

Comments on Draft National Saltwater Recreational Fisheries Policy

1	i need to be a part of ur investigation
2	<p>My only comment is in regard to artificial reefs in the waters off of the Alabama Gulf Coast and bag limits . If NMFS is solely basing data along the Alabama Gulf Coast on Public reefs where these fish are obviously depleted due to constant fishing by the public to determine the Red Snapper and other reef fish are overfished you are missing out on a large data resource in the Private Reef sector. Many of our Local For Hire Boats do not fish on Public reefs but rather pay companies like "The Reefmaker" to create Private reefs which allow for a larger populations of Red Snapper and other reef fish to aggregate . I would hope going forward that NMFS would consider using data from some of these other reefs as a more accurate way to calculate population and bag limits moving forward .</p>
3	<p>After getting through the rhetoric it boils down to reallocating fish from those who depend on the commercial fishermen for their share of the mutually owned marine resources and giving more fish to the anglers.</p> <p>There is nothing in MSA that puts angling above seafood production for the nation no matter how bright the wordsmith.</p> <p>The policy will be divisive. It will pit angler clubs against seafood groups. Most unfortunately NOAA will try to take fish from the sector that is totally accountable and allocate the fish to a sector that wants no part of record keeping or inspection or law enforcement.</p> <p>There is no balance in this proposed policy.</p>
4	<p>Much greater weight should be given to anecdotal input from the angling community. The best example of little to no credit given to anecdotal input was prior to the red snapper closure. At that time I was chartering. My fellow captains and I said there is little problem with the red snapper stock. It was rejected! The Red Snapper fishery was in the 7th year of an SAFMC recovery program. For each of the previous four years anglers were catching larger and more plentiful red snapper, off the Florida East Coast. Regardless of our input the fishery was closed. This is despite a significant decline in effort due to the excessive cost of fuel. Then the fishery was close, deemed over fished, and experiencing over fishing by the scientists. .</p>
5	<p>Nothing you write as policy matters and will have little or no bearing on what happens out here in the real world. Groups of people will operate on their own perceptions and political, philosophical, and ideological positions.</p> <p>For example, we all know that there are more red snapper out in the Gulf than ever before. Scientist like Bob Shipp agree. Even NOAA said on May 29, 2012, "Following an updated population assessment that shows overfishing in the Gulf of Mexico red snapper has ended and the population is rebuilding, NOAA is increasing the 2012 commercial and recreational fishing catch limits" YET government agencies like Gulf Management Councils just keeps cutting and cutting access to fishing. Last year we had 9 days of fishing for red snapper in federal waters. None of this makes any sense.</p> <p>And, YOU government people have all the power to make all the rules about how to collect data, and when YOU don't do it, YOU penalize anglers and cut their catch limits. We anglers do not have the power to put a data collection system in place or we would. We would do YOUR job if we could. This is why we tend to give up on our government.</p>

6	<p>In Alaska, there are two classes of recreational anglers who are treated differently in federal waters fishing for halibut. Anglers who own their own boat have a more generous limit vs those who have to access the fishery using a guide. This disparity is dangerous in that it encourages unskilled people to rent a boat so that they can have the same limits as boat owners. If a recreational angler is to be valued for their economic impact and allowed the safest access to their fishery, then all anglers should be treated as one user group with equal access.</p> <p>We should have a policy in practice that requires this. Alaska has already had deaths as a result of dividing the recreational sector. Safety is supposed to be one of the requirements of M/S act. Allowing this to continue in practice in Alaska is a M/S violation and a very dangerous precedent for the rest of the nation.</p>
7	<p>I would like to suggest a national or east coast/west coast salt water fishing license. I would like to see one of the options as similar to a commercial license where the boat owner has the license and anyone fishing on the boat is covered. The reality is, I take a fair number of people out on my boat fishing for a one shot trip. I always tell them to stop and get a license first - they never do. I would suggest a recreational salt water boat fishing license that I could purchase to cover anyone fishing on my boat. It would give me peace of mind and greater revenue flow for the government to reinvest back into the industry. Thanks</p>
8	<p>we have more red snapper off the coast of South La. then ever before in the last 25 years. NOAA's science needs to be regional and regulate fish populations on regional levels. South La. has the same limits as Fla. Not good science. Come fish with me I will show you schools of red snapper in 54 ft of water where I have caught mangrove snapper. I can't catch mangrove any more there's too many red snapper. Y'all guy's are missing the real story to ignoring it. I as a tax payer, am not happy with NOAA's policies</p>
9	<p>I think the draft policy is excellent. I am especially pleased by the focus on science based and ecosystem management. My favorite quotes from the draft policy are:</p> <p>"...benefit of the nation through science-based conservation management..."</p> <p>"Support ecosystem conservation and enhancement which provide natural and, where appropriate, enhanced habitats to support diverse, healthy fisheries and fish populations including abundant and resilient forage fish stocks:"</p> <p>I have also been following the formulation of new Mid-Atlantic Striped Bass regulations, and am pleased with the science being applied there.</p>
10	<p>SOUNDS IMPRESSIVE BUT BASED ON YOUR USE OF UNSCIENTIFIC AND BIASED DATA, UNFAIR ALLOTMENT OF FISH LIMITS TO THE RECREATIONAL SECTOR, YOUR ATTEMPTS TO REGULATE OUR FISHERIES VIA CATCH SHARES, SEASON CLOSURES NOT BASED ON ANY REAL DATA, AND RULE MAKING IN FAVOR OF LONG LINERS AND PURSE SEINERS I TRULEY EXPECT NOTHING LESS FROM NOAA BUT YOUR CONTINUED EFFORTS TO REDUCE THE OPPORTUNITIES TO RECREATIONAL FISHERMAN.</p>
11	<p>Thanks for the chance to comment on NOAA's policy on saltwater recreational fisheries. As the owner and operator for soon to be three decades I would like to say that never in my lifetime have a more perfect example of crony capitalism and outright corruption than has with regards to the red snapper fishery in the Gulf of Mexico since the reauthorization of the Magnuson Stevens Act in 2007.</p> <p>Recreational policy...the federal government can't manage a check book much less a complex system like a marine fishery but the states sure as hell can.</p>
12	<p>Looks good!</p>
13	<p>Consider changing the 3 mile limit to 12 miles for ROCK FISH, off, the Virginia coast the past three years no fish inside the 3 mile limit.</p> <p>thanks</p>

14	<p>Thank you for giving me this opportunity to comment. I hope that NOAA will look at North Carolina's inshore fisheries and ask? Why is North Carolina the only state left in the US that allows large mesh gill nets in its inshore waters. Shrimp trawling is allowed in North Carolina's inshore waters. I hope you're organization can convince the North Carolina Department of Marine Fisheries on the importance of good fisheries management for its inshore waters. North Carolina needs to protect and restore the inshore fish stocks, so everyone can enjoy them now and for future generations. The proper management of inshore fisheries is already being accomplished in states that border NC. I hope NOAA can convince NCDMF on protecting and preserving its inshore fish stocks.</p> <p>Thank you.</p>
15	<p>This is the most tortured regurgitation of fishery policy to make it look like new policy that I have read in a long time. What is the hidden agenda here? Until you make the recreational fishery accountable for every pound they catch you are whistling past the graveyard. Constant overfishing by the recreational group destroys cultural, social, and economic factors in any decision making process.</p>
16	<p>i live in a rural community . we here do a lot of subsistence fishing . recreational ,commercial fishing being addressed...but what about subsistence fishing?</p>
17	<p>I posted the following on the NOAA Fisheries Service Facebook page, pertaining the proposed policy in question:</p> <p>As a policy document, it fails to accomplish at least part of its stated purpose - specifically, the part about facilitating public understanding of the natural and regulatory environment," as articulated in the first paragraph of the second page.</p> <p>All things considered, it's a three page document that is virtually devoid of details. The devil is in the details, always has been and always will be. Certainly, the document has numerous verbal pleasantries, but when considered as a whole, it doesn't really tell the public at large much of anything.</p> <p>Without knowing how something is going to be done, or to what degree, or even the why behind it, do you support it or oppose it? As written, in its current incarnation, it is open to interpretation.</p> <p>It's not a lengthy document, and so that makes it not unduly time-consuming to actually read. But, that said, in its current form, it lacks "meat on the bones" - because it doesn't really deal with anything in a substantive way. It looks like something that a bureaucrat would write. Yes, it has multiple positive concepts encompassed within it, but it doesn't speak to any real level of detail that the public at large would actually need to enable and empower them to grasp - exactly and specifically - what it at stake and at issue.</p> <p>If you add the details needed, then it becomes longer, which means that less people are likely to actually read it. If the actual details of what is being authorized are to appear in other documents, then until those are considered in conjunction with what is presented here, then the public would simply be left in the dark.</p> <p>The "trust us" approach is subject to being abused by government entities and personnel. Other federal agencies come more quickly to mind than NOAA, where such is concerned, but other agencies do not hold a monopoly upon being able to end up out in the proverbial left field.</p> <p>In its current incarnation, what are the restrictions upon NOAA, in pursuit of what is being proposed, herein? Knowing what those restrictions are, if any, as well as how and when they apply, matters.</p> <p>Promoting recreational fishing through science-based conservation and management could be both good or bad, or both simultaneously. It is always going to boil down to details.</p> <p>If this policy is consistent with and in furtherance of a prior act of Congress, then what was missing from that which necessitates the promulgation of this? Was something important missing from that act? Is this proposed policy even necessary, at all? If so, then what makes it necessary? If there are threats and</p>

dangers, but you don't bother to point them out, then how are people supposed to know what they are?

The question isn't whether there should be good stewardship of natural resources, but rather, what are people being limited from or prohibited from doing, how and in what ways, and for what durations of time?

The proposed policy does not create any right or benefit for the public. So, why does the public need it? For clarification of an earlier act of Congress? If that's the case, then the standing law in question needs to be amended via the legislative process.

If this document takes effect, as written, how does it benefit NOAA? What is it that it will enable you to do, that you can't presently do?

The three page document is worded broadly. A core deficiency of it is that, of the various things that it seeks to effectuate, it fails to state which of those things prevails, and in what situation. Because it is worded in such a broad manner, it is subject to manipulation.

As far as the caveat of "sustainable" is concerned, as utilized in the document in question, that strikes me as the potential lynchpin of it all.

The bottom line is this - how such policy documents are worded makes all of the difference in the world. There's a reason why this document is desired by NOAA. What is that why? I ask that, as I sift through this one hundred and seventy-eight page PDF document of the Magnuson-Stevens Fishery Conservation and Management Act located at:

http://www.nmfs.noaa.gov/sfa/magact/MSA_Amended_2007%20.pdf

On page # 2 of the policy draft, it states, "this policy broadly pertains to non-commercial activities of fishermen who fish for sport or pleasure...,"

That, alone, sends up red flags in my mind. Thus, it clearly isn't commercial fishing that this policy seeks to deal with, but its target is vastly more encompassing than the commercial fishing industry. Even if they (individuals) release what they catch, this policy, as written, will broadly pertain to them.

As an individual citizen, I am far more supportive of federal governmental regulation on fishing and some other maritime activities, where the commercial industries are concerned, than I am of federal governmental regulations on individual fishermen and individuals engaged in other maritime pursuits.

Ultimately, everyone isn't going to agree on virtually anything. The oceans are becoming increasingly polluted and, in certain instances and in certain locations, fishing stocks are being depleted. So, ideally, we wouldn't need conservation of resources, at all, but none of us live in an ideal world.

That said, the sum totality of human experience, including in our country, teaches us that government bureaucracy has a way of both manifesting itself, in the first place, and one instance of bureaucracy invariably tending to lead to even more layers of bureaucracy, in the second place, and that bureaucrats have a way of perpetuating bureaucracy, in the third place.

The problem is almost always going to lie on the restricting end of things. Promoting broad and diverse access sounds wonderful. Promoting a restrictive policy or restrictions through a policy that broadly pertains to virtually anybody and everybody generates suspicion on the part of average, ordinary Americans.

These days, science gets manipulated like a pawn. It's not just that bad science is promoted, at times, but incomplete science. NOAA has a difficult job, at best. There are many things that it does a wonderful job at. Like many things, the job can be a thankless one, at times. But, it goes with the territory of being a

	<p>government agency.</p> <p>This three page policy draft document utilizes lofty language. But, it could benefit from revision, particularly clarifying language. At a minimum, it needs to incorporate an explanation of why it is even needed, at all.</p> <p>In its current worded form, I wouldn't support it, even though I probably support a lot of what it appertains to.</p>
18	<p>Recreational and commercial fisheries is being ruined because the state of florida is handing out to many fishing licenses. When is the state going to put a limit on how many licenses they handed out to make a little money. Help are fisheries restrict the boats and licenses they allow on florida waters. Make commercial fisherman earn 50 to 75% of there income to hold a licenses</p>
19	<p>You do not care about us. If you did, you would stop the abuses from the comercial fleets. I know it is all about money but, we and you need to save the fishing for our children and grand children.</p>
20	<p>It all sounds good. The true test will be in how it plays out. I'll stay cautiously optimistic considering what has gone on with striped bass and what appears to be the total ignorance toward the decline of bluefish.</p>
21	<p>Although you have done great things in the past up to the present. You fine folks still have a hard time listening to the folks that you regulate heavily. Here in Naples Florida the mayor has tightened fishing regs tighter on the pier. He did it without going tothe people with sufficient time to respond. You also have done similar things. Example is the reporting of recreational catches. Problem being as such. Not enforceable unless your going on private property and docks. The other one is it got approved regardless of the townhall meetings that said outright no to it. All I'm asking is that you listen to us a little more closely. We are your best resources for what happens out there. We are already spending the money to be out there. Goliath Groupers need a season and please check with the public first before it goes through the approval process. You have had great success. Let's keep the good work on a roll. All of your staff I have encountered have been fantastic. Your our advocates on this. We really do need you.</p>
22	<p>What about subsistence fishing and gathering rights? It wasn't mentioned in the draft. To me noaa ain't got nothing to do with our our cultural practices which isn't only traditional Hawaiian because the entire State of Hawaii is diverse in dozens of cultures. There is too much non Hawaiian influences in Hawaii to narrow it down so don't.</p> <p>The draft mentions "This policy recognizes the authorities and responsibilities of natural resource management agencies, regional fishery management councils, interstate marine fisheries commissions, states, and advisory bodies and seeks partnership in its implementation."</p> <p>Does NOAA have a list of these agencies so the public may look into this further? A list should be made public or placed online with the proposed policies.</p> <p>What is wrong with our current State of Hawaii Department of Land and Natural Resources already established rules and regulations. And will these new noaa policies override the State's policies? I say no it shouldn't. For the better of the people of Hawaii NOAA's proposed policies regarding recreational fishing should stay within State powers so the people who live here can decide how we want to stewardship. Not people in whitehouse or the National Ocean Council or outside the country or state. Your comments should only be from Hawaii residents.</p>

23	<p>I'm glad to finally see a draft policy of saltwater recreational fishing. The draft seems at first read to be fairly comprehensive. It includes acknowledgement of the need for science, regulation, economics, accountability and even allocation to maintain and revive important fish and fisheries. Politics should be included in this list to insure the regional management councils are fair and balanced in their representation. The North Pacific Fisheries Management Council is woefully unbalanced in representing recreational anglers. The lone recreational member cannot even get issues on the agenda because no one will second a motion. This policy should also acknowledge that a recreational angler is a recreational angler regardless of how the angler accesses a fishery. Regulations should be consistent for anglers who might fish from shore, on their own boat, a friends boat or a charter boat. Anglers should not be penalized with more restrictive regulations just because they either cannot afford a boat, or simply choose not to own a boat and prefer to hire a charter boat . The National Standards provide no rationale nor direction to segregate recreational anglers by access means to any fishery. This policy should in fact mandate this definition to insure that politics at the council level does not trump the NS.</p>
24	<p>Alaska, under the North Pacific Fisheries Management Council purview, is one of the only areas where the recreational sport fisheries (for Halibut & Salmon) are not offered at least 50% of the fishery catch limits, like in the lower 48. Your fisheries policy should correct this, especially since NMFS & NOAA's own data and reports show the economic impacts for sport and COMMfish activities are about equal.</p>
25	<p>Sounds like a lot of crap to me. I don't think recreational fishing is compatible with the Magnusen act. Important game species like striped bass need to be managed to maximize abundance, not sustainable take. Heck, you guys can't even manage for sustainable take. Look what you've done to GOM cod. And stripers are in big trouble, but you still count success as numbers of dead fish.</p>
26	<p>As far as I know the Atlantic fishery is managed by the ASMFC so I do not know how NOAA might effect policy, but I will submit an observation.</p> <p>As a "recreational" angler it seems incongruent that NOAA is collecting data to the end of providing the best possible plan for a robust population.</p> <p>I am considering only three species for this comment. Striped bass, american eels, and atlantic menhaden. ASMFC appears to manages these species with MSY,MEY or perhaps an OSY models. These are fine models for timber or perhaps shellfish management but for a fishery such as the one being discussed it seems an intrinsically flawed method to achieve what NOAA has outlined as it goal, abundance.</p> <p>I have done cursory research only but have never come across ASMFC mention anything about the exploration of the Atlantic's carrying capacity for any of the mentioned species.</p> <p>As an example, I do know that a 40% harvest of 20 bn is larger than a 60% harvest of 10bn fish, and leaves greater room for error. From anecdotal data through history, I have heard it said that menhaden schools could once be measured in the hundreds of square miles. Today's anglers are excited to measure them in portions of acres. I highly doubt that anyone concerned with abundance for the sake of abundance, which of course would be the ideal situation for recreational fishing, believes that robust populations are not possible. I think it is simply perceived , with cynicism and resentment, that the salt water registry is just another hand in our wallet and true abundance will never be considered.</p> <p>As for access, anyplace within 50 miles of me prohibits parking when an access suit is won, so nobody bothers. Additionally their is an increasing trend toward private landowners installing "swim only" buoys, complete with float lines making mile after mile of shoreline accessible, but criminal to fish within...even after dark when swimmers are gone, fishing in the vicinity is always a problem as the float lines tend to get in the way causing tangled, dead, lost fish.</p> <p>Thank you for your consideration of this opinion.</p>

