

DRAFT PACIFIC COUNCIL COMMENTS TO NATIONAL MARINE FISHERIES SERVICE
REPORT TO CONGRESS ON SECTION 201 OF THE MODERNIZING RECREATIONAL
FISHERIES MANAGEMENT ACT

The Pacific Fishery Management Council (Council) reviewed the draft Report on Section 201 of the 2018 Modernizing Recreational Fisheries Management Act. The Council believes the report is a good description of National Marine Fisheries Service's (NMFS) nationwide roles and functions in a complex network of regional fisheries management councils and operations. Our Scientific and Statistical Committee (SSC) and Highly Migratory Species Management Team (HMSMT) provided valuable perspectives, which are included below.

In general, we believe the representation of the Council perspective could be strengthened in several sections. Additionally, the report does not clearly state that NMFS' functions providing science (fishery dependent and independent) should be supported by Congress at a level that allows NMFS to provide the services expected of them. Below, a quote excerpt from the report (with quotation marks) is followed by a suggested modification.

1. "Fishery-dependent data are collected as part of commercial, recreational, or subsistence/cultural/tribal fishery activities. These data provide information on the landings, catch rates and bycatch of the fishery as well as the biological composition of the catch (i.e., age, size, sex, and species). Fishery-independent data are collected using standardized scientific surveys, which use consistent methods over space and time to maintain objectivity and obtain an accurate perception of wild fish stock dynamics. These data include abundance, distribution, and demographics of fish stocks in their natural environments."
 - Insert language as indicated in emphasized text above.
2. "Different methods involving on-site collection of both effort and catch are utilized on the Pacific coast, and self-reporting of catch and effort is utilized in some for-hire fisheries and specialized applications."
 - Comment: The West Coast catch sampling programs seem to be given short shrift here. We recommend adding a descriptive sentence or sentences remarking that West Coast sampling is not simply "different," but contributes to national sustainability goals and outcomes.
3. "Additionally, non-governmental data sets, most frequently those collected by state agencies, can be *and are* incorporated into stock assessments."
 - Change as modified here: "Additionally, ~~non-governmental~~ data sets from non-federal sources, most frequently those collected by state agencies, can be *and are* incorporated into stock assessments."

4. “MRIP’s Strategic Plan, adopted in 2017, maintains the program’s commitment to continuous improvement of survey designs and results...”
 - Comment: Funding is needed to implement this commitment. The Council notes that flat funding has not kept up with sampling and survey costs, which continues to threaten NMFS’s and the Council’s ability to collect data necessary for sustainable management of the public trust resources in our care. For example, Oregon’s sport sampling program, the Oregon Recreational Boat Survey (ORBS), has been in the certification process for many years, in part due to insufficient NMFS staff and funding to complete the certification process.
5. “for stocks that cannot be assessed in a timely fashion”
 - Insert: for stocks that cannot be assessed by NMFS in a timely fashion
6. “However, external assessments can also be disruptive, especially when they are provided late in the management process or without sufficient documentation to critically evaluate the approach. In these cases, the assessment tends to compete or conflict with the federal stock assessment without being subject to an equivalent level of peer review. As the contribution of external assessments continues to increase, many Councils have developed, or are developing, protocols for including these assessments in the management process.”

Comment: This issue is not descriptive of the Council process. To reflect the difference, add a sentence to describe that the Council has rigorous procedures on stock assessment contributions that supports an orderly consideration of stock assessment science from both federal stock assessors and from outside contributors.

7. “For NMFS and Fishery Management Councils (and their SSCs)”
 - Comment: Add a recommendation to ensure adequate funding for fishery-independent surveys, such as the West Coast Bottom Trawl Survey, and fishery-dependent data collection, including state sampling programs that rely on NMFS and other funding.

Our staff would be happy to assist with any information needed to fulfill the recommendations above.

In addition, please see the following comments from Council advisory bodies:

Scientific and Statistical Committee (SSC):

The SSC could comment only on the current state of the West Coast region data gaps. The NMFS West Coast Region already provides guidelines and review procedures for data collected by state agencies and nongovernmental organizations. The SSC notes that a comprehensive summary of research priorities and data needs that might better inform a revised version of the report to Congress should be based on the existing PFMC Research and Data Needs Report, which provides a comprehensive list. The

SSC would like to highlight some important data and procedure needs. First, the SSC noted that the data needs and procedures for inclusion in management are similar for recreational and commercial fisheries, as management of both relies on data-informed stock assessments to make decisions. Therefore, any data included in stock assessments is of great importance. In general, for nearshore recreational species, there is a lack of fishery-independent sampling data and of catch index and age composition data. In terms of process for incorporating data, the SSC highlighted that in the West Coast region, methodology reviews are performed independently to the stock assessment process, and that having pre-assessment data review workshops would be a more robust way to identify new data sources and to ensure that the data are used correctly. The SSC is willing to evaluate and review a future version of the report that includes more detailed information about the PFMC data needs and methodology to include nongovernmental and state data.

Highly Migratory Species Management Team (HMSMT):

The HMSMT would like to highlight some important HMS-specific data and procedure needs. First, given the use of private docks and marinas by private HMS recreational vessels, the HMSMT supports continued efforts to increase in-person shoreside survey coverage and further the use and refinement of Marine Recreational Information Program recreational HMS data collection methods to more accurately account for catch in this recreational fishery sector. The HMSMT also recommends continued efforts to incorporate HMS recreational data and observations into international HMS stock assessments. For example, aerial surveys for HMS, similar to those conducted for coastal pelagic species, potentially could provide a science-based method to evaluate anecdotal information about abundance and also address the lack of fishery independent data cited by the SSC (Agenda Item I.1.b Supplemental SSC Report 1). Lastly, the HMSMT agrees with the SSC that the existing PFMC Research and Data Needs Report contains a comprehensive summary of HMS research priorities and data needs that might be used to inform a revised version of the report to Congress.

PFMC
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