



North Pacific Fishery Management Council

Simon Kinneen, Chair | David Witherell, Executive Director
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June 14, 2023

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 June 5-11 meeting, the North Pacific Fishery Management Council (NPFMC) received a report from Mike Ruccio, OSF NMFS on the status of the ANPR to modify the Guidelines for implementing National Standards 4, 8, and 9. This briefing provided more information than the briefing for the Council Coordination Committee last month. Mr. Ruccio informed the Council that it had been over a decade since the agency had modified any of the guidance for these three standards and did not provide any reason for urgency other than potential turnover in administrations. Despite the request to you by the Council Coordination Committee to extend the public comment deadline until October 15, we were told that the Agency was not planning on extending the comment deadline past September 12, because the added time would not allow revisions to be completed during this administration.

The presentation did remind the Council of the significant role of guidance for Councils as they consider and balance the National Standards in developing management recommendations. The NPFMC believes that the guidelines are much too important and durable in nature to be modified in a rushed process, and therefore providing meaningful input prior to agency development of the proposed rule is critically important. The ANPR was published only two weeks prior to our June Council meeting and the current schedule does not allow for another Council meeting prior to the comment deadline. The Council needs at least two meetings to develop comments and receive regional stakeholder input on the Council's response.

In this particular case, the ANPR is unique in that it is vague and there is a vast universe of potential ideas and recommendations to consider before commenting on the ANPR. For instance, Mr. Ruccio described the intent to focus on two challenges: climate related impacts and promoting EEJ, and did not mention implementation of the National Seafood Strategy. He agreed this could be an oversight, and for Council members this was a moment of recognition that a robust input process is necessary for such a critical set of guidance that affects all of the Nation's federal fisheries. The Regional Fishery Management Councils are the primary users of the guidelines and should be given sufficient opportunity to consider the complexity of potential implications and provide recommendations and well-reasoned comments on the issues being considered for revisions at each step in the process. As such, **the North Pacific Council formally requests that NOAA Fisheries extend the comment deadline for the ANPR until October 20, which would allow for an additional CCC and NPFMC meeting.**

Sincerely,

A handwritten signature in black ink, appearing to read "D. Witherell".

David Witherell
Executive Director

cc: Mr. Sam Rauch
Ms. Jennifer Lukens
Ms. Kelly Denit
Mr. Mike Ruccio
Mr. Jon Kurland