27	<p>I would like to say that I agree with the public draft policy, however the policy is vague and I believe should give specific "best practices" to states and territories on how to achieve the goals outlined. On one particular point I know that in the past a call in method had been used to identify catch numbers on certain species, with the social media technologies we have in place I believe a better method is possible, also a rewards system may be needed to produce accurate results. The east coast looks to NOAA as the scientific authority on matters dealing with our coastal waters, the document seems extremely loose as to what would be actually expected from a regulation standpoint and I think more targeted practices should be identified. Thank you for letting me participate.</p>
28	<p>The content of the National Saltwater Recreational Fisheries Policy was very broad, providing no specific goals or metrics. While the policy guidance in the document is good, the value of the document is essentially nonexistent.</p> <p>In order to improve the value of the document I would recommend listing specific goals, such as increasing the proportion of the economy that is represented by recreational fishing, increasing the per capita involvement in recreational fishing, increasing the number of new participants in the recreational fishery. Having specifically defined categories and then defining the goals (i.e. a maintaining a 3% increase from the previous 5 year avg) is something that increases the probability of successful policy. Without actual goals there can be no accountability, because there can be neither success or failure.</p>
29	<p>NMFS should abide by Congressional mandate to STOP sector separation (it doesn't work) and fix the fatally flawed science that is used to illegally close off our fishing rights. Stop hiding behind lawyers and the so called environmental groups that are really profit fronts for some well funded foundations! Remember that you are PUBLIC SERVANTS, your place should be in serving the people, not the special interest agendas!!!!</p>
30	<p>To whom it may concern, I am a recreational fisherman. When I fish it is usually with my 2 sons. We are catch and release fisherman taking an occasional fish for eating. It is one of the few times as a family that you actually get to talk to your children with out outside distractions (phones, computer's, electronics, girls, etc.) I guess all want to say is do what's right for all. Even the occasional fisherman. Thank you.</p>
31	<p>You open by stating "increasing number of people are pursuing recreational opportunities afforded by this nation's expansive coastal and ocean resources."</p> <p>What coast is this playing out. In Florida you will find many empty boat ramp parking lots because we are no longer allowed to bring home a red snapper or grouper due to your closures. The two large head boat owners have sold most of their boats and now just have one each going out. The industry is in a death spiral due to closures. No one wants to pay to fish for grunts. Combine fishing closures and fuel prices and you get an empty ocean. Oh, I know that that was your goal anyway. You can't fool all of us.</p> <p>I went fishing in Alaska for the last time this summer. Our charter captain is selling his boat and getting out of the business because the regulations restrict guided fisherman's take to what amounts to one half of that allowed to non guided recreational anglers. That reg was championed by the commercial lobby. Oh, I forgot that all fish belong to the commercial fishermen. Sorry</p>
32	<p>Could you provide me with your previous policy on saltwater recreational fisheries</p>
33	<p>The following language in the draft policy concerns me " as set out in the MSA definition of recreational fishing, whether retaining, consuming, sharing or releasing their catches, as well as the businesses and industries, such as the for-hire fishing fleet and tournaments, which support them. "</p> <p>Seems like there is a high emphasis on harvest related language and commercial language in that definition. Sport fishing should not be so harvest oriented. Sportfishing should not emphasize the number of fish you are allowed to keep.</p>

34

This is my last post from my web site and I think it sums up the Charter and recreational sector to a "T".
11/19/14:

Now the rest of the story!!!

The emergency action (EA) taken by John Bullard and the astute members of his staff will be in effect for 6 months from the time it was evoked. This will bring us into the 13th of May, 2015. If the New England Marine Fishery Council (NMFC) fails to address this EA then Bullard will extend this for another 6 months. The plan has been, to let Bullard write the EA and then the NMFC will write it into the next set of laws coming forward called Amendment 53. Once this is included in Amendment 53 it stays until the Cod fish have recovered. This has been estimated to be 5 to 10 years.

The next step that was cleverly played out was the Total Allowable Catch (TAC) of cod for the 2015 season set at 200 metric tons. This places the entire fishery in the GOM in an extremely precarious position. This is what we in the industry describe as a discard fishery. Last season it was a 1500 MT limit and that was tight. What this means is any Cod fish that is caught is counted toward this 200MT limit. The dragger that is dragging for flounder might catch Cod fish even though he was not fishing for them. The same applies to the gill netter and the anglers targeting Pollock or Haddock that catch Cod fish. They will be added to that 200MT limit. There will be no retention of Cod fish by any charter boat or recreational angler while fishing any open areas of the GOM and they are limited areas. This rule will hold for at least 5 to 10 years.

The areas that will be affected by the latest round of restrictions from the New England Marine Fishery Service (NMFS) and NOAA are from Portland, Maine to the tip of Province Town, Ma. The Jefferies Ledge that we fish almost exclusively will be closed and is now closed for the next six months. Then they have placed rolling closures on major portions of the GOM from the inside of the Jefferies Ledge to the shore line, as shown by the blacked out areas on the charts listed a few posts back. You can see that they change during the year. The most closed areas occur during our fishing season.

These actions by the NFMC, NMFS and NOAA will put the charter industry out of business and shut down the entire recreational fisherman from going out to catch some fish for the freezer. All the small draggers and small gill netters from Portland, Maine to Province Town, Ma are all done now. The big boat operators that can venture off to beyond the GOM will survive and do very well in the cash department.

Just a side note: Yesterday. I was in DeMoulas Market Basket and USA fresh caught Haddock was \$3.99 a pound. Cod was \$5.99 per pound. Must not be the same Haddock and Cod that swim out in the GOM.

There are lots of Haddock as many of you have seen but we are allowed to catch only 3 per person. The reason for this is twofold. 1. We have to catch too many Haddock to get our three at 21 inches and all the ones we throw back, 50% are considered dead. 2. While trying to catch Haddock we often catch Cod. As of now we cannot catch Cod or keep Cod. Look at the rules that the NMFC and NMFS had on the Cod and Haddock last season. We were allowed 9 cod at 21" and 3 Haddock at 21". It seemed to me that this ruling was reversed. Cod are in jeopardy and we can have 9 of them yet Haddock are everywhere and we can only have 3 of them. I believe that a 3rd grader could have done a better job at that one. Let's not forget a few years back Haddock was unlimited. I ask you "does this make any logical sense to anyone out there?" This just shows how these astute radical environmentalists operate. They are all wrapped up in their science and all of them are running aground.

To summarize this story is easy. The EA is in place for 6 months. The NMFC is going to write it into the frame work 53, but if not Bullard will put the EA in for another 6 months. The NMFC will put it into frame work 53!!! Then comes the secondary backup for the closures, the 200 MT Cod limit. Once the 200 MT is reached the entire GOM will be closed to all fishing, period.

This has put my business in a very tough position. Any monies I have made on the charter boat business are

now stopped. My income stream from this profession has been cut off. Any income that I would have earned for the next 5 or 6 years prior to me selling the business is lost. The Business itself is useless and has no value now except for the boat value. I have two boats and two mornings. No one in our area is going to want to buy a charter boat no matter how nice it is. All the commercial little guys have mornings also and boats that will be for sale. Sounds like this could be a serious problem for many.

My last words are to all the geniuses that reside with NMFC, NMFS and NOAA: "You have created a terribly complex community that no one can get into except for your environmental groupies." All of you need to get out of your high end glass cubicles, shut down your I Pads and Lap tops and get out with the stake holders that you have destroyed. The only stake holders left are the BIG GUYS. Just what the ex head of NOAA, Jane Lubchenco wanted.

Your statement in #6 states::

"Communicate and engage with the public in a credible and transparent manner to build trust and promote public awareness of, and involvement in, science and management processes through active two-way dialogue, public-private collaboration (e.g., cooperative research and citizen science activities), and other approaches which complement NMFS's ongoing science programs."

Sure we get to state our opinions but they go no where. Just us letting out our frustration. I have been to NMFC meetings for over 20 years and it has not made any difference and I am at the mic a lot. Your idea to make the recreational sector a participant is just your way at NOAA to cover your own asses so that the law is covered..

My opinion is that the NMFS, NMFC, NOAA and John Bullard have been making a mess out of the fisheries since they started. Below is a letter I sent to NMFS and Bullard after the last NMFC meeting in Hyannis, MA.

September 2014

To: National Marine Fisheries Service Council

I have been a Charter Boat Captain operating out of New Hampshire for over 30 years, taking passengers out for a day of ground fishing. I have seen the highs and lows in the fishery from no Haddock back in the 80's and early 90's, to an abundance of them now in 2014, and have seen the Cod stocks fluctuate the same, with the low numbers we see today. Large Cod fish seem to have vanished and it is hard to believe the Charter Boat and Recreational sector are solely responsible for this outcome.

I am on the Jefferies ledge on a daily basis during the season and fail to see where all the pressure is coming from on the part of the Charter Boat and Recreational fisherman. If our Vessel Trip Reports (VTR's) were used to pinpoint the locations of the Charter fleet during the season, I can't believe there would be much concern to the pressure being put on the Gulf of Maine (GOM) by these boats. The amount of fish we bring in during the season from this area is not a significant amount, although the data from NMFS will show otherwise. NMFS does not use our VTR's for tallying what we catch. Instead, they use data from pier and dock surveys and phone calls to the fishing population based on salt water fishing licenses. Prior to those salt water fishing licenses, phone calls were made to the general population. Somehow NMFS sees this method more accurate than using our VTRs. We have been filling them out for over 20 years and never once has the NMFS used this data. They contain such information as to where we fished by latitude and longitude, how many hooks used, how many hours we fished, what we caught by specie, what was kept, what was discarded and much more. We sign them indicating this information is correct to the best of knowledge under perjury of the law. It makes no sense why this information is less accurate than random phone calls and spot check dock surveys.

I feel the Charter Boat Sector should be a closed fishery and a control date of 2010 used. The fishery is under pressure and should not be subjected to any new growth in the Charter Boat sector.

I can attest to the fact that sector fishing and catch shares have devastated the Cod population by allowing all permits not being used, to be completely filled 100 % of the time. From our perspective, large commercial boat owners have benefited from this policy, while the smaller boat operators have been gobbled up in the process.

In June of 2012, sector fishing opened up at Stellwagon Bank, off the coast of Massachusetts. Prior to this, the Charter Boat and Recreational fishermen were catching keeper Cod and Haddock in good numbers. Within days of the Sector fishing onslaught, the fish were reduced to nothing more than throw backs. This is indicative to any area that sector fishing has been implemented.

The proposal made by the Groundfish Oversight Committee on September 18, 2014 in Portland, Maine to close the Jefferies Ledge, shows how the committee has taken the latest Cod assessment results and interpreted them as a total collapse of the Cod stocks in the GOM, and appears to focus on the Charter Boat and Recreational sector, as the culprit.

Now! With all this, comes the proposal to open up the Cashes and Phippines Ledge. This proposal is hard to understand. On one hand they want a closure of the Jefferies Ledge and on the other hand, they want to open up areas just beyond the ledge. This will only benefit the larger commercial operators. Is this just the way the system works now? Give all to the big stake holders and let the little players be sunk at sea?

If the proposal to close the Jefferies ledge passes this council and is approved by NOAA, it will represent the end of the Charter Boat Fleet in Maine, New Hampshire and a portion of Massachusetts. Connected businesses will also feel the economic fallout from this decision

The Codfish and Haddock that live and grow in those areas, are the same ones that travel to the Jefferies Ledge and beyond. Let's not allow ourselves to believe that these fish only live in specific areas without any studies to prove so. Much like the Haddock mortality that went from 0% to 50 % without any studies to prove otherwise. Picking a number and "saying" it is fact, does not "make" it a fact.

We have listened to many stories that tell of the government boats "trying" to conduct a survey, using the wrong type of ground gear, towing too slow or too fast, towing in too deep of water, etc. These stories are heard within the fishing community whether it is the commercial fishermen or the charter boats. Stories that tell us the data collected is not correct and in most cases, totally way out of skew.

An example of this was brought to the attention of the NMFS council at a meeting in 2012 by several Georges Bank Yellow Tail Flounder fisherman. They told of how one of the government survey boats was conducting Yellow Tail Flounder surveys on Georges Bank, the same days they were there. The three commercial boats caught their Yellow Tail limits for all three days and noted that the survey boat found no Yellow Tail in the area. They cited the exact position of their vessel and shared why the government boat found no Yellow Tail.

- The vessel was too deep.
- The vessel was sitting on a muddy bottom.
- They were towing too slow.
- They were using the wrong fishing gear.

In 2011 NMFS held a meeting in Portland, ME, telling the Charter Boat and Recreational sector that Haddock was going to be limited to 8 fish per person and a 21 inch size limit. Two days later at the meeting held in Portsmouth, NH, the talk was of unlimited Haddock from the 8 proposed in Portland, ME just two days prior. The reason given was that a new assessment took place and the Haddock bio mass was much larger than previously realized. The end result was unlimited Haddock catches for all.

Then in 2013 after 2 years of unlimited Haddock fishing, we are told the new regulations were 3 Haddock at 21 inches for each person on the boat. The Charter Boat and Recreational sector over fished their quota by 256%. What a swing this science has produced. Does anyone at NMFS or NOAA see any problems with these large swings in assessments?

Once again, in the summer of 2014, the Haddock assessment is conducted and again Haddock are more abundant than previously calculated. However, this time there will be no change in the catch limits for the Charter Boat and Recreational sector. In fact, there will be no keeping of Haddock or Cod after August 31, 2014. Haddock will be re-opened after October 31, 2014. Our charter season will be at a close after October

	<p>31, 2014.</p> <p>How can we believe in an organization distributing this data and changing it up and down on a continual basis? Once again, we, the Charter Boat and Recreational Sector, have to look at the Groundfish Oversight Committee and ask, "What are they trying to accomplish?" For that, we have to look at the background of who the committee is made up of. What we find is that it is heavily stacked with commercial fisherman. Do they really want us out? Or... them back in?</p> <p>The Charter Boat and Recreational Sector have zero confidence in the NMFS and NOAA, believing they are trying to correct the ground fish problem in the GOM.</p> <p>It appears the larger commercial stake holders are driving the ship forward and attempting to extinguish all the smaller operators and charter boats, in order to have the fishery for themselves.</p> <p>Respectively. This should sum up my opinion of what you are trying to do now.</p>
35	Very displeased with sector separation.
36	<p>I am opposed to the commercial exploitation of striped bass. The fish are under so much pressure these days, including the herring and menhaden fisheries being decimated, that putting a dollar sign on bass guarantees their demise as a sustainable species. Fishing the Cape Cod Canal daily I witnessed repeated violations by rod & reel comms' this year. I saw many people who do not own a boat fish under the boat comm permit limit of 15 fish. I saw comms' during a month long blitz there stack fish the day before and take way more than their limit and know for a fact that they were not selling to any dealers who would report the catch. There is so much under the table selling of fish that never get counted towards the season total. Selling under the table is a way of life for many guys who will sell for much less to not report for various reasons. No serious fisherman that I know has any confidence at all in the fisheries management doing the right thing. We've watched how cod were handled. Most feel that the fisheries management exists only to keep the \$\$ rolling along for the comms' as long as it lasts. If using fish stocks to generate \$\$ is their real mission, management is missing the boat ignoring the billions that are generated by the recreational sector, food, lodging, tackle, gas, road tolls, camping fees, marinas, the list of places where money is spent by the recreational sector is endless. When stripers disappear the economic pinch will be felt deeply.</p>
37	The whole purpose of the conservation measures for striped Bass was to reduce harvest of the larger spawning females that migrate up the Chesapeake Bay in the spring. How did this objective get off course?
38	<p>All looks good!</p> <p>It reflect all the ideas expose on the different forums and public consultations.</p> <p>Thanks.</p>
39	It would be if policies actually included a small narrative as to why they are needed. There are often policies that folks have no idea of why they were created.

