



May 6, 2025

Secretary Howard W. Lutnick  
Department of Commerce  
1401 Constitution Avenue NW  
Washington, DC 20230

Acting Administrator Laura Grimm  
NOAA/National Oceanic and Atmospheric Administration  
1401 Constitution Avenue NW, Room 5128  
Washington, DC 20230

Assistant Administrator Eugenio Piñeiro Soler  
NOAA Fisheries  
1401 Constitution Avenue NW, Room 5128  
Washington, DC 20230

Dear Secretary Lutnick, Acting Administrator Grimm and Assistant Administrator Soler:

On behalf of the Marine Fish Conservation Network (Network), I'm writing to share our views on how NOAA and the Department of Commerce could further America's progress in fisheries management by continuing to rebuild our fishery resources for economic prosperity, recreational enjoyment, increased ocean health and healthy food production and food security.

From recreational and small-boat commercial fishermen to seafood purveyors and chefs, people depend on science-based management of our fisheries and oceans to ensure they can keep their businesses and local economies going and deliver healthy, domestic seafood to the tables of millions of Americans. U.S. fisheries generate approximately 2.3 million jobs and more than \$470 billion to our economy. We need the fisheries experts and resources at NOAA to do the hard work of keeping our oceans healthy and our fisheries productive so coastal communities and working waterfronts continue to thrive and seafood lovers across the nation can enjoy the ocean's bounty.

As an organization made up of a diverse membership, we offer the following Network priorities for your consideration and support:

**Promoting Working Waterfronts, Local Economies & Small Businesses**

The most timely and effective way to build economic resilience in commercial and recreational fishing sectors and our coastal communities is to advance the following policy priorities: (1) support thriving fishing communities (2) improve effective catch accounting and data management, (3) strengthen bycatch provisions. To achieve these three objectives, we offer the following recommendations and actions:

- (1) Intergenerational fishing cultures form the economic and social fabric of the coastal United States.
- Restore and maintain waterfront infrastructure through access to grant programs and federal funding opportunities.
  - Ensure ocean access for commercial businesses, recreation, tourism, and traditional uses.
  - Prioritize the needs of working waterfronts in the face of threats, like natural disasters and development, that could have lasting impacts on coastal communities, local jobs, and regional economies.
  - Ensure communities have sustained participation in and access to fisheries by requiring regional fishery management councils to anchor some percentage of limited access fishing privileges with a community fishing association, permit bank, community development trust or other similar strategy that meets criteria defined by each council.
  - Elevate the importance of community-based fishermen by clearly defining who they are. Define “community-based fishermen” as: *those commercial fishermen who live and/or work within fishery-dependent communities of this nation, and whose catch is delivered into these communities for processing and/or marketing, and those recreational fishermen and businesses who reside in and rely upon coastal communities for infrastructure support and access for their sports experience.*
  - Preserve access to and ensure the funds under the Saltonstall-Kennedy Act are used as required by statute, namely “to address the needs of fishing communities, optimize economic benefits by building and maintaining sustainable fisheries, and increase other opportunities to keep working waterfronts viable.”
- (2) Improving science-based assessments, catch accounting, and data management are essential to achieving healthier oceans and more productive fisheries.
- Fully fund comprehensive and regular stock assessments in all regions, with an objective of full assessments of all directed fisheries at least every three years and annual assessments for all stocks that are overfished or subject to overfishing.
  - Fully fund electronic monitoring (EM) implementation in New England and Alaska by 2028 and in all other observed fisheries within five years of reauthorization unless the fishery is found to be incompatible with EM.
  - Commission an independent audit by technology and data management experts to review data management associated with stock assessment and catch accounting systems across all regions to ensure the best possible data is available on a timely basis to managers, fishermen, and the public.
  - Expand catch monitoring to include recreational and commercial fisheries.
  - Allow the use of third-party contractors to improve cost efficiency of catch observation and at-sea monitoring programs.
  - Develop a fair and equitable cost distribution system to fully fund at-sea monitoring.
- (3) Strengthening monitoring and transparency of bycatch in all fisheries will increase economic opportunities for fishermen.
- Address the ambiguity associated with the phrase “to the extent practicable” in NS 9 by specifying that the standard is meant to drive improvements in current fishing practices that result in bycatch reductions beyond levels that have been achieved in the past.
  - Prioritize and promote traditional directed fisheries over bycatch uses.
  - Improve monitoring and reporting systems to better quantify bycatch.

- Incentivize selective gear and facilitate gear conversion.
- Establish effective seafood traceability requirements in all fishery management plans, particularly to distinguish American-caught seafood against foreign imports.
- Direct regional fishery management councils to consider full retention requirements for species with high catch mortality rates so marketable seafood is not wasted.
- Work with the regional councils and stakeholders to establish community-based solutions, such as quota banks, to reduce bycatch.
- Standardize the definition of bycatch: *fish which are harvested in a fishery, but which are not sold or kept for personal use, and which includes fish historically allocated to another fishery, economic discards and regulatory discards. “Bycatch” does not include fish released alive under a recreational catch and release fishery management program.*

### **About the Marine Fish Conservation Network**

We are a coalition of commercial and recreational fishing associations, regional and national conservation groups, aquaria, sustainable seafood suppliers, and marine science organizations dedicated to sustaining abundant fish populations, healthy marine ecosystems, and thriving working waterfront communities through defending and strengthening U.S. ocean conservation policy and science-based fisheries management.

We promote the long-term health of U.S. fisheries and strengthen the myriad of diverse small businesses making up our fishing communities while ensuring our oceans and those who rely upon it can successfully meet the emerging economic and environmental challenges of the future.

For nearly three decades, we have led efforts in the U.S. to promote healthy oceans and productive American fisheries, including playing an instrumental role in the evolution of federal fisheries policy toward a more conservation and science-based management approach.

Our policy recommendations are thoroughly vetted by our diverse coalition of stakeholders, ensuring that our united voice speaks for people and communities nationwide. These policy priorities have direct, positive impacts on the business of fishing, whether commercial or recreational, as well as the seafood supply chain, and allow all sectors to better meet the challenges of the future.

Thank you for your consideration of these priorities. We would welcome the opportunity to discuss them further or provide additional information.

Sincerely,



Robert C. Vandermark