January 15, 2015

Greater Atlantic Regional Fisheries Office
55 Republic Drive
Gloucester, MA 01930

RE: GARFO Draft Strategic Plan

Members of the Fish Locally Collaborative (FLC) and our broader community of supporters appreciate the opportunity to submit comments on the Greater Atlantic Regional Fisheries Office (GARFO) Draft Strategic Plan for FY2015 - FY2019. We would like to highlight the specific language in the Plan that we find most promising and to indicate our interest in collaboration with GARFO in advancing this work.

The FLC is a network of fishing communities, including fishers, processors, marketers, families, scientists, and seafood consumers, with over 400 individuals representing sixty organizations and networks, and over 400,000 fishing families spanning the globe.

The FLC began in 2008 with a focus on the New England fishing industry. The FLC does not speak as a unified voice on all matters, but rather seeks to collaborate, research, and learn from each other in developing new solutions and policy directives in sustainable fisheries. This particular letter is signed by fishermen and organizations that have quickly discussed this opportunity to provide comments on the Plan.

FLC Values and Perspectives

The FLC is committed to restoration of marine ecosystems, fishing communities, and a fair seafood value chain. The network values a genuine democratic and bottom-up approach to fisheries management, which is needed to achieve healthier ecosystems and ensure a diverse fleet that maximizes value to fishing communities, local economies, and the food system. Success will be achieved when appropriate management tools are made available, fishermen's local knowledge is accounted for in the decision-making process, and the scale of fishing matches the scales of the ecosystems.

The fishing industry includes ports, fleets, processors, fish workers, and people who eat seafood. Our nation benefits from strong coastal communities (both rural and urban) and measuring a fisherman's impact needs to include the triple bottom line with an increased focus on community (social) values and benefits. Large-scale corporate interest and control over access to fisheries hurts marine ecosystems, hurts local economies, hurts the seafood value chain, and divides fishing communities.

The Magnuson Stevens Fisheries Conservation and Management Act establishes goals and describes national benefits in terms of fish stocks, habitat protection, port economies, and

seafood, but current management has focused primarily on fishing and its impact on habitat, to the relative exclusion of community benefits and healthy seafood.

While cutbacks in allowable catch driven by ten-year rebuilding plans have received the greatest attention as the cause of economic distress in the fishing fleets and ports, the current management system has exacerbated these difficulties greatly, particularly for community-based and family-owned boat fishermen, through such mechanisms as:

- Stock assessments unable to deliver reliable predictions and management alternatives
- Failure to assess non-fishing impacts, such as climate change, pollution, and ecosystem dynamics
- Collapsing prices due to cheap foreign imports, high-volume extractive fisheries, and weak domestic markets for local seafood
- Inflexibility in shifting effort of the fleet to other species
- Regulations that fail to protect the discrete, local fish populations that are so important to community-based and family-owned boats
- Pressure from real estate development in working waterfronts
- High fuel and other costs of fishing

Work of the FLC

FLC members are active in researching and creating new models and practices to address a range of needs and opportunities, including: protection of fleet diversity, multi-species harvesting and community-based management approaches; local food system development, such as expanding markets for hospitals, schools, colleges; creating the Community Supported Fishery (CSF) model and replicating it widely; working waterfront protection; value-added product development and waste recovery; ocean planning and decision making. We also reach out to and are informed by experts and practitioners in the farming sector and other related fields of institutional, market, financial, and technology innovation and reform.

FLC Support for GARFO Strategic Goals and Special Emphasis Projects

Because of both our values and our expertise and engagement in management, institutional, and market reforms, we applaud GARFO's stated commitment to the following, as seen on page 5 of the Strategic Plan:

"As indicated in overarching guidance at higher governmental organizational levels, demand continues to increase for the vital services NOAA Fisheries provides to the nation for:

- *Productive and sustainable fisheries, that create jobs over the long term in working waterfront communities, as well as provide opportunities for recreational enjoyment,*

- *Safe and affordable sources of seafood,*
- *The recovery and conservation of protected resources, and*
- *Healthy ecosystems*

  - all backed by sound science and an ecosystem-based approach to management. Key elements of these services are the economic, societal, and environmental benefits they provide the nation.