40	<p>Frustration is the word that must be recognized by NOAA due to the past and remaining fall out of your decisions. First, Catch Shares has raped the fisheries for the United States Population that eats fish especially in the northeast. Scientific studies have proven false for accuracy that have been used for quotas toward all species. NOAA heads of certain departments have allowed theft of fishermen's rights and livelihoods. Have mismanaged recovered property and monies through false claims that were found in court cases. Subsequent measures for preservation of species</p> <p>Now we must be the victims of hyper media reports that don't deal with the real facts of over fishing which also includes mismanagement of authority related issues.</p> <p>There are continued cases of commercial draggers that are shown to be using overfished methods that allow for the demise of populations of bait fish right in front of our eyes, let alone the 3 mile limit being unrestricted in the "watch dog" category of limiting commercial methods. Now the emergency restrictions are in fact</p> <p>based on real non-scientific reports done at non-realistic drags that don't allow for tides, fish migration and fish populations that move to different habitats up and down the east coast. Look at the satellite tag monitoring and investigate where fish are populating and surviving and are then being over fished by methods our forefathers</p> <p>in the fishing community never anticipated would be the demise of where NOAA is positioned today. Recreational fishermen have no chance for fishing in shore waters</p> <p>unless bait is able to survive and populations of species are PROTECTED FROM COMMERCIAL DRAGGERS AND LONG LINING THAT AREN'T MONITORED OR PUNISHED IN THE POCKETBOOK like the recreational inshore fishermen.</p>
41	<p>I have fished in salt water since the 1950's. In 1997 I became a fishing guide in Ct. I live in the southeastern part of that state. I am licensed there as well as N.Y. and RI. My anglers are primarily fly fishers but I do have a fair number of light tackle anglers also. When I first started guiding we had many "slow" 30 fish days on the water. Around the start of 2000 we noticed a considerable drop off in fish caught. We were now averaging about 10 fish per trip. In 2005 it dropped to five fish per trip. This past year if we caught five fish it was a great trip. There were many days in the early season this past year that other guides at my dock and as well as myself had to cancel trips because of a lack of fish in our area. In days past the area that we fish was known as the "Golden Triangle" Watch Hill to Block Island to Montauk and back. Not only did we see the numbers diminish but the size of the fish shrunk also. Granted there are times when large schools of bass show up and people say where is the shortage? But at the same time there are many areas that are devoid of fish. There was a very large school of stripers that moved north this spring. You could follow their progress by the fishing reports. First in northern N.J. then on to southern Long Island then to the Montauk Rips and finally to the Southwest ledge off Block Island. These fish were all in the 30 to 50 lb. range and they were decimated by bait fisherman and poachers. There are videos on you tube of dozens of large bass being dumped over the side as by catch. It seems that there is almost as many fish that are wasted as are kept by draggers. Another cause to the decline of fish is a lack of bait. Menhaden and herring are two prime examples of this. You already know how important menhaden are to the stripers and how they help sustain life and water quality in the Chesapeake Bay. In Mass. when the trawlers were complaining about a lack of fish the regulators suggested that they switch gear and target mackerel and herring because there were plenty of them to catch. They did that and guess what. there is now a shortage of mackerel and herring off cape cod. Guess what eats herring and mackerel? That would be Bluefin Tuna and striped Bass. NMFS has know about this for years and you have denied it and refused to act and now the east coast fisheries are in poor shape. There can only be two possible reasons for this. The regulators are either incompetent by not doing their job in protecting the fishery or they are corrupt and catering to specific interests that are not interested in having a healthy fishery. When anglers travel to fish on a charter or go with a guide they usually come for a few days. That means they stay in local hotels and eat in local restaurants and buy equipment from area tackle shops. If there are no fish they won't come and a lot of people are affected.</p>

42	<p>The proposed policy seems balanced and reasonable. I hope that it is implemented effectively.</p> <p>I am not a scientist or a statistician, but I hope we can see some more and improved data related to fishing pressures, the fish stocks and their forage sources.</p> <p>I enjoy fishing and keeping some for consumption. On the margin, I favor conservation over exploitation.</p>
43	<p>Please stop destroying oil and gas rigs once shut down. At least leave the basic infrastructure in place as habitat. If the red snapper restrictions give us short seasons, at least put the days on the weekend so the average Joe can fish more than one weekend if lucky. When waves keep us onshore for those with boats under 35 feet (most of us), we miss much of the short seasons due to waves. By the way, I keep a photographic record of my catch and since 2004 we are catching noticeably larger fish in a much shorter time on the water, yet still finding certain reefs loaded with tiny fish. Your estimates of the population are clearly well below reality. I support the restrictions that have worked, but you have gone way too far in the last two years and I fear the tiny fish will disappear as these monster fish eat their young.</p>
44	<p>You can establish policy and that is a well and fine. But until you establish an accountable system for the recreational sector, that actually COUNTS the fish, instead of GUESSING, the recreational fishermen will continue to suffer short seasons no matter how many fish are in the Gulf of Mexico. Using "buffers" in the recreational fishery to adhere to the MSA is a cop out. We need a system like the commercial sector that actually uses hard numbers. You need to develop an Offshore Permit, and a MANDATORY recreational reporting system. Thank You.</p>
45	<p>I am for making decisions based on good data. As we all know the data has been flawed. It is imperative that the changes to data collection be made immediately. The seasons have been too restrictive in the past based on flawed data. I am in the fishing tackle business in Pensacola, Florida and the regulations have almost ruined our business. I am all for conservation when needed but most of the species that are considered over fished are really in good shape. Red Snapper comes to mind. We need immediate relief of these burdensome restrictions or this type of business that I have been the owner of for 28 years will be doomed. I hope that the powers at be recognize the urgency of my statement. The businesses that rely on recreational fishermen are all having to make changes in order to survive. We need help now.</p>
46	<p>I am primarily a Striped Bass and Bluefish surf fisherman. I have been fishing for over 35 years and have to say fishing, especially this year, has been dismal at best. This year I have made 100 fishing trips while 54% of the time not catching a single fish. The largest Bass I had caught this year was maybe 33 inches. The majority of the fish are just under 28" which leads me to believe that most of the fish that attain legal status (28") are being culled. I have fished in storms, dawn, dusk and after dark which are all prime times for Bass with very little to show for it. I am strictly a catch and release fisherman; however, I do not have a problem with someone taking a fish here and there for the table. I do have a problem with the current way the fish are being managed by the ASFMFC. They manage it to cull as many Bass as possible which is not fair to myself and the many other recreational fishermen. I would like it managed where I have a good shot at catching Striped bass along with an occasional shot at a bigger fish (>= 30lbs).</p> <p>Your policy seems to be a step in the right direction and really hope that something is done to change the course of the way the fishery is currently being managed. Even though they are in the process of changing the Bass bag limits, I believe it is not enough and is too late. Even if it works, which I am not sure it will, this change takes years to have an actual affect.</p>
47	<p>I think the self reporting system that the states implemented this year should be very helpful information. As a scuba diver/ spear fisherman, me and all the other divers I know, SEE just how many red snapper there are off the coast of Alabama. We have countless hours of video to prove it. Please give us a longer red snapper season!!!!Thank yourself</p>

48	<p>Your proposal sounds good and that is the extent of it. Totally believe NOAA is putting out this fluff policy to satisfy the act. Sure some will think it is a grand policy. It is really just empty words. The recent Gulf Red Snapper decision to separate private recreational anglers from charter anglers shows NOAA real intentions. Which is, to giving (for free) those who are paid to take people fishing more of the allotted Red Snapper and days to fish. What you have done shows your disdain for private recreational anglers.</p> <p>Thank you.</p>
49	<p>First you need to have sound science which you do not have and you do not want because the truth would be opposite facts to your communist control of all recreational fishing in the gulf of Mexico. You refuse to use the accurate data that the state of Louisiana has presented to you on Red Snapper in the gulf. I am totally in favor of each state controlling the waters out 200 miles and have an accurate count of the fish at all reef sites including Rigs. Hopefully this election will stop your discrimination of all recreational fisherman in the gulf. I am totally against your present system of estimated arbitrary limits on all fish with only your estimates of the fish population without an accurate count, which is used to control all fishing in the gulf. What a joke only Crabtree makes these estimates the way he wants.</p>
50	<p>Protect the cod and the bottom of the food chain, e.g. shrimp, herring, etc. Protect all breeding areas for all species.</p>
51	<p>This is a worthless document--all for show. NOAA talks a reasonable game, but after holding their public hearings, do whatever the EDF wants. All this song and dance, but yet we have fewer recreational fishing days for snapper than ever before. All the while, the population of those fish has exploded. There should be no commercial fishing for any species that is deemed to be overfished. No one should be allowed to "own" any public resource and profit from it (excluding possibly the government)</p>
52	<p>The policy - pgs 1 thru 3 - is so much political fluff. It means nothing to a fisher. The regs and rules that will accomplish this policy are what I would like to comment on.</p> <p>Furthermore, NMFS and NOAA have no right to impose regulations that are based on the catch, limits, seasons and other regulations of states as each state chooses to regulate fisheries in their waters. And, both NMFS and NOAA continue to ignore the most probable harm to the Fed waters fisheries. That would be the commercial fisherman.</p>
53	<p>I was at the meeting in Mobile and voice my comments as one of the last speakers. You have NOT made the fishing public aware of what Sector Separation is. You therefore negated the rights of 2.8 million licensed fishermen in favor of a handful of charter fishermen. You have sold completely out to the commercial fishing interests with 50% of the catch. Remember this, it was commercial fishermen who virtually wiped out red snapper stocks in the upper gulf in the 1800's. Only the advent of oil rigs that gave them someplace to breed, did they come back. You will allow this again. It will not be us who devastate the snapper population. You have taken our rights away. One more chip in the rights of private individuals.</p>
54	<p>This policy smells of even more regulation Lots of double speak Why do recreational fisherman need a draft policy or anything? Tax dollars at work I suppose...</p>
55	<p>I would like to start off saying I believe in managing our fisheries. I don't believe in taking something away first with out showing the reason updated on a web site or at a location so people can see. Also think you should let an outsider in when making decision affecting lives. When it comes to making things better lets do that but at the same time not take money or food out of someone's house hold that comes in for the year. Make it where it's ran like a business and not like someone is being paid off behind scenes. If I want to do something with my company I have to apply for permission from my government. If you want to make it harder that's fine but make it possible for public figures to have a fighting chance and the same freedom rights that ours four fathers died for. Our country was built on it and it should stay that way.</p>

56	The draggers are still allowed to drag up everything in their nets and ruin the ground fishing. Their haddock quota has been doubled so that means more dead cod to be discarded. But yet the recreational fisherman that spend millions of dollars on boats, gear, rooms, bait ect ect are being punished for what the commercial fishing has done to ground fishing.
57	First of all,I hope yall are really listening to the recreational fishermen.I have been snapper fishing for the last 30 years, and there are more snapper now than any other time I can remember.We catch them trolling, drifting,and bottom fishing for grouper,beeliners and trigger fish.We can't catch anything else because they are so abundant.Please listen to Dr Bob Shipp as he is THE AUTHORITY on red snapper stocks.I don't think Mr Crabtree has ever been out on a true recreational fishing boat.I have private spots in 130 ft of water that my depth finder won't read but 20 feet down because of the thousands of snapper competing for food.You can see them under the boat and drop down to the fish you want to catch,kind of like cane pole fishing.I have over 100 spots just like this off the Alabama coast and I am just 1 of the 1000's of recreational fishermen.One of the problems is that some of these spots used to hold beeliners and trigger fish but they are getting more scarce because the snappers are like pirannahs and eat everything.Please quit using the flawed guesses,I mean science that you have been using for the data.Alabama's new system is not perfect, but it is a million times better than what yall have been using.How about making snapper a game fish and do away with all of the wasteful commercial fishermen.I have personally witnessed 100's of dead snapper and beeliners floating behind a commercial boat out of Destin fishing a rig 65 miles south of Dauphin Island.We sat and watched them fill up plastic totes with little ice in them while they gutted them about an hour later.I prefer my snapper to go straight in an ice chest full of ice.I guess I've ranted long enough but I feel strongly that the very rights I defended while I was in the Marines are being taken away from me.Thank you for your time.
58	Sounds like a solid, strong statement in favor of recreational fishing. Just wish NOAA/NMFS felt as strongly about the supporting the nation-feeding, job-creating, commercial fishing sector as strongly!
59	I like that the Sport Fishing sector is going to be recognized in NOAA Fisheries Policy decision process, but I think our financial contributions to the economies encompassing these fisheries needs to be compared to the same economic impacts provided by the commercial sector. It's long been felt that the sport fishing sector ultimately drives a stronger financial contribution over a much larger segment of the coastal communities, yet the commercial sector always gets the majority of any allocations and consideration for fisheries. I feel these factors should weigh in favor of the Sport Fishing community being recognized for the real economic boost it provides, and therefore giving this sector more equitable consideration for fisheries allocations.
60	Why does NOAA insist on using obviously wrong data(MRIP) to regulate Black Sea Bass?MRIP is not science,it is nonsense. I have been registered with Fed salt water angler program since it's inception and I have never been surveyed.I look at the data tables for Black Sea Bass and I(know those numbers are complete crap. USE REAL DATA,vessel trip catch reports,angler surveys ,actual catch data!Not fictitious MRIP data that any actual human fisherman can see is wrong.
61	To whom it may concern please stop using catch estimates that you're using right now it does not work. We need to go back to a size limit for black Seabass of 10 inches to 11.also the reefs that are built off the coast of Ocean City do work.I have seen this for myself I have also helped to install materials for these Reese I am a firm believer her that this is the future for our fishery please support this effort thank you sincerely Terry L Burgess you may email me with any replies thank you

62

Dear Gulf Council ,

Although you here the many that complain they don't want sector separation or accountability , the fact remains is there are twice as many who do want to be accountable and are willing to incorporate a Vms and comply with the same regulations as the commercial sector .

These groups of individuals want better data collection than the status quo .

The ifq programs are a work in progress and I suggest we do the same for the recreational industry .

I/we are both a commercial fishing and recreational fisher

The commercial sector pays a cost recovery fee when they harvest ifq fish and yes maybe the 3% is not enough .

What does the recreational industry pay ?

The red snapper ifq is meeting it's goals, it has reduced discards, it promotes safety at sea , there is no longer derby fishing .

In the recreational red snapper fishery on the other hand has created a derby style gold rush mentality, and does not promote safety at sea .

It has increased discards ten fold , due to shortened seasons , the rec sector has overfished its quota 4 out of the last 5 years except the year of the oil spill .

So now the answer is Regional management , Really ,?

Noaa/ Nmfs has proven even with all the Red Snapper quota being allocated to rec sector they will continually overfish thier quota .

In the commercial ifq fishery, people can see what the quota is , how much is being harvested and with that said the commercial sector is staying under its allocations.

Reallocation needs to be equiptable and in order for it to be equiptable ,the recreational sector should have a fair , accountable system just like the commercial sector .

The general public should be able to see actual landings for both sectors by what vessel , what captain , what area , and of course be greeted by law enforcement in the same equiptable manner .

In closing just remember that we are both a recreational and commercial fisher .

As an accountable commercial fisher , We have always had to report what was actually landed , pay a cost recovery fee for ifq fish , permit fees , salt water products license, safety gear , etc.

As a rec fisher never had to report what we landed , never received a phone call about what I've caught .

The recreational fishery needs a tag program , a vessel monitoring system , a reporting system that all sectors can see what's actually being harvested by each sector .

A ifq based fishery for the charter for hire fishery will be a good fit for them as our IFQ system is working very well .

At the end of the day We are all taxpayers , just some pay more than others !

Sincerely.

