COMMENTS
for the March 22, 2012 Hearing of the
Subcommittee on Fisheries, Wildlife, Oceans and Insular Affairs
titled "*Empty Hooks: The National Ocean Policy Is The Latest Threat to Access for Recreational and Commercial Fishermen.*"

Comments Submitted By:

United Catcher Boats &

Alaska Bering Sea Crabbers
Alaska Crab Coalition
Alaska Groundfish Databank
At-Sea Processors Association
Crab Group of Independent Harvesters
Pacific Seafood Processors Association
Petersburg Vessel Owners Association
Southeast Alaska Fishermen's Alliance
United Fishermen of Alaska
West Coast Seafood Processors Association

INTRODUCTION

Chairman Fleming, Ranking Member Sablan, and Members of the Subcommittee; thank you for the opportunity to testify today regarding the implications of the Administration's new National Ocean Policy Implementation Plan on commercial fishermen and fisheries. My name is Justin LeBlanc. I am the federal government relations representative for United Catcher Boats (UCB).

UCB is a trade association of 70 commercial fishing vessels that participate in the Alaskan Pollock, Alaskan crab, and West Coast groundfish fisheries. Our vessels are called catcher boats because that is all we do – we catch fish and deliver our catch "in the round" to processing facilities. We do not process the fish, even minimally.

Joining UCB in presenting these comments to the Subcommittee are…

Together, these commercial fishing and processing organizations represent numerous companies which participate in the federally managed fisheries in the Exclusive Economic Zone off Alaska, Washington, Oregon and California, along with businesses that rely on these companies. These fisheries comprise over 55% of the annual commercial seafood harvest of the United States. The yearly direct value is over two billion dollars, with hundreds of millions of dollars of secondary economic effects resulting from our expenditures in other sectors such as shipyards, marine equipment, seafood packaging, insurance and finance, and transportation providers.

In addition, on November 7, 2011, the Seafood Coalition submitted a letter to the Full House Resources Committee (and attached to this testimony) expressing the need for Congressional action barring the Administration from continuing to divert appropriations from authorized programs to implement an ill-conceived NOP that is not authorized by Congress and that threatens fishing industry jobs.

The Seafood Coalition is a broad national coalition that includes commercial fishing interests, seafood processors, and coastal communities. This broad-based group, which includes members from every region of the U.S., accounts for about 85 percent of the seafood landed annually in the U.S. The Seafood Coalition believes the Administration has turned a deaf ear to the seafood industry's concerns in implementing NOP, choosing instead to push ahead with a new "top down" bureaucracy empowered to develop plans

and to restrict ocean uses through regulations issued under an array of oceans-related statutes.

The commercial fishing industry has been involved in this issue for well over a decade since the ocean policy commissions began preparing their reports. We have offered our views each step of the way since then. When the recommendations of the oceans commissions were put into legislative form by various environmental groups (H.R. 4900/108th Congress, H.R. 2939/109th Congress, H.R. 21 in the 110th and 111th Congresses) we provided comments and testimony along with many other ocean user groups. After Congress repeatedly refused to enact this legislation, the approach of the environmental community changed and H.R. 21 reappeared in the form of the Administration's National Ocean Policy (NOP). The NOP was given life through the President's proclamation of Executive Order 13547 on July 19, 2010. We now are being offered another opportunity to provide comments on the NOP Implementation Plan, the Administration's effort to impose a new regulatory program for the oceans and Great Lakes.

Although we are again submitting comments, we are disappointed that despite the importance of our industry to the nation's economy, and despite our familiarity with ocean ecosystems, our comments at each step in this process have been ignored. We continue to present what we think is an obvious case: the NOP's Coastal Marine Spatial Planning/Regional Planning Body structure is an unauthorized new regulatory program aimed at imposing a new ocean governance structure which conflicts with successful Congressionally authorized programs such as regional fishery management. Nevertheless, we remain committed to participating in the process and we hope that the Administration will eventually make this as transparent and collaborative a process as has been claimed all along.

THE IMPLEMENTATION PLAN

The Draft Implementation plan proclaims four overarching themes. We will briefly address each.

