



To: Senator Lisa Murkowski
Cc: Jamie O'Connor, Legislative Assistant
From: [Robert C. Vandermark](#), Executive Director
Date: December 2, 2022
Re: Proposed Working Waterfronts Framework

The Marine Fish Conservation Network (Network) appreciates the opportunity to provide our views on your draft Working Waterfronts Framework. We applaud your approach to this process by convening a statewide listening tour seeking input from multiple stakeholders with an interest in overcoming common challenges around issues of access, infrastructure, workforce, renewable energy, and the blue economy. The Network appreciates your leadership to ensure healthy oceans and sustainable, productive fisheries now and into the future. We are pleased to respond to the questions you posed in the announcement.

Are there ideas in the Framework that you particularly like and have suggestions to improve?

The Network considers this a very sound draft framework. The provisions are beneficial and enhance the small businesses – seafood retailers, local restaurants and chefs, tackle shops, hotels, shipwrights, mechanics, welders, machinists, and others – making up our fishing communities.

The following points addressed in your proposed framework are of particular interest to the Network.

- Our organization welcomes the additional efforts to better understand and address the effects of climate change and warming waters on marine life and coastal communities as outlined in the ocean and coastal acidification research and monitoring section.
 - We firmly believe federal fisheries policy should mandate that federal fisheries managers consider the impacts of climate change in the development of all fishery management plans, as well as include conservation measures to mitigate those impacts.
 - Laws and regulations should also recognize the growing reality of climate change emergencies and establish new policies and processes for quickly implementing contingency plans to ensure the health and resiliency of fish stocks in the face of these events.
 - In addition to the suggestions above, the Network supports efforts to reduce carbon emissions associated within the fishing industry and is happy to see the Fishing Vessel Electrification Pilot Program included in the framework.
- The Network supports investments to make working waterfronts infrastructure more resilient. Modernizing and upgrading shoreside infrastructure, including small-scale community processing and access to ice and cold storage, are essential to strengthen our domestic seafood supply chain and allow small-scale fishermen to thrive.
 - The fishing industry and the small businesses that comprise it, including commercial fishing operations, guides, outfitters, processors, restaurants, and chefs have been detrimentally impacted by the coronavirus pandemic. These businesses provide

sustainable and high-quality food, gainful employment for workers, and are instrumental in rebuilding our nation's economy. Financial support and investment from the federal government will help community-based fishermen regain their footing and continue their contribution to our economy. The Network encourages exploration of community quota or permit banks that stabilize fishery access for our nation's small-scale fishermen.

- Investments in modernizing working waterfronts and increasing seafood supply infrastructure allow quality seafood to reach consumers directly, which in turn will benefit local fishing communities by creating jobs and retail channels. A Working Waterfronts Grant Program, or another funding source or program, would provide a stable stream of funding for improvements to supply chain infrastructure.
- The Network encourages workforce development for maritime trades, including entry-level opportunities for community-based fishermen. Our organization supports continued efforts to build a strong foundation for a thriving U.S. fishing industry for generations to come, including funding and reauthorizing the *Young Fishermen's Development Act* (Public Law No.116-289).

Are there ideas in the Framework that you disagree with?

As previously mentioned, the Network considers this a sound draft framework. We would bring to your attention, however, the concerns raised by our Alaskan members and colleagues with the Tourism and Domestic Seafood Marketing and Promotion sections. As this framework advances, we appreciate your consideration of their comments on these concepts.

Do you have other ideas that the Senator should add to her Framework?

As an organization with a diverse membership, including but not limited to, small businesses, commercial fishermen, and recreational anglers, we offer the following recommendations for your consideration:

Supporting and Strengthening Science-Based Catch Accounting and Data Management

Accurate, timely, and transparent stock assessments are the foundation and hallmark of successful, science-based fishery management. The Network believes that improving science-based assessments, catch accounting, and data management are essential to achieving healthier oceans and more productive fisheries. We suggest adding provisions to this framework that fully fund comprehensive and regular stock assessments in all regions, commission an independent audit to review data management associated with stock assessment and catch accounting systems, expand catch monitoring to include recreational and commercial fisheries, and allow the use of third-party contractors to improve cost efficiency of catch observation and at-sea monitoring programs.

Strengthening Bycatch Provisions

Bycatch continues to be a persistent problem in fisheries in Alaska and across the United States. In federal fisheries, bycatch often comprises species, such as forage fish, marine mammals, and seabirds, that fall outside of either regional fishery management councils' management plans or such council's authority. In many cases, bycatch in one fishery is a targeted species in another. In these instances, bycatch-related discard mortality can directly limit harvest opportunities for those engaged in the directed fishery and destabilize communities that depend on fishing. We must implement concrete steps to reduce bycatch and to prioritize and promote directed fisheries over bycatch uses. Congress must also improve the monitoring and quantification of bycatch in all fisheries. Bycatch reductions should promote ecosystem health, protect historic directed fisheries, and provide socioeconomic opportunity for fishery-dependent communities.

Improving Forage Species Conservation and Management

There is growing awareness that we need to manage forage species more conservatively than we have in the past to ensure healthy marine ecosystems. While fishery managers need to prioritize the management of forage fish stocks, defining a species as a “forage fish” in need of more conservative management measures is often difficult. Furthermore, most of the regional fishery management councils have lagged in implementing management plans necessary to conserve forage fish and ensure that they can fulfill their role in marine ecosystems. Congress should pursue new or amend existing policies to clearly mandate that regional fishery management councils act in accordance with emerging best practices for maintaining the ecological role of these prey species.

Strengthen and Refine National Standard 8 (NS 8)

NS 8 should ensure and enhance sustained participation by community-based fishermen. NS 8 currently requires conservation and management measures to provide for the sustained participation of fishing communities and to minimize adverse economic impacts on such communities. This standard should be strengthened to include clear measures that will minimize adverse economic impacts while achieving conservation goals, and secure sustainable participation in fisheries.

Upholding Federal Statutes

Four main statutes serve distinct but complementary purposes for responsible ocean conservation and fisheries management: The Magnuson-Stevens Act (MSA), the National Environmental Policy Act (NEPA), the Endangered Species Act (ESA), and the Marine Mammal Protection Act (MMPA). All four are needed to ensure the sustainable management of U.S. fishery resources through a broad ecosystems approach. Each statute must be allowed to function as Congress intended, requiring independent examination of the relevant issues by both the public and by the federal agency having the expertise needed to make a properly informed decision.

As you consider the work ahead regarding your proposed Working Waterfronts Framework, managing U.S. fisheries, the health of our marine ecosystems, and supporting coastal communities, we would be happy to provide additional information on any of our priorities and more detailed comments on your framework. Thank you again for your leadership, and we look forward to working with you on these important policies in the 118th Congress.

ABOUT THE MARINE FISH CONSERVATION NETWORK

The [Marine Fish Conservation Network](http://www.conservefish.org) is a coalition of commercial and recreational fishing associations, regional and national conservation groups, aquaria, seafood purveyors, and marine science organizations. For the last two decades, we have united commercial fishermen, recreational anglers, conservationists, scientists, and citizens around a shared mission: conserving and revitalizing wild ocean fisheries and the long-term health of ocean ecosystems. We aim to promote the long-term health of U.S. fisheries and strengthen the myriad of diverse small businesses that make up our fishing communities, while ensuring our oceans and those who rely upon them can successfully meet the emerging economic and environmental challenges of the future.