

Janet Coit
Assistant Administrator
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
1325 East-West Highway
Silver Spring, MD 20910

March 31, 2023

Dear Administrator Coit,

The undersigned individuals and entities are members and representatives of the U.S. commercial fishing industry, a category that includes vessel owners, captains, crewmembers, port associations, and seafood businesses.

Although we hail from diverse ports and participate in many different fisheries, we are united by our shared support of fishery friendly climate action that *simultaneously* reduces, sequesters, or avoids GHG emissions at scales sufficient to hold warming well below 2°C (while pursuing efforts to limit warming to 1.5°C), while *also*:

- Avoiding collateral impacts on ocean, coastal, estuarine, and watershed environments;
- Avoiding interference with the harvest and provision of wild seafood for the public;
- Contributing conservation co-benefits that enhance the resilience of these ecosystems to climate change and other stressors; and/or
- Facilitating the voluntary adoption of cost-effective, locally appropriate technologies and practices to reduce fuel use and greenhouse gas emissions by fishing vessels and shoreside businesses.

We submit this letter in response to NOAA's solicitation for public comment on its draft National Seafood Strategy. Many of the undersigned have submitted additional responses to this call, and this letter neither supersedes, affirms, nor contradicts those other letters. Instead, its purpose is to lend additional emphasis and guidance to the critical and timely topic of ensuring that the NOAA National Seafood Strategy supports climate action that works *for* U.S. fisheries and not at their expense.

In this letter, we focus our comments on the first and fourth focal areas in the draft Strategy, namely "sustain or increase sustainable U.S. wild capture production" and "strengthen the entire U.S. seafood sector." As the draft correctly points out, both climate change and many ocean-based climate solutions represent drivers of unprecedented disruption to the U.S. fishing and seafood system. The draft also points out that seafood itself is a relatively low-carbon source of protein that offers particular promise in the context of food systems designed to reduce and mitigate the effects of climate change. Furthermore, the draft highlights the importance of themes such as: strengthening habitat conservation in support of fisheries; modernizing seafood infrastructure (e.g., vessels, port and dock facilities, working waterfronts); and fostering a growing and diverse seafood workforce.

Building on these themes, we outline below two priorities that should be considered in NOAA's National Seafood Strategy.

1. Illuminate a road to net-zero emissions that is "fishery friendly."

The years 2021-2022 marked a turning point in the U.S.' commitment to addressing its contribution to the crisis of global climate change, with the White House and Congress signaling unprecedented ambition through domestic reinstatement of the Paris Agreement's internationally embraced greenhouse gas reduction goals and the passage of two groundbreaking pieces of climate legislation: the Inflation Reduction Act and Bipartisan Infrastructure Law.

While these steps are commendable and necessary, it is not enough to ensure that our nation's ecosystems and wild places are spared the worst effects of climate change. An equally important step, which the federal government has yet to take, is to ensure that these ecosystems are *also* protected from potentially harmful impacts of some of the technologies and approaches that are likely to be deployed in the march towards net-zero.

In the context of the National Seafood Strategy, the ecosystems that produce wild seafood may experience negative impacts from rapid development of industrial offshore wind, deployment of risky forms of marine carbon dioxide removal, escalated levels of extraction of copper and critical minerals in sensitive watersheds, irresponsible forest removal for energy development or biofuel production, large-scale hydroelectric power, and assorted other decarbonization strategies that, especially when done hastily and without care, may impact the marine, coastal, and watershed environments that support U.S. seafood. Conversely, production of wild seafood may experience *positive* impacts from some decarbonization solutions, such as farmland and forest conservation, which can offer win-wins for the climate and ecosystems by improving upstream water quality while sequestering carbon in soils and long-lived woody biomass.

While NOAA's direct role in deploying and permitting decarbonization solutions is limited, NOAA's expertise in oceans and fisheries make the agency indispensable in bringing to light the potential negative *and* positive impacts of proposed decarbonization solutions to fishery ecosystems. NOAA scientists have a unique role to play in sorting "fishery friendly" from "fishery risky" decarbonization solutions and in developing guidelines that would result in the prioritization of "friendly" over "risky" investments, including in the context of investments and actions executed by other federal agencies.

