

November 30, 2021

**Re: MSA Reauthorization, H.R. 4690, Committee on Natural Resources: Subcommittee on Water,
Oceans and Wildlife**

Chairman Huffman, Ranking Member Bentz, and Members of the Subcommittee,

I would like to take the opportunity offer written testimony to the Subcommittee as Members consider H.R. 4690 and deliberate over Magnuson Stevens Act Reauthorization. As a member of our nation's coastal commercial fishing community, I would remind Members that the decisions made by this Subcommittee will directly impact the lives and futures of millions of Americans who make their living due to sustainably and responsibly managed U.S. ocean resources. My community will be on the front lines directly receiving management success or management failure as a result of the policies set by legislative action and subsequently implemented through the Regional Fisheries Management Councils. That importance cannot be understated.

Climate Ready Fisheries: Title I of the bill, "Climate Ready Fisheries", and in particular Section 102, "Promoting Climate Resilience in Fisheries Management", has raised serious concerns from fisheries managers. All Regional Fishery Management Councils have submitted detailed comments about how they are already achieving the goals/intent of this section of the bill through existing management processes and scientific/management partnerships, while noting that the new requirements would create additional and unnecessary workloads which the Councils do not have the ability to fulfill.¹

The November 4, 2021 Council Coordinating Committee (CCC) letter to Representatives Huffman and Case states: "The CCC believes that some sections of H.R. 4690, as drafted, will increase the workload on the Councils and the agency, create demands for data and analyses that in many cases cannot be supported, could increase the risk of litigation on several important topics, appears to reduce the flexibility and the role of the Councils, and does not appear to authorize sufficient funding to meet its requirements."²

This statement alone should create pause and concern for Subcommittee members, as well as a comprehensive and realistic assessment of the bill's requirements. I would strongly recommend that Subcommittee and Committee members read the CCC and RFMC letters in detail. The goal of any legislation should be management success, which the current legislation has largely achieved. Good

¹ See all RFMC letters on H.R. 4690 here: <http://www.fisherycouncils.org/msa-reauthorization>.

² See CCC Letter to Congressman Huffman on HR4690 at <https://static1.squarespace.com/static/56c65ea3f2b77e3a78d3441e/t/6184665bad15664b1e6f0a24/1636066908392/CCC+Letter+to+Huffman-Case+HR4690+Nov2021.pdf>.

intentions cannot be equated with good outcomes. While the intent of the legislation may be good, if the outcome in reality results in an inability for the Councils to successfully fulfill legal mandates, the management system will be plagued with unending legal challenges and result in failure to support the fishing communities of America through sustainable management.

Several Councils and the CCC, for example, have noted the bill's requirements to project MSY under probable future conditions is not realistically possible. Similarly, they have noted that the bill's new definition of Habitat Areas of Particular Concern (HAPCs) to include areas that "*may become* important to the health of a managed species"³ and associated requirement that Councils predict these areas into the future for management is an impossible mandate. According to the CCC, "These are just two of many examples of the bill placing unrealistic demands on the available scientific information."⁴ Such provisions would set up U.S. fishery management to fail, which should be neither the intended goal nor the accidental outcome of legislation.

All stakeholders, regardless of sector, have an interest in management success. Creating a broken management system from the outset as a matter of federal governmental policy is not in the best interest of anyone. However, the real impacts of management failure would be felt most by coastal fishing communities who will be the collateral damage if these provisions receive Congressional approval.

Secretarial Power: A concerning and recurring theme of the bill seems to be the removal of management authority away from the Regional Fishery Management Councils and towards the Secretary. The CCC highlights this fact on page 3 of its letter: "Several sections of H.R. 4690 could diminish the role of the RFMCs". This is concerning because 1) the Secretary is a political appointee therefore subject to frequent political policy swings/lobbying efforts, 2) the Councils have expertise and knowledge that a political appointed Secretary is unlikely to possess, and 3) direct rule by one individual of the Executive branch is not the best way to govern.

For example, Section 106 "Emerging Fisheries", removes the authority of Councils to request the addition of new fisheries via the 90-day notice and removes the authority of the Council to submit changes to the list of fisheries; it essentially vests control of both of these issues in the Secretary. Section 102, "Promoting Climate Resilience in Fisheries Management", requires the Secretary to conduct climate vulnerability assessments of managed species, and then recommend management measures to the Councils consistent with the Secretary's determination(s), then requires the Councils to publish a prioritization plan within one year to implement management measures consistent with the Secretary's notification/recommendations; this section essentially allows frequent top-down management by the Secretary to direct the focus of the Regional Fishery Management Councils based on "climate vulnerability assessments".

