

Altamaha Riverkeeper * Atchafalaya Basinkeeper * Blue Frontier * Blue Water Baltimore * Cahaba Riverkeeper * Center for Biological Diversity * Chesapeake Bay Foundation * Coastal Conservation League * Conservation Law Foundation * Crystal Coast Waterkeeper * Defenders of Wildlife * Earthjustice * Emerald Coastkeeper * Florida Wildlife Federation * Galveston Baykeeper * Greenpeace * Gulf Restoration Network * Humboldt Baykeeper * League of Conservation Voters * Miami Waterkeeper * Middle Susquehanna Riverkeeper * Milwaukee Riverkeeper * Moms Clean Air Force Virginia * Natural Resources Defense Council * New England Coastal Wildlife Alliance * New Jersey Sierra Club * Ocean Conservancy * Oceana * Operation SPLASH * Orca Conservancy * Pew Charitable Trusts * San Diego Coastkeeper * Sandy Hook Sea Life Foundation * Sassafras River Association * Seacoast Science Center * SeaSave Foundation * Shark Angels * Sierra Club * Sound Rivers * St. Johns Riverkeeper * Suncoast Waterkeeper * Turtle Island Restoration Network * Wabash Riverkeeper * Waterkeeper Alliance

June 15, 2016

The President
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear Mr. President:

Our organizations write because the National Oceanic and Atmospheric Administration's Fisheries Service (NOAA Fisheries) is on the brink of finalizing a rule change that would be, if not amended, **the first weakening of the conservation mandates in the nation's fisheries law and regulations since 1996. The proposed rule** (Magnuson-Stevens Act Provisions; National Standard Guidelines, 80 Fed. Reg. 2786-2811 (Jan. 20, 2015)) **would weaken fisheries protection and threaten jobs, coast economies, and the health of our oceans. We ask that the proposed rule either be fixed to remedy the substantial deficiencies identified below, or be withdrawn.**

The U.S. has made notable progress in restoring U.S. fisheries. Levels of overfishing are declining and the number of depleted fish populations has reached historic lows. The progress towards sustainable fisheries has been the product of a series of improvements in the country's fisheries rules and the governing law, the Magnuson-Stevens Fishery Conservation and Management Act (MSA), as well as hard work by fishermen, managers, scientists, conservationists, and other stakeholders.

These notable successes, however, are not a rationale to weaken protections. There remains much work to be done. Many fish populations, such as Atlantic cod and Gulf of Mexico greater amberjack, are still in trouble. At the same time, new challenges are surfacing, such as rapidly changing ocean environments brought about by climate change, and many old problems, such as habitat destruction and excessive bycatch, remain. NOAA Fisheries' National Standard One or "NS1" Guidelines are a key component of addressing these challenges, as they provide direction to regional fishery managers on how to prevent overfishing, rebuild overfished fish populations, set catch limits, and generally conserve and manage fish populations for the nation's benefit.

NOAA Fisheries appears poised to finalize changes to the NS1 Guidelines that would weaken U.S. fisheries policy by:

- Increasing the likelihood of overfishing by allowing managers to delay necessary reductions in catch limits resulting from new scientific information, to avoid overfishing determinations by averaging data over multiple years, to carry over unused quota without knowing if it is a sign that a fish population is in decline, and to overfish certain species by grouping them with other species;
- Allowing managers to delay the rebuilding of depleted fish populations, including by stretching out rebuilding timelines; and
- Allowing fish populations to be dropped or excluded from *any* conservation and management under the MSA.

NOAA Fisheries proposed the rollbacks to the NS1 Guidelines in January 2015. Since that time, there has been widespread opposition to the proposal, including from members of Congress (by letter on November 5, 2015), more than 100,000 members of the public, and 45 ocean and environmental organizations, as well as from a host of scientists, seafood associations, businesses, and retailers, fishermen, and seafood chefs. Many of our organizations have met multiple times with members of your Administration to express our strong concerns and have offered specific language fixes to the proposal's flaws in writing.