As the federal budget is limited while this demand grows, NOAA Fisheries at the headquarters level focuses its efforts to support:

- *Two core mandates (productivity and sustainability of fisheries and fishing communities, and recovery and conservation of protected resources)*
- *More effective partnerships, and*
- *Innovative business models.*

FLC Support for Increased Public and Stakeholder Engagement

FLC members heartily endorse the intentions described in the Plan for GARFO to engage fully with the public and stakeholders, going forward, as described on p. 3:

- *"Achievement of many of our GARFO responsibilities will rely on close coordination with and participation of, other federal offices (including the Northeast Fisheries Science Center and NMFS Headquarters), the fishing industry, and other partners and stakeholders."*

And, on p. 20:

- *"GARFO will strive to improve customer service and stakeholder satisfaction with agency interactions ….. to increase public and internal knowledge of NOAA Fisheries programs and to improve dialogue and feedback mechanisms between stakeholders and GARFO. This should result in more effective external communications and better informed decision making."*

We support the following, specifically, the language in the Plan for an integrated approach, in partnership with stakeholders and the public, to enhance fishery community resiliency, pp. 13-14:

- *"Working with stakeholders, and in collaboration with NOAA line offices, identify and implement an integrated approach among regional programs to enhance community resiliency as it applies to sustainable fisheries, recovery of protected resources,*

habitat, resource disaster financial assistance and recovery, and place-based conservation;

- *Working with NEFSC, the New England and Mid-Atlantic Fishery Management Councils, and the public, identify potential avenues by which ecosystem approaches to management and climate change could be integrated into more traditional single species management;*
- *Collaborate with a variety of partners and stakeholders to promote conservation of habitats through development and implementation of best management practices, management plans, watershed plans, and other non-regulatory tools."*

"Special Emphasis" Activities

FLC members support, in addition to those listed above for Community Resiliency, the following activities of Special Emphasis:

- *"By January 2016, collaboratively establish a plan with the New England and Mid-Atlantic Fishery Management Councils to proactively identify and resolve fishery management issues that threaten fishery sustainability and community resilience;*
- *By January 2016, initiate discussions to develop measures to increase fishing opportunities for abundant fishery stocks that have a low interest in current fisheries and markets;*
- *Work with NEFSC, HQ and ACCSP to adopt consistent approaches for use of current state/federal fishery dependent data, including quality assurance and quality control processes;*
- *Develop policy/guidance on various habitat issues to promote conservation of fish habitats and other living aquatic resources;*
- *Coordinate and collaborate with the NEFSC in the development of research priorities in support of habitat management activities and development of refined EFH designation;*
- *Complete an updated "Fishing Through Hard Times: overview, identifying possible avenues for economic relief and recovery associated with the groundfish fishery resource disaster;*
- *Encourage the consumption of U.S. caught seafood."*

Additional Comments

FLC members strongly recommend that an emergency action be taken to coordinate a fisheries dependent and independent data collection effort as input to a more reliable cod stock assessment. There is simply not enough data collected by NOAA vessels, such as the Bigelow. The industry and academics have requested multiple times in recent years that a

major program for chartering fishing vessels for research be implemented. In the FY2015 Senate Appropriations report, a similar mandate is stated:

Charter Vessels—To help improve the quality and abundance of fishery data used for stock assessments, the Committee continues to encourage NOAA to expand the agency's activities in chartering commercial fishing vessels to serve as research and fishery survey vessels. Increasing these charter opportunities will enlarge the geo- graphically diverse data collection for broad fish populations and enhance numerous ocean research programs. Other parts of NOAA, including the National Ocean Service and the Office of Oceanic and Atmospheric Research line offices, shall charter commercial fishing vessels, when applicable, to augment ongoing survey and research activities.

Cooperative Research—Depleted fish stocks result in significant economic losses to our Nation. At a time when fishing opportunities are constrained by uncertainty in stock assessment, and increased access to healthy stocks depends on better data, the Committee believes that maintenance of ongoing monitoring programs and surveys is critical. The Committee encourages NMFS to continue to prioritize long-time series surveys, with emphasis on surveys that are conducted cooperatively with industry and States. In addition, the Northeast Fisheries Science Center is directed to work collaboratively with the fishing industry to update the Northeast Cooperative Research Strategic Plan, including: the identification of science priorities; a process for greater involvement of fishermen in data collection; and better communication of how the results of cooperative fisheries research are used.

Offers of FLC Collaboration

As a diverse network of fishing communities, fishers, processors, marketers, families, scientists, institutional purchasers of seafood, and seafood consumers, the FLC is uniquely positioned to bring fresh perspectives and experts into the work of GARFO. We are pleased to be able to endorse the language of the GARFO Strategic Plan that we find to be most important to the development of a sustainable fisheries going forward. Following the submission of these comments, we look forward to dialogue with GARFO leadership about ways to seize these opportunities and maximize the value of collaboration.

