



ASSOCIATION *of*
FISH & WILDLIFE
AGENCIES

The voice of fish and wildlife agencies

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September 12, 2014

Ms. Eileen Sobeck
Assistant Administrator
NOAA National Marine Fisheries Service
1315 East West Highway
Silver Spring, MD 20910

Dear Ms. Sobeck,

Thank you for the opportunity to provide comments on the development of the NOAA Fisheries National Saltwater Recreational Fisheries Policy. The Association of Fish & Wildlife Agencies (AFWA), an association representing the collective interest of all state fish and wildlife agencies, believes that NOAA's approach to creating a recreational fishing policy is well thought out and timely given the importance of coastal recreational angling to the economies of many states. State fish and wildlife agencies play an integral role in the management of our coastal species and habitats, and we value NOAA's partnership in those management efforts. Indeed, to that point, we suggest NOAA emphasize existing programs to implement the policy, including opportunities for continued engagement. We have the following specific comments for your consideration:

- *Draft Goal #1: Foster and enhance sustainable, healthy, and diverse recreational/non-commercial fisheries and public access to them.* We strongly encourage NOAA to acknowledge the need for a stronger joint management approach of coastal resources with the states and clearly state the importance of state-managed assets (inshore habitats and estuaries) to NOAA managed offshore fisheries. Many offshore fisheries are dependent on state management of estuarine and coastal systems so the need for close co-management is critical to include assistance in the protection and rehabilitation of these valuable resources. Our members request that policy clearly state the need for protected intact and improved habitat quality in those areas that are currently degraded, not just alluded to in other terms of the policy. We believe it is critical to have these terms in the policy to ensure increased NOAA action focused on habitat protection along with educating coastal recreational anglers about the importance of habitat to healthy fish populations. It is also critical that the needs of shore-based and inshore anglers be incorporated in, and considered with, the crafting of the policy, as they shouldn't be overlooked in this policy.
- *Draft Goal #2: Integrate saltwater recreational/non-commercial considerations throughout NOAA and the federal marine fisheries management system.* We request that NOAA carefully consider whether or not a full-time Recreational Fisheries coordinator in each region is the best allocation of organizational resources during times of contracting budgets and organizational capacity. This is likely a decision that needs to be considered regionally as different regions of the country have different needs. We want to make sure that your agency is making the best decision when it comes to resource distribution.

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- Draft Goal #4: *Enhance transparency, follow-through, and continuity of action.* Our member agencies request that a structured decision-making process be fully considered as a mechanism to implement this Policy. States have learned valuable lessons in resource management when engaging with necessary stakeholders through this mechanism and it would be beneficial to your agency to more frequently employ the use structured decision making strategies to better engage with and inform the public on issues that affect recreational fishing.

Again, thank you for the opportunity for the states to have input into this Policy and if you have any questions on our comments, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Forster". The signature is written in a cursive style with a large, circular initial "D" and a long, sweeping horizontal line extending to the right.

Dan Forster
President