Shortly before your Administration took office eight years ago, the NS1 Guidelines were strengthened by the previous Administration. We hope that you help cement your legacies in both ocean conservation and job creation by withdrawing or fixing NOAA Fisheries' proposal that rolls back these same guidelines. Stronger, not weaker, fisheries management is necessary to ensure the long-term sustainability of fishing communities and to protect and restore ocean health. Thank you as always for your tremendous leadership in protecting our environment.

Sincerely,

Jen Hilbum
Executive Director
Altamaha Riverkeeper

Dean A. Wilson
Waterkeeper
Atchafalaya Basinkeeper

Margo Pellegrino
Field Organizer
Blue Frontier

David Flores
Waterkeeper
Blue Water Baltimore

Myra Crawford
Executive Director
Cahaba Riverkeeper

Catherine Ware Kilduff
Staff Attorney
Center for Biological Diversity

Kim Coble
Vice President for Environmental Protection
Chesapeake Bay Foundation

Dana Beach
Executive Director
Coastal Conservation League

Peter Shelley
Senior Counsel
Conservation Law Foundation

Larry Baldwin
Waterkeeper
Crystal Coast Waterkeeper

Mike Senatore
Vice President
Defenders of Wildlife

Martin Hayden
Vice President, Policy and Legislation
Earthjustice

Laurie Murphy
Executive Director
Emerald Coastkeeper

Manley Fuller
President
Florida Wildlife Federation

Jen Prowls
Board Member
Galveston Baykeeper

Phil Kline
Senior Ocean Campaigner
Greenpeace

Cynthia Sarthou
Executive Director
Gulf Restoration Network

Jennifer Kalt
Director
Humboldt Baykeeper

Andy French
Fellow
League of Conservation Voters

Rachel Silverstein
Executive Director
Miami Waterkeeper

Carol Parenzan
Riverkeeper
Middle Susquehanna Riverkeeper

Cheryl Nenn
Riverkeeper
Milwaukee Riverkeeper

Sarah Chasis
Senior Attorney and Oceans Program Director
Natural Resources Defense Council

Carol "Krill" Carson
President
New England Coastal Wildlife Alliance

Jeff Tittel
Executive Director
New Jersey Sierra Club

Lara Levison
Senior Director, Federal Policy
Oceana

Andreas Merkl
CEO
Ocean Conservancy

Rob Weltner
President
Operation SPLASH

Shari Tarantino
President
Orca Conservancy

Doug Fetterly
Marine Action Team Chair
Sierra Club

Tom Wathen
Vice President
Pew Charitable Trusts

Harrison Marks
Executive Director
Sound Rivers

Matt O'Malley
Legal and Policy Director
San Diego Coastkeeper

Lisa Rinaman
Riverkeeper
St. Johns Riverkeeper

Mary M. Hamilton
Executive Director
Sandy Hook Sea Life Foundation

Justin Bloom
Executive Director
Suncoast Waterkeeper

Captain Emmett Duke
Riverkeeper
Sassafras River Association

Terra Pascarosa
Field Operations Manager
Mom's Clean Air Force,
Virginia Chapter

Wendy Lull
President
Seacoast Science Center

Todd Steiner
Executive Director
Turtle Island Restoration Network

Georgienne Bradley
Executive Director
SeaSave Foundation

Rae Schnapp
Riverkeeper
Wabash Riverkeeper

Jamie Pollack
Executive Director
Sharks Angels

Daniel Estrin
General Counsel and Legal Director
Waterkeeper Alliance

cc: The Honorable Shaun Donovan, Director, Office of Management and Budget
Ms. Christina W. Goldfuss, Managing Director, Council on Environmental Quality
The Honorable Penny Pritzker, Secretary, U.S. Department of Commerce
The Honorable Dr. Kathryn D. Sullivan, Under Secretary of Commerce for Oceans and
Atmosphere and NOAA Administrator
Ms. Eileen Sobek, Assistant Administrator, National Marine Fisheries Service