Sincerely,

Valerie I. Nelson
Gloucester, MA
Water Alliance
Valerie.I.Nelson@gmail.com
(978) 283-7569

Ron G. Borjeson
Commercial Fisherman
Scituate, MA

Jason Jarvis
Commercial Fisherman
Westerly, RI

Bryan Fromm
Commercial Fisherman
Montauk, NY

Ed Snell
Rita B. Offshore Fishing
Portland, ME

Shannon Eldredge
Cape Cod Community
Supported Fishery
Chatham, MA

Stephen Welch
Commercial Fisherman
F/V Holly and Abby
Scituate, MA

Stu Tolley
Commercial Fisherman
F/V Dawn T
Chatham, MA

Sean Barrett
Dock to Dish
Montauk, NY

David Levine
American Sustainable Business Council
Washington, DC

Kathey Ozer
National Family Farm Coalition
Washington, DC

Edwin A. Yowell
Slow Food USA
New York, NY

Paul Bogart
Health Care Without Harm
Boston, MA

Anim Steel
Real Food Challenge
Boston, MA

Aaron Longton
Commercial Fisherman
Port Orford Sustainable Seafood
Port Orford, Oregon

Joanne Burke PhD, RD. LD
Thomas Haas Professor in Sustainable
Food Systems
University of New Hampshire

Maddie Phadke
Sustainable Business Network of
Massachusetts
Cambridge, MA

Robin Alden
Penobscot East Resource Center
Stonington, ME

Sarah Schumann
Eating with the Ecosystem
Warren, RI

Niaz Dorry
Northwest Atlantic Marine Alliance
Gloucester, MA

Ken Tolley
Commercial Fisherman
F/V Hunter
Chatham, MA

Katie Eagan
Commercial Fisherman
Bristol, RI

Russell Kingman
Commercial Fisherman
Chatham, MA

Orion Kriegman
New England New Economy Transition
Jamaica Plain, MA

Jonathan Gonzalez
Eat US Seafood.com
Santa Barbera, CA

Lucia Von Reusner
Green Century Capital Mngmnt.
Boston, MA

Karen Spiller
KAS Consulting
Boston, MA

Noemi Giszpenc
Cooperative Development Institute
Shelbourne Falls, MA

Drew Fournier
U-Mass Amherst Student

Steven Parkes
Cape Ann Fresh Catch
Gloucester, MA

Professor James Wilson
University of Maine
Old Town, ME

Molly D. Anderson
Partridge Chair in Food & Sustainable
Agriculture Systems
College of the Atlantic

Alison Cohen
Why Hunger
New York, NY

Tom Kelly, Ph.D.
Chief Sustainability Officer
University of New Hampshire

Joann Lo
Food Chain Workers Alliance
Los Angeles, CA

Leesa Cobb
Port Orford Ocean Resource Team
Port Orford, OR

Rick Hind
Greenpeace
Washington DC

Andrianna Natsoulas
Author
Las Cruces, NM

Ted Ames
Penobscot East Resource Center
Stonington, ME

Robert Hall
Compression Institute

Braintree, MA

Diane Wilson
Calhoun County Resource Watch
Seadrift, TX

Kevin Scribner
Forever Wild Seafood Club
Portland, Oregon

Katelyn Rozenas
Concerned Citizen
Dudley, MA

Matt Gove
Big City Fish Share
Brooklyn, NY

Mark Seifried
United Church of Christ
Boston, MA

Meri Ratzel
Fisheries Scientist
Harwich, MA

Keith Harrington
Adbusters Media Foundation
Brooklyn, NY

Kristen Barker
Concerned Citizen
Cincinnati, OH

Dr. Kathleen Burns
Sciencecorps
Lexington, MA

Simone Adler
Other Worlds
Oakland, CA

Hondo, TX

Peter Burke
Concerned Citizen
Amherst, MA

Patti Page
Concerned Citizen
Gloucester, MA

Laury Hammel
Sustainable Business Network of MA
Boston, MA

Marissa Mommaerts
Concerned Citizen
Sebastopol, WI

Elisabeth Farrell
UNH Sustainability Institute
South Berwick, ME

Christopher King
Provincetown, MA
Cape Tip Seafoods

Anamarija Frankic
Green Harbors Project
Boston, MA

Johanna Rosen
Food Solutions New England
Greenfield, MA

Dr. Deborah S. Rogers
Concerned Citizen
Oakland, CA

Zoe Brent
Concerned Citizen
Sebastopol, CA

Jon Berger
Real Food Challenge
Silver Spring, MD

Steve Gilman
Northeast Organic Farming Association
Stillwater, NY

Angela Andre
NYU Grad Student
New York, NY

Hank Herrera
Center for Popular Research
Oakland, CA

Christi Electris
Tellus Institute
Brookline, MA

Amy Little
Northeast Sustainable Agriculture
Working Group (NESAWG)
New Paltz, NY