

November 18, 2022

Dr. Scott Doney  
Office of Science and Technology Policy  
Executive Office of the President  
1650 Pennsylvania Ave., NW  
Washington, DC 20504

***Re: Notice of Request for Information regarding Ocean Climate Action Plan***

Dear Dr. Doney,

We, the undersigned, are domestic seafood harvesters and shoreside businesses or associations dependent on products harvested by our fishermen and women. We appreciate the opportunity to offer the following comments on the Office of Science and Technology Policy (OSTP) and the Council on Environmental Quality *Request for Information to inform development of the Ocean Climate Action Plan (OCAP)*.<sup>1</sup> Our activities, which are integral to the nation's food security, require access to the nation's ocean and coastal waters. We have also achieved significant gains in ocean ecosystem and climate understanding through our work as scientific partners on a variety of research projects and are strongly committed to these efforts. We support and endorse the comment letter submitted by the Responsible Offshore Development Alliance (RODA). In particular, we offer the following recommendations to OSTP:

- Seize this opportunity to explicitly prioritize inclusion of fishermen's important knowledge and perspectives, which have for too long been absent from executive-level ocean policies, and require this of all Agencies participating in the development of the OCAP;
- Convene a meeting or summit on how to best integrate fishing knowledge into Administration-level activities, with national seafood industry participation;
- Establish dedicated funding to develop and integrate Fisheries Ecological Knowledge into U.S. climate policy, including substantial investments in cooperative research;
- Formally include "Fishing Communities" in the broader definition of underserved communities as it relates to ocean-based climate solutions;
- Include the following statement in the OCAP, "The commercial fishing industry is integral to the nation's food security, culture, and history, and an important economic driver for many ports and harbors across the U.S. Ocean-based climate solutions shall prioritize avoiding adverse impacts to the fishing industry";
- Encourage federal agencies to identify, quantify and qualify all known costs and benefits of potential ocean-based climate solutions before decisions and/or significant investments are made, so that we collectively maximize the utility and conservation of our nation's marine resources;
- Enhance coordination among state and federal agencies surrounding scientific efforts to address the impacts of offshore developments to living marine resources, habitats, and the ecosystem;
- Explore strategies to determine how the costs and impacts resulting from ocean-based climate solutions may be shared equitably, in addition to asking how the benefits of ocean-based climate solutions can be shared equitably; and
- Prioritize collaborations to consider and implement ocean-based climate solutions that protect U.S. food security while maintaining our ability to provide a low climate impact source of protein to achieve win-win scenarios.

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<sup>1</sup> 87 Fed. Reg. 60228 (Oct 4, 2022).

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Cape Clam, Inc.  
Cape May Ice Co., Inc.  
Cape Trawlers, Inc.  
Cumberland Freezers, L.L.C.  
Dorothy May, L.L.C.  
Elise G, L.L.C.  
Evening Star LLC  
F/V Charisma LLC  
F/V Gannett LLC  
Golden Nuggett, L.L.C.  
Illex One, L.L.C.  
Loper-Bright Enterprises Inc.  
Lund-Marr Trawlers, L.L.C.  
Lund's Export Sales Co., Inc.  
Miss Madeline, LLC  
Mnt. Vernon, LLC  
Nancy Elizabeth, LLC  
993 Ocean Drive, LLC  
Ocean Leader LLC  
Shakari, LLC  
Scombrus One, LLC  
Squid Light, LLC  
Top Fish, LLC  
Western Explorer, LLC  
WIFTEK, L.L.C.  
Windy Jane, LLC  
Oxnard Unloading Serv LLC  
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