

MARINE FISHERIES ADVISORY COMMITTEE (MAFAC)
Comments on the NOAA Fisheries Service
Habitat Enterprise Strategic Plan for 2016 to 2020
Approved November 9, 2015

General Comments on the Habitat Enterprise Strategic Plan

This is a very ambitious plan with defined and specific goals.

- In every goal area, the plan calls for setting priorities and focusing on specific areas and regions, especially those where partnerships are already established to collaborate on habitat work (*i.e.* restoring fish passage along the Penobscot River, or rocky reefs and abalone in California). These are laudable aspects of the plan.
- More emphasis is needed on socio-economic importance of marine resource based coastal communities and their reliance on coastal fisheries.
- MAFAC recommends the use of a consistent sentence and/or phrase when referring to other consulting parties. For example, the reference to “tribal,” “industry,” “non-governmental organizations,” and “coastal communities” should always be included.

General Comments on Goal 1: Conserve Habitat for Managed Fisheries and Protected Resources

- MAFAC supports the need for increased recognition of habitats that are outside the jurisdiction of NOAA Fisheries Service. International involvement will be needed to achieve this goal, especially for deep corals and submerged aquatic vegetation. Federal, State, and local government collaborations, such as the Fish and Wildlife Coordination Act, are needed to protect critical coastal habitats such as hard bottom near large estuaries which provide for a suite of valuable commercial species.
- MAFAC supports tidal wetland restoration activities including levee removal or setbacks, tide gate removal or modification, fill removal, sediment replenishment, invasive species control, and revegetation.
- MAFAC supports using essential fish habitat (EFH) consultations to strengthen wetland protection.
- MAFAC strongly supports the strategies in Objective 2 to improve fish passage and riverine habitat.
- Objective 3 and 4 strive for better protection of corals, both shallow and deep sea. Preventing sedimentation of shallow corals from five watersheds over five years is very ambitious. The strategies under Objective 3 are more realistic than the overall objective.

The strategy also needs to recognize coral habitat protection provided by fishery management actions that reduce bycatch of deep water corals.

- MAFAC supports the strategies listed under Objective 5, in particular implementing the National Shellfish Initiative.
- MAFAC supports the strategies under Objective 6 to assess submerged aquatic vegetation or SAV status, develop conservation best practices, restore targeted areas, and strengthen protection and restoration.
- MAFAC supports promoting activities that have been demonstrated to enhance ecosystem services and habitat value such as shellfish culture and the construction of artificial fish and oyster reefs.

General Comments on Goal 2: Restore NOAA Trust Resources Impacted by Oil and Other Hazardous Substance Releases

- This goal is very necessary in light of potential expansion of energy production sites and the need to prevent releases, respond when releases occur, and restore damaged habitats.
- MAFAC supports the emphasis on public involvement and a publicly transparent decision-making process.
- Settling 22 Natural Resource Damage Assessment (“NRDA”) cases will allow habitat restoration measures to begin. Ensuring that these settlements account for full restoration is crucial.

General Comments on Goal 3: Increase Resilience of Coastal Ecosystems, Communities, and Economies through Habitat Conservation

The objectives and strategies for coastal and fishing community resilience depend significantly on actions taken by states, municipalities, and other federal agencies. NOAA Fisheries’ ability to consult and collaborate is paramount for success in this goal.

- Communities are a part of the ecosystem and they generate and drive coastal economies. Habitat restoration should enhance – not preclude – the ability of these coastal communities to continue to drive their economies. This includes the sustainable utilization of habitats for both commercial and recreational activities, both of which provide significant socio-economic benefits to the coastal economies.
- Smaller fishing communities are particularly dependent on healthy coastal and nearshore habitats to maintain the productivity of nearshore and offshore stocks.
- The resilience of the coastal communities and economies will be dependent on being able to adapt and evolve as climate changes continue to affect the people and businesses. This may include habitat restoration, aquaculture, and other similar uses of habitat.

- Improving resilience may require changes in the fishery management, resource allocation, and permitting systems to allow local community access to newly proximate fishery stocks. Expedited processes will be needed for short-term pilot programs to demonstrate restoration, sustainability, and adaptive management. Otherwise, communities will be stifled in their ability to keep up with changes in fisheries.
- It is unclear what is within the scope of the plan for increasing resilience for coastal communities. Does this encompass built infrastructure – storm water drainage and roads, renourishment of beaches, and building protective dunes and walls? Or is the scope limited to ways that habitat conservation can contribute to resilience? This should be more clearly addressed.

