



Pacific Fishery Management Council

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Marc Gorelnik, Chair | Merrick J. Burden, Executive Director

October 13, 2022

Ms. Janet Coit
Assistant Administrator, NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

Re: Council Comment on the National Oceanic and Atmospheric Administration (NOAA) Fisheries' Draft Equity and Environmental Justice (EEJ) Strategy.

Dear Ms. Coit:

The Council received presentations on the NOAA Fisheries EEJ strategy at its June meeting from Mr. Sam Rauch, Deputy Assistant Administrator for Regulatory Programs, and at its September meeting from Ms. Abigail Harley and Ms. Stacey Miller of the West Coast Region. The Council appreciates the careful attention that has gone into the development of this strategy. We are supportive of the strategy's goals and objectives and would like to work with NOAA Fisheries to help ensure successful development of regional EEJ implementation plans.

The Council operates with an open-door policy and takes pride in basing decisions in a transparent process. However, we acknowledge that openness and transparency alone cannot sufficiently address EEJ matters, and that multiple factors determine whether EEJ objectives can be sufficiently met. For example, the root of many problems that EEJ initiatives seek to address can be traced back to a history of social exclusion and marginalization. These matters are complex, pervasive, and exist within society broadly - beyond matters that are solely in the realm of fisheries. While full resolution of these societal matters is larger than the Council process, the Council nevertheless has an important role to play in helping to advance EEJ.

The Council recognizes that EEJ issues cannot be fixed overnight and that it will be important to have realistic and measurable goals. Success against these goals will rely on a number of factors including available funding and personnel, coordinated partnership with NOAA Fisheries, and the identification of actions that can be accomplished with available resources and in the context of the full suite of Council priorities. These factors are interconnected and impact one another. Engagement through ongoing and wide ranging partnerships will be important to achieving EEJ goals including, for example, partnership with social scientists at the Science Centers and coordination with states and tribes.

With respect to the specifics of the NOAA strategy and the issue of measurable goals, the Council notes that many of the metrics proposed by NOAA to evaluate success are measurable but may not be meaningful in terms of achieving desired EEJ outcomes. That is, measures such as the number and percentage of NOAA staff trained, number of NOAA offices represented at regular

meetings, or the number of Regional/Program EEJ working groups established reflect activity but do not appear to be meaningful indicators of impact. For example, tribes are considered fishing dependent communities. With this in mind, one appropriate and measurable metric might be whether important fish stocks are supporting tribal fisheries and levels of harvests that meet the cultural and socio-economic needs of the respective tribes. The Council encourages NOAA Fisheries to consider this perspective as it works to finalize its policy.

One of the major themes that arose during the September Council discussion of EEJ was the question of how to engage with those who have not been participating in the Council process, but who are nevertheless affected by Council decisions. Outreach has always been a goal of the Council. Council members, Council advisory body members, and Council staff all work to communicate Council activities and decisions while taking in the perspective and needs of affected groups. Nevertheless, the Council is currently taking a broad look at its processes (including meeting format and communications) with an eye toward enhancing effectiveness and efficiencies, and this effort closely intersects with EEJ objectives.

The Council believes that encouraging bottom-up efforts to educate constituents about the Council process and promote their participation is instrumental in achieving EEJ goals and objectives. One significant barrier to effective participation in the Council process is knowledge about fishery management and the Council process. The Marine Resources Education Program (MREP), a program developed by fishermen for fishermen, has an excellent record of helping to educate and engage new participants in fishery management processes and provides an example of one of the types of efforts that may be helpful in pursuing EEJ related objectives. Beyond fishermen, there are other potential participants, (e.g., community leaders and nongovernmental organization representatives), that might benefit from an education program such as MREP. As part of the EEJ efforts, MREP might be encouraged and supported in expanding its outreach among fishermen as well as to other constituent groups. Those who work with agencies can help MREP expand its reach by referring to MREP those constituents with whom they come into contact.

Overall, EEJ efforts provide an important opportunity to build further trust with constituents. Such trust leads to more participation in the management process, and consequently, a better-informed process, while at the same time improving fishery managers' alliance with fishermen and other constituents to help ensure good fishery conservation and management. The Council has a keen interest in improving Council processes to better address matters of EEJ and hopes that the same types of training provided to NOAA Fisheries employees will be available for the Council, Council staff, and Council advisory bodies. To help better understand where the Council is starting from on matters of EEJ, Council staff will be developing a list of its existing activities that address the types of outreach and process accessibility envisioned under the EEJ strategy. Council staff are also ready to work with NMFS staff at the regions and science centers to identify a role for the Council in the development of the regional implementation plans.

We look forward to partnering with you to enhance our shared objectives concerning EEJ issues.

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Sincerely,

A handwritten signature in black ink that reads "Marc Gorelnik". The signature is written in a cursive style with a large, sweeping initial "M".

Marc Gorelnik
Chairman

JLS:ael

Cc: Council Members
Mr. Sam Rauch
Ms. Abigail Harley
Ms. Stacey Miller