Section 506, "Preparation and Review of Secretarial Plans" requires the Councils to submit an FMP for approval to the Secretary within 180 days of a partial approval or disapproval of a Fishery Management Plan (FMP) for a species requiring conservation and management. If the Council does not

³ Emphasis added.

⁴ See CCC Letter to Congressman Huffman on HR4690 at <https://static1.squarespace.com/static/56c65ea3f2b77e3a78d3441e/t/6184665bad15664b1e6f0a24/1636066908392/CCC+Letter+to+Huffman-Case+HR4690+Nov2021.pdf>, p. 2.

comply, the Secretary is required to issue the FMP directly. However, 180 days is not enough time for a Council to prepare an FMP in compliance with the National Environmental Policy Act (NEPA), existing MSA requirements, potential Endangered Species Act requirements, or even the Council public process. Therefore, the result of this section would be that all plans partially approved or disapproved by the Secretary would be then directly written and issued by the Secretary, rather than the Councils. The CCC comments, "Section 504 contains similar language if the Secretary determines that a rebuilding plan is not making adequate progress...This would affect the Councils by reducing the regional role in fisheries management that is one of the foundations of the MSA." Another clear example of this same problem is the bill's requirement in Section 508 to add river herring and shad to the list of managed stocks in the Mid Atlantic Fishery Management Council's Mackerel Squid Butterfish FMP and New England Fishery Management Council's Atlantic Herring FMP within 180 days of the passage of the bill. The Mid Atlantic Council has already commented that 180 days would result in the above scenario and is not enough time to satisfy NEPA.

While the Council process may not be perfect, it is better than the alternative. Directly creating legislative provisions where authority will be taken away from the public Council process and transformed into FMP management by the Secretary, a single politically appointed individual, via a non-public process is not good policy. It is not transparent, and it is not likely to experience the scientific or management scrutiny that would result as a result of the Council process.

Council Input on Executive Orders: Section 305, "Council Accountability and Membership", contains language that prohibits Council members/Advisory Panel members/Council employees/Council contractors from using federal funds to attempt to influence executive orders or presidential decrees and would create civil penalties including expulsion from the Council or loss of Council employment for doing so.

Councils are already prohibited from lobbying activities; they can only provide input on an issue when invited to do so by Congress, NOAA, other agencies, etc. However, this language appears to remove the ability of a Regional Fishery Management Council to provide input- whether or not that input is requested- on any Executive Order or Presidential decree regardless of the situation. This is particularly disturbing as the current Administration has announced the America the Beautiful initiative to conserve 30% of the nation's water by 2030.⁵ To prohibit, under penalty of law, the Regional Fishery Management Councils as the managers of our nations marine resources from providing input in this process would be catastrophic. It is also counter-intuitive; prohibiting the inclusion of those with the most expertise in this area from participating in the process would certainly not be productive public policy.

The New England Fishery Management Council raises these concerns and also the provision's potential to encourage frivolous litigation: "This section incorporates current restrictions on lobbying that apply to the Councils. However, it extends the prohibition to attempting to influence certain Presidential actions. This latter addition may inhibit the ability of the Council to provide its perspective on the arguments for or against the Presidential action. In addition, the enforcement mechanism

⁵ See <https://www.doi.gov/pressreleases/biden-harris-administration-outlines-america-beautiful-initiative>.

proposed requires the Secretary to investigate any complaint or a potential violation received from any entity. This has the potential to encourage frivolous complaints that will burden the agency.”⁶

Forage Fish Provisions: Section 508, “Forage Fish Provisions”, requires Councils to maintain “sufficient abundance, diversity, and localized distribution of forage fish populations” along with associated mandates; it also requires the Secretary within 180 days to add river herring and shad to the list of managed stocks in the MAFMC’s Mackerel Squid Butterfish FMP and the NEFMC’s Herring FMP.