Adopt Ecosystem-Based Management

This has been a goal of resource managers for many years. It is a goal that we support. But, as any oceanographer will tell you, it is also a goal that cannot be fully achieved without vast amounts of additional scientific data that will take decades to collect and interpret, even assuming that funding is available. In the meantime, resource managers must use the best available data to manage our ocean resources. Progress has definitely been made in moving from single species management to using ecosystem principles. In fact, the fishery management process used by the North Pacific Fishery Management Council incorporates consideration of ecosystem effects for almost all decisions they make and the Pacific Fishery Management Council is well along on adopting a similar process. Nevertheless, we are a long way from being able to claim that we understand any ecosystem well enough to be able to simultaneously manage all the species which

interact within a given region. This is especially true given that current law requires specific actions – rebuilding overfished stocks, protecting endangered or threatened species, protecting marine mammals – which elevate certain species to a higher plane than others within an ecosystem.

Obtain, Advance, Use, and Share the Best Science and Data

As we just pointed out, everyone supports collecting and using the best possible science. But doing so requires large amounts of money and time. We hope that the federal budget will soon allow a greater allocation of funds toward this goal. But, in the meantime, scientists and resource managers will have to do the best job they can with the data that is available. To the extent that funding is not available to provide precise, accurate and current data which allows the best management of ocean resources, we need to be careful not to set goals which are technically unobtainable.

Promote Efficiency and Collaboration

Once again, we are all in favor of greater cooperation and coordination among the agencies which regulate ocean activities. Interestingly, when discussing this theme the document states, "This draft Implementation Plan creates no new regulations, however, within existing authorities, legal and regulatory barriers to full implementation of the National Ocean Policy will be identified and permitting processes will be streamlined." This statement is as close as we have seen to an admission that there is no specific statutory authority for this program. It also suggests that the Administration intends to impose new regulations where necessary in order to eliminate the "regulatory barriers" they identify, and to seek new legislation that would provide the statutory authority.

Strengthen Regional Efforts

The final theme is to strengthen regional, state and local ecosystem conservation efforts. We doubt anyone would be opposed to this goal, and as long as the resources are available it is something we would support. At the same time, we suggest that since federal funds are scarce, the Administration should focus on supporting existing organizations with a record of success, such as the regional fishery management councils and the federal scientists on whom they rely.

Fiscal Responsibility

There is a discussion of Fiscal Responsibility on page 5 of the document. It says that the National Ocean Council will issue an annual memorandum on how federal resources should be allocated. We think it would be more useful if a detailed NOP implementation budget were developed and presented to Congress. Given federal budget constraints, it is almost certain that Congress will continue to refuse funding for the NOP initiative unless such a budget plan is offered. Providing a budget proposal that is subject to public scrutiny and debate will also increase transparency of the process. The document itself even admits that carrying out the Implementation Plan is, "contingent on the availability

of funds". This is one of the reasons we have argued since the beginning of this process that if NOP is to be pursued it should involve small steps and pilot projects. We fear that if various agencies attempt to implement this massive program within their current budgets, large amounts of money will be diverted from ongoing, Congressionally mandated programs. An example of the threat posed by such a diversion of funds is the possibility that certain fishery stock assessment surveys done in the North Pacific could switch from being done annually to being done bi-annually. Lowering the quality of the data available to fishery managers would threaten economic activity worth over one billion dollars annually. As an affected industry, we and our employees are not ready to see our livelihoods threatened should implementation of the National Ocean Policy result in funds being siphoned off from existing NOAA fishery programs.

Treatment of Commercial Fisheries

As we said earlier, the commercial fishing industry has now participated in this process for over a decade, through the oceans commissions, H.R. 21, its predecessor legislation, and now NOP. Our goal all along has been to preserve and strengthen the system of regional, stakeholder-driven fishery management that has worked so well in our part of the country. Even after all our attempts to participate, the Draft Implementation Plan ignores the points we have made and proposes the creation of a new ocean resource management system that appears to have few limits. Page 9 of the report states that "fisheries can be better managed" and that NOP "will improve future management decisions." Our question is: Decisions made by whom? We suggest that either the Regional Fishery Management Council process be exempted from this entire program or that the NOP/CMSP/RPB process be revised so that it genuinely becomes the voluntary planning process we have been told it was intended to be.

The Nine Priority Objectives

The bulk of the Draft Implementation Plan describes specific actions the Administration intends to take to achieve the nine priority objectives. There are numerous milestones and deadlines for each. We will not take the time to go through the scores of actions and milestones laid out in the plan. However, we will highlight some which we believe are overly ambitious/costly or which seem to lead to the inescapable conclusion that NOP is more of a regulatory program as opposed to the transparent, collegial planning process we keep hearing about.