63	<p>The policy as stated seems sound, however, collected data in recent years has obvious glaring practical impossibilities....Specifically regarding commercial vs recreational catch data. These errors have been widely reported and acknowledged but no corrections implemented. Let's place more emphasis on all the required VTR data. There is a true lack of confidence in the direction of fishing regulation today. Let's build substantially more artificial reef and watch ground fishing take off.</p>
64	<p>Good morning. I read the new NOAA fisheries policy and think it is well written. I would like to see NOAA fisheries act on the policy with the recreational angler at the forefront of decision making instead of the commercial fishing industry.</p> <p>I have recreationally fished in Florida for over 25 years and have seen the regulations change for the benefit of the commercial fisherman, not the recreational fisherman. The recreational fishing seasons for red snapper, amberjack, gag grouper, and red grouper have been continually shortened along with lower bag limits.</p> <p>We used to fish every weekend, spend money on gas, bait, tackle, boat repairs, etc. supporting the economy attached to fishing. With the implementation of lower bag limits, shortened seasons, the price of gas, and the economy as a whole we are fortunate to be able to fish once a month. I see this happening across the recreational fishing community in West Central Florida.</p> <p>Fisheries managers show that recreational anglers are overfishing several species such as red snapper, red grouper, and gag grouper. Your catch numbers can't be correct with the lessened pressure on the fish based on my observation at marina's, tackle stores, less trailered boats on the roads, and continually seeing less boats offshore fishing. Most anglers don't go offshore when red snapper and gag grouper are closed and other bag limits are low. We like to bring home fish to eat!</p> <p>Please consider that God put fish in the ocean for everyone to catch and eat. If there aren't enough fish according to your counts, I believe it is time to limit/eliminate the commercial harvest of those fish.</p> <p>Regulators had to eliminate the commercial harvest of red drum after the "blackened redfish craze" because the commercial industry obliterated the red drum stocks. There is no commercial harvest of whitetail deer for a reason. There aren't enough deer to support it.</p> <p>Please consider the above comments when decisions are made. I would like my children and children's children to be able to catch fish and bring them home to eat in the future!</p> <p>Thank you,</p>
65	<p>It is my concern that recreational fishing will be limited or stopped in favor of commercial fishermen. I live in the Pensacola/Orange Beach, Alabama area. There are literally thousands of artificial reefs in our Gulf waters that attract and provide ecosystems for every type of reef fish, particularly red snapper. Red snapper in our area are more plentiful and larger than anything we have seen in the past, yet we are limited to a nine day season. It makes no sense. The regulations coming from NOAA and NMFS are out of touch with the fish populations we see. Let the states of Florida and Alabama regulate reef fishing out 25 miles and let the NOAA and NMFS regulate beyond that. At least try it and see who does a better job of management. It is clear to me that NOAA and NMFS have an agenda to stop recreational fishing all together. They have too much power!</p> <p>Respectfully submitted</p>
66	<p>NMFS and ASMFC has overfished the Atlantic Menhaden down to less than one percent of its unfished biomass. You have destroyed the largest fish stock in the USA and in the history of fisheries management. This fish is the riveting that holds the east coasts food chain together. What manner of biologists are you? No FMP for menhaden.... No questions as to why this stock has collapsed?</p> <p>Must be great working for an organization that's has no consequences for dismal incompetence. All our stocks depend on menhaden here.... You are destroying the fecundity of the whole ecosystem..... The BAM assessment model is gibberish couched in mathematical nonsense and models nothing. Shame on you all.</p>

67	<p>Once again the policy fails to correct the core problem with the fishery management system. The current system in practice places all control of the management in the hands of one person, the regional administrator. He is able to determine who is on the SSC, Advisory panels and the council.</p> <p>In the South Atlantic the regional administrator only allows individuals who he has vetted to ensure that there are no one to be contrary to his agenda. He has shown to be hostile to the recreational anglers and does not allow them an effective voice in the process.</p> <p>As long as one person who is not elected has almost absolute control to push his agenda without opposition any policy will certainly fail.</p>
68	<p>It seems very much a generic collection of ideas and policy with little indication of how it will affect me as a recreational fisherman.</p> <p>The devil will be in the details and enforcement as time passes.</p> <p>Nothing to be learned at this time in my opinion</p> <p>Much like obamacare....</p>
69	<p>True the draggers been cut to hell but to much bycatch of small fish are thrown back daed. Make gill netting the way to fish less bycatch</p>
70	<p>It would be helpful to define what a saltwater fishery is in terms of this policy, and where this policy pertains. Is it determined by the fish species (tuna versus a diadromous species such as salmon), by the salinity (freshwater, brackish, or marine), by the management or political boundaries (state waters versus federal waters, inside versus outside the EEZ, etc.), or by the legislative mandates (MSA, ESA, MMPA, etc.).</p>
71	<p>The Policy mentions science repeatedly. Try using it.</p> <p>Additionally as a family fisherman, I am disgusted with NOAA and NMFS and despite 97% disapproval.....you continue to push catch shares. Get the EDF out of government's decisions, eliminate roy crabtree, LISTEN to the people who you work for and pay your salaries. Put that in your saltwater rec fisheries policy</p>
72	<p>I think you Policies really suck. I would like to no who is paying the so called noaa people off?</p>
73	<p>Why are you soliciting comments. No one pays any attention to them anyway. The Snapper Amendment 40 in the Gulf Council is a perfect example. 93% of the comments were AGAINST this proposal, yet it was passed.</p> <p>Your science is bogus and unbelievable. FIX the science and then fix the fishery. Right now there is more snapper in the Gulf than has ever been, yet I and the rest of the recreational anglers are facing a ONE DAY season in 2015. That's all I have to say before I blow a fuse!!!!</p>
74	<p>Place fisheries management in the hands of the Coastal states where it should be. The individual states are better equipped to know and effectively manage the resource off their shore.</p>
75	<p>STOP SECTOR SEPERATION. THE DATA IS UNPROVEN AND WILL DRASTICALLY EFFECT THE RECREATIONAL FISHERMEN. THE BIG MONEY INTERESTS THAT PARADE AS ECOLOGISTS DO NOT HAVE A CLUE AS TO WHAT IS GOING ON.</p>
76	<p>I think you have drafted an open ended document that gives NOAA the power to regulate the "Recreational Fishery" however it sees fit. NOAA needs to regulate the commercial fishery as that is the one where all the problems are. I will not support any regulation of the "Recreational Fishery" and would vote against any future funding for NOAA. I will write my congress people. You know where the problems are, regulate them but as we all know you can't regulate the other countries of the world so in order to justify your existence you are trying to regulate the "Recreational Fishery" in the US, who you can regulate. I was told by an employee of NOAA " that's how we keep our jobs" quote.</p>

77	<p>I think it would be a good idea to expand on # 3 " Coordinate with state and federal management partners to align science, management, and enforcement priorities and strategies in support of stable, predictable, and well monitored recreational fisheries."</p> <p>We need more consistent conservation laws across all sea boarding states to ensure that management benefits and responsibilities are shared equally. A few quick examples - Scup size possession in Ma is 10 ", in Va. it's listed as 8"; American eel in Ma - 6", limit 50, Va. - 9" and 25 in possession. Which is the better limit needed to protect the resource? Or, are either right and who decides? thank you.</p>
78	<p>As an avid fishing angler for the last 20 years in the Cape Cod MA area I have noticed a sustantial reduction in the following species of fish. Cod, Striped Bass, Fluke, Bluefish. Im not sure what the exact reasons for the decline but I am seriously considering selling my boat and taking up golf. Things have gotten so bad that I really dont even enjoy the excitement of the fishing experience anymore. This year out of 18 trips in my boat and many more than that from the shore. I managed only 4 keeper striped bass, 3 keeper sized fluke, 3 bluefish and zero cod.</p> <p>One thing is for sure, when I see the draggers destroying the bottom of the Vineyard sound that is one of the biggest problems. My suggestion would be to at least make it illegal to drag within 3 miles of any shoreline. I am not alone in what I am saying and several people I know have given up there boats and fishing gear already.</p> <p>Thank you,</p>
79	<p>we need our fishing stock to be regulated we need to allow some jewfish to be caught maybe a lottery where 100 can be caught and kept next year let the people record all the data about the catch and return it to you there are way tooooooo many of them thanks.</p>
80	<p>Dear Sir,</p> <p>I have fished Alaska for the last 15 years, and when my two grandsons were of the age so I can take them fishing, as they have no father to share what I have been doing all my life, as I am now 85 years old, and will continue till I can't fish anymore.</p> <p>For the last few years, we have fished the area 2C at Whalers Cove Lodge located on Chatham Straits. My comment is in the last 2 years the Halibut limit Has been in favor of the self guided fisherman. I always use a charter boat from the lodge and the reason is, one, I am to old to take a boat by myself and taking my two grandsons, I know where the best spots are and its to far and dangerous to go 30 miles away.</p> <p>I feel we are penalized because we use a charter boat and we pay more for the privilege of using a charter boat. When we go to Alaska this coming August, my cost for all three of us for the lodge is 14,100 dollars and does not include airfare, hotel and restaurants before getting to the Lodge. As you can see it gets very expensive to fish four days. The way the Halibut limits are set I feel it benefits the commercial fishermen where they are not bound by restricted limits except for a quota. Every time we release fish that measures between 47" and 76" I feel we are helping the commercial fisherman. I think it only right to save the fisheries for everyone including future fishermen, but there must be a better way. I think increasing the low end and decreasing the higher end, would make it a little fairer. Last July we released quite a few Halibut between 47" and 76", and that hurt's, after spending all that money and time.</p> <p>I hope for the 2015 season the commission institutes a fairer catch and release size for Halibut.</p>
81	<p>A lot of nice happy words. But it is in the details not yet promulgated that we will see how we fare. For example you have known that MRFSS was fatally flawed for years yet continued to ignore the Magnuson requirement to fix it and used it with window dressing changes. Bad flounder trawls, skewed allocations, the foolish expansion of the biomass of spiny dogfish, the anti-fisherman Lubchenco era, etc. have resulted in a lack of faith in your ability to manage the resource.</p> <p>It will be a challenge for you to overcome your past.</p>

82	<p>I am very pleased that NOAA is formally addressing the importance of recreational fisheries. Thanks. I would like to mention two issues in New England that warrant attention (that you have probably heard about ad nauseum) . One is the over-abundance of spiny dogfish and their predation of juvenile cod. I don't see how we can recover the cod stocks when the young are being gobbled up by the millions. That issue may be easy to fix by re-opening the commercial harvey for those fish. The second concern may not be so easy. Simply put, we have too many seals and they are a having a huge impact on fish stocks. I have heard estimates that each seal eats upward to 60 pounds of fish daily. There are no fish populations that can maintain that level of predation without facing eventual collapse. Then there is the issue that the only natural predator for seals are large sharks such as great whites. Having viewed a video of a great white inside Chatham Harbor on the Cape raises Peter Benchley fears for all of us. Good luck with your work.</p>
83	<p>Your policy is certainly a fine statement of intent. However what recreational fishing needs is a firm policy on poaching, especially for commercial purposes. Additionally all commercial sales by markets and restaurants of WILD striped bass should end.</p>
84	<p>The policy and drafts look good, but frankly, I do not trust NOAA or the NPS regarding anything positive about recreational fishing. The both of you are keenly focused on closures. I have set on the FKNMS advisory board for 6 years and experienced that loaded board incrementally and relentlessly focused on closures until they die. I have seen the NPS proceed to close 1/3 of FL bay to all fishing unless poling or having the money for a trolling motor, defacto closing virtually all sight fishing in shallow waters. Biscayne National Park with a clearly immature point of view now wants to close thousands of acres to all fishing - not limiting size, bag limits or even making the waters catch and release but rather CLOSE to all fishing. Your goal to be trusted is formidable. Good luck.</p>
85	<p>Point #1 Any National Policy reaches far beyond the individual States jurisdiction. It is important that we include worldwide partners as well including likeminded groups like the Organisation for Economic Co-operation and Development (OECD). Including all interested parties would build a cooperative resource that could be utilized in many ways. As the European Alliance Anglers share the same global body of water that we do their interpretation and scientific research goals should be integrated as well. The more diverse people we have working toward a common goal the better result we'll all enjoy in the end.</p> <p>Point #2 Take the case of Recreational Angling vs Angling for profit. The European Anglers Alliance produced a definition on Recreational Angling agreed to by the European Anglers Alliance at the General Assembly 2004 in Dinant, Belgium. The OECD defines recreational fishers/fishing, in general, refers to fishing for sport or pleasure. I believe that the distinction should be clearly made between one that utilizes a shared resource solely for self-sustenance, sport or pleasure and one that does so for profit.</p> <p>It does not matter if the person typically utilizes a resource for self but occasionally does so for profit. In planning and organizing a shared resource these two activities must be distinctly separated and dealt with differently – no matter how the catch is made. Here I refer to the European Anglers Alliance's definition on Recreational Angling defining recreational angling as the activity of catching or attempting to catch fish, principally by rod and line, pole or hand-held line for non-commercial purposes; provided recreational anglers do not sell the fish they catch. I do not want to exclude the many other ways in which fish and other desired aquatic organisms are captured; ie. nets, woven traps, weirs, diving, spearfishing, hand fishing, doodling or noodling, etc.</p> <p>I disagree with the European Anglers Alliance definition of Other Recreational Fishing that includes long lines. Long line fishing is a commercial fishing technique, for profit. We must make a clear cut and unambiguous distinction between what is done for self, or for the family group (individual consumption), and what is done for profit. By definition recreational angling is not done for profit. Angling for profit, no matter how small the impact on the shared resource, must be held under commercial fisheries rules and not be a part of the ever decreasing recreational take allowed.</p>

	<p>Point #3 This is a selfish point but I feel that it is one that needs to be made. The needs of the recreational fishers/fishing and the Recreational Angling Sector (RAS) or the economy that these activities supplement should take priority over commercial fishing ventures. The RAS includes but is not limited to, “tackle shops and tackle manufacturers, bait suppliers, charter-boating, recreational boat builders and handlery suppliers, marina operators and specialised angling media, angling tourism and other related business and organisations as well as the whole management environment (e.g. public agencies) to varying degrees dependant on or directed at recreational angling.1”</p> <p>An alternative to commercial fisheries lies in initiatives wherein individuals are making a case for raising fish for consumption in self-contained structures. They take no water from the outside world, I'm assuming after the initial setup, and release no effluent back into the general eco-system. What this means is that since it is a self-contained sterile, if you will, environment there's more control over the fish than is available in the open water fish farms. These large-scale aquaculture growth centers are creating technology and building fish factories on land, releasing almost no pollution and in turn are fertilizing vegetable crops with the waste product. These farmed fish never need antibiotics, hormones or other chemicals to keep them healthy. And because they are kept in optimal conditions, they grow twice as quickly as fish in traditional net pens.</p> <p>Of course in my black and white military mind I think of the areas of the country where land once was passed over because it had little or no agricultural value, from a surface farming perspective. This could be a real estate initiative as well. One could place an operation like this just about anywhere in the country and close proximity to the market place would make transport costs less and keep the product fresher for the consumer. I think it's a very neat idea and making the needs of the recreational anglers a priority will help to drive technology like this to feed the masses rather than relying upon a finite and limited resource wild catch to do so.</p> <p>Thank you for providing me with the opportunity to be heard on these important issues.</p>
86	<p>I believe that there is a clear duty to solicit the cooperation of the AMACE to keep the channels dredged to Chinook and Illwaco. Otherwise recreational fishing will die in Pacific County.</p>
87	<p>Although I am very happy that NOAA is addressing recreational salt water fisheries in this policy, I am also concerned. I worry that it may not have a substantial impact on recreational fishery regulations. What I mean is that state governments, those who actually do regulate local sport fisheries, are so different in their management of these resources. How does one blanket policy cover all of them?</p>
88	<p>These are all good concepts what we need to see is how you are going to achieve these goals. You have given away half of our public resource (fish) to those who wish to catch and sell. These resources must be rented to whoever wants to be a commercial fisherman. When commercial fisherman are out there year round fishing and the public-(who wants to go catch their own supper) can only fish a few days a year. That is a screwed up system. In fact with the Ifqs and catch share programs implemented for the commercial fleet. We are paying to operate that system. The commercial allocation needs to be reduced on many species and resource rent needs to be paid by the commercial fishing fleet. Also a use it or lose clause needs to be attached to these ifq shares. The shareholder must catch 50% or more of his own fish. These sit at home commercial fishermen that were gifted out fish, need to either start fishing again or go into a new business.</p> <p>All the above will go to help the recreational fishing. But most importantly we need Stamps for certain species of fish. This so you can get a much better count on the universe of anglers for different species and make longer seasons. For example if you count every saltwater angler in the gulf as fishing offshore for reef fish; when you determine the season, it will be much shorter than necessary because over half of the license holder never go offshore reef fishing..</p> <p>Also there needs to be either more councils to make rules for smaller areas or you need to turn over fisheries management to the states out to 200ft range.</p>