Specific Comments on Goal 3

Objective 1: By 2020, identify and implement targeted conservation approaches to build resiliency of coastal ecosystems and communities threatened by climate change and extreme weather events in each region.

- Like other elements of this plan, the timetable is very ambitious. Resiliency in this objective appears to only involve conservation of habitat to protect communities. Access rights of fishing communities to bordering nearshore fisheries is an essential part of resilience.

Federal Emergency Management Act (FEMA) policies that encourage development in coastal habitats and reconstruction projects that damage coastal habitats need to be revised to incorporate resiliency goals and new information on changing coastal conditions.

- The plan should identify how grants and educational materials developed by Sea Grant and other institutions will be used to communicate methods for increasing the resilience of coastal communities.

Strategy 1: Conduct risk assessments and prioritizations.

- Risk assessments and resulting priorities must take into account key climate threats and their possible effects on coastal ecosystems and communities. This will require analyses of changes occurring in local subunits within regional ecosystems that may precede, accompany, or lag behind changes occurring at larger scales. This will allow identification of areas of concern. Extensive collaboration with all user groups will be essential.
- Due to the constant evolution of climate change and the unpredictability of natural disasters, NOAA Fisheries Service may not be able to forecast all possible climate threat scenarios to implement timely and specific actions.

Strategy 2: Develop climate adaptation best practices.

- MAFAC recommends that the development and implementation of “best practices” must allow for evolution and innovations and not be fixed or set in stone. As improvements and innovations are found, the rapid implementation of changes to “best practices” is necessary.
- Provisions for facilitating community access to new fisheries arriving as a consequence of climate changes will be needed as climate-stressed fisheries disappear. This should include pilot projects, limited experimental fisheries, etc. The Regional Fishery Management Councils need to review management systems and processes that prevent flexible responses to shifting stocks. Fishery Management Plans should incorporate flexibility and frameworks that allow in-season and annual adjustments.
- Articulating best practices will be helpful to local and state governments and coastal managers.

Strategy 3: Implement climate adaptation measures.

- MAFAC believes that measures must be developed through consultation with all stakeholders and not be optional as suggested by the word “or.”
- Freshwater management needs more explanation. Are we managing to moderate the effects of too much freshwater on coastal habitats (pulses of high flow due to over-designed drainage systems), too little freshwater on coastal habitats (freshwater diverted for other uses and loss of estuarine habitat conditions), or both?

Objective 2: By 2020, demonstrate measurable progress toward achieving the objectives for each Habitat Focus Area (HFA), and use the HFAs as models to promote collaborative habitat conservation for multiple benefits.

- While also a very ambitious timetable, it seems that this Objective is more practical with its ability to “demonstrate measurable progress.”
- MAFAC believes that implementing priority actions, evaluating progress, maximizing community engagement, and sharing lessons learned are good strategic practices.

Strategy 1: Implement priority actions in HFA implementation plans.

- For those that are not yet familiar with each HFA, including a list or a map of Habitat Focus Areas in a sidebar would be helpful.

Strategy 2: Develop an evaluation process to measure HFA progress and

guide future funding decisions.

- This action will be beneficial to guide ongoing and future decisions on priorities, budget, and funding.

Strategy 3: Maximize community engagement to ensure long-term sustainability.

- This strategy is critical to the success of building resilient communities and economies.
- MAFAC believes that it is necessary to involve some compromise and negotiation within communities in order to ensure equity in the collaboration.
- MAFAC believes it is critical that HFAs take into account the evolving needs of the affected communities.

Strategy 4: Share lessons learned.

- MAFAC strongly believes that sharing information about successful as well as unsuccessful actions is important and necessary so that best practices can improve while keeping pace with climate change.

Objective 3: Leverage our participation and leadership in regional (landscape-scale) ecosystem-based conservation partnerships to achieve the Habitat Enterprise’s strategic goals and objectives.

- It makes sense to work within regional partnerships to advance the Habitat Enterprise’s goals and objectives. Commercial and recreational stakeholders, which operate sustainably pursuant to applicable law, should also be considered ecosystem-based conservation partners. In implementing the five strategies, as well as any future strategies, their participation and needs must be considered.

Goal 4: Invest in Staff Development and Improve the Impact of People, Programs, and Services

- MAFAC agrees that a well-qualified and informed workforce is essential for achieving the Plan’s goals.

Cross-Cutting Strategies

- MAFAC supports prioritizing conservation actions based on a risk-assessment or limiting factors analysis, developing targets, advancing habitat science needed for management, strengthening partnerships, improving communication with stakeholders, and developing national policy and guidance.