



Pacific Fishery Management Council

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Marc Gorelnik, Chair | Merrick J. Burden, Executive Director

December 29, 2022

Ms. Janet Coit
Assistant Administrator, NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

Re: Council Comments on Revisions to the 2015 National Saltwater Recreational Fisheries Policy

Dear Ms. Coit,

The Pacific Fishery Management Council (Council) received presentations on the [2015 National Policy for Saltwater Recreational Fisheries](#) (Policy) and the [discussion guide](#) that emerged from the [2022 National Saltwater Recreational Fisheries Summit](#) from Mr. Russell Dunn at our November meeting. The Council agrees that the Policy should be updated to address changing ocean and fishery conditions due to climate change. The Council also notes that access to quality fishing opportunities is more challenging now than in 2015, due to competing ocean usage, and that the Policy should reflect this new context.

Successful implementation of the revised Policy and the associated guiding principles will be dependent on National Oceanic and Atmospheric Administration (NOAA) Fisheries' commitment to fund and execute regional implementation plans in coordination with the West Coast Region, states, and recreational angling community. This relates to the ability to carry out several principles outlined in the Policy.

The Council recommends NOAA expand Principles 5 and 6, which emphasize the importance of scientifically sound information and the value of communication and engagement of the recreational community in science and management. While all the principles in the Policy are important, Principles 5 and 6 are foundational to successful fishery management. Increased funding is necessary to provide quality fishery dependent and independent data for use in stock assessments and management of nearshore species. The existing paucity of nearshore species data available for management of these stocks on the West Coast results in assessments with a high degree of uncertainty. This in turn leads to restrictive management measures that limit access to quality recreational fishing opportunities.

The Council recommends NOAA prioritize funding for A) nearshore surveys and B) surveys with Canada and Mexico necessary to support management of transboundary stocks to better inform recreational fishery management. Scientifically sound management also requires that NOAA engage with the recreational community to further develop an optimal yield framework that accounts for social, ecological, and economic factors. Increased funding for monitoring and

enforcement is also needed to reduce management uncertainty and provide greater access to healthy stocks.

NOAA should strengthen partnerships with the states, public, and fishing organizations to expand data collection efforts including citizen science opportunities, collaborative research, self-reporting catch applications, and habitat restoration projects. West Coast anglers continue to champion several efforts to promote sustainable fishing practices including use of descending devices to reduce rockfish mortality, creating a new midwater long-leader gear to avoid stocks of rebuilding rockfish, and habitat restoration projects. NOAA funding paired with the expertise of recreational anglers is a recipe for success.

The Policy should also be updated to address the impacts of climate change on recreational fisheries. Changing oceanographic conditions impact juvenile survivability and recruitment of recreationally important species. Additionally, harmful algal blooms and the resulting increases in domoic acid can cause delays or closures in shellfish fisheries which can cost tens of millions of dollars in lost revenue, impact recreational fishing communities, and cause spillover of effort into other fisheries. Climate-ready fisheries require accurate stock assessment forecasts, modernized data systems, and accelerating our adaptive management approach.

NOAA should also communicate science and policy matters in plain language and provide translated materials, as appropriate, in support of Principle 6. Clearly communicating scientific uncertainty and providing detailed explanations on the factors that influence changes in stock status is paramount to building and maintaining public trust. The Marine Resource Education Program (MREP), which is funded by NOAA, has been successful in demystifying the science and management processes and building trust. MREP also provides the opportunity for fishery scientists and managers to share insights and learn from each other. The MREP and other efforts in support of Principle 6 provide a clear and effective pathway to achieving goals outlined in NOAA's draft Equity and Environmental Justice Strategy.

The Council appreciates the opportunity to provide comments on revisions to the 2015 Policy which are needed to address changing ocean and fishery conditions. Updates to the Policy and funded implementation plans will improve the quality of data used in stock assessments and management, support climate-ready fisheries, and strengthen relationships with the recreational community.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc Gorelnik". The signature is fluid and cursive, with the first name "Marc" being more prominent than the last name "Gorelnik".

Marc Gorelnik
Chairman

KLA:acl

Enclosure: [Agenda Item C.2.b, Supplemental GAP Report 1, November 2022](#)

Cc: Council Members
Mr. Russell Dunn
Mr. Tim Sartwell
Dr. Scott Rumsey
Mr. Ryan Wulff
Mr. Daniel Studt

GROUND FISH ADVISORY SUBPANEL REPORT ON NMFS NATIONAL POLICY FOR SALTWATER RECREATIONAL FISHERIES

The Groundfish Advisory Subpanel (GAP) received and discussed a presentation on the 2022 National Saltwater Recreational Fishing Summit by Mr. Daniel Studt, National Marine Fisheries Service Recreational Fisheries Coordinator, West Coast Region, and offers the following comments/suggestions.

The GAP supports the overarching 2015 Purpose and Policy statements, Scope, Goals and Guiding Principles.

Under Principles 1, 3, 4, and 5, we offer these suggestions:

- Encourage cooperative fisheries surveys and management in collaboration with Canada and Mexico. National Oceanic and Atmospheric Administration (NOAA) Fisheries manages the harvest of many trans-boundary fisheries. Thus, high levels of scientific and policy collaboration are essential.
- Elevate collaborative research efforts between the public and state/NOAA Fisheries. The growing citizen science movement should be discussed in the context of self-reporting catch applications whose increasing popularity is being driven, in part, by the work of conservation organizations.
- Provide additional funding for needed fisheries independent data supporting stock assessment efforts. Current data availability continues to be a challenge, especially with respect to areas where fishing has been temporarily or permanently restricted or access is limited by the distance or weather conditions commonly encountered.
- The GAP notes a need to increase Federal support for the state-managed enforcement bodies tasked with at-sea enforcement. A higher level of at-sea presence supports less restrictive regulatory measures. Limited enforcement ability results in overly restrictive measures at sea. Enforcement advisors are compelled to strive for regulatory measures that can be enforced at the landing site and restrict pelagic fisheries with groundfish aboard. We need to minimize the current dynamic which unnecessarily constrains gear use and spatial access.

Under Principles 2 and 6:

- The update would benefit from greater recognition for the food value of the recreational catch. Recreational angling not only provides an opportunity for fun in the sun, but most often also the high value food for the table. This is food for not only the angler and their family, but catches are often shared much more broadly with less fortunate anglers, friends and neighbors, as well as members of underserved communities through donation to food banks and other distribution entities.
- NOAA Fisheries and the Councils should develop a process for engaging recreational fisheries stakeholders in a more in-depth discussion of optimum yield and how it can be

used to identify and prioritize management objectives better suited to the cultural, economic, and conservation goals of the angling community.

- Policy and funding should support public outreach across diverse communities, cultures, and languages on emerging fishing techniques and opportunities, which support regulatory compliance, conservation, and fishing success. Supporting fishing opportunities for youth is especially important for providing access to marine careers such as commercial fishing, marine transportation, or many other related marine fields.
- Recreational fishing should be expressly allowed around aquaculture and wind structures. Marine conservation and recreational angler access often benefits from structures placed in the marine environment. However, this access must be expressly allowed as a condition of leasing the public space to private entities for any purpose. This follows Public Trust Doctrine priorities.

PFMC
11/2/22