Overly Ambitious Action Proposals (target date):

- Page 19 --- Explore "the 95-percent of the ocean that remains poorly known." (2014)
- Page 23 --- Enhance ocean education so that "a highly competent workforce is available for U.S. employers." (2014-2017)
- Page 25 --- Assess the environmental knowledge of middle school students. (2017)

- Page 27 --- Develop and deploy within ten years a fleet of unmanned air, sea surface and underwater research systems. (2022)
- Page 32 --- Map the entire EEZ and continental shelf. (2017)
- Page 50 --- Address "planned and unplanned activities impacting coral reef ecosystems." (2012)
- Page 56 --- "Integrate relevant socioeconomic monitoring information with ecosystem monitoring information to understand changes in coupled human-natural systems in selected areas." (2013) [Perhaps this would be a more appropriate task for academia?]
- Page 57-58 --- Conduct research to assess direct and indirect impacts of climate change and ocean acidification on coastal communities, including estimations of mean sea-level rise, impacts on jobs, and effects on marine species. (2013-2015)
- Page 65 --- Provide funding to private landowners to help them reduce nutrient and sediment runoff. (2012)
- Page 67 --- Reduce air pollutants (sulfur, nitrogen, mercury) to the oceans and Great Lakes. (2012) Control storm-water runoff from the federal highway system. (2015)
- Page 74 --- "Protect 2 million acres of lands identified as high conservation priorities" (including 700,000 acres of forest) (2015)

Evidence that NOP is a Regulatory Program

- Page 4 --- "CMSP is an important tool for implementing EBM." It will lead to a more "certain decision-making process for managing activities in the ocean"
- Page 6 --- "The NOC expects to complete and approve the final Implementation Plan in the Spring of 2012. Federal agencies will then implement its initial set of actions."
- Page 11 --- "Existing regulatory requirements and programs that were developed based on a fundamentally different model may need to be modified"
- Page 12 --- "an EBM approach supports adaptive, iterative management."
- Page 12 --- "various responses or actions may become necessary given the limits of existing regulatory or statutory authority."
- Page 13 --- Find "opportunities to incorporate EBM principles into Federal laws, regulations, and policies"
- Page 15 --- "Establish a process for adaptive resource management"
- Page 39 --- "Review the interpretation and, as necessary, propose to strengthen content and/or application of Federal legislation…..to incorporate and better support climate change adaptation efforts."
- Page 51- 52 --- The Plan proposes to identify "important marine areas for management or protection". This includes use of "national marine sanctuaries, national estuary programs, and national marine monuments." "Priority species" would be protected using "Essential Fish Habitat (EFH) Provisions including Habitat Areas of Particular Concern (HAPC)". This passage provides some of the strongest and clearest language that RPB's, comprised principally of federal officials with no expertise in fisheries management, will develop CMS Plans that

usurp the responsibilities of regional fishery management councils. Contrary to the stated intent of the NOP, the Plan creates confusion and ambiguity on EFH and HAPC responsibilities, as well as other areas of fishery management authorities, where none now exists.

- Pages 85 – 92 --- This section discusses Coastal and Marine Spatial Planning and the role of the Regional Planning Bodies. It lays out a detailed process for creation of the nine Regional Planning Bodies, implementation of CMSP, creation of CMS Plans for each region, and the presentation of these plans to the National Ocean Council for certification. This is to be accomplished by 2019.

One of the stated goals of CMSP is empowering coastal communities through a public planning process to make decisions about activities in their regions. This sounds fine until you realize that the membership of the RPB's consists entirely of government officials, dominated by Federal representatives. The document states that "Members will be of an appropriate level of responsibility within their respective governing body to be able to make decisions and commitments throughout the process." This sounds less like planning and more like regulation to us. The system is then removed even further from public/local control by the fact that once the RPB's have developed their CMS Plans, these plans are submitted to the National Ocean Council (a group of 27 Federal officials). This Federal entity then decides if the plan is worthy of "certification". Our presumption is that the next step would be implementation of the plan through new or modified federal regulations. Otherwise, what would be the point of the exercise? We make this statement despite the following discussion that appears on Page 109 of the document (the "Summary of Public Comments" section):

> Public Comment: "The Administration should clarify that it will not be the purpose of the Regional Planning Bodies to override the duties of regional fishery management councils."
>
> Response: "The Executive Order expressly provides that Federal agencies will implement NOC-certified CMS Plans consistent with existing statutory authority, including the Magnuson-Stevens Act. Regional planning bodies will be established to develop these plans. They do not have any legal authority or mandate that would override the statutory or regulatory duties of any existing entity, including Regional Fishery Management Councils."

