

## **Draft MAFMC staff comments on the draft Northeast Regional Implementation Plan of NOAA Fisheries Ecosystem-Based Fisheries Management Roadmap:**

- Under Guiding Principle #1, the *Develop management strategies to facilitate the EBFM process* section indicates that “long-term coordination will be necessary to blend the two approaches” taken by the Mid-Atlantic and New England Councils in implementing EBFM. Additional clarification as to what is implied by “blend” is needed. As noted in the document, the two Councils have taken very different approaches to implementing ecosystem considerations in their management process and using the term “blend” seems to imply one approach for both Council’s is a goal of the Northeast plan. Given the highly inter-connected fisheries within the region, there is clearly a need to continue the cooperative and collaborative management and science partnerships between the Councils, ASMFC and NMFS. There is also a need to share advancements and lessons-learned as each Council continues with the development and implementation of ecosystem considerations and approaches; however, those efforts should remain separate and not integrated into one “blended” approach in order to meet the needs, challenges and priorities specific to each region.
  - Related to the issue mentioned above, it should be noted that the Northeast Regional EBFM implementation Plan is the only plan that combines two management Council’s – all others are specific to a particular Council. Given the fact that one regional office and one science center services both Councils, we understand the development of a comprehensive Northeast Region Plan; however, as noted above, it should not be done in order to develop one approach for both Councils.
- Encouraged to see the document acknowledge the likely increase in interactions with species from the south and the need for increased coordination, but there does not appear to be any sort of Action Item or Milestone associated with this issue, or it’s not clear as to what current Action Item this may fall under. For example, Action Item 1a3 may be appropriate but specific Milestones related to EPU’s. Additional clarification and detail would be helpful.
- Under Guiding Principle #2, the *Conduct science to understand ecosystems* section focuses on NEFSC specific surveys and initiatives. Suggest mentioning the availability/potential use of other important fishery independent surveys such as NEAMAP and those surveys supported by NMFS such as those covered under the Interjurisdictional Fisheries Act that could be useful in ecosystem science.
- Under the *Provide Ecosystem Status Reports for each Large Marine Ecosystem* section under Guiding Principle #2, suggest including some language that highlights the fact that a significant amount of data and information within the Mid-Atlantic SOE report was utilized by the Council in its development of the Risk Assessment. Since the Risk Assessment is a continuing process, it emphasizes the need to continue the annual development of the SOE report.
- Table 2, Roadmap and Action Item Number 2a4. The Fishery-Dependent Data Visioning project milestone associated with this Action Item indicates this project will be finalized

within the next year. This timeframe seems to be much sooner than previous updates on this project which indicated a 3-5 year timeframe. Some clarification on this milestone may be needed.

- Table 2, Roadmap Action Item 3a1. The footnotes associated with the documents mentioned under the Milestones appear to be off by one.
  - This footnote issue appears in other locations as well – e.g. first full paragraph on page 12 referring to the Mid-Atlantic Risk Assessment
- Table 3, Roadmap Action Item 3b1. Action Item indicates factors which impact all 800+ managed species are considered. Question why factors that impact all 800+ managed species would be considered within the Northeast Regional Plan? There are likely factors impacting a particular species that are not relevant or appropriate for the Northeast Region. Consider modifying to something similar to the Southeast Region Plan that states “Ensure that factors which impact managed species are being considered”.
- Under Guiding Principle #4, the *Development of MSE capabilities* section indicates an FTE (currently split between two FTE’s) will be responsible for MSE projects. Some additional clarifying language regarding the role and responsibilities of this position may be helpful. Will this position be the only position/person to do all MSE work needed by the Council or will it all be facilitated through this position? As noted in the draft document, both Councils have pending needs for MSE analyses and these demands are likely to increase in time. We support NMFS increasing their MSE capacity but don’t want this FTE position to create a bottle-neck in the development of MSE projects.
- Under the *Evaluate ecosystem-level measures of resilience* section within Guiding Principle #6, there is discussion regarding further work is needed to establish social and economic related thresholds to determine ecosystem resilience. It might be worth noting here that one goal or possible outcome from Mid-Atlantic Council’s EAFM guidance document and Risk Assessment initiatives are to help in the development of region/Council specific social and economic thresholds.
  - Related to the point above, the Milestone column associated with Roadmap Number and Action Item 6b1 could also include continued development/refinement of the Mid-Atlantic Council Risk Assessment
- Under the *Evaluate community well-being* section within Guiding Principle #6, it mentions the two community resilience workshops (one in New England and one in the Mid-Atlantic) GARFO conducted. An additional sentence or two as to how the information gained from these workshops will be used in the future, particularly as it relates to tracking and understanding changes in community reliance, might be helpful.