



Gulf of Mexico Fishery Management Council

Managing Fishery Resources in the U.S. Federal Waters of the Gulf of Mexico

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D R A F T

Valerie Termini
NMFS, Office of Science and Technology
1315 East-West Highway, Silver Spring, MD 20910

NCSS Public Comment

Dear Ms. Termini:

The Gulf of Mexico Fishery Management Council (Council) reviewed the NOAA Fisheries Draft Climate Science Strategy on three occasions. The Council was briefed by Roger Griffis at the January Council and March SSC meetings and the Council's Sustainable Fisheries/Ecosystem Management Committee reviewed the strategy in more detail during the March Council meeting. The Council applauds NOAA Fisheries for producing such a comprehensive strategy for building a framework to address potential climate impacts on our living marine resources and is eager to participate in the development of southeast regional implementation plan.

The challenges posed in the Climate Science Strategy are great and best exemplified by difficulties encountered by the scientific community to develop ecosystem models to inform management. But, as the proposed strategy clearly explains, the need to address climate impacts is imperative if fishery managers are to accurately ascribe population changes to underlying effects and make robust and appropriate management decisions.

While the Council understands the need to use the best available science, the science never seems as well developed as needed. The Council's main concern with the proposed strategy is that NOAA Fisheries not rush too quickly into establishing guidelines to develop climate-smart management reference points (Objective 1) and management strategies (Objective 2) before there is an adequate science infrastructure in place to properly inform such changes.

The Climate Science Strategy identifies the need for partners and clearly the Councils are one of those partners. Surprisingly, however, the Gulf Council saw no mention in the strategy of partnering with National Sea Grant to assist with either the educational components or with the various offices within NOS. The Council encourages that the full capabilities of the NOAA family, including the Southeast Fisheries Science Center's integrated ecosystem assessment group that is developing processes for ecosystem assessments, be coordinated to assist in the monumental effort that will be required to address future management challenges in a proactive manner. The Council also urges NOAA Fisheries to work with the various Landscape Conservation Cooperatives that are working on similar issues.

The draft Climate Change Strategy suggests that ecosystem status reports be generated annually or biennially. The Council's Scientific and Statistical Committee (SSC) feels that this is too infrequent, and has recommended reporting as frequently as quarterly in order to detect ecosystem changes at an early stage.

There was little mention in the draft Climate Change Strategy of funding and staffing needs. There needs to be a high priority to providing funding to hire staff and conduct the necessary data collection and research activities to support the Strategy. Increasing capacities of the Science Centers to conduct climate-informed management strategy evaluations would likely require that each Science Center hire an MSE specialist. Diverting existing staff and funding from other critical activities such as stock assessments will only hurt the overall mission of NMFS.

There are some areas where the Council believes additional clarification could be useful. In particular, would a specific adaptive process be defined in a set of guidelines or is the existing Council process considered adaptive? A clearly defined adaptive approach would be useful. The term "Harvest Control Rule" should be clearly defined, especially if the implication is something other than a refinement of our existing ABC Control Rule. The Gulf Council also would like to see an emphasis on maintaining current monitoring facilities that have long time series associated with them.

Thank you for allowing the Gulf Council to provide input into the Draft Climate Science Strategy.

Sincerely,

Kevin Anson,
Chair

cc: Gulf Council
Eileen Sobeck
Roy Crabtree
Bonnie Ponwith
Gulf Council Staff