89	<p>I'm an avid supporter and leader of conservation of our natural marine fisheries and hope that your efforts to achieve the stated goals are as successful as anticipated. I join you in this quest to produce science based stewardship of our resources, industry, people, and community. In so doing I believe the surest way to achieve this is to invoke the local recreational fishing stake holders in acquiring the chosen data delivered to the local scientific research team on a state level.</p> <p>Get the local citizens volunteers involved in a wide segment of local fisheries responding to requested specific data documentation sent to selected participants for actual information sent back to the research facility.</p> <p>Interaction with the stakeholders on a regular bases will also keep fresh data at hand and give the public the research results of your efforts of your transparent public body.</p> <p>The National Policy Advisory group should consist of local stakeholders such as recreational fishermen as well as the science and research community.</p> <p>I believe many hands make light work and locals recreational fishermen know the fisheries best.</p>
90	<p>I have been actively fishing in RI., MA.,CT.,and NY. waters for sixty-five years. In that time I have witnessed many changes in both fish stocks and the attempts to protect them. Some have had sucess more have failed. I have fished both commerically and recreationally over this time and have one precident you should begin with over any other. Level the playing field and make the resorces available on a fifty-fifty basis for both commercial and recreational fisherman. It is not only morally correct but in other aspects as well. Quotas; metrics in pounds for one verses number of fish for the other. Economics; the value of a fish caught recreationally verses commercially. A commercial fish is approx. 1.27% the value of a recreational fish. Lastly look at your own numbers and compare the monies spent on research and fisheries management, commercial verses recreational. You can not propose a policy without first making it fair and equitable. If not it will garner little support from anyone. Respectfully.</p>
91	<p>I think NOAA's policy is geared toward giving commercial fishermen access to the public's natural resource and taking it away from the private recreational angler.</p> <p>The policy talks about using good science, but NOAA is not using good science. NOAA's science does not even take in to account the number of fish on the thousands of artificial reefs in the gulf. The state of Alabama has shown NOAA how easy it is to count the number of fish caught, and how wrong NOAA's current numbers are.</p> <p>If the fish stocks are so low, that we as private anglers can not harvest them, why do you not close the season for commercial fishermen and charter for hire also????? Redfish was removed from the commercial market because of over fishing????</p> <p>NOAA is taking away a means for me to feed my family and selling it to the tourists from New York.</p>
92	<p>Does not address current regs which preclude supporting NMFS policy, as follows:</p> <ol style="list-style-type: none"> 1. Protected species such as seal, cormorant, spiny dogfish (recently unprotected), porpoise combine to remove vast amounts of forage from food chain of recreational inshore species. There is no balance to current state of fishery. All the while, seal population of 20,000 off Massachusetts consume 6% body weight daily, plus they ingest stomachs only. Also they prey on inshore nursery stocks of pollack and cod as well as river herring also protected. 2. Where is the policy statement concerning public access and pollution of beaches by seals? <p>All of the above greatly influence current cutback to striped bass fishery and contribute to shortages of other inshore species such ad summer flounder.</p> <p>Summary Policy is off the mark and does not reflect reality experienced by this recreational fisherman.</p>

93	<p>I just want to comment on the closure of red grouper in federal waters Oct. to Dec31. I was all for this closure, thinking it was for the benefit of future stocks. Then I read that the Commercial Fishery was not included, and was still open. I feel that punishing the recreational fishermen is an ongoing problem, giving the Commercial men the bulk of every species, while we (recreational fishermen) sit on there hands and wait months to fish again, until the season opens.</p>
94	<p>Stripers Forever Comments on the draft NMFS Recreational Fishing Policy</p> <p>We have read the draft NMFS recreational fishing policy statement, and we applaud the formal recognition by NMFS of the socio economic value of recreational fishing, the rights of the public to access this resource, and the fact that the guiding and charter industry are not elements of commercial fishing, but rather enablers of recreational fishing access.</p> <p>Our concern is that we do not see any evidence of commitment on the part of NMFS to make sure that these declared values are given the appropriate weight in management decisions that NMFS may participate in. Mr. Sam Rauch of NMFS moderated a workshop at the Summer 2014 Atlantic States Marine Fisheries Commission meeting where he candidly discussed some perceived inadequacies in fisheries management that would be addressed by the new policy. In particular, he singled out the subject of allocation between stakeholder groups as an example of a policy “rusted in place” and in need of updating. The website announcing the policy update process promised direction in making the hard decisions that appears to be absent from the draft document.</p> <p>The challenges regarding allocation described in the National Standards section of the Magnuson Act suffer from the lack of direction more than some other aspects of the Act. For example, consider the statement regarding allocation that says: “If it becomes necessary to allocate or assign fishing privileges among various United States fishermen, such allocation shall be (A) fair and equitable to all such fishermen; (B) reasonably calculated to promote conservation; and (C) carried out in such manner that no particular individual, corporation, or other entity acquires an excessive share of such privileges.”</p> <p>Instead of addressing these obviously subjective descriptions of lofty goals, NOAA has concentrated on technical reports describing how economics theory might provide the guidance for maximizing the socio-economic “value” of our fisheries. Between 1990 and 2012 there have been repeated attempts to get traction with this approach, all of which have failed because these concepts have never been developed into a clear policy that is applied to fishery management decisions.</p> <p>The Executive Order signed by President Clinton in 1993 directed fisheries managers to rely on economic “Net National Benefits” to drive management decisions. Twenty-two years later, a decade-long debate over decreasing striped bass abundance has terminated in a new addendum to the Fisheries Management Plan without ever mentioning “Net National Benefits” or any of the goals established by the National Standards. In fact the debate and decision process degenerated into the age old struggle pitting the financial desires of the current harvesters against what would truly provide the greatest benefit to the most people.</p> <p>If the job of NOAA is to help ensure that fisheries managers adhere to Magnuson, then we need stronger, clearer policy documents to bridge the gap between lofty goals in the Act and the real world.</p>

95	<p>I applaud the most recent work of the Council, as they have taken bold steps to protect Gulf of Maine Cod, that are long over due. What the Council has done takes courage and I don't envy the position you're in. While I personally don't believe the GOM Cod stocks are as low as the stock assessment shows, I don't deny that there is a problem and that steps had to be taken. Although, I do commercially fish for groundfish with rod and reel, the majority of my business is through recreational charter-fishing trips, targeting groundfish. I would like to argue in favor of a very conservative and extremely limited season for recreational fishermen to be able to target GOM Cod. Allowing a bag limit of 2-3 fish for the months of July and August would make fishing possible for the general public. Although most Americans don't own a limited access groundfish permit, or even a boat capable of traveling to the places where groundfish are caught, by definition of the MSA they do own a piece of the fishery and the Recreational/Party/Charter industry is how they access it. Simply targeting other fish, such as Haddock, is very difficult without catching a few Cod in the mix. The truth is many people fishing in private boats, who are officially targeting Haddock or Pollock, will keep many of their incidentally caught Cod, in spite of the law prohibiting it. While this will never happen on my boat, or the boats of my peers as we take pride in considering ourselves professionals, I think it would be wiser to allow for very limited possession of Cod, by recreational anglers, such that the fish they catch can be more accurately accounted for. As it is, law enforcement resources for Maine Marine Patrol and their out of state counterparts remain scarce, and offending parties would almost certainly not be caught. Keep in mind that recreational anglers, who fish with rod and reel, are fishing with the least intrusive and least effective gear. I'm very confident that allowing recreational anglers to keep a couple cod per trip would have a minimal, and unnoticeable impact on recovery. No one pumps more money into the economy per pound of fish landed than the recreational angler. Please consider my comments. I encourage you to circulate them among your counterparts, and welcome and discussion regarding ways to preserve access to the fishery for the recreational angler. Thank you for your continued hard work on behalf of fish and fishermen. I would love to discuss ways that we might work together to allow for a limited recreational season for cod. please don't hesitate to contact me with your questions or comments. very respectfully.</p>
96	<p>Please protect what little striped bass that are left. Cut the harvest in half at least.</p>
97	<p>I am an avid saltwater fly fisherman, who almost exclusively targets striped bass. I reviewed your proposed policy statement and I am disappointed by its vague, broad stroke approach to a dwindling resource...the Atlantic Coast Striped Bass Population/bio-mass. I have virtually quit fishing for my favorite GAMEFISH because my time is only wasted on the water seeking a successful outing. The economic impact is significant in gas, tolls, hotels, dining, reality fishing purchases, etc.. Take this and multiply by the hundreds of recreational anglers, who no longer venture forth in their exercises in futility seeking this special gamefish. Millions of dollars are being lost by NOAA not managing this fishery to sustainable levels comparable to ten years ago. We're back to where we were in the early 1980's. STOP KILLING STRIPERS OVER 34"!!! Override state regulations and establish an Atlantic Coast daily harvest of ONLY one fish between 24"-28" slot designation. Take a page from FL's successful restoration of snook, redfish and spotted sea trout.</p>
98	<p>Want to echo the thoughts and comments presented by Stripers Forever and add my own support for taking action necessary to make sure there will always be a healthy, abundant supply of striped bass for recreational fishing! I want my grandsons to have the same enjoyment I have had all these years and that will be possible only if effective measures are taken NOW to ensure a future supply of this outstanding game fish! Commercial fishing interests need to understand that effective conservation methods will benefit their interests as well as those of us who fish for recreation!</p>
99	<p>I'm sorry but I was hoping this would have a lot more teeth. No one could argue with your objectives but they simply read like a list of platitudes unless you state how these goals are going to be achieved. I was especially disappointed in your statement re conservation, We need more than "good intentions"; we need new tough and rigorous conservation measures that will protect stripers and other game fish. When will we do what we know needs to be done and stop avoiding the issue with empty but well intended statements?</p>

100	<p>I have fished for striped bass off the coast of Maine for the last 15 years . Over that period of time I have seen a big decline in the fish I've caught, and what other fisherman have caught . My response has been spending less time Maine which has relate in less money being spent on lodging food and tackle . This fishery [fish and bait fish] is a big resource for the coastal states and needs to be conserved. I believe Maine's laws take good step towards those goals and the fishery would benefit if all states took a similar path.</p> <p>Thank you</p>
101	<p>please protect the striper bass. As sports fishermen we need to do that</p>
102	<p>As a long time recreational fisherman I have seen an increase in size and reduction of amount of fish caught in fishing regulations. I do value the management practices, but feel that the policies are not benefiting the fisheries as much as they can. Larger, older fish provide a better stock for future generations, and that smaller fish compete with older, mature fish for food. So I believe that management strategies must address this. If we want to build our fisheries we need to be able to take more smaller fish and return the larger fish to the fishery. I have viewed many studies in which taking 'trophy' animals has reduced size and numbers of animals (http://news.sciencemag.org/biology/2014/08/scientists-want-end-traditional-trophy-fishing-threatened-species) . I believe it is better to let anglers take more smaller fish and have to release the larger fish to breed. The bighorn sheep and cod are prime examples (http://www.cbc.ca/news/technology/bighorn-sheep-shrinking-due-to-hunters-study-suggests-1.2459623). I fully support regulations but would like to see a more aggressive policy in releasing larger/trophy specimens</p>
103	<p>I am an avid fisherman, and do believe in the benefit of regulations. I have seen striped bass and flounder species recover greatly with regulations. What I would like to see is a management strategy in which numbers of fish are regulated both by 'pocket' sizes and by amounts. It is a psychological victory to catch your limit, so if we can adjust size and catches to address this it would be great. For example, a black sea bass in NJ must be 12.5" and you can keep 15 for most of the year. If we made regulations in which 15-20 fish can be kept at a smaller size (ex. 9"-11") and 3-4 at larger/trophy size; anglers will release the larger, more reproductive fish and cull some of the competing smaller fish. I would feel ecstatic if I limited out on both pockets of fish, and would not feel sad in returning some of the larger fish to reproduce.</p>
104	<p>I am a recreational striper fisherman and wholeheartedly support the Striper Forever position. I fish and I vote.</p>
105	<p>make the striped bass a game fish .</p>
106	<p>Striped Bass: As a fishing guide in the Boston area I think that we should have a slot limit of one fish 25" to 29". Keeping fish capable of breeding makes little sense. If the stock is to be replenished, we need the larger fish which, as you know, are females.</p>
107	<p>Please manage the striped bass program in a manner that benefits the fish as a natural resource. The vested interests of all other parties, notably commercial harvesters, must be completely incidental to the protection and enhancement of the species.</p> <p>We should be stewards first; all other considerations should be secondary...and based on sound science, not economic exploitation.</p> <p>Thank you for your consideration.</p>

108	<p>My husband and I sent a previous letter regarding this policy, though it doesn't look as if NMFS dealt in any substantial way with the issues we raised, except to make their policy more vague. The questions we raised still remain. Why is the federal government promoting a hobby? That surely is the job of industry, not government. The "periodic review of fishery allocations" is a huge red flag, for the reasons we mentioned in our letter. It makes it impossible to plan for a long-term commercial fishing business operation, if there are going to be allocation battles every 3-5 years or so. The term "angler satisfaction" is not defined, nor are there any parameters given about when it might be achieved, or how to do so. I also am providing information from the most respected survey and report of recreational pursuits in the U.S., the Topline Survey.</p> <p>The 2011 Sports Participation Topline Report of the Sporting Goods Manufacturers Association shows an 11.1% decline in participation in freshwater fishing, and a 19.9% decline in saltwater sportfishing since 2000 (p. 26). Similarly, the Outdoor Foundation's website posts an Outdoor Recreation Participation Topline Report for 2011. Of particular interest is youth trends (ages 6-24), where freshwater angling is down 15.6% over 3 years and salt water angling is down 27.6% (over 3 years) nationally for this same demographic. The Oregon Dept. of Fish and Wildlife's External Budget Advisory Committee follow-up report from the April 14, 2012 meeting acknowledges that Oregon is no exception to this decline. On p. 1, the report notes that resident fishing license sales declined 13% during the period 1975-2011, and the decline in youth participation was also noted. These documents show that the Pacific Region (Alaska, Hawaii, Washington, Oregon and California) had the lowest participation in sport fishing of any region in the country, at 9% of the population.</p> <p>It looks to us as if NMFS is bowing to pressure from recreational fishing organizations who want to shore up a dwindling industry by eating into commercial allocations. Meanwhile, the U.S. is a net importer of fish, as our commercial fisheries as currently structured cannot meet the demand. The commercial fishery could expand; participation in the recreational fishery is shrinking, and has been for two decades. It seems to us that setting up such a recreational policy is not going to serve the national interests well. Focusing on how the two industries can cooperate and enhance each other is more in the national interest than pitting them against each other which is what this proposed policy will do.</p>
109	<p>I agree with much of what is in the NMFS new draft document, however, I don 't see much of it put into practice as it pertains to the recreaional fishery.</p> <p>Example, the curent state of our striped bass fishery is totally disarray and quickly heading towards disruction. After the Technical Committee reviews, studies, all of the available info on the current status of the striped bass stock, and then PUBLICALLY STATES, that the new suggested management options, only have a 50% probability of being successful, something is extremely wrong with the process! Knowing that the spawning females will enter the "over-fished, and over-fishing is ocuring" status in 2015 and 2016, not taking further, restrictive measures, boarders on MADNESS, ALMOST INSEINE management practices.</p>
110	<p>I read what was written, and I think noaa is on the right track about people who fish for the enjoyment . I read a lot of different fishing magazines an they are usually negitve when it comes to the goverment. I think noaa needs to be more proactive with their message . Most of the people I fish with do not even know about the work noaa is involved with. All they know is what the state they live in is doing.As far as striper fishing goes I have had bad luck since sandy fishing from the surf in NJ to much west wind. Keep up the great work.</p>
111	<p>Good words, but actions so far have favored commercial and more recently for hire/charter operators over the rest of us, whom by the way are in the majority.</p>

