

HIGHLY MIGRATORY SPECIES ADVISORY SUBPANEL REPORT ON
NOAA FISHERIES WEST COAST REGION STRATEGIC PLAN: 2016-2020

The Highly Migratory Species Advisory Subpanel (HMSAS) appreciates the opportunity to comment on the latest working draft of the National Marine Fisheries Service (NMFS) West Coast Region (WCR) Strategic Plan. The HMSAS appreciates that the WCR seems to have incorporated some of the Pacific Council comments as communicated by the Council to Barry Thom in the letter dated January 22, 2015 (I.2.a, Attachment 2). However, in many instances, without a “red lined” copy it is impossible for the HMSAS to be sure that all the Council’s comments have been incorporated.

The first full paragraph on page 2 of the I.2.a, Attachment 2 makes a very important point concerning how marine mammal conservation must be accompanied by marine mammal management. The statement on page 15, second paragraph, last sentence under the Protected Resources Goal states “Under the MMPA, we conserve and manage all marine mammal populations along the West Coast.” We appreciate the acknowledgement of this principle. Mr. Thom’s letter to Dorothy Lowman dated February 12, 2015, states:

[W]e expanded our strategy regarding human interactions with marine mammals to specifically call out tools to address impacts [of marine mammals] to fishing gear and catch, as well as vessels, docks and marinas.

Nevertheless, in many other sections of the Strategic Plan, there remain unclear statements concerning whether conservation or management are co-equal goals. The HMSAS believes it should be clearly stated that they are, and this should be uniform throughout the Strategic Plan.

After reviewing the Section “IV Highlights-Goals in Action” the HMSAS remains puzzled that there is only mention of salmon and groundfish fisheries. The absence of HMS in this section is in stark contrast to the other “examples of issues and drivers that highlight our goals in action.” This is particularly of concern since earlier in Mr. Thom’s letter emphasis is put on “productivity and sustainability of fisheries and fishing communities” and that the Strategic Plan will be used to “guide internal decision making and resource allocation regarding specific projects and actions.”

A final comment is that many of the goals, objectives, and strategies are very laudable, and refreshing for the harvesters to read. Nevertheless, the enumerated items often seem to be things which the WCR should be doing now, and says it is doing now. To use one example, on page 13 under “Engagement” and “Strategies,” item 7 states in part:

Encourage industry involvement in research through cooperative research projects, exempted fishing permits, and promotion of grant opportunities.

While the recent discussion of Exempted Fishing Permits (EFPs) has demonstrated the WCR’s appreciated and serious efforts in this regard, an additional factor is clearly necessary, but not mentioned. That is educating the public on the purpose and scope of EFPs.