

March 1, 2017

The Honorable Wilbur L. Ross Jr.
Secretary of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Dear Mr. Secretary:

The Regional Fishery Management Councils (Councils) would like to congratulate you on your appointment as the Secretary of Commerce. Among its many mandates, your Department is responsible for the sustainable management of our nation's fishery resources. The Councils provide a critical link between fishermen, small businesses, industries and communities and the National Marine Fisheries Service (NMFS) and other management agencies to help achieve the Administration's goals in growing the economy, developing businesses and trade, serving the American public and maintaining sustainable marine resources.

Overview of Council Role and Value

The Magnuson Stevens Act (MSA) established a unique regional/federal partnership for governance of our nation's fisheries, relying on the Councils to provide regional approaches to regional circumstances. After 40 years of implementation, this approach is now widely regarded as successful; it established a scientific foundation for sustainable fisheries. As a result, US consumers have access to quality seafood and US caught seafoods have a competitive edge in world markets. US management provides a model for fisheries elsewhere.

Our commercial fisheries provide more than economic value; because they are sustainably managed they also provide a secure source of seafood for US consumers. At present, about 90% of the seafood consumed in the U.S. is imported. The supply of imported seafood is vulnerable to significant decrease from either unsustainable harvests that reduce the supply or from political instability. In distinct contrast, US domestic fisheries provide a secure supply of quality seafood.

In 2015, over \$5.2 billion of fish and shellfish were landed by US commercial fisheries. This economic value of our commercial fisheries is broadly distributed around the nation. About \$2 billion are landed in Atlantic Coast ports, \$0.8 billion in the Gulf and \$2.3 billion in west coast ports.

Recreational fisheries are also an important cornerstone of the coastal economy. In 2014, 11 million saltwater anglers took 68 million fishing trips, generating nearly \$61 billion in sales impacts, \$35.5 billion in value-added impacts, \$22 billion in income impacts, and supporting 439,000 U.S. jobs. The cultural significance of this activity should not be underestimated, nor the impact on local communities. Management of recreational fisheries does come with unique challenges, and the Councils are intimately involved in addressing these -- from cooperative efforts to improve catch and effort information, to development of alternative approaches to meet the annual catch limit (ACL) mandate, the Council process serves as a forum for recreational fishing community participation.

Recommendations

Partnerships – Maintaining an effective Council/NMFS partnership is an ongoing process. The Council Coordination Committee (CCC) urges this administration to support a strong partnership with the Councils, with an eye to continuous improvement. The administration



should establish their expectation that NMFS will engage the Councils early and often in all activities that involve them, continually keep them informed, and frequently ask for their input.

Priorities -- Align agency priorities more closely with Council priorities. The CCC remains concerned that important policy directives issued by NMFS (e.g., forage fish, allocation review, and ecosystem-based fisheries management) frequently do not take into consideration the need for additional staffing and resources that Councils may need to implement them. The demands on Councils to fulfill existing regulatory and management requirements are significant, and these should be met before any new mandates are required.

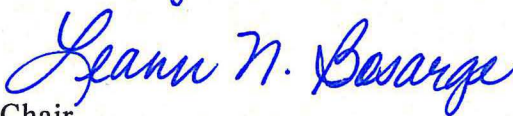
Baseline funding for sustainable management – At-sea surveys of fish populations are the ‘bread and butter’ of the sustainable management that is the hallmark of US fisheries under the MSA. Reducing stock assessment funds will reduce harvests by US fishermen, which will increase imports of foreign seafood. Increasing stock assessment funding is the best investment an administration can make in US fisheries.

Finding efficiencies in the management and regulatory processes – The Councils strive to balance the competing objectives of maintaining transparent, open public process, digesting complex scientific information, complying with federal regulations, making the process understandable and accessible to a broad range of stakeholders and performing in a cost-effective manner with limited resources. Too often, attempting to achieve all of these simultaneously results in a loss of efficiency. Our stakeholders are often bewildered by the maze of federal regulations that we must comply with, and are unwilling to tackle the mountains of paper that contain the information they need in order to understand potential Council actions and the impact on their fisheries and livelihoods. This administration should work with the Councils to identify the parts of the existing process that have become duplicative or have become barriers to effective stakeholder engagement and craft solutions for streamlining those.


Respectfully,



Chair
Caribbean Fishery Management Council


Chair 
North Pacific Fishery Management Council


Chair
Gulf of Mexico Fishery Management Council

Chair 
Pacific Fishery Management Council


Chair
Mid-Atlantic Fishery Management Council

Chair 
South Atlantic Fishery Management Council


Chair
New England Fishery Management Council

Chair 
Western Pacific Fishery Management Council