112	<p>I believe that recreational fishermen can and would be willing to report Tru caches and our releases for your documentation purposes and decision making. I do not believe that 270 commercial licenses in the Gulf of Maine produced the same type of economic loss that would be seeing if you did not allow recreational fishermen to catch in keep ground fish. I am a conservationist at heart but the changes that are necessary have left to do with the type of fishing that hook in line fishermen do and more to do with driving the bottom and destroying the structure of the bottom of the ocean. I am Not sure of how to approach that from your standpoint but I do believe that it can be scientifically done. and I hope it will be done so that generations to come would enjoy and benefit from Gulf of Maine ground fish thank you</p>
113	<p>The Port of Ilwaco is located on the mouth of the Columbia River in Southwest Washington State. We have a full service marina with 800 slips servicing both sport and commercial boaters and fishermen. It is important to have local/regional management of the fisheries and this framework is already in place. Any decisions made in regards to fishery policy need to go through the regional council's process and procedures. This process functions to represent the area's constituents and interests, which are critically important to making policy in each respective region.</p> <p>Both sport and commercial fisheries support our Port and community. Negative impacts to either group can have unintended consequences threatening the overall system of both our local and regional economy. Coastal communities depend on a functioning system of both sport and commercial fisheries. Both of these fisheries are important to maintain an economy of scale to sustain our long term economic health and viability. We do not have many alternatives to our local natural resource based economy and our coastal communities need to be represented in the process when making policy on these matters.</p>
114	<p>This is basically an appropriate and acceptable plan. However, I have concerns with Policy bullet 1), specifically the phrase "encouraging periodic review of fishery allocations".</p> <p>Almost 2 years ago a non-saltwater group co-opted a Federal meeting with stakeholders in an attempt to drive allocation issues on the ocean off Washington and Oregon. Their purpose was to facilitate reallocation of salmon impacts from an ocean commercial fishery to an in-river recreational fishery. Ocean recreational interests were successful in sidetracking their attempts to high-jack a process that they tried to co-opt. Allocation of harvest between local / regional recreational and commercial fisheries have been processed through the Regional Councils for many years and should stay there. Specifically, we have advisory bodies to our Pacific Council that have dealt with allocation issues in the past and the Council should be the sole arbiter of how our West Coast fishery resources are allocated in the future. Council members come from all Pacific states and from both industry and government. We have sufficient means by which to deal with allocation issues without having a non-saltwater fishing group trying to do an end run around a longstanding process.</p> <p>Leave allocation issues to the regional councils. Encouraging periodic review is fine. Requiring it - NO. Thank you</p>

115	<p>To Whom It May Concern-</p> <p>Thank you for the opportunity to comment on the National Saltwater Recreational Fisheries Policy. The policy as currently written is a very good effort by NOAA Fisheries to move the recreational fishing industry toward equal status with the commercial fishing industry. While recreational fishing has a very large and important economic impact to the nation, it has been managed as an after-thought.</p> <p>It is my feeling that the recreational fishing industry should be treated the same as the commercial fishing industry, but managed differently. That should be stated a little more plainly in the policy.</p> <p>It is my hope that ultimately much of the policy intent can be codified in the Magnusson Stevens Act when it is finally re-authorized. High on that list and something that, in my opinion, the policy tacitly recognizes would be a revised definition of recreational fishing; such as: "Recreational fishing means fishing in which the fish is taken for personal use or released and provides socio-economic benefits to participants and the Nation."</p> <p>I also believe that the Policy should address the issue of allocation. Not the specifics, but the policy guidance for this important issue.</p> <p>Thank you again for the opportunity to comment.</p>
116	<p>Suggest some additional teeth be added to the policy in regard to commercial and recreational fishing being given equal consideration and resources to flourish.</p> <p>Perhaps language in the introduction can be added that gets at this. Something like "NOAA's economic data indicates that recreational fishing's impact to our economy is on equal footing with other sectors and therefore NMFS will aim to provide recreational fishing with equal treatment and status compared to other sectors in all areas such as research, fisheries management resource allocation, etc."</p>
117	<p>Western Pacific Regional Fishery Management Council's Comments on Draft Saltwater Recreational Fisheries Policy</p> <p>December 17, 2014</p> <p>General Comments:</p> <ul style="list-style-type: none"> • The Policy should provide for national guidance but allow for regional flexibility in implementation as all regions have different challenges and concerns. A regional approach to the policy also follows the approach provided for in the National Saltwater Action Agenda. The use of "non-commercial" as a term in the draft goals also points to the regional differentiation. We would like to see this regional approach provided more clearly in the policy by using this policy as a broad policy with regional policies developed by the regional offices and regional fishery management councils. <p>Introduction Comments:</p> <ul style="list-style-type: none"> • The document states that NMFS seeks to "balance the needs of the resource, industry, people and communities." Since communities and industry are comprised of people, this statement could be better written (streamlined). • Regarding "maintaining healthy marine and coastal ecosystems," the term "healthy" is normative. There is not one particular and specific "healthy" resource condition. Rather, there is a range of healthy conditions. • Although the authors are seeking to avoid the term "non-commercial" because it is not in the MSA, the Introduction could do a better job in this regard. Perhaps: "Saltwater fishing for recreation, sustenance, and cultural needs is an important and expanding thread in the social, cultural, and economic fabric of coastal communities in the United States." <p>Policy Goal Comments:</p>

	<ul style="list-style-type: none"> • The Agency is stating that their primary policy goal is to “promote recreational fishing.” That is really broad for a primary policy goal and would be better served to include a more detailed goal of perhaps “to collaborate better across their own agency, with fishermen, and with local agencies to manage recreational fishery resources so as to ensure the availability of those resources to anglers” • The policy should include as a goal or objective, “the integration of saltwater recreational fisheries considerations throughout the programs and activities of the Agency and the federal fisheries management system.” Right now that language is in the draft policy, but it is not stated explicitly as an intended end result of the policy. • The policy goal states “Within this context, this policy broadly pertains to non-commercial activities of fishermen who fish for sport or pleasure, as set out in the MSA definition of recreational fishing, whether retaining, consuming, sharing or releasing their catches, as well as the businesses and industries, such as the for-hire fishing fleet and tournaments, which support them.” The intention for this sentence seems to come from the desire to have a regional approach to the policy. However, this fails to include the Western Pacific region because it focuses on “fishermen who fish for sport or pleasure, as set out in the MSA definition of recreational fishing...” In effect it says: we are focused on one non-commercial motivation (sport/pleasure), but if people who fish for that reason also share or consume their catch, hey, that’s cool too. That is not how the Western Pacific region’s fishermen should be recognized. Sport/pleasure is just one motivation and the ancillary benefits derived from that sentence are other motivations that should be considered. <p>Policy Comments:</p> <ul style="list-style-type: none"> • Is the stated policy the best policy to solve the problem? Well, we are not sure because there is never a stated problem that the policy is intended to address. The policy should speak to what is wrong in recreational fisheries and explain how this policy addresses and corrects these wrongs. • With regard to the six items listed to further the policy, at least two of these items (#5 and #6) are things the Agency already does. As such, they may not need to be stated in the policy document. At the very least, they should be stated specific to recreational fisheries management or in terms of what needs to be improved regarding data and communication.
118	Comment #17 is spot on. I read the policy and it didn't seem to say much. It's a start.
119	I just read about the killing sprees of cownose rays off of the east coast. I am appalled that this is happening in this day and age. I realize that there are certain regulations that are within the pervue of the states and others for the feds. Plesae do what you can within your authority and also with with the states to protect our ecosystems. No doubt, there are other issues on the west coast such as the over harvest of the squid. Please help to protect marine species!
120	I just read about the killing sprees of cownose rays off of the east coast. I am appalled that this is happening in this day and age. I realize that there are certain regulations that are within the pervue of the states and others for the feds. Plesae do what you can within your authority and also with with the states to protect our ecosystems. No doubt, there are other issues on the west coast such as the over harvest of the squid. Please help to protect marine species!
121	Please consider policies that end the slaughter of cownose rays. Hunting these animals does nothing useful for anyone.
122	<p>Not sure how you "align science management, and enforcement priorities and strategies in support of stable, predictable, and well monitored recreational fisheries." You should use the best available science to determine bag and size limits for recreational fishing. Moreover, bait fish populations need to be addressed if other fisheries are to be sustainable.</p> <p>Also suggest that policy 2 should be listed first since without healthy ecosystems you cannot have healthy fisheries whether recreational or commercial.</p>
123	I have read lots of fancy words and quotes...when it all comes down at the end of the day,the people that will make the rules are using outdated info and pressured by others with huge Bank accounts IMHO..short and not too sweet. Been there..seen it...Live with it.

124	<p>ALOHA!</p> <p>While establishing a policy is admirable,,the key lies with breaking the institutional inertia within NOAA Fisheries to truly lead fisheries management as prescribed in the MSA.</p> <p>The term recreational fails to encompass the larger more inclusive community of "other" fishermen who are being represented by this limited term, based upon the its origin, RE-CREATE!</p> <p>Most Pacific Islanders fish for food as did their ancestors who practiced fishery management measures using empirical knowledge-based science that needs to be incorporated with today's.contemporary science.</p> <p>Building divisive terms fails to achieve the sustainability of our nation's fishery resources as without the commercial sector there would be little fish for the masses. In the Pacific Island communities, the commercial sector is supplemented by the "other" sector that practices sharing their catch so both sectors are in the same proverbial boat so to speak. They collectively bring fish to the masses and therefore are adverse to catch allocation in any form. To those who malign the commercial sector, they need to look back at the three fingers pointing back and self assess as WE are ALL extractors of the same limited resource.</p> <p>Key to any policy's success is buy-in by the identified community and that can best be achieve by the needed change in NOAA Fisheries' institutional orientation as was identified at the very first Recreational Fishers Forum... The proverbial ball is in NOAA Fisheries court and we have all been patiently waiting. No need for more institutional silos but more integration in management actions through EQUAL REPRESENTATION OF ALL SECTORS including those with native rights.</p> <p>One key goal must be the reporting and collecting all catch and effort data, from all sectors including the catch that are released or suffered depredation, etc. essential to assessing the health of the our nation's various fisheries.</p> <p>It is the collective responsibility of ALL fishermen with NOAA Fisheries' leadership working with the various state administrations and the FISHERMEN embracing a "policy" toward building a sensible and practical ALL IN approach to fishery management to ensure the sustainability of OUR fishery resources.</p> <p>MAHALO for your ear! A Pacific Islander</p>
125	<p>Data Collection issue must be corrected First:</p> <p>Turn Private Rec over to the States and let them manage the fishery. Let the Gulf Council go back to its original intended purpose. the management of the commercial fishery.</p> <p>why????</p> <p>data collection is the sole issue on the private rec side. Red Snapper in the Gulf. Stripped Bass on the East Coast. bad data collection methods have ruined the fishery. and the council has no desire to fix it because it is run by commercial fishing interest.</p> <p>this so called "use best data available" is a joke and a failure.</p> <p>it is time to turn over total management of the recreational fishery to the States and let them collect the data. the States can work with NOAA just as easy as the Gulf Council.</p> <p>Gulf Council is Commercial and form a new council for the States run and managed by the States</p>

126	<p>The Gulf Council has failed.</p> <p>it is time to let all councils go back to there intended purpose. the management of the commercial fishery.</p> <p>let the States in there perspective regions manage the recreational fishery in conjunction with NOAA. let each region make there own decisions.</p> <p>for example, the Gulf of Mexico does not need scientist or input from Maine or California. all decisions will be made by the five Gulf States. NOAA will give us a catch limit and then they are out of it. each region will manage there fishery as they see fit. not how some Government bureaucrat see fit.</p>
127	<p>subject: Equal catch share.</p> <p>Each Stakeholder should get equal share of all quotas. 1/3,1/3,1/3. Charter boat, Private boat owner, commercial</p> <p>why does the commercial fishery get the majority of the catch share?</p> <p>Black Grouper: 73% of quota. red grouper: 76% of quota red snapper: 51% of quota Gray trigger: 79% of quota</p> <p>i want my equal share.</p>
128	<p>I revised the recreational policy and it is clear to me that it reflects the reality and needs for the recreational fishers and industry. Good work!</p>
129	<p>Like frequently noted, the devil is in the details. The policy sounds great with lofty ideals. Recreational fishers usually get short stick when seasons are laid out, like 9 days this year for snapper. Commercial and CFH guys are runing the details and fish year around. The worst result I have observed is charter boats fishing year around with catch shares from the commercials. It ends up with a few boats and guys catching all the snapper and none for recs.</p>
130	<p>First off, WOW!!!! My area of fishing is the Gulf of Mexico off Texas. Pertaining to the Red Snapper issue. Will try to keep this to the point (mine, anyways). Unproductive oil/gas platforms....getting blown up for dismantling. OK by the same govt'. that wants to protect our fish...This in itself kills thousands not to mention habitat gone. Sector separation...we have had for sometime now. My boat is Federally permitted so I cannot fish year round. Even if I could, not that many "state spots" in my area. BUT I CANNOT because I have the permit, so, I AM SEPERATED ALREADY. Next, data....As long as I have been chartering (formerly party boats), not once even though I keep accurate logs on my catches, has anyone ever approached me for numbers or size. Commercial fishing...from the words of a one time commercial fisherman (and this I can personally confirm from when I did that), 4000 lbs. of throwbacks where killed (no. of fish ?), for every 1000 lbs. of keepers (no. of fish?). Some say we have more fish than ever before. Usually when I hear this, it is from some "youngster". Fishing here since the mid seventies, I do believe that some captains do have some excellent spots with large numbers and large fish. but I also know that due to outside influences, pollution, excess pressure, or what have you, many areas have not "came back" to where they used to be. Seasons, trip limits, tags.... I see no way to make everybody happy on this issue. Of course charter fishing is how I pay my bills and I am getting way to old to start something new, so I am going to favor anything that helps that. That said, I do believe in conservation and I do hope the best, not only for our fisheries here in the Gulf, but around the world. It has been my life, thanks</p>
131	<p>I forgot to mention something in a first letter. In regards to Red Snapper season for Federal fishing in the Gulf of Mexico. As a charter boat operator and trying to pay bills, we need more than a week or so to know when our seasons will be so that we can book trips. What do we tell our potential customers? "WE DON'T KNOW BECAUSE THE GOVERNMENT DOES"NT KNOW?" "MAYBE NEXT WEEK, BUT I WENT AHEAD AND BOOKED JETTY TRIPS, SORRY". I missed out on some offshore trips last year because of this. Just trying to</p>

	make a living!
132	Where's the policy? I don't see anything in this draft policy other than rhetoric. What are we commenting on?.....spelling?
133	the use of seal loin repplent devices worked great. We should be allowed to use them again as they were extremely effective.
134	The regulations should be the same for all states. No exceptions It seem Maine is the only one with an odd size and a one fish limit. In order to really control the fisheries one must maintain a constant. Size, bag limit, and a good release policy (circle hooks). Hope this helps
135	Hello: Below are a few brief comments about the NOAA policy on saltwater recreational fisheries. 1-the goals of the policy should be to manage, not promote. 2-the definition of recreational fishing - the word retain should not be included. Was else is there other than share, consume or release? 3-I am against the use of hatcheries to sustain or support recreational fisheries. In general, I want to see stocks managed for THEIR best interests, not the interest of any user group (recreational or commercial fishing). Those groups interests should be secondary to the health of a particular stock.
136	On behalf of the 65 members if the RI Party and Charter Boat Association (RIPCBA), their crew members and the tens of thousands of recreational fishermen we carry aboard our vessels each year, I offer the following. We applaud Noaa Fisheries for recognizing the importance of recreational fishing in the United States, and more importantly to our members, specifically recognizing the importance of the for hire industry as a supporting industry for recreational fishing opportunities. We are encouraged by Policy 1 which states "understanding factors which affect fishing participation and angler satisfaction". We strongly support Policy 4, which recognizes new technologies and a need to have high quality data to make good management decisions. The Policy sets the stage for better collaboration among all interested parties through a recognition of the need for transparency, two-way communications, and strategies that engage State Agencies and the Private Sector as potential problem solvers. The Policy could go further to set expectations and responsibilities within the recreational fishing communities, as beneficiary of this policy, which will be necessary to achieve the stated goals of the policy. The RIPCBA considers the policy an important document that could shape recreational fisheries as we move through time. We appreciate the chance to comment and we look forward to working with NOAA Fisheries in the future