H.R. 4690 has an entire section- Section 105- dedicated to shifting stocks. Climate change and stock shifts are a foundational theme of the entire bill. Yet, Section 508 regarding “forage fish” management mandates that Councils somehow maintain “localized distribution of forage fish populations”. Legislation cannot be created that simultaneously mandates certain management action because stocks are shifting and other management action to require localized abundance and localized distribution. It is self-contradictory. Additionally, it is realistically impossible. It is impossible for fishery management to pen fish into certain areas in the open ocean. This provision would create both management failure and an open door for litigation.

Including river herring and shad as stocks in the fishery for the Mackerel, Squid, Butterfish and Herring FMPs would essentially close those targeted fisheries for species that are not only non-targeted but actively avoided and are in a depleted state only due to decades of habitat degradation in rivers due to dams and pollution. The result of adding them particularly to the Mid Atlantic Fishery Management Council’s Mackerel, Squid, Butterfish FMP would be that two MSC-certified squid fisheries, leading in global sustainability, could be shut down due to requirements to manage to the lowest common denominator. My home state of Rhode Island, the smallest state in the union, is responsible for more MSC- certified longfin squid landings than all other East Coast states combined, with calamari heralded as our official state appetizer. To lose this fishery for factors related to river herring and shad outside of realistic fishery management control would be devastating.

River herring and shad are depleted not due to fishing pressure but due to land-based habitat destruction. There is no way for Fishery Management Councils to manage road runoff in all the states on the Eastern seaboard, or remove all the dams, or revive water quality or habitat in areas that are now quite literally a metropolis. Over 3800 dams still exist on rivers in the Chesapeake Bay watershed alone; and in watershed areas with 5-10% impervious cover, 50-100% mortality of river herring eggs and larvae occur.⁷ Addressing these issues is outside the realm of Regional Fishery Management Councils.

Even so, the Mid Atlantic and New England Councils have implemented management measures focusing on avoidance of these species, and the Atlantic States Marine Fisheries Commission also has an established FMP. The Mid Atlantic Council has deliberated multiple times on potentially adding river herring and shad as stock in their Squid Mackerel Butterfish FMP, which it ultimately decided to abstain from as inappropriate. In its comment letter on this bill, the Council gives detail on why it chose not to

⁶ See

https://static1.squarespace.com/static/56c65ea3f2b77e3a78d3441e/t/615b0c3799fecf78c5fe19fe/1633356856095/211001_NEFMC+to+Reps+Huffman+and+Case+HR+4690.pdf, p. 6.

⁷ See http://maps.tnc.org/EROF_ChesapeakeFPP/ and <http://www.merrimack.org/web/wp-content/uploads/2012/07/Water-Quality-Impacts-to-River-Herring-and-Other-Fishes.pdf>.

do so and provides links to decision documents containing science, deliberations, etc., and other existing management for these stocks.

Per the Mid Atlantic Council, “As a general principle, we believe the Councils should retain the authority to determine species requiring conservation and management through FMPs. Any legislation that directs the Secretary to prepare or amend fishery management plans (e.g., recent legislation to add shad and river herring as managed species) creates conflicts with current management under other existing authorities.”⁸ I agree. Not because I support every Council action- far from it- but because there are much more detailed regional, scientific, management and other ongoing comprehensive issues that should go into such decisions than will ever be discussed in depth by this Subcommittee. This is why the existing Magnuson legislation relies on Council-based management to very high legislative standards.

Creating additional blanket “forage fish” measures for all regions does not acknowledge both the differences between regions and the ongoing initiatives already undertaken by the Councils across the country. The Mid Atlantic Fishery Management Council has an established “Ecosystem Approach to Fisheries Management” policy and associated initiatives including consideration of predator needs that has actually been the leading focus of a joint initiative with the European Union’s Pelagic Advisory Council.⁹ The Mid Atlantic Council has also proactively passed an Unmanaged Forage Omnibus Amendment,¹⁰ the New England Council has enacted an ABC control rule to specifically account for herring’s role as forage,¹¹ and similar actions specific to their regions have been taken by other Regional Fishery Management Councils.

U. S. fisheries are already more extensively managed than U.S. oil and gas extraction and U.S. pharmaceutical and medicine manufacturing, according to a study conducted by George Mason University.¹² Creating additional duplicative or conflicting requirements will not help management or stakeholders to succeed; the effect will be the exact opposite.

