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Dec 31, 2014

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

Re: Comments on the draft National Saltwater Recreational Fisheries Policy

Mr. Dunn:

Please accept these comments from The Pew Charitable Trusts on the draft National Saltwater Recreational Fisheries Policy, released Nov 19, 2014.

Recreational saltwater fishing in the United States provides recreational opportunities, significant economic benefits, and serves a vital cultural role for many Americans. Angler's needs are different than their counterparts in the commercial fishing industry, and thus effectively managing this segment of a fishery presents unique management opportunities and challenges. This draft policy affords NOAA's Fisheries Service an opportunity to articulate both its responsibilities for using the best available science in sustainably managing recreational fisheries under the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act), and its goals for increasing participation in and improving the stability of those fisheries to ensure their long-term socioeconomic and ecological sustainability.

We are encouraged that the agency has identified conservation of the forage base and protection of important fish habitat as priorities, as these are shared concerns for many anglers and conservationists. However, while the policy acknowledges the economic, cultural and social importance of recreational fishing, it fails to similarly acknowledge the ecological impact of recreational fishing on the health of our fishery resources. Given the fact that recreational landings account for the majority of landings for many popular species (for example, gag grouper in the Gulf of Mexico, black sea bass in the South Atlantic region, and ling cod in the Pacific region), and millions of anglers participate in recreational fishing, effectively managing this sector is critical to the health of our ocean resources.

Data collection, accountability measures, and interagency coordination of recreational fisheries management all need improvement to ensure sustainable fisheries and healthy ocean ecosystems for present and future generations of Americans. Thus, the agency must elevate the importance of conservation in the recreational fisheries policy. Doing so will reinforce that conservation is the critical management driver behind most agency actions.

We recommend revisions to the draft policy as noted below to better balance the agency's stewardship mandates with its efforts to improve recreational fishing opportunities. In addition to comments, we have edited the text of the draft policy for your consideration; suggested additions are in red and deletions are crossed out.

The introduction should delineate the impacts of recreational fishing upon a shared, managed resource.

The introduction rightly establishes the economic, social, and cultural importance of recreational fisheries, and notes that growing human populations along our coasts are changing the dynamics of recreational fishing. However, it fails to connect those changing dynamics to new or increased demands on shared, public fishery resources, instead only noting changing economics and demographics. The agency must acknowledge the ecological dimensions of recreational fishing along with the socioeconomic dimensions. Recreational fishing can be a significant source of mortality in certain fisheries, through both landings and discards. While the actions of an individual angler have only a small impact on the resource and its ecosystem, the combined effects of millions of anglers must be monitored and managed to effectively control fish mortality, avoid overfishing, prevent ecosystem degradation, and rebuild depleted fish populations. The policy must also recognize that recreational fishing is only one component of managing fisheries, and that commercial and subsistence fishing also provide economic, social, and cultural benefits to the Nation.

INTRODUCTION

Saltwater recreational fishing is a traditional, important, and expanding thread in the social, cultural, and economic fabric of coastal communities in the United States.

Saltwater recreational fishing drives billions of dollars in economic activity each year providing substantial benefits to the economy at the local, regional, and national scales. With growing coastal populations, an increasing number of people are pursuing recreational opportunities afforded by this nation's expansive coastal and ocean resources. These and other shifts are changing the traditional economics and demographics of U.S. fisheries. **While individual anglers may catch only a few fish, the large number of total anglers in a region can have a significant collective impact on the health of fish populations and marine ecosystems.** ~~Saltwater recreational fishing drives billions of dollars in economic activity each year providing substantial benefits to the economy at the local, regional, and national scales.~~

Beginning with its roots as the Commission of Fish and Fisheries in 1871, NOAA's National Marine Fisheries Service (NMFS) has played a continuous leadership role in science-based stewardship of our nation's living marine resources, seeking to balance the needs of these **shared, public resources and ecosystems,** with those of industry, people and communities. The Agency's foremost responsibility is to achieve and maintain healthy marine and coastal ecosystems capable of supporting sustainable and productive fishery resources for the **long-term** benefit of the American people. In pursuit of this goal, NMFS highlights the direct links between healthy habitats, sustainable fishery resources,

and enduring, high quality fishing experiences. The Agency recognizes the important social, cultural, and economic benefits to the nation associated with saltwater recreational fishing, and is committed to pursuing a collaborative stewardship approach promoting public access, fishery accountability, and regulatory enforcement.

The policy goal should assert the stewardship responsibility of the agency.

