition, Guideline 5 - implementing ecosystem considerations into management - should better explain the clear connection between near-term actions to protect forage and ecosystem-level reference points. Finally, the Road Map should provide direction for research which investigates both the human and natural factors that impact or improve forage fish recruitment, including gear types, buffer zones, and essential fish habitat.

### ***Think Big***

Historically, NOAA Fisheries has focussed EBFM implementation in U.S. large marine ecosystems and in concert with Councils and other domestic agencies. EBFM should be implemented consistently across species and across regions. We commend NOAA Fisheries decision to “think big” in the Road Map and recognize that EBFM management challenges cross ocean basins and that addressing challenges at varying spatial scales and with partners across multiple jurisdictions can support ecosystem resilience. We urge NOAA Fisheries to consider how to tailor tools, products, reports and advice to address the complex management of highly migratory species and their habitats both domestically and internationally.

### ***Improve Stakeholder Communication***

Engaging the diverse community of ocean users is at the crux of EBFM. However, the Road Map focuses predominantly on working with state and federal leaders to evaluate the impacts to commercial fishermen and fishing communities. The Road Map should direct NOAA Fisheries and the Councils to outreach to and engage with tribal leaders, recreational fishermen, subsistence fishermen, charter boats, whale watching communities, chefs, bird watchers, kayakers, swimmers, stewards, and others who engage with and depend on healthy ocean habitats whether for profit, for inspiration, entertainment, or enlightenment. We ask you to include a more detailed process for engaging the public which includes bi-directions feedback loops to ensure equity and transparency in EBFM implementation.

Furthermore, we ask that NOAA Fisheries provide public facing communication, such as an infographic, to illustrate how all of NOAA Fisheries EBFM and climate-ready

initiatives tie together with other National policies. This will help guide regional managers to the correct programs as they work to integrate EBFM into management and as provide the public with a clear path of NOAA Fisheries' EBFM network and plan.

***Demonstrate Success***

The Road Map can provide better coordination between national policy priorities and regional action, reduce the science and management gaps, and help provide more effective communication to stakeholders so that the Council can incorporate ecosystem science into management to produce more resilient fisheries that sustain coastal communities and the integrity of our marine ecosystem. Ultimately, EBFM is not a checklist, but an interactive process between scientists, managers and stakeholders to protect the integrity of trust resources. We support annual reporting on progress of Action Items as well as Council use of materials and adoption of key EBFM principles. To this end, we recommend the addition of metrics around climate-readiness and other outcome-oriented changes.

We thank NOAA Fisheries for its consideration of our comments and its continued commitment to EBFM. We look forward to collaborating as we engage in a new way of thinking and managing that considers ecosystem level impacts and action and secures the resilience of our marine habitats and fisheries.

Sincerely,

A handwritten signature in black ink, appearing to read "Theresa Labriola". The signature is fluid and cursive, with a large initial "T" and "L".

Theresa Labriola  
Pacific Program Director