Essential Fish Habitat: Section 502, “Essential Fish Habitat Consultations” makes dramatic changes to fishery management requirements regarding Essential Fish Habitat (EFH). Not in the least is to change the current legal threshold requiring Councils to minimize adverse impacts to EFH “to the extent practicable”. H.R. 4690 removes the qualifier “to the extent practicable” and inserts a new definition of “adverse effect”, defined as “any impact that reduces the quality or quantity of EFH”. The new law if adopted would therefore require Councils to essentially minimize all fishing activities, as “any impact” is not qualified by any measure or counterbalanced by context- i.e., if the impacts are minimal, temporary, do not create harm to the stock, etc. By removing “to the extent practicable” all discretion of the Councils is eradicated, and the Councils are mandated to essentially stop fishing activity in EFH areas, which are many and varied in nature.

⁸ See

https://static1.squarespace.com/static/56c65ea3f2b77e3a78d3441e/t/615628171bf7864459884e00/1633036312180/MAFMC-HR4690_2021-09-30.pdf.

⁹ See <https://www.mafmc.org/eafm>.

¹⁰ See <https://www.mafmc.org/actions/unmanaged-forage>.

¹¹ See <https://www.nefmc.org/library/amendment-8-2>.

¹² See George Mason University Mercatus Center “The McLaughlin-Sherouse List: The 10 Most-Regulated Industries of 2014” at

<https://www.mercatus.org/publications/regulation/mclaughlin-sherouse-list-10-most-regulated-industries-2014>.

The New England Fishery Management Council has voiced serious concerns to both Council function and litigation of Council action that would arise from the adoption of such language: “This section would modify the MSA required elements of FMPs to “minimize adverse effects on essential fish habitat.” This would remove the current phrase “to the extent practicable.” This is a significant change that would change the way measures to minimize adverse effects are evaluated. In the extreme, the only way to minimize adverse effects is to prohibit fishing, or at least prohibit certain gears. Removing the practicability language creates an opportunity to litigate any FMP that allows any adverse effects whatsoever to continue in order to comply with the goals of the MSA and its National Standards. Any plaintiff need only show that some additional measure would further reduce any effects, regardless of whether the measure is practicable or conflicts with one of the National Standards. Similar language would be added for HAPCs, and could have similar impacts”¹³

The Mid Atlantic Fishery Management Council has voiced similar concerns. Additionally, the Council raises the point that removing “to the extent practicable” would place EFH provisions above all other Magnuson mandates, which are varied and have need of balance between them in order for conservation and management to function: “The Council is concerned that this change could essentially require the elimination of any fishing that has, or could have, any impact on EFH.... removal of the practicability clause could open the door to litigation (or re-litigation) on any fishery management action that allows for any degree of adverse impacts to habitat. The Council also notes that the new definition of “Adverse Effect” is quite broad and, in combination with the removal of the practicability clause, would significantly increase the Council’s responsibility to restrict fishing activities that have any adverse effect (even temporary) on EFH. The Council believes that the EFH and HAPC provisions in the MSA are vitally important to protecting fish habitat. However, we are concerned that the proposed changes leave little flexibility to balance habitat protection with the other management objectives identified in the MSA, such as the requirements to achieve optimum yield, minimize adverse economic impacts, or consider efficiency in the utilization of fishery resources.”¹⁴

A balance of competing Magnuson requirements is necessary for effective management, and the explicit removal of “to the extent practicable” from the law not only makes this balance impossible but also sends a clear message that the intent of Congress is to prevent fishing in large areas of the ocean. From a stakeholder perspective, this is terrifying. Were members of the Subcommittee to go online to the Mid Atlantic Ocean Data Portal Map and click on the “Essential Fish Habitats” link footnoted below, they would find that every square mile of the Atlantic Ocean from the Canadian line to Cape Hatteras off North Carolina is designated as Essential Fish Habitat for one or more species.¹⁵ As every type of fishing has some kind of impact, however miniscule or temporary, the Councils would be

¹³ See

https://static1.squarespace.com/static/56c65ea3f2b77e3a78d3441e/t/615b0c3799fecf78c5fe19fe/1633356856095/211001_NEFMC+to+Reps+Huffman+and+Case+HR+4690.pdf, p. 7.

¹⁴ See

https://static1.squarespace.com/static/56c65ea3f2b77e3a78d3441e/t/615628171bf7864459884e00/1633036312180/MAFMC-HR4690_2021-09-30.pdf, p. 7.