137	<p>We need flexibility in regulations since we are out every day that is fishable. I have a saying... Everyday is different and we are happy to take what the ocean has to offer. We need to be empowered to take what we need to to make the day joyful and fun for our clients who pay us to do just that. When there are many 16 & 17" fluke around that we catch and release, an 18" keeper is a real prize. Clients don't understand this at all. I don't either. Lower counts & lower sizes works best for us with fluke. People want action! When the fish are really thick we need to be able to take a few more. When the fishing is not so good we need to take what the ocean is offering on that particular day...no fluke around we need to able to take a few sea bass to "save" the day. Stripers are not hitting we need to switch over to fluke. Tuna fishing sucks and is dead because of the amount we are allowed to catch. On some days we need to swing by Block Island to catch something for dinner. VTR's tell you what we are catching. Let us catch what we can catch. Allow us to take what the ocean offers. We will have great days, good days, and days that suck. Don't make more days suck because of regulations based on old data. Check out the VTR's We are not killing the resource!</p>
138	<p>I would like to see the c bass fishery numbers go. 7 fish per person is tough to sell, especially when you throw back a hundred in 4 hours of fishing. The stripped bass fishery should allow one fish at 28 inch and one fish over 34.</p>
139	<p>I would like to see the c bass fishery numbers go. 7 fish per person is tough to sell, especially when you throw back a hundred in 4 hours of fishing. The stripped bass fishery should allow one fish at 28 inch and one fish over 34.</p>
140	<p>The first step in creating the policy should be to assure that all statements in it are true. There are problems in the introduction to the Policy in that regard, as recreational fishing is not "expanding" and effort is not "increasing". Over the last 10 years, according to NMFS data, the number of recreational fishing trips made (in the states that participate in MRFSS/MRIP) has dropped nearly 20%, from 79 million to 64 million. Effort has dropped by 29% in the North Atlantic, 24% in the Mid-Atlantic, 22% in the South Atlantic, 48% in Hawaii and 51% in the Caribbean. The only region that bucked that trend was the Gulf of Mexico, where effort remained flat. Thus, suggestions that angling effort is "expanding" should be excised from the policy.</p> <p>The most important contributor to a quality angling experience is an abundance of fish and a population structured to include some larger individuals. Although the policy uses phrases such as "consistent with...the Magnuson-Stevens Fishery Conservation and Management Act" and "through science based conservation and management", there is no clear statement of the importance of healthy, fully-restored stocks to recreational fishermen. That should be corrected.</p> <p>The agency should not seek to "promote recreational fishing." "Promoting" any such activity is the responsibility of privately-funded trade associations, not taxpayer-funded public bodies. In addition, giving the same agency the duties of "promoting" and "managing" the same industry can lead to organizational conflicts when the actions appropriate to managing and restoring fish stocks are very different from those needed to promote industry interests in the short term.</p> <p>The use of the phrase "retaining, consuming, or sharing" fish in the Policy section is somewhat jarring; "consuming" and "sharing" pretty well covers anything that NMFS should encourage anglers to do with a dead fish. "Retaining", particularly given the particular reference to "tournaments" later on, suggests that NMFS is supporting the old style of kill tournament, usually for sharks or billfish, in which the entries are "retained", weighed and then trucked to a landfill. That is not a good think. Deleting "retaining" and leaving "consuming" and "sharing" would be a preferable construction.</p> <p>The reference to using "aquaculture to support recreational fisheries" is also troubling. It sounds too much like supporting hatcheries, which merely provide managers an excuse to allow overfishing, knowing that additional "manufactured" fish can be used to remediate the excess kill. Hatcheries reflect a failure of fisheries management, and should not be viewed as a viable option.</p> <p>NMFS should also be leery of any kind of electronic reporting or "citizen science" that can't be independently ground-truthed or validated by statistical analysis. "Citizen" science can better be described</p>

	<p>as "agenda-driven" science, in which people attempt to prove that fish populations are larger, and angler landings smaller, than NMFS believes, in order to permit a bigger kill. As such, it is likely to be biased and of little use to managers.</p> <p>To recap, the recreational policy should emphasize good science and good conservation, which puts the interests of the fish above that of the fisherman. For doing so is the only way that both fish and fishermen will truly thrive.</p>
141	<p>What a bunch of BS! I have been a charter boat owner/operator for 30 + years at the mouth of the Columbia river in Washington State, and we have record runs of salmon in the Columbia river. More fish have been recorded over Bonneville Dam since the 1930's, yet the Feds have the river over regulated so much that the states have to close the sport fishing so that the two commercial gillnet fisheries can exist, and create tension between the sport fishing and the two commercial fisheries deliberately. Example: no sport fishing on the days they MIGHT have a commercial fishery, yet they have a net fishery they call a test net fishery three to four times a week during the spring chinook sport fishing season? With strong runs expected again in 2015 you will again close the river to sport fishing in April when our prized spring chinook are the most plentiful, just like every year.</p>
142	<p>I believe it is time that NMFS finally changes the split on fishery quotas to 3 separate catagorys. Commercial, Recreational, and For Hire Industry. For years the For Hire Industry has been part of the recreational quota, and it used to work fine...recently though in the past 10 years, fisheries management has caused a hardship to the For Hire Fleet with changing seasons, size and bag limits of certain species of fish etc. Those changes presented a hardship to our industry when a season was shut down and we had spent money on advertisement and booked charters and taken deposits to take people fishing. Those deposits all had to be returned and the people that booked those trips blamed the For Hire Fleet for the inconvenience of cancelled booked hotels, and vacations.</p> <p>We have been part of the recreational quota forever, but the difference between us and true recreational fishermen is that we provide data on our fishing with VTR's...You know what we catch, where, how many fish were retained and discarded, and the effort invovled. As for the recreational fishermen the only data you have has always been suspect, whether is was MRFS info or now MRIP.</p> <p>The info gathered is voluntary, it should be mandatory reporting. It also is suspect due to the fact that anglers do lie..sometimes they had a bad day of fishing but when the survey person asks the questions they say oh what a great trip. We caught our limit etc. and on the contrary, we have to people that don't want to report anything and they either say they caught nothing or very little, or they refuse to give the interview at all. They forget that we give the info to NMFS via the VTR's. Most of the recreational community does not care about fishery management except that they get their piece of the pie. They want to go out and fish hard to get their limit. It is like fishing in an aquarium. That is why they fight the For Hire Industry when NMFS has given us a break on certain fish with a different bag limit etc. on fish like cod, tautog, tuna, scup. The For Hire Industry needs to be allowed to fish and maintain and manage those species of fish needed to run their businesses. Just like the commercial industry. Commercial fishermen need fish to catch and get paid to run their businesses, THe For Hire Industry needs to be allowed to catch fish, or have the perception of an amount of fish that customers will come fishing so that we can run our businesses. Both commercial and for hire fleets provide accurate and currant data to NMFS and their States so they can be regulated. This is why we need to have our own piece of the pie. If recreational anglers feel all of a sudden that they do not need X amount of a fish or a season, fine, but they do not speak for the thousands of anglers that fish only on For Hire Vessels. A recreational angler that has his own boat can go fishing as much as he wants and many do. We see some of the same recreational boats out fishing 3-5 days a week. They must really like to eat fish or the sport, but the funny thing is many of the boats have 4-6 different people on them every day too. That to me means they are playing charter boat. Unlike the typical For Hire Angler. He saves up his money to go fishing 1-3 times a year, and expects to at least have a chance of bringing home some fish to eat. I am not asking for more fish for our piece of the pie, or I am not asking for our piece of the pie to come from the commercial quota. I am asking for our piece of the pie to come from the recreational quota of which I am fishing in and of which I am taking recreational fishermen out and reporting those fish taken on the recreational quota. We have been doing this forever and nothing is changing other than asking to have</p>

	<p>our historical catch of fish that we provided data for be allowed to be called our For Hire Quota of which we can be regulated on and fish out of. You will have our data through VTR's so you can stop our fishing if the quoa is met etc..just like the commercials. The unfair thing is the mentality of the recreational anglers. They do not report any data "really", but they just fish and fish and not care...short fish, more fish than they are allowed, etc. Yes that is not all rec. anglers but a large majority of them, and why..THERE IS NO ENFORCEMENT...the States always say we have no money for enforcement. That cop out has to go away and enforcement has to be visible and doing their jobs, or why bother making any laws at all..It is all a joke</p>
143	<p>NOAA needs to learn how to make more fish, Needs to accept the fact that MRIP is worse than MRFSS, Needs to correct recreational catch data by using VTRs and accepted 'percentage of the fishery' findings from For-Hire & Private Boat operators; NOAA desperately needs to discover what sea floor habitats have been lost in the rise of industrial fishing and effect their repair: Marine fishery restoration cannot stand on catch restriction alone.</p> <p>Reef Restoration Makes Fishery Restoration Simple.</p> <p>Using bad data as though sacred amounts to theft of public property - Stop.</p> <p>NOAA needs to, right now, allow management access to PSE adjustments within MRIP estimates.</p> <p>NOAA Must Employ Their Full Suite Of Scientific Resources In The Restoration Of Our Fisheries Including Population Biology & Habitat Ecology.</p>
144	<p>Please stop using bad catch estimates to destroy recreational fishing fix mrip.we have many Reeves off the coast of Ocean City Maryland I feel our fish population is really stable right now.we do need to reduce the size limit of Seabass as you may know Seabass reproduce at a younger age we need this to happen please do not believe The false information that comes mrip Seabass in our area is not overfish the private boatowners that I know of does not catch as many fish as reported this is a serious problem that needs to be addressed right now.thank you for your time and I will be waiting for your answer</p>
145	<p>Your policy statement is as beautifully worded as it is utterly meaningless. MRIP -- which has been repeatedly demonstrated to be so flawed as to render its "findings" completely unreliable -- continues nevertheless to be the rule and guide of NOAA's stock estimates and management practices. To call this "science" stands logic on its head.</p> <p>MRIP estimates are worse than worthless: it is used as the basis for imprudent regulatory measures that hurt recreational and commercial fishermen alike, and arguably harms the fish population as well.</p> <p>Magnuson-Stevens requires that NOAA put some money into habitat restoration, but instead, I'd wager that the money (pro rated salaries of bureaucrats, paper, etc.) that was spent on drafting this largely meaningless policy statement is more than what was spent by NOAA on actually building reefs or restoring damaged or destroyed fish habitat in the past year.</p> <p>As Yogi Berra said, "if you don't know where you are going, you are liable to wind up somewhere else." That is where NOAA is thanks to MRFSS and MRIP -- somewhere else! And like the Wizard of Oz said "I can't come back, I don't know how it works." That is you guys. You are trapped in some parallel universe that is the figment of the imagination of a little girl who got hit in the head with a window shutter in a tornado.</p> <p>You have zero credibility and zero possibility of successful fisheries management until you admit what a miserable and pathetic failure your agency's efforts have been and address the basic concerns. To the extent your proposed policy statement fails to recognize the reality of the situation, it cannot act as a roadmap to get back to where we all want to be: restoration of habitat and the maintenance of a healthy and sustainable eco-system.</p>
146	<p>We generally agree with the new directions of this draft policy, and are especially pleased to see that guides, head boats and charter boats which exist to enable individual members of the public to access and enjoy public fishery resources, have been separated from commercial fishing interests.We look forward to seeing policies implemented that will promote the long term health of our entire marine ecosystem.</p>

147	<p>My hope is specific to cod and striped bass.</p> <p>For cod, I want the fishery protected until stocks rebound. Low bag limits with longer length limits (25") Party boats (almost year round) and summer charter boats represent a significant part of our coastal economy. Consider their needs please. The commercial sector has no ability to self-regulate. They need tight controls due to the impact of their mass-harvesting. I sincerely believe party boats are more significant economically than many believe. Party boats can catch and release, and they all do.</p> <p>Now for striped bass. Control the inshore harvesting of striped bass somehow?? Our Maine fish are being returned unharmed almost always. Last summer (new charter captain/20 trips) I filleted six striped bass and caught approx. 100. In New Hampshire some boats harvest thousands of pounds.....same goes for Massachusetts.....and what about North Carolina!!!! We protect "our" fish so others can slaughter them.</p> <p>Commercial harvesting of striped bass should stop. Each state should have the same recreational limit. These are migratory fish. Why protect them in one neighborhood and not in the next.</p> <p>A law change would probably need to occur for drastic changes in inshore striped bass harvesting rules. I would support spending time with our Congress to make this happen. Striped bass are once again on the decline and we must change the way we manage this fishery.</p> <p>Sincerely,</p>
148	<p>As a member of the "for hire" charter boat fleet. I feel that we are able to regulate the 25 percent reduction in ways that do not destroy our businesses. With our immediate and accurate reporting, there is no guess work involved. Charter boats harvest a small percentage of the recreational quota. They provide jobs and support local businesses while bringing in tourists to local communities. To regulate us the same as a recreational fishermen is unfair. If science states what has to be done to save our ocean, we should be able to manage the stock the way that best supports our businesses and still reaches the goal set forth by the government. The results will be the same, but not detrimental to our businesses. Please let us achieve our goals our way and not be told how to do it by a person who may or may not spend 10 days a year fishing. The recreational fishing community can manage their quota the way they see fit as long as the goals remain the same. I am in favor of a separate quota for each. Commercial quota is managed to the exact pound. "For hire" quota can be managed in the same way. Accurate data is better than guess work.</p> <p>Respectfully</p>
149	<p>As a highly regulated profession, the Charter boat business is always called upon for surveys, permits, and data entry. The recreational angler on the other hand is not. As a member of RICPA, I disagree with regulation on Striped Bass. I feel that we should be allowed the opportunity to keep 2 fish per person while the recreational angler is allowed 1 per person per day. We do not have enough law enforcement to manage the draft proposal except for us, the law abiding captains on the water every day. I give discounts for those anglers choosing catch and release and have released more fish this past season than my recreational friends. Please consider making the charter boat status a separate entity than the recreational angler.</p>
150	<p>The charterboats will lose business if stripers are cut to one person. I don't think you will have many customers willing to spend a \$1000.00 to catch One Fish.</p> <p>We should have our own quota. We give the information to For Hire Survey, and to National Marine Fisheries. It should be very easy to give us a quota. A slotting could possibly work.</p> <p>1 @ 28" and another @32</p>
151	<p>A policy forms the foundational principles to establish desired goals, guide decisions and achieve rational outcomes. It serves as a vision statement and is implemented as a procedure or protocol.</p> <p>Since NMFS doesn't control financial budgets or have direct governing oversight of the many councils, commissions or agencies, this policy can only attempt to guide actions of those many diverse governing</p>

bodies towards achieving a desired outcome.

There will never be agreement among the vastly diverse and conflicting stakeholders involved in saltwater recreational fishing. There are simply too many different ideological and economic differences among these groups.

Policies should be mechanisms arranged to reach explicit goals. The six NMFS goal actions identified in the draft are relevant, but don't always include "the measure of success" element. I also believe that while they may not currently be listed in priority order, education is the key element, and basically expressed in goal 6 communicate and engage with the public.

At the macro level, the recreational fisherman (conservationist who practices catch and release, the law abiding fisherman, and the uneducated keep all I catch type) and the supporting commercial elements (charters, head boats, bait shops, marinas, etc.) truly have diametrically opposing gratification goals. The average recreational fisherman generally wants access, opportunity, and a reasonable catch to experience and/or a reasonable amount of fish to take home to reward/justify his time, effort and expense. The supporting commercial elements are generally limited to short-term economic return (profit) and trying to keep a declining industry afloat. While these groups are typically opposed on most issues, there is one common area they share and that should be the focus of this policy.

The issue they share is lack of trust in the science that is driving government policy and regulations, mainly the health of certain fisheries typically targeted by recreational fisherman. Striped Bass, Black Sea Bass, Cod, and Fluke are the center of most of the controversy (at least on the east coast), but do not represent to the total picture. This is why I think communication and education is the most important element of this new policy. Law enforcement and government agencies can't adequately cover every beach, boat, bay, river and fishing vessel to ensure compliance. We have to increase voluntary compliance through better communication and education.

The majority of the stakeholders described above simply do not believe in the science validity of the Magnuson-Stevens Act (MSA), its studies results, or the resulting catch regulations. This can only be overcome through better communication, education, and participation in the process. As an example, I know from my firsthand experience that when I drift over structure sea bass fishing, I catch tons of shorts and few keepers, but if I use a dual anchor system and zero in on positioning my boat right on top of the wreck, I have a majority of keeper sea bass and much fewer shorts. To the average recreational fisherman who drifts over structure, he sees an overwhelming population of 10-12" fish that he has to keep throwing back and typically doesn't do proper venting, so many fish may die vice go in his cooler. He experiences this while reading about the health of the Sea Bass being in jeopardy and thinks it is a pile of crap. He then relates that to everything else that is published saying fish stocks are at risk or we have to reduce recreational catch quotas. Better communication and education can overcome this.

I also understand this is a formatted government document, but it doesn't "speak" to the recreational fisherman in a way that motivates them to want to be part of the process and a field supporter of the policy. Even under the best circumstances, you will only get an extremely small percentage of the stakeholders to participate, but if you can motivate them to speak on your behalf to their fellow fisherman, boat dock neighbors, etc., we will have far greater success. The real challenge is bridging the policy document with public engagement events to generate more interest.