The draft policy goal, as written, subsumes the conservation and management responsibilities of the agency into the goal of recreational fishing promotion. But the agency has a responsibility to take necessary conservation and management actions to sustain our fishery resources under the Magnuson-Stevens Act irrespective of the promotion of one sector of fishing. Thus, the agency must give, at a minimum, equal weight to the policy goal of ensuring the sustainability of the resource through science-based conservation and management of recreational fishing. In addition, the policy goal should be linked with advancing all the requirements of the Magnuson-Stevens Act, not just the Act's purposes.

POLICY GOAL

Consistent with, and in furtherance of, ~~the purposes of~~ the Magnuson-Stevens Fishery Conservation and Management Act (MSA), the goals of this policy are to promote recreational fishing for the cultural, social, and economic benefit of the nation, **to ensure the sustainability of the resource** through science-based conservation and management **of recreational fishing**, and to provide for wide-ranging participation in and enjoyment of recreational fishing for present and future generations.

NMFS recognizes that fully achieving these goals will require thoughtful examination and integration of saltwater recreational fisheries considerations throughout the programs and activities of the Agency and the federal fisheries management system in combination with strong management partner and constituent relationships. In so doing, it is incumbent upon NMFS to fulfill its stewardship responsibilities **by implementing necessary conservation and management measures** in a broadly inclusive manner **that strives for workable, effective approaches which seeks to minimize disruptions to, and burdens on, the regulated community**, and facilitates public understanding of the natural and regulatory environment.

Within this context, this policy broadly pertains to non-commercial activities of fishermen who fish for sport or pleasure, as set out in the MSA definition of recreational fishing, whether retaining, consuming, sharing or releasing their catches, as well as the businesses and industries, such as the for-hire fishing fleet and tournaments, which support them.

This policy recognizes the authorities and responsibilities of natural resource management agencies, regional fishery management councils, interstate marine fisheries commissions, states, and advisory bodies and seeks partnership in its implementation.

The policy requires numerous changes to ensure the conservation responsibilities of the agency are met and communication with the recreational fishing community is improved.

The draft policy contains six action items for the agency. In general, the overall topics identified are appropriate and important considerations for recreational fisheries management. However, we have suggestions for improving each item to ensure the agency is giving adequate weight to the conservation mandates of the Magnuson-Stevens Act and more effectively communicating with the public. We will address each action item individually.

1) Promote public access to quality fishing opportunities

The agency should consider not only the relevant cultural, social and economic factors in decision-making, but also the relevant ecological factors. The quality of fishing opportunities will be improved by further integrating the best available understanding of the fishery ecosystem, so that recreational fishermen can access sustainable, well-managed fish populations. There are certainly cases where it is appropriate to increase fishing opportunities as conservation gains are made, but this should be done in a way that does not jeopardize progress in restoring and maintaining healthy fish populations.

1) Promote public access to quality fishing opportunities by supporting consideration of relevant **ecological**, cultural, social, and economic factors in decision-making; encouraging periodic review of fishery allocations; fostering expanded fishing opportunities based on **scientifically-supported** conservation gains (e.g., **rebuilt populations, increased stock biomass, restored age structure improved release survival, restored habitats, easing of regulatory fishery restrictions when conservation goals are achieved**); and, understanding factors which affect fishing participation and angler satisfaction (e.g., changing and complex regulations, impediments to fishing) and finding mechanisms to address them.

2) Support ecosystem conservation and enhancement

This section of the draft policy essentially conflates ecosystem conservation with habitat conservation. While habitat identification, protection, and restoration are vital components of ecosystem conservation, there are additional, separate components which are also of great importance. Notably, the policy fails to mention the prevention of overfishing and the restoration of overfished populations as keystone components supporting ecosystem conservation. While the draft policy connects forage fish conservation to habitat protection, forage fish management is more than simply identifying relevant habitats; forage fish should be managed to not only meet the demands of the fishery but also the important role those fish play as prey to marine species, including commercially- and recreationally-targeted fish. The draft policy also fails to mention the importance of improving release survival and reducing the incidence and mortality of bycatch and discards. These four components – preventing overfishing and restoring depleted stocks, protecting and restoring habitat, managing forage fish in an ecosystem context, and

avoiding unnecessary mortality from discarding and bycatch – are all necessary to “support ecosystem conservation and enhancement” and should be included in the policy.

Finally, the aquaculture language should be removed from the policy. The recreational fishing policy is not the appropriate venue for promoting this separate consideration.

