



2005 Market Street, Suite 1700 215.575.9050 Phone
Philadelphia, PA 19103-7077 215.575.4939 Fax

901 E Street NW, 10th Floor 202.552.2000 Phone
Washington, DC 20004 202.552.2299 Fax
www.pewtrusts.org

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Russell B. Dunn
National Policy Advisor for Recreational Fisheries
National Marine Fisheries Service
263 13th Avenue South
St. Petersburg, FL 33701

Re: Development of the National Saltwater Recreational Fisheries Policy

Mr. Dunn:

The Pew Charitable Trusts submits the following brief comments for the public scoping process of the National Saltwater Recreational Fisheries Policy.

Recreational fishing plays an important economic and cultural role in many regions of the United States. In fact, recreational fishing accounts for the majority of landings for many popular species, including gag grouper in the Gulf of Mexico, black sea bass in the South Atlantic region and ling cod in the Pacific region. Years of sanctioned overfishing put these and other popular targets for recreational anglers at risk, but progress is being made in mitigating these impacts. Many recreationally important fish populations, including bluefish, summer flounder, and black sea bass have been restored to healthy levels under the conservation provisions of the Magnuson-Stevens Act. Science based annual catch limits and accompanying accountability measures will continue to be vital components of effective, sustainable fisheries management in the United States. However, there is an opportunity to refine and enhance the implementation of the Act to better address the issues associated with managing saltwater recreational fishing.

Healthy recreational fisheries depend on abundant fish. Therefore, the saltwater recreational fishing policy should have restoration and maintenance of abundant fish populations at its core. Too often current saltwater recreational fisheries management does not effectively control mortality, which has a significant impact on the health of fish resources, leading to increasingly limited recreational fishing opportunities.

Specifically, we recommend that the National Saltwater Recreational Fishing policy should:

- Be science-based – Recreational fisheries management should use the best scientific information available, make use of scientifically accepted models to help fill in data gaps, and explore innovative ways to gather information, such as electronic data collection, storage and handling. It should also better engage anglers in data collection and reporting systems. Timely and reliable information on the amount, type, size and location of fish caught by recreational fishermen is a key to successful recreational fisheries management.

- Utilize effective mortality limits - Recreational catch limits should be science-based and prevent overfishing, be designed to prevent overages, and if overages occur, management should include accountability measures.
- Manage for the long-term – Recreational fisheries should be managed to ensure abundant and healthy levels of all age classes of a population, but especially the older and larger animals. Those fish are typically the most productive spawners and serve as the foundation for maintaining a sustainable population.
- Be nested in an ecosystem-based fisheries management system – Fishery management plans should look broadly at the interactions between species and how fishery management decisions affect larger ecosystems. As a starting point, the following ecosystem principles should be incorporated:
 - Management should ensure that enough forage fish are left in the water to meet ecosystem needs. This will require consideration of the needs and interactions between predators and their prey, as well as monitoring and management of the bait fish needs of recreational fishermen.
 - Essential habitats for fish should be identified and conserved. Coral reefs, natural hard bottom, fish spawning aggregation sites, and other ocean habitats provide vital areas for fish to reproduce, feed, or take shelter. These habitats are vulnerable to impacts from damaging commercial fishing practices and other nonfishing activities.
 - Mortality from bycatch, discards, and releases should be better monitored, accounted for in management, and reduced. Reducing this mortality through a variety of angling behavior and management measures will pay dividends in healthier populations of fish. Regional best practices should be identified and incorporated into management and education efforts.

Most recreational fishermen care deeply about the health of fish populations and are strong conservation partners. NOAA Fisheries should re-double its efforts to engage them in data collection and reporting, the identification and application of innovative best practices, and through cooperative research programs.

Thank you for the opportunity to submit comments.

Sincerely,



Lee R. Crockett
Director, U.S. Oceans
The Pew Charitable Trusts