

June 20, 2023

007120JUN2023

Ms. Janet Coit Assistant Administrator, NOAA Fisheries 1315 East-West Highway Silver Spring, MD 20910 Via email: janet.coit@noaa.gov

Dear Ms. Coit:

At its May 23-25th, 2023, meeting, the Council Coordination Committee (CCC) received a presentation on an Advanced Notice of Proposed Rulemaking (ANPR) to determine if updates to the Guidelines for National Standards (NS) 4, 8, and 9 are needed to improve federal fisheries management. The goal of the ANPR is to solicit public input on the current guidelines, including areas/issues that may benefit from further consideration or revisions.

The ANPR focuses on climate-related impacts and promoting Equity and Environmental Justice (EEJ) in fisheries as it relates specifically to NS 4, 8, and 9. The agency is also considering updating the interpretations of "fishing communities," as defined in the Magnuson-Stevens Fishery Conservation and Management Act, and as it relates to fair and equitable allocation of marine resources, EEJ, and climateready fisheries.

Potential revisions to the National Standards should be discussed and deliberated carefully by each Regional Fishery Management Council (RFMC), as any modifications to the guidelines will influence the development and implementation of fishery management measures. Presentations on the ANPR will be offered to each RFMC between June and August 2023; however, the public comment period closes on September 12, 2023. Because this rushed timeline precludes many RFMCs of the opportunity to draft letters for further consideration and deliberation before submittal, the CCC passed the following motion.

Motion: The CCC recommends that NMFS extend the comment deadline on the ANPR for National Standards 4, 8, and 9 Guidelines to October 15.

Motion carried without opposition.

Caribbean Executive Director: Miguel Rolon Chair: Marcos Hanke

New England Executive Director: Thomas Nies Chair: Eric Reid

Gulf of Mexico Executive Director: Dr. Carrie Simmons Executive Director: John Carmichael Chair: Greg Stunz

North Pacific Executive Director: David Witherell Chair: Simon Kinneen

South Atlantic Chair: Dr. Carolyn Belcher

Pacific Executive Director: Merrick Burden Chair: Marc Gorelnik

Mid Atlantic Executive Director: Dr. Christopher Moore Chair: Mike Luisi

> Western Pacific **Executive Director: Kitty Simonds** Chair: John Gourley

The RFMCs are the primary users of the NS guidelines, each with unique stakeholder needs; therefore, we respectfully request an extension of the deadline for comments on this ANPR. Do not hesitate to reach out to Gulf Council leadership should you have any questions.

Sincerely,

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Mike Luisi, Chair Mid-Atlantic Fishery Management Council

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Carolyn Belcher, Ph.D., Chair South Atlantic Fishery Management Council

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Marcos Hanke, Chair Caribbean Fishery Management Council

Marc Forth

Marc Gorelnik, Chair Pacific Fishery Management Council

Eric Reid, Chair New England Fishery Management Council

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Gregory Stunz, Ph.D., Chair Gulf of Mexico Fishery Management Council

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Simon Kinneen, Chair North Pacific Fishery Management Council

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John Gourley, Chair Western Pacific Fishery Management Council

cc: Mr. Sam Rauch / Ms. Kelly Denit / Ms. Marian McPherson / Thomas Nies / Christopher Moore / John Carmichael / Carrie Simmons / Miguel Rolon / Merrick Burden / Kitty Simonds / David Witherell