Specific Recommendations:

1. I think goal number 6 pretty much addresses the communications need but should be brought up to be #1. If you could only list one policy goal, this one would be it because better understanding leads directly to increased voluntary compliance with any current or future regulations. I also think you need to change "...promote public awareness of..." to "...promote public education on..." within this goal. If this leads to

	<p>decreasing the number of “uneducated keep all I catch types” we will have major success.</p> <p>2. Restructure the POLICY GOAL section to better speak to recreational fisherman. This section should better reflect why it is important to them. Again, if you can improve rec fisherman support, this will shape the economic spending that will change the culture and behavior of the supporting commercial elements. I believe NMFS has some solid metrics for how much rec fisherman spend, so consider talking about that here as a way to show you understand how vital a player they are in shaping this policy.</p> <p>3. Add a new separate goal(or maybe strengthen goal 3). There needs to be something included that addresses policy goals for curving poachers (commercial & rec) as well as the black market. While I understand it would be extremely difficult to implement, we need to ensure all enforcement revenue goes back to the cause, not some general organizational (state or local) fund.</p> <p>4. Reorder the existing Goals as follows: 1) Communicate and engage with the public... 2) Promote access to quality fishing opportunities... 3) Coordinate with state and federal management partners... 4) Provide scientifically sound and trusted... 5) Advance innovative solutions... 6) Support ecosystem conservation... or if you go with a new one on curving poachers, etc., make it #3 in the above sequence I believe this reordering would show more focus on what is important to the average recreational fisherman and better align with their perceptions.</p> <p>A fellow recreational fisherman friend, Alberto Knie, recently said it on a Facebook exchange I posted trying to encourage more comments to this draft policy. He summed it up saying “History cannot repeat itself because we have much to lose in today's economy and fishery. We can all start by listening to each other, agree to disagree and implement a better system with real data.” The more people we can get to do that through implementation of this policy, the better the state of our fisheries future will become.</p>
152	<p>I think these 6 policies will be great for our saltwater fishing, further I think our ecosystem needs a lot of work. Limits and sizes need to be changed. I know that this is done through the state and federal level, but they may hear what NOAA has to say.</p>
153	<p>On the surface, conceptually promising if indeed intent is to improve/expand recreational fishing. Here's the problem, too much institutional inertia against that objective to believe this will actually be accomplished. Hope springs eternal, so here's some better language/suggestions:</p> <p>2) "Support ecosystem conservation, enhancement AND EXPANSION" Why? The mid-Atlantic (and I'm sure other areas too) has lost much of its natural reef and habitat as the result of stern towed trawlers and water quality. Set a goal to re-establish this footprint. More trees, more squirrels....same with reefs and their occupants. Until the OC MD inlet was cut by a hurricane and MANY TONS of rock emplaced in and around it there were 0 tog for shore anglers and small craft. Now different story, lots of tog. Until the trawl fleet wiped out expanses of corals and sea whip near shore Sea Bass landings were exponentially greater than today....such that a larger boat is needed to go much farther offshore need to even have a chance. Return of filtering species on hard substrate on a large scale needed to return water quality.</p> <p>3) Coordinate with Federal and State management partners. How about LOCAL entities and helping them (think FUNDING) that are doing herculean efforts to improve habitat and recreational fishing. A great example is the OC MD Reef Foundation (http://www.ocreeffoundation.com)</p> <p>5) ...scientifically sound and trusted....information. Good! Kill MRIP! Many fisheries scientists agree the data is crap and the statistics cover inherently poor data. Anyone actually believe with a straight face that MA</p>

	<p>private anglers in Jul/Aug caught more Seabass than the entire Charter Fleet from Maine through the Gulf COMBINED??? Anyone really believe there are private anglers in Boston Whalers taking Tog off NJ in FEB/MAR?? Well that's the sort of ludicrous data being generated and mandated for determining regulations!</p> <p>How about regulations that account for the biological differences in reproductive activity and strive to achieve maximum fecundity? Current Sea Bass regulation and trend forcing Sea Bass to 1st spawn when they also reach harvest size! That is the reality that explains the collapse of the Sea Bass fishery since the mid-2000s.</p> <p>By the way, more habitat = more fish which supports everyone, private, charter AND commercial.</p>
154	<p>The Agency's draft policy sounds encouraging in concept. In real life, the regional councils and NMFS have put private enterprise ahead of public non-commercial access to the common pool resources of our fisheries. Cases in point are the snapper fishery of the Gulf and the halibut fishery of the North Pacific. All fisheries are fully utilized. To "Promote access to quality fishing opportunities" means allocation shifts from commercial harvest toward the public which would be a 180 for most councils and NMFS. I fish recreationally, commercially, and also provide access to federally managed fisheries as a guide. As a commercial fisherman whatever harvest I'm allowed becomes my property when landed. Current national policy, or at least national practice, is to afford harvest rights ("privileges") to the private sector to the detriment of recreational and personal use. I hope that the rhetoric of this new national policy will manifest itself in the actions of federal managers.</p>
155	<p>Thank you for the opportunity to comment upon the Draft National Recreational Saltwater Fisheries Policy of the National Marine Fisheries Service.</p> <p>The National Marine Fisheries Service should recognize that the interests of the recreational fishing industry and recreational fishermen are not always coextensive. The recreational fishing industry often stresses short term economic needs, which sometimes results in a demand for more liberal regulations, while anglers often stress longer term conservation goals, which sometimes results in a demand for more conservative regulations. The industry is primarily concerned with more people going fishing and anglers are primarily concerned with more fish being available to catch when they go fishing. The Draft National Saltwater Recreational Fisheries Policy is flawed because it does not acknowledge this distinction. The Draft refers to the statutory definition of "recreational fishing." That definition, incidentally, does not mention the recreational fishing industry: "The term "recreational fishing" means fishing for sport or pleasure." 16 U.S.C. § 1802(37).</p> <p>This is not to say that recreational fishermen do not benefit from a thriving recreational fishing industry, which provides tackle and gear, bait, information, expertise, and access to otherwise inaccessible waters. CCA NY also recognize that the recreational fishing industry includes many conservationists. But when spokespeople for the recreational fishing industry speak on a fisheries issue, they are expressing an opinion from the point of view of those in the industry. What anglers believe is the prudent conservation choice is often different. The National Marine Fisheries Service should amend the Draft National Recreational Saltwater Fisheries Policy to expressly acknowledge the distinction between recreational fishermen and the recreational fishing industry.</p> <p>Congress included promoting fishing as a purpose of the statute. Yet, that mandate includes an important qualification: "[T]o promote domestic commercial and recreational fishing under sound conservation and management principles, including the promotion of catch and release programs in recreational fishing..." 16 U.S.C. § 1801(b)(3). The statute defines "conservation and management" – a term which appears throughout the statute – as "...[A]ll of the rules, regulations, conditions, methods, and other measures (A) which are required to rebuild, restore, or maintain, and which are useful in rebuilding, restoring, or maintaining, any fishery resource and the marine environment; and (B) which are designed to assure that— (i) a supply of food and other products may be taken, and that recreational benefits may be obtained, on a</p>

continuing basis; (ii) irreversible or long-term adverse effects on fishery resources and the marine environment are avoided; and (iii) there will be a multiplicity of options available with respect to future uses of these resources. 16 U.S.C. §1802(5). This definition of “conservation and management” reflects the focus of the Magnuson-Stevens Act on the long-term protection of America’s marine resources over short-term economic goals. The economic goals are important, but conservation of the resources is primary. CCA NY believes the best way for the National Marine Fisheries Service to promote fishing is to conserve and manage the nation’s fisheries so that fish are abundant for today and for years to come. When fisheries are healthy, little promotion is needed. The Draft National Saltwater Recreational Fisheries Policy of the National Marine Fisheries Service should place a greater emphasis on the primacy of conservation.

A subtle implication in the Draft National Saltwater Recreational Fisheries Policy is that recreational fishermen are opposed to fishing regulations. This is untrue. Most anglers recognize that without fishing regulations there would not be enough fish for fishing to be worthwhile. Anglers have seen particular fish stocks decline due to overfishing and rebound due to sound regulations. The Draft National Saltwater Recreational Fisheries Policy cites “changing and complex regulations” and “impediments to fishing” as examples of “factors which affect fishing participation and angler satisfaction.” What dissatisfies anglers is going fishing and not catching fish, not “changing and complex regulations.” When the fishing is good, people go fishing. Fishing regulations must necessarily be “changing” because fish populations change (as when a stock improves and a regulation can be eased) and fishing regulations are sometimes complex because the problems they address are complex. The National Marine Fisheries Service should remove language in the Draft National Saltwater Recreational Fisheries Policy that is critical of regulation as a management tool. Its inclusion is imprudent because it undermines the public’s faith in fishery management.



Russell Dunn
National Policy Advisor for Recreational Fisheries
NOAA Fisheries
Russell.Dunn@noaa.gov
(727) 551-5740

Thomas Gadacz
5353 Gulf Blvd. A-201
St. Petersburg, FL 33706
H 727-360-8030
C 706-726-7899
E thomasgadacz@yahoo.com

December 24, 2014

RE: Response to Public Comment Draft, National Saltwater Recreational Fisheries Policy of the National Marine Fisheries Service, National Oceanic and Atmospheric Administration

Russell,

The International Federation of Fly Fishers and the Florida Council of the International Federation of Fly Fishers submits the following comments regarding the Response to Public Comment Draft, National Saltwater Recreational Fisheries Policy issued November 20, 2014.

We submitted comments on September 10, 2014 regarding the use of sound scientific data, including those for species forage base and habitat, in evaluating the population trends and health of a fishery.

We greatly appreciate incorporation of these two concerns in Policies #2 and #5. We lend our support to the revisions made in the Policies issued on November 20, 2014 and continue to support your and NOAA's efforts to establish a meaningful National Saltwater Recreational Fisheries Policy.

The IFFF is comprised of more than 700 Florida and 13,500 national and international members, many of whom enjoy fishing with the artificial fly. The IFFF originated catch and release as a major conservation policy. Our organization promotes not only conservation but also preservation and restoration of our fisheries. Many of our Florida members also are professional

guides who specialize in assisting fly fishermen from all over the world who fish in Florida waters and treasure our marine as well a freshwater fisheries.

Phil Greenlee, President and CEO,
International Federation of Fly Fishers

A handwritten signature in cursive script that reads "Thomas Gadacz". The signature is written in black ink and is positioned above the printed name and title.

Thomas Gadacz, President
Florida Council, International Federation of Fly Fishers

Thomas H. Logan, VP and Conservation Chair
Florida Council, International Federation of Fly Fishers

Ron Whitely, Newsletter Editor
Florida Council, International Federation of Fly Fishers

Glenn Erikson, Conservation Director
International Federation of Fly Fishers



December 30, 2014

Ms. Eileen Sobeck
Assistant Administrator for Fisheries
National Marine Fisheries Service
1315 East-West Highway, Room 14636
Silver Spring, MD 20910

Dear Ms. Sobeck:

Thank you for recently meeting with representatives from many of our organizations to discuss the draft National Saltwater Recreational Fisheries Policy. This letter is to elaborate upon many of the items discussed, as well as to provide additional thoughts.

Your commitment to develop a National Saltwater Recreational Fisheries Policy, in response to the recommendation made by the Commission on Saltwater Recreational Fisheries Management (a.k.a. Morris-Deal Commission), has been widely praised by the recreational fishing community. Additionally, we are encouraged by your remarks that the policy is intended to be considered in every future decision made by the agency. Developing a policy that will institutionalize within NOAA the key tenets of recreational fishing is not an easy task, not only because of existing legal and statutory requirements the agency must operate under, but also because of the challenge of overcoming the primary focus the agency has had over the years on commercial fishing. A successful policy must establish overarching, long-term goals that will result in meaningful improvements in saltwater recreational fisheries management and the health of our marine resources.

In addition to establishing goals, we believe it must be articulated how these policy goals will be realized. Far too often, there can be a disconnect between the top-level goals of an agency or organization and how actions are carried out among various departments, regions and personnel on a day-to-day level. Particularly given the historic inattention that NOAA has given to recreational fishing, to demonstrate that this policy will be meaningful and impactful, our community is not only seeking broad goals under which the agency should operate but also an explanation of how these new goals will be implemented by the agency.

During our discussion, it was made evident that the draft National Saltwater Recreational Fisheries Policy was written to be high-level and fairly non-specific so as to uphold meaning and remain relevant over time. We understand and appreciate this intention. Viewed in isolation, however, it is difficult to understand specifically how a policy such as this will result in meaningful change. In order to visualize how this policy will impact recreational fisheries

management and stewardship of our marine fisheries resources going forward, we believe the policy should also include an implementation strategy that elaborates upon the policy goals and describes specific actions and projects the agency will take to meet them. The Recreational Fisheries Policy of the U.S. Fish and Wildlife Service serves as a sound example of incorporating both high-level goals as well as actionable strategies for implementation. Other NOAA policy documents, including the Aquaculture Policy and Catch Shares Policy, contain detailed information for how the stated policy will be implemented, without being overwhelmingly exhaustive. Neither of those other policy documents are overly lengthy.

We understand that NOAA plans to update its 2010 Recreational Saltwater Fisheries Action Agenda and format it to align with the goals of the National Saltwater Recreational Fisheries Policy, thus serving as its implementation plan. However, we understand that this will not be finalized in time for the currently scheduled release in February of the final National Saltwater Recreational Fisheries Policy.

We respectfully ask you to reconsider the current timeline for finalizing the National Saltwater Recreational Fisheries Policy to allow it to be concurrent with the release of an implementation plan. The value of both documents will be significantly greater if released jointly. Conversely, release of the policy as a standalone, as it is currently structured, will likely invite questions and uncertainty about specifically how the policy will be carried out, leading to a less positive reception and potentially weakening its ultimate impact.

In our September 12, 2014 letter commenting on the development of the National Saltwater Recreational Fisheries Policy, we expressed the following five recommendations for concepts to be incorporated in the policy:

1. Recreational species should be managed for abundance and age structure
2. The catch and harvest should be allowed to move up or down with the population level
3. Managing for stability
4. Limiting the implementation of catch shares, particularly in mixed-sector fisheries
5. Allocations between the commercial and recreational sectors should be set using economic valuation as one of the primary metrics, not just past catch history

This was not intended to be an exhaustive list, but rather the identification of many of the priority topics of our community. We remind you of these recommendations to highlight that the management and policy changes we are anticipating would need to be expressed at a more detailed level than the structure of the draft National Saltwater Recreational Fisheries Policy would allow. While our priorities could be referenced in high-level policy goals, for the most part they fit better in an implementation plan, which could describe in some detail how the agency is working on these concepts as they relate to the agency's overall policy goals.

We again are greatly appreciative of your commitment to develop a National Saltwater Recreational Fisheries Policy and your agency's efforts toward this goal. We also do not intend

Ms. Eileen Sobeck
December 30, 2014
Page 3

to be critical of the draft National Saltwater Recreational Fisheries Policy, although we will offer suggested edits to the document in separate correspondence. Rather, we simply wish to express our strong belief that the policy would be greatly aided, and be much better received by our community, if it is accompanied by a meaningful implementation plan.

Sincerely,

Mike Nussman, President and CEO
American Sportfishing Association

Jeff Angers, President
Center for Coastal Conservation

Patrick Murray, President
Coastal Conservation Association

Jeff Crane, President
Congressional Sportsmen's Foundation

Steve Stock, President
Guy Harvey Ocean Foundation

Rob Kramer, President
International Game Fish Association

Thom Dammrich, President
National Marine Manufacturers Association

Ellen Peel, President
The Billfish Foundation

National Saltwater Recreational Fisheries Policy

of the

National Marine Fisheries Service

National Oceanic and Atmospheric Administration

INTRODUCTION

Saltwater recreational fishing is a traditional, important, and expanding thread in the social, cultural, and economic fabric of coastal communities in the United States.

With growing coastal populations, an increasing number of people are pursuing recreational opportunities afforded by this nation's expansive coastal and ocean resources. These and other shifts are changing the traditional economics and demographics of U.S. fisheries. Saltwater recreational fishing drives billions of dollars in economic activity each year providing substantial benefits to the economy at the local, regional, and national scales.

Beginning with its roots as the Commission of Fish and Fisheries in 1871, NOAA's National Marine Fisheries Service (NMFS) has played a continuous leadership role in science-based stewardship of our nation's living marine resources, seeking to balance the needs of the resource, industry, people and communities. The Agency's foremost responsibility is to achieve and maintain healthy marine and coastal ecosystems capable of supporting sustainable and productive fishery resources for the benefit of the American people. In pursuit of this goal, NMFS highlights the direct links between healthy habitats, sustainable fishery resources, and enduring, high quality fishing experiences. The Agency recognizes the important social, cultural, and economic benefits to the nation associated with saltwater recreational fishing, and is committed to pursuing a collaborative stewardship approach promoting public access, fishery accountability, and regulatory enforcement.

POLICY GOAL

Consistent with, and in furtherance of, the purposes of the Magnuson-Stevens Fishery Conservation and Management Act (MSA), the goals of this policy are to promote recreational fishing for the cultural, social, and economic benefit of the nation through science-based conservation and management, and to provide for wide-ranging participation in and enjoyment of recreational fishing for present and