

COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON RECREATIONAL FISHERIES POLICY UPDATE

The Coastal Pelagic Species Advisory Subpanel (CPSAS) reviewed the draft National Saltwater Recreational Fisheries Policy of the National Marine Fisheries Service (NMFS) (Agenda Item C.2.b. Supplemental NMFS Report, November 2014).

The CPSAS recognizes the traditional, cultural and economic importance of saltwater recreational fishing in the United States and appreciates the acknowledgement of this importance by NMFS. Given that NMFS has an aquaculture policy and now a recreational fishing policy, we question the lack of a comparable commercial fishing policy. Without such a policy, there is no guidance highlighting the importance of commercial fishing and domestic seafood production, and no objectives and strategies to assist the agency in prioritizing commercial fishing goals and allocating necessary resources (including funding) to those priorities.

The CPSAS provides the following comments and recommended modifications specific to the numbered paragraphs in the POLICY section on page 2 of the document.

Item number 1. Promote Public Access to Quality Fishing Opportunities

There are a number of objectives included under bullet #1 that require further clarification. Specifically, the intention and implication of “encouraging periodic review of fishery allocations” as well as NMFS’ interest in “fostering expanded fishing opportunities based on conservation gains” should be clarified and discussed in the policy. As currently drafted there is concern that the policy may intend to reallocate commercial quotas, or harvest opportunities to the recreational fishing community. While we appreciate the need to share opportunities, conservation gains, such as increased stock biomass resulting from commercial management should not be reallocated to recreational fisheries unless those fisheries are equally accountable for recreational catch and effort; and are subject to a thorough regional Council review and allocation process under present COP’s. Further we mention that these allocation exercises can be exhaustive and drain a large amount of resources from NMFS and Council staff. For these reasons we recommend that each Regional Council should make their own determination as to how often they should occur, as opposed to a nationally mandated time schedule.

Item number 3. Coordinate with State and Federal Management Partners

Commercial interests operate under an umbrella of catch accountability and strict adherence to annual catch limit, annual catch target, and other buffered harvest policies designed to help conserve stocks from overfishing, and we believe that likewise, recreational fishing mortality should be tracked and accounted for in order to achieve the same conservation objectives. We suggest the following additions, in underlined text, to improve this specific objective:

Coordinate with State and Federal Management Partners and Recreational Interests to align science, management, and enforcement priorities and strategies in support of stable, predictable, and well-monitored recreational fisheries. Monitoring goals for recreational fisheries should include catch accounting, biological data, regionalized harvest data, and fishing effort to inform scientific and management analysis and policy decisions.

The CPSAS appreciates the opportunity to comment on the draft Recreational Fishing Policy and the outreach NMFS undertook with the fishing community to develop this draft policy. In its efforts to further develop an overarching national recreational fishing policy and to achieve the goals and objectives as stated in the draft policy, the CPSAS encourages NMFS to work collaboratively with the recreational fishing community. Likewise, input from the public and commercial fishing interests are advised to reduce conflict and ensure recreational policy is not inconsistent with MSA and past commercial management objectives for any given fishery.

PFMC
11/19/14