¹⁵ See MARCO Mid Atlantic Ocean Data Portal EFH map at: <https://portal.midatlanticocean.org/visualize/#x=-74.54&y=42.13&z=6.000000000000003&logo=true&controls=true&dls%5B%5D=true&dls%5B%5D=0.5&dls%5B%5D=162&basemap=ocean&themes%5Bids%5D%5B%5D=2&themes%5Bids%5D%5B%5D=24&tab=data&legends=false&layers=true>.

mandated per the proposed language to minimize “any” impact to EFH without consideration for impacts to stakeholders. The result would most likely result in our bankruptcy.

Also contained in Section 502 is a new definition for Habitat Areas of Particular Concern (HAPCs) and associated requirements to designate such areas and avoid adverse effects on such areas. Without balancing requirements with a practicability clause, the impacts of this language would presumably end with the same outcomes as the proposed EFH language. One additional requirement of the HAPC language, however, is to require Councils to predictively identify and manage HAPCs. The new definition would encompass areas that “will be” significantly stressed by human activities due to “anticipated future environmental conditions” or “may become important to the health of the managed species”.

Predictive management based on how well a Council can guess future conditions- when many don’t have adequate scientific information to fulfill current management needs - is not good public policy. The CCC notes that “This would require Councils to predict the future in a dynamic, highly variable system” and would place “unrealistic demands on the available scientific information.”¹⁶ Fisheries management is already difficult enough due to the sheer reality that you are managing a resource that cannot be seen and that is continually moving. Requiring management based on a Council’s best attempt to peer into the future will complicate an already difficult job and no doubt create management failures. The New England Fishery Management Council has stated that in practice these HAPC requirements would create “a standard that will be difficult, if not impossible, to apply” but also that the requirements “will make it difficult for fisheries to adapt to climate change.”¹⁷ I would hope that the Subcommittee would agree that measures making such adaptation difficult would not be in the best interests of the fishing communities of the United States.

Bycatch Reduction: Section 503, “Reducing Bycatch” follows the lead of Section 502 and amends the MSA’s existing National Standard 9 regarding minimization of bycatch by removing “to the extent practicable”. This could effectively outlaw most if not all commercial and recreational fisheries, and again removes the Council’s ability to balance competing Magnuson mandates. The New England Fishery Management Council has highlighted both the fact that such a change would open the door to “extensive litigation over bycatch measures” and “effectively elevat[e] National Standard 9 to take precedence over all National Standards”.¹⁸ The Mid Atlantic Council takes a similar stance and shares previous federal judicial determinations where the federal district Court found that individual MSA National Standards cannot be viewed in a vacuum but must be part of a balancing act within management.¹⁹ Removing flexibility in management is never going to result in good fisheries

¹⁶ See <https://static1.squarespace.com/static/56c65ea3f2b77e3a78d3441e/t/6184665bad15664b1e6f0a24/1636066908392/CCC+Letter+to+Huffman-Case+HR4690+Nov2021.pdf>, p. 2.

¹⁷ See https://static1.squarespace.com/static/56c65ea3f2b77e3a78d3441e/t/615b0c3799fecf78c5fe19fe/1633356856095/211001_NEFMC+to+Reps+Huffman+and+Case+HR+4690.pdf, p. 7.

¹⁸ See https://static1.squarespace.com/static/56c65ea3f2b77e3a78d3441e/t/615b0c3799fecf78c5fe19fe/1633356856095/211001_NEFMC+to+Reps+Huffman+and+Case+HR+4690.pdf, p. 8.

¹⁹ See https://static1.squarespace.com/static/56c65ea3f2b77e3a78d3441e/t/615628171bf7864459884e00/1633036312180/MAFMC-HR4690_2021-09-30.pdf, p. 7-8

management, or perhaps in this case force “management” to mean no fisheries, commercial or recreational, at all.

Northeast Regional Pilot Research Trawl Survey and Study: Section 405 “Northeast Regional Pilot Research Trawl Survey and Study” would require the Secretary, relevant Councils and the Northeast Area Monitoring and Assessment Program (NEAMAP), to develop a fishing industry-based pilot trawl survey to study and enhance the existing federal vessel survey, and use the NEAMAP survey as a model. I fully support this provision. It would seriously enhance collaborative scientific research in the Northeast region, which has been lacking in this area. This provision has received bipartisan support and is contained in both H.R. 4690 and the Congressman Young H.R. 59 bill.