2) Support ecosystem conservation and enhancement **by identifying, protecting, and restoring** ~~which provide~~ natural and, where appropriate, enhanced habitats to support diverse, healthy fisheries **and protect key lifecycle stages and activities (such as spawning); managing forage fish stocks for abundance, resilience, and their importance as prey; improving release survival and reducing the incidence and mortality of bycatch and discards; ensuring overfishing does not occur through use of science-based annual catch limits and effective accountability measures; and rebuilding depleted fish stocks. ;** ~~and fish populations including abundant and resilient forage fish stocks. ; and, encourage development and application of sustainable, safe aquaculture to support recreational fisheries consistent with existing agency policy.~~

3) *Coordinate with state and federal management partners*

This is a laudable goal, and the agency should strive to work more cooperatively with its management partners. However, this action item should include the objective of creating sustainable recreational fisheries, in addition to stable, predictable, and well-monitored ones.

3) Coordinate with state and federal management partners to align science, management, and enforcement priorities and strategies in support of **sustainable**, stable, predictable, and well monitored recreational fisheries.

4) *Advance innovative solutions to evolving science, management, and environmental challenges*

The growing challenges of climate change, acidification, pollution, and competing ocean users demand the consistent application of existing best practices in science and management in addition to new and innovative solutions. The agency should take a stronger leadership role in these fields, as well as working through partnerships with state and federal managers, academic institutions, fishermen, and other stakeholders. NOAA Fisheries should create or enhance its management infrastructure and methodology to ensure timely incorporation of the data developed through these partnerships into the stock assessment and quota setting processes, or risk losing the goodwill and cooperation of partners.

4) Advance innovative solutions to evolving science, management, and environmental challenges through **direct agency initiatives, as well as partnerships, by identifying, developing, and disseminating existing best practices and** supporting investigation and development of ~~new technical guidance~~, scientific tools, methods, **infrastructure**, data collection techniques (e.g., electronic catch reporting), gear technology, and management approaches.

5) *Provide scientifically sound and trusted biological, cultural, social, and economic information*

Improving the depth and breadth of both the biological and socio-economic scientific information available to the fishery management process is vital to creating more sustainable and predictable fisheries for all users. However, the lack of information, the existence of uncertainty, or pending new information should not be used to delay necessary management actions.

5) Provide scientifically sound and trusted biological, cultural, social, and economic information to enable balanced, well-informed decision-making bolstered by continuing programmatic improvements **while ensuring scientific uncertainties do not lead to management inaction, consistent with the Magnuson-Stevens Act.**

6) *Communicate and engage with the public*

Better communication is one of the most important actions the agency can take to improve relations with recreational fishermen and the success of fishery management. Recreational fishermen can be important allies in conservation, and many are passionate about improving the quality and quantity of their recreational fishing opportunities through science-based, sustainable management. But too often, the agency communicates the “what” of a management action without sufficiently engaging stakeholders in the “why.” The additional language that we’ve suggested below outlines the types of information that should be communicated to anglers so that they better understand why a management action is being taken. Finally, the policy should not suggest the dialogue may be limited to two interests, but instead, be more inclusive.

6) Communicate and engage with the public in a credible and transparent manner **by ~~to~~ build building trust in and understanding of the science and management process, including, but not limited to, what data is needed, the rationale behind the use of various data collection methods, how that information is used to assess and manage fisheries, the process of assessment, and the necessity of management actions; ~~and promote~~ promoting public awareness of, and involvement in, science and management processes through active ~~two-way~~ dialogue, public-private collaboration (e.g., cooperative research and citizen science activities), and other approaches which complement NMFS’s ongoing science programs.**

Summary

The draft National Saltwater Recreational Fisheries Policy could be a useful to clarify the agency’s efforts to better manage recreational fisheries and communicate with recreational fishermen. But overall, the agency should better incorporate ecological considerations through the draft policy to ensure it is meeting its stewardship responsibilities under the Magnuson-Stevens Act. Recreational saltwater fishing is socially, culturally, and economically significant to our coast, and the best way to enhance and increase recreational fishing opportunities is to make sure there are enough fish in the water.

Thank you for the opportunity to comment on this draft proposal.

Sincerely,

A handwritten signature in black ink that reads "Ted Morton". The signature is written in a cursive style with a large, sweeping initial "T" and a long, horizontal flourish at the end.

Ted Morton
Director, U.S. Oceans
The Pew Charitable Trusts