We understand that the Regional Planning Bodies do not have independent legal/regulatory authority. The point is that the CMS Plans they create then go to the NOC for approval and implementation by every agency throughout the federal government. This process is clearly stated in the "Final Recommendations of the Interagency Ocean Policy Task Force" (July 19, 2010…page 65) ---

> "Agencies would incorporate components of the CMS Plan into their respective regulations to the extent possible. Adherence with CMSP would be achieved through Federal and State agencies and tribal authorities incorporating CMS Plans into their pre-planning, planning, and permitting processes, to the extent

consistent with existing laws and regulations. The CMS Plan signatories would periodically review these processes and where legal constraints are identified, would seek to remedy these constraints, including by working with the NOC to evaluate whether a legislative solution or changes to regulations are necessary or appropriate."

This clearly states that CMS Plans will be implemented government-wide, and that if new regulations are required to achieve the goals of the NOC, they will be pursued. We are not comforted by the boilerplate language about the process being "consistent with existing laws and regulations". If an agency implements the NOP/CMSP plans in a way which, in our view, conflicts with an existing law or regulation, our only option would be to go to court. As the Administration is aware, few entities have the resources to file court challenges on a regular basis. All ocean user groups, not just the seafood industry, would have little chance of preventing the imposition of CMS Plan regulations.

In the end, this is the most critical point. Despite repeated rhetoric from the Administration that this is designed to be a bottom-up, stakeholder driven process with no regulatory authority, a plain reading of the Implementation Plan reveals a federally-controlled, closed-door effort that will compel 27 different federal agencies to conform their regulations to comply with a regional ocean plan. Some have suggested adding an representative of the Regional Fishery Management Councils to each of the Regional Planning Bodies. The Administration has said yes, provided they are a federal, state, or tribal member of such. But suggesting the Councils need or deserve representation on the Regional Planning Bodies simply reinforces the fact that the RPBs will have regulatory authority over the Councils. If not, then why would the RFMCs need some sort of representation. Further, by specifying that an RFMC representative must be a federal, state, or tribal member, the Administration is further clarifying that the RPBs do not provide for true stakeholder participation.

WHO WINS?

Nowhere in the NOP Implementation Plan does it clarify how user conflicts in the ocean will be resolved. If we embark upon a regional ocean zoning effort, inevitably multiple user groups will want to 'claim' a particular area of the ocean, be it for fisheries, mineral resource extraction, renewable energy, recreational activity, or marine reserves. By what metric will a particular claim be awarded? Historical use of the area? Number of jobs created? Amount of money generated for the economy? National Security? Food Security? Least environmental impact?

When asked this question at a CMSP workshop last year, Administration officials responded that "science would decide". But such a question is not wholly a scientific one. It is a social, economic, and even cultural decision that is far more nuanced. 27 federal bureaucrats deciding who wins and where among multiple ocean users does not provide for the stakeholder and public participation necessary to make such difficult decisions. The failure of the NOP Implementation Plan to specifically address this inevitable dynamic is incredibly naïve.

STATE EFFORTS

Some have argued that our concerns regarding the NOP Implementation Plan are overblown as several states are already implementing programs in state waters that are meeting with success. While I am not familiar with all of these efforts, I am familiar with

the Coastal and Marine Spatial Planning law of Washington state. Enacted in March 2010 but not yet implemented due to lack of funds (see below), the Washington state CMSP law provides many protections for commercial fishing and other user groups that are lacking in the NOP:

- Section 1 (3)(h)(i) Establish an ocean stewardship policy that takes into account the existing natural, social, cultural, historic, and economic uses;
  (i) Recognize that commercial, tribal, and recreational fisheries, and shellfish aquaculture are an integral part of our state's culture and contribute substantial economic benefits;

The Washington State measure recognizes existing uses and notes the "substantial" economic benefits of such uses, including commercial fishing. About the only references to commercial fishing in the federal NOP relate to overfishing. In fact, given that we have now placed all federal fisheries under Annual Catch Limits as required by the Magnuson-Stevens Act and are rebuilding overfished fisheries, the NOP references seem outdated.