Atlantic Councils: Section 303, “Atlantic Councils” would create a new seat for the New England Fishery Management Council on the Mid Atlantic Fishery Management Council and vice versa; these individuals would be appointed by the Secretary. I support this concept- currently the two Councils have already appointed liaisons from their respective existing Council members to serve as liaisons between themselves. However, these individuals do not currently possess voting rights on the opposing Council. Granting these liaisons, or such appointees, voting rights seems to be the intent of Section 303, and I would support that intent.

However, the Councils should appoint these individuals from their existing Council members, as currently practiced, and the liaisons simply granted voting rights. The Councils themselves know who has expertise where and in what fisheries, what issues are at hand for discussion, and are best suited to appoint their own liaisons. Giving this ability directly to the Secretary, who would not have this level of knowledge about expertise levels, is more likely to politicize the position(s). Also, there is no need to create entirely new seats. Both the Mid Atlantic and New England Councils have expressed concerns about Council vs Secretarial knowledge related to this type of an appointment where expertise is an essential component of the liaison role.

I would support granting voting rights to liaisons within the existing Council liaison structure/practice. In my opinion, this would be a beneficial development to regional fisheries management. However, I would not support adding new individuals appointed by the Secretary.

Depleted Designation: Section 505, “Depleted Fisheries and Preventing Overfishing” adds a definition of “depleted” to mean a stock that is below its biomass level due to various factors including but not limited to fishing. On face value, this would seem to be a move in the right direction of acknowledging that low stock levels can be attributed to many factors, such as habitat loss, for example, as in the case of river herring and shad discussed above. However, the section also explains that use of the term “depleted” shall be deemed a reference to “overfished” as defined currently in the Act and as found/defined in previous case law. Therefore, in practice, there would be no difference between current law/management and future law/management should this language be adopted.

H.R. 59, the “Strengthening Fishing Communities and Increasing Flexibility in Fisheries Management Act” bill as proposed by Congressman Young does a better job of addressing the “depleted” term. That bill would replace the term “overfished” with the term “depleted” but also require that the Secretary differentiate between stocks that are depleted due to fishing and stocks that are depleted due to factors other than fishing. Additionally, it would require that the Secretary differentiate if stocks are the target of directed fishing or not. Again, in the example of river herring and

shad discussed above, these stocks are not only not a target of directed fishing but are actively avoided and associated with management measures designed to reduce incidental bycatch. Therefore, the difference in both designation and resulting management as well as public perception would be better addressed by the H.R. 59 language.

Conclusion: Overall, H.R. 4690 contains some very concerning language on many issues that would directly negatively impact commercial fishing communities of the United States. Many provisions will force management failure, as noted by the comments from the various Regional Fisheries Management Councils, by requiring more of science as well as the management structure than they can provide. Failed management means direct negative impacts on the lives and businesses of commercial fishing stakeholders, as we are bound to the results of science and management, whether successful or failed. The goal of legislation should be to manage for success, both in express intent and indirectly in practice.

Also concerning is the continual mention by the Regional Fishery Management Councils of opening doors to extensive litigation that would arise from various provisions of the bill. The goal of legislation should never be to create extensive litigation that will hinder sound and stable administration of the law. I would encourage Subcommittee Members to carefully consider those sections in light of the comments you have received from these bodies.

And finally, certain sections of the bill, including those on EFH, Bycatch and Forage all pose the terrifying potential to shut down healthy and productive fisheries altogether. The goal of the Magnuson Stevens Fishery Conservation and Management Act is not just to conserve; it is also to manage fisheries. These two goals have to be balanced to provide the maximum benefit to the nation. The nation will receive no benefit by shutting down healthy fisheries and essentially eradicating the need for fishery management by placing conservation as the sole goal, whether directly or indirectly, of legislation. That is in essence what these sections would accomplish in practice.

The current version of MSA is primarily working from a stock sustainability standpoint. What is needed now is a complimentary focus on sustaining fishing communities and greater flexibility for managers, not additional or duplicative burdens. I would encourage Subcommittee members to explore and support legislative action that would work towards achieving these ends, such as is contained in many sections of H.R. 59.

Thank you for the opportunity to submit testimony.

Respectfully,

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