



February 25, 2022

The Honorable Debra Haaland
Secretary of the Interior
Department of the Interior
1849 C. Street, N.W.
Washington, DC 20230

Dear Secretary Haaland:

Please accept these comments from the Council Coordination Committee (CCC) regarding the Request for Information (RFI) to inform how the American Conservation and Stewardship Atlas (Atlas) can best serve as a useful tool for the public and how it should reflect a continuum of conservation actions in the America the Beautiful (ATB) initiative.

The CCC represents the shared interests of the U.S. Regional Fishery Management Councils (Councils). Established through Federal statute in 1976, the Councils manage the most broadly distributed activity in U.S. Federal waters -- fishing. The Councils use sound science in applying scale-appropriate, adaptive, stakeholder-driven approaches to fisheries management, including developing special use and restricted zones in U.S. Federal waters that occur along the conservation continuum contemplated under ATB.

The Councils already apply a process that adheres closely to the eight ATB key principles for conserving and restoring land and waters. All Council conservation areas are established using a collaborative and inclusive approach, where people have worked together to conserve the health and productivity of marine resources (Principle 1). These areas provide conservation of relatively undisturbed natural places in the U.S., and yield meaningful benefits to all Americans, including providing healthy sustainable protein that is available and affordable to a broad range of U.S. consumers (Principle 2). While the Exclusive Economic Zone (EEZ) is owned by the nation (not private landowners as on land), the Councils work closely with fishermen and stakeholders in each region to ensure effective stewardship of these areas, fisheries, and the ecosystem (Principle 6). Conservation areas are established to create jobs, support productive fisheries, and support vibrant coastal communities (Principle 5). All conservation areas are established using the best scientific information available (Principle 7) and are developed to be flexible and adaptive to adjust to a changing climate and availability of new scientific information (Principle 8). Further, because the Councils operate through a stakeholder driven process, some conservation areas are developed using locally led or locally designed conservation efforts (Principle 3) and other areas have been developed to support priorities of tribal nations and communities (Principle 4).

The first step in establishing a database of conservation areas is to define the term ‘conservation area.’ From the CCC’s perspective, a conservation area is an established, geographically defined area, with

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Mid Atlantic

Executive Director: Dr. Christopher Moore
Chair: Mike Luisi

New England

Executive Director: Thomas Nies
Chair: Eric Reid

North Pacific

Executive Director: David Witherell
Chair: Simon Kinneen

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Executive Director: Kitty Simonds
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planned management or regulation of activities that provides for the maintenance of biological productivity and biodiversity, and ecosystem function and services (including providing recreational opportunities and healthy, sustainable seafood to a diverse range of consumers). The CCC also emphasizes that many conservation areas can achieve conservation goals without prohibiting all fishing activity as the overall health of fish stocks and ecosystems are also managed through science-based annual catch limits, gear restrictions, and other tools to support and conserve marine habitat.

The Atlas should include the best available data to support the ATB initiative. The Councils are experts in the data that is available to support decision making in the U.S. Federal waters, particularly data on fisheries and habitat. Councils have noted that the Protected Seas database developed in coordination with the National Ocean Service does not accurately reflect all conservation areas established to regulate fisheries in the EEZ. That database should not be used as the sole, authoritative source in development of the Atlas for Council managed areas.

The Atlas preparers should utilize the expertise of the Councils and the CCC report being prepared on conservation areas. A preliminary report to the CCC in October 2021 showed that there are at least 663 Council-implemented conservation areas in the U.S. EEZ, and all bottom tending fishing gears have been prohibited in more than 54% of the EEZ. Details on these areas are being compiled. The Council's comprehensive evaluation of these conservation areas relative to the goals of ATB will be complete and ready to incorporate into the Atlas in June 2022, after being presented at the [May 2022 CCC Meeting](#).

The report will review the area-based management in the Councils and NOAA Fisheries purview, inform the five questions posed in the RFI notice, address the eight principles in the Executive Order, and provide the data needed for the Atlas.

At this time the CCC offers the following recommendations. The Atlas needs to be more than just a database. It should describe the conservation activities in different regions of the U.S., reflect the continuum along which those activities are applied, and assess the risks to biodiversity given the current conservation and management programs in place. The Atlas should be more than an accounting of whether we have reached 30% conservation target by 2030. It should tell the story of how different types of conservation measures in the U.S. benefit the environment, the economy, and provide access and opportunity to our communities, including those that are underserved. The Atlas also needs to be more than just a baseline, it should be a living document. Like the Council process, it should have the flexibility to be nimble and adapt to a changing environment.

The CCC should be an active partner in this effort. Toward that end, we request you put a placeholder for input on the Fishery Management Councils' conservation actions in U.S. Federal waters, with the intention of using the CCC report when it is available in June 2022. Our CCC Area-Based Management Subcommittee will be available to answer questions and engage with you to support incorporating this information into the American Conservation and Stewardship Atlas.

Please feel free to reach out to the current CCC Chair, Michael Luisi at michael.luisi@maryland.gov if you have any questions about this request.

Sincerely,



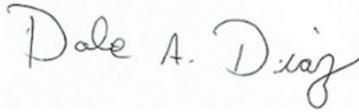
Mike Luisi, Chair
Mid-Atlantic Fishery Management Council



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