- Section 6. (2)(f) Protects and encourages working waterfronts and supports the infrastructure necessary to sustain marine industry, commercial shipping, shellfish aquaculture, and other water-dependent uses;

Again, Washington State's statute emphasizes the importance of sustaining commercial activities by ocean users, including investing to support these uses. The overall tone of the Administration's NOP is one of restricting current users.

- (5) If the director of the department of fish and wildlife determines that a fisheries management element is appropriate for inclusion in the marine management plan, this element may include the incorporation of existing management plans and procedures and standards for consideration in adopting and revising fisheries management plans in cooperation with the appropriate federal agencies and tribal governments.

Paragraph 5 gives deference to the fishery management authority to determine whether to incorporate fisheries management elements into marine management plans. Fishery management responsibility is clearly expected to remain with the current decision making body. The NOP could result in fishery management councils developing management plans and RPBs developing CMS Plan components (say, establishing MPAs over 40% of an ecosystem as some advocate) that should remain solely under the purview of the relevant fishery management council. This is our concern about creating a second fishery management process—in this case one without fishery management expertise and without fishery participants involved in the decision making process.

- (6) Any provision of the marine management plan that does not have as its primary purpose the management of commercial or recreational fishing but that has an impact on this fishing must minimize the negative impacts on the fishing.

> The team must accord substantial weight to recommendations from the director of the department of fish and wildlife for plan revisions to minimize the negative impacts.

Paragraph 6 is a complement to paragraph 5. It cannot stand alone. While paragraph 5 preserves the current fishery management decision making process, paragraph 6 makes clear that any action that affects fishing but whose primary purpose is not to manage fishing *must minimize the negative impacts on fishing.* There is no such consideration in the NOP for effects on fishing from CMS Plan elements.

- (7) The marine management plan must recognize and value existing uses. All actions taken to implement this section must be consistent with section 8 of this act.

The language stating that a Washington State CMS Plan must "recognize and value existing uses" is very helpful and supportive of current users. There is no such guidance in the federal NOP policy.

If the NOP paralleled the Washington state law, I suspect you would face far less opposition to the NOP from commercial fishing organizations nationwide as well as other current ocean user groups.

THE COST

In addition to the substantive concerns outlined above, we are also deeply concerned about how this overreaching and expansive effort will be paid for. The President's proposed FY13 Budget contains no budget for implementation of this new National Ocean Policy. Instead, the agencies charged with participating in implementation have stated that their efforts will be funded through their existing budgets and appropriated dollars because "implementation of the NOP is consistent with [their] existing statutory obligations and appropriations." In other words, the Administration intends to funnel money away from congressionally-authorized and funded activities such as fisheries stock assessments and ecosystem research to support a new layer of federal bureaucracy. Ironically, funds will be diverted from the very activities that the NOP itself says need to be increased and improved!

The Administration is implementing NOP with neither congressional authority nor with congressionally-approved funding. Given the absence of an NOP implementation line item we believe Congress should include in each relevant appropriations bill (covering all 27 agencies identified by the NOP) a prohibition on the use of funds within that bill for the implementation of the NOP.

CONCLUSION

As we said earlier, we would prefer that the Regional Fishery Management Council process be exempted from this program. If not, then we request that the final NOP

Implementation Plan categorically state that nothing in the plan will lead to either new or modified Federal regulations. If this is a collegial, voluntary planning process, as we have repeatedly been told, we are happy to participate. If this is a new Federal bureaucracy whose aim is to regulate virtually all ocean activities, then we prefer to opt out until such time as Congress has provided specific authorization for such a program. Thank you for the opportunity to testify today.

The Seafood Coalition

November 7, 2011
The Honorable Doc Hastings
Chairman, House Natural Resources Committee
U.S. House of Representatives
1324 Longworth House Office Building
Washington, D.C. 20515

Dear Chairman Hastings:

The Seafood Coalition is writing to express its appreciation to you for holding two recent hearings on the Administration's National Ocean Policy ("NOP"), which includes the controversial ocean zoning component of Coastal and Marine Spatial Planning ("CMSP"). The testimony received at the Natural Resources Committee hearings highlights the need for Congressional action barring the Administration from continuing to divert appropriations from authorized programs to implement an ill-conceived NOP that is not authorized by Congress and that threatens fishing industry jobs.

The Seafood Coalition is a broad national coalition that includes commercial fishing interests, seafood processors, and coastal communities. This broad-based group, which includes members from every region of the U.S., accounts for about 85 percent of the seafood landed annually in the U.S. We are a diverse group, but united in our opposition to the Administration's NOP. The Administration has turned a deaf ear to the seafood industry's concerns in implementing NOP, choosing instead to push ahead with a new "top down" bureaucracy empowered to develop plans and to restrict ocean uses through regulations issued under an array of oceans-related statutes.

The concerns raised by the Seafood Coalition have been articulated previously by this organization. In May, 2008, the Coalition wrote to then-Natural Resources Committee Chairman Rahall requesting changes in H.R. 21, an ocean policy bill introduced in multiple Congresses and almost indistinguishable in its provisions from the NOP. The bill won little support over the past decade, and accordingly, made very little headway. This history suggests both that advocates of the NOP recognize that Congressional authorization is necessary and that they remain unwilling to work with the oceans community to develop a measured and economically sound policy.

We highlight for Congress three specific concerns with the NOP initiative that can be addressed by prohibiting federal spending on this unauthorized program:

1. The NOP creates a federal ocean zoning regime that will likely result in substantial new regulations and restrictions on ocean users. The *Final Recommendations of the Interagency Ocean Policy Task Force* report, which is incorporated by reference into the NOP Executive Order 13547, establishes nine regional planning bodies ("RPBs") composed of government entities and charged with developing ocean zoning plans. According to the Task Force recommendations, *"The plans would be adaptive to allow*

for modification and addition of new actions based on new information or changing conditions. Their effective implementation would also require clear and easily understood requirements and regulations…that include enforcement as a critical component."

2. The NOP creates a new "top down" bureaucracy that supersedes the "bottom up" regional fishery management council system and other effective management systems.

As noted above, the RPBs will be composed primarily of federal agency officials with some participation by state officials and tribal representatives. This contrasts with regional fishery management councils and the bodies responsible for other management programs established by the Magnuson-Stevens Act. The regional fishery management councils and other "bottom up" management programs which develop plans for managing fishery resources in federally managed waters, are composed largely of private citizens appointed by the Commerce Secretary. The NOP empowers the RPBs to manage activities in federal waters, including fishing activities, creating a confusing and duplicative fishery management system and usurping the jurisdiction of existing regional fishery management councils and other effective management bodies.

3. The federal government is currently diverting money authorized for other purposes, including funds that are better used for fishery survey research and monitoring programs, to create the new NOP regulatory program. Without fully funded fish stock assessment programs, fishery managers must be precautionary and set lower harvest limits given less information will be known about the size of fish populations. Diverting money from important science functions of NOAA Fisheries leads directly to job losses and lower incomes for fishermen and processing workers and adverse economic impacts for already struggling coastal communities.

For these reasons, and more, the Seafood Coalition asks Congress to bar further diversion of fund from authorized programs to implement the NOP. Thank you for considering these views.

Sincerely,
Nils Stolpe for the Seafood Coalition

Seafood Coalition member organizations
Alaska Bering Sea Crabbers
Alliance of Communities for Sustainable Fisheries
American Fishermen's Research Foundation
At Sea Processors Association
Blue Water Fishermen's Association
Coos Bay Trawlers Association -
Deep Sea Fishermen's Union
Directed Sustainable Fisheries
Fisheries Survival Fund
Fishermen's Association of Moss Landing

Garden State Seafood Association
Groundfish Forum
Monkfish Defense Fund
North Carolina
Fishermen's Association
Omega Protein, Inc.
Oregon Trawl Commission
Organized Fishermen of Florida
Pacific Coast Seafood Processors
Pacific Whiting Conservation Cooperative
Southeastern Fisheries Association -
Southeastern Fisheries Association/East Coast Fisheries Section
Southern Offshore Fishermen's Association
United Catcher Boats
Washington Dungeness Crab Fishermen's Association
Washington Trollers Association
West Coast Seafood Processors Association
Western Fishboat Owners Association