



# Gulf of Mexico Fishery Management Council

*Managing Fishery Resources in the U.S. Federal Waters of the Gulf of Mexico*

4107 West Spruce St Suite 200

Tampa, Florida 33607 USA

Phone: 813.348.1630 • Toll free: 888.833.1844 • Fax: 813.348.1711

[www.gulfcouncil.org](http://www.gulfcouncil.org)

## **DRAFT FOR COUNCIL REVIEW**

August xx, 2022

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

Dear Ms. Coit:

The Gulf of Mexico Fishery Management Council (Council) appreciates the opportunity to provide comment on NOAA Fisheries' Draft Equity and Environmental Justice (EEJ) Strategy.

The Council is generally supportive of the strategy's three overarching goals and six core objectives, but it remains unclear how NOAA Fisheries' EEJ Strategy will be successful at the national and subsequent regional EEJ strategies without proper funding. For example, the objective for Equity in Research and Researching Equity would identify underserved communities, address their needs, and assess impacts of management decisions. But as noted in the EEJ Strategy, NOAA Fisheries' first barrier to EEJ concerns the lack of awareness of the underserved communities that may be impacted by fishery management decisions. As defined in Executive Order 13985, underserved communities in the fisheries context may include fishing vessel crews and fish processor workers. In the Gulf of Mexico, there is very little information about these groups that are employed in the region's fisheries and their description is often absent or very qualitative in amendments to fishery management plans the Council uses to make management decisions. Identifying these populations is an important first step to addressing their needs and impacts from management decisions, but one that will require substantial financial resources. The Council thinks that without this fundamental and vital information at the start of these EEJ efforts would likely result in failure for both the completion of the remaining core objectives and subsequent efforts to overcome barriers. Additionally, the success for identifying and overcoming barriers to equity and environmental justice would likely remain unquantified and unknown metrics of success.

Alongside the collection of appropriate baseline data to identify such underserved communities, the Council encourages NOAA Fisheries to define the metrics that would be used to measure progress towards the EEJ Strategy's objectives. The Council supports the objective of building relationships with underserved communities and notes the importance of in-person interactions with fishing communities. One historical example of this is NOAA Fisheries' personnel

spending time on the docks in order to develop and maintain relationships with fishermen that are unable to travel and participate in meetings. The Council encourages NOAA Fisheries to continue and even expand on these working relationships as new staff are onboarded.

The Council appreciates that opportunity to comment on NOAA Fisheries' Draft EEJ Strategy. NOAA Fisheries should continue to engage the Council as it works to develop its regional plan, in which more specificity in planned actions is expected to be provided, as well as further details of the financial and human resources to be made available through this initiative. The Council invites NOAA leadership to provide progress updates at future Council meetings.

Sincerely,

Dale Diaz  
Council Chair

Cc: Gulf Council / Council staff / Heather Blough / Sam Rauch/ Clay Porch, Ph.D. / John Walter, Ph.D. / RMC Executive Directors