Therefore, the signers of this letter implore NOAA to leverage its expertise at this pivotal time, and to make a sustained and strenuous effort to support fishery and seafood stakeholders when working with other agencies, as well as the White House's National Climate Task Force, National Climate Advisory, Office on Clean Energy Innovation and Implementation, and Office of Science and Technology Policy, in preferentially promoting climate-related investments and actions that *avoid* negative impacts and *promote* positive benefits to fishery ecosystems and seafood economies. This approach to stakeholder representation is currently missing from the seafood strategy and the agency's approach generally, and it is sorely needed.

To support this role, we ask NOAA to amend the National Seafood Strategy's Goal #1, as follows:

Changes in ocean conditions and the resulting shifts in distribution and abundance of marine resources, as well as the intensity of damaging storms are affecting access to and production of seafood as well as subsistence and Tribal fishing. *Meanwhile, the oceans, coasts, and waterways that support U.S. fisheries are increasingly called into action to support ambitious decarbonization strategies, with the goal of reducing further the U.S. contribution to global climate change.* These factors, in addition to new ocean uses and advances in sampling technologies and data modernization call for an evolution in science and management frameworks for a climate-ready seafood sector, including:

- **Fisheries Science.** Provide the science and economic and social analyses necessary for fisheries management under changing ecosystem dynamics *and to project and assess impacts of decarbonization strategies to fishery ecosystems and fisheries....*
- **Habitat Conservation in Support of Fisheries.** Protect and restore habitat important to our nation's fisheries and support resilient coastal communities, *including from any negative impacts posed by decarbonization strategies to fishery ecosystems and fisheries.*

2. Accelerate a transition to a low-carbon fishing fleet by supporting locally led, bottom-up innovation and planning.

Since the passage of the Inflation Reduction Act (IRA) in August 2022, members of the commercial fishing industry have submitted at least four letters to various federal agencies, including NOAA, asking that some portion of the Act's \$369 billion for decarbonization programs be apportioned to support a transition to low-carbon fishing vessels. For example:

- In a November 2022 letter, 190 associations, individuals, and businesses (facilitated by the North American Marine Alliance) asked NOAA to allocate \$100 million of the \$2.6 billion that the agency received under the IRA for coastal resilience projects, to support and/or finance clean energy opportunities for the nation's small-boat fishing fleet, including vessel retrofits and electric conversions, pilot projects demonstrating new technologies, and outreach and education.
- In a November 2022 letter, 14 associations and 34 individuals and businesses in the fishing industry wrote to the White House Office of Science and Technology on the creation of an Ocean Climate Action Plan, calling for the streamlining of existing federal programs (e.g., Diesel Emissions Reduction Act) as well as the establishment of new and diverse dedicated funding streams to support bottom-up planning and innovation.
- In December 2022 letter, 7 fishing industry associations wrote to the Environmental Protection Agency (EPA) regarding the IRA Greenhouse Gas Reduction Fund (which allocates \$27 billion for competitive grants for the provision of financial and technical assistance to projects that reduce or avoid greenhouse gas emissions and other forms of air pollution) asking the agency to design the program in such a way that funds might be available to fishing vessels and shoreside operators for investments in greenhouse gas reduction activities on board fishing vessels and in fishing ports;

- In a January 2023 letter, 14 associations and 35 individuals and businesses in the fishing industry submitted a letter to the EPA regarding the IRA Clean Ports Program (which allocates \$3 billion to provide grants related to reducing air pollution at ports) asking the agency to set aside ten percent of program funds, or \$300 million, for investments in US fishing and seafood facilities, vessels, and related working waterfront infrastructure in ports across the nation.

These letters also urged the EPA and NOAA to ensure that commercial fishing is given an opportunity to participate in emissions reductions initiatives through goals including creative approaches to financing, bottom-up incentives, and robust engagement based on common understanding and objective sharing. Additionally, the letters noted that due to the diverse characteristics of fishing ports, the best mix of low- and zero-emissions technologies will not be universal, and consequently, planning and investment must be locally led and tailored to the unique uses, challenges, and opportunities found in each port.

Furthermore, these letters stressed the fact that application of high-efficiency and zero-emissions technologies on fishing vessels in the U.S. is currently at a pilot stage, and technologies are prohibitively expensive. As a result, wraparound support is needed to launch more pilot programs, develop fisherman-led educational exchanges to vet and build confidence in new technologies, work with port managers and energy systems experts to design linked vessel-port decarbonization plans, and then ultimately, to bring the costs of zero-emissions technologies down to a level that is competitive with diesel engines via grants, tax incentives, and/or other financial mechanisms.

The White House's Ocean Climate Action Plan (OCAP), published in March 2023, integrates these recommendations in part, by recommending that NOAA work with the Departments of Energy (DOE) and Transportation (DOT) in the next 6-12 months to conduct scoping on opportunities related to fishing fleet decarbonization, and to explore the potential expansion of existing (or the creation of new) funding programs to support this transition. Although the OCAP recommendation on fishing fleet decarbonization is fairly cursory and technologically limited when contrasted with the OCAP's expansive three-page section on green ports and shipping, signers of this letter are broadly supportive of this goal and stand ready to offer our assistance. In fact, many of us are already collaborating on a bicoastal, fishing industry-led scoping project called "Accelerating a Transition to a Low Carbon Fishing Fleet," with an estimated publication date of November 2023. More information may be found at <https://www.fisheryfriendlyclimateaction.org/projects>

The need to accelerate a transition to a low-carbon fishing fleet intersects with two elements of the National Seafood Strategy: Goal #1's emphasis on the impacts of greenhouse gas emissions to seafood ecosystems and Goal #4's emphasis on modernizing seafood infrastructure and fostering a resilient seafood and fishing workforce. Therefore, we encourage NOAA to elevate the priorities articulated by the fishing industry in this and previous letters by amending the second bullet point under Goal #4 of the National Seafood Strategy, as follows:

Seafood Infrastructure. Work across federal agencies to modernize U.S. seafood infrastructure (e.g., vessels, hatcheries, port and dock facilities, processing, storage,

working waterfronts) to strengthen and enhance opportunities for coastal seafood communities and regional food economies *and to promote locally led, cost-effective opportunities to pursue low-carbon innovation in the fishing and seafood sectors.*

Conclusion

As the National Seafood Strategy moves towards completion and then implementation, we encourage NOAA to work with fishery stakeholders to advance fishery friendly climate action by communicating and coordinating through the Fishery Friendly Climate Action campaign, a national network that convenes fishing businesses, fishermen, and seafood-related businesses to promote fishery friendly climate action at all levels through coordination, information sharing, and communications support. More information is available at fisheryfriendlyclimateaction.org.

We invite NOAA to coordinate and communicate with fishery stakeholders through the infrastructure provided by the Fishery Friendly Climate Action campaign, in order to jointly advance fishery friendly pathways to reaching net-zero targets, including but not limited to the adoption of low- and zero-carbon technologies and practices within our own industry.

NOAA leadership can enhance coordination and communication for these purposes by updating the Seafood Strategy so that it is easier to establish partnerships between NOAA and organizations/businesses that achieve the following goals and objectives:

1. Facilitating interagency coordination, i.e., with NOAA line offices and other federal agencies, and support and encourage coordination efforts with other federal agencies and entities, including the Environmental Protection Agency, Department of Agriculture, relevant White House offices, and others where appropriate.
2. Assisting with interagency coordination through the National Climate Task Force, and other relevant interagency bodies as appropriate.
3. Facilitating and supporting data sharing and analysis with fishing communities in support of fishing community supported efforts to promote fishery friendly climate action.
4. Contributing appropriate federal resources and subject matter expertise to support these efforts.

Thank you for the opportunity to provide comment. Responses to this letter may be sent on our behalf to Sarah Schumann, coordinator of the Fishery Friendly Climate Action campaign, at shiningseaconsulting@gmail.com.

Sincerely,

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