

November 6, 2020


Mr. Chris Oliver
Assistant Administrator for Fisheries
NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

Dear Chris,

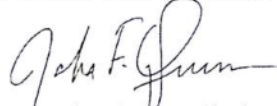
The Council Coordination Committee (CCC) heard the presentations on aquaculture with interest at its recent meeting via Webex, September 23-24, 2020. We are pleased to see development on a number of aquaculture activities and request the ability for the Regional Fishery Management Councils (RFMC) participate in the process. This will provide opportunity for the RFMCs to review, provide input and address fishing and fishery management needs prior to implementation. In the development of the Aquaculture programmatic environmental impact statement that assesses the impacts of siting aquaculture facilities, the CCC recommended that NMFS coordinate a review with the Councils prior to seeking public comment. Given the timing of the RFMC meetings, we would like to request early engagement with the RFMCs to ensure a thorough and timely review.

The CCC also recommends that prior to the identification of Aquaculture Opportunity Areas (AOA), NMFS provide the spatially referenced data, including coordinates, bathymetry, habitat type, oil and gas locations, renewable energy, and other applicable data sources, that were used to identify the AOA. The information provided should encompass the same variables, resolution, and geographic scope used to identify the applicable AOA. Receiving this information will allow the RFMCs to address data concerns and make decisions and recommendations based upon the best available data. To accommodate this request, the CCC requests NMFS provide opportunity for the RFMC to participate on the AOA implementation teams.

Sincerely,


Taotasi Archie Soliai, Chair
Western Pacific Fishery Management Council


Phil Anderson, Chair
Pacific Fishery Management Council

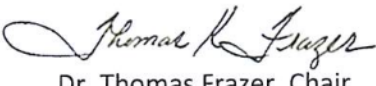

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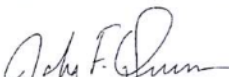
The Council Coordinating Committee (CCC) convened via virtual conference on September 23-24, 2020 and endorsed a recommendation regarding the National Standard 1 (NS1) Technical Guidance, requesting the NMFS to circulate draft reports of the NS1 Technical Working Groups through the Regional Fishery Management Councils (RFMC) for formal review and comment by their respective Scientific and Statistical Committee (SSC). The review should provide sufficient time for each RFMC SSC to fully evaluate these documents and develop recommendations to their respective RFMCs. Coordination and guidance through RFMCs SSCs is important given the technical nature of these guidance documents and its implications on Council fishery management decisions.


Further, the CCC requested NMFS Office of Sustainable Fisheries form a working group comprised of NMFS and RFMC staff in determining alternative approaches, including but not limited to, fishing mortality rate-based, length-based, or trip limit, etc., in managing data limited stocks pursuant to 50 CFR 600.310(h)(2) stemming from the Technical Guidance memorandum by NMFS Subgroup 3. Nearly every RFMC struggles with obtaining reliable weight-based catch estimates through established data collection programs for data limited stocks as required by the MSA. Alternate approaches should be used for data limited fisheries to produce more representative estimates of stock status in place of relying on highly uncertain catch-based information known to have excessive error. Managing stocks based on proxies from such incomplete or uncertain information disregards likely harvest rates relative to stock productivity. The CCC seeks to further explore alternative approaches to better manage fisheries with data limited stocks in each region and to engage NMFS-OSF in the development of any policies that would stem from this Technical Guidance.


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Dear Chris,

The Council Coordinating Committee (CCC) at its virtual meeting on September 23-24, 2020, established a subcommittee to develop recommendations to the NMFS internal working group on guidance to implement the new National Environmental Policy Act (NEPA) regulations as they relate to the Magnuson-Stevens Fishery Conservation and Management Act (MSA), including functional equivalency.

The Regional Fishery Management Councils (RFMCs) must meet NEPA requirements on the actions taken by the RFMCs and implemented through MSA. As such, it is important the RFMCs understand and have early and meaningful contributions to discussions in the development of guidance for the implementation of the new NEPA rule. We appreciate your continued support in ensuring CCC and RFMCs engagement in improving the application of NEPA for Council actions under the MSA, and look forward to working with NMFS in developing the new guidance.

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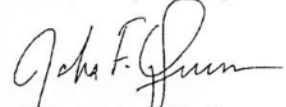
The Council Coordinating Committee (CCC) at its virtual meeting on September 23-24, 2020, heard a report from each Council on their recommended actions addressing the President's Executive Order 13921 in promoting seafood competitiveness and increasing fishery production. Most Councils developed their prioritized list of recommended actions in consultation with their advisory bodies. The issues and actions are inherently diverse, which reflects the different issues each region is facing. Much of the CCC discussions focused on the procedural aspects of how NMFS will be addressing these recommendations. The CCC is concerned about the continuity of this process when there is a change in administration. The CCC, therefore, requested NMFS continue to brief the CCC and RFMCs on the review and implementation planning of recommendations provided by the RFMCs regarding all aspects of Executive Order 13921 (e.g., changes to regulations, orders, guidance documents, or other similar agency actions).


We appreciate your continued support of managing our national fishery resources by the Regional Fishery Management Councils as authorized through the Magnuson-Stevens Act.

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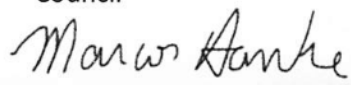

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Dear Chris,

The Council Coordinating Committee (CCC) at its virtual meeting on September 23-24, 2020, heard a report on the Marine Fisheries Advisory Committee recommendation to reestablish the National Seafood Council. The CCC discussed the broader need for NMFS to support fisheries managed through the Magnuson-Stevens Act (MSA) and endorsed a recommendation requesting NMFS evaluate NOAA FishWatch criteria for the purpose of serving as an equivalent to third-party certification deeming US fishery products as sustainable. In addition, the CCC requests NMFS report back on the utility of FishWatch for this purpose and any possible alternatives by the May 2021 CCC meeting.

Third-party certification impacts US fishing fleets and undermines consumer confidence in US-caught seafood. US fisheries are, by the nature of the MSA, inherently sustainable per NOAA and the Department of Commerce approval of the Councils' fishery management plans. A federal label noting this sustainability would put all US seafood on equal footing in the market and be a source of pride for US consumers. We appreciate your continued support of US fisheries as managed through the Regional Fishery Management Councils under the MSA and the sustainable seafood it provides the nation and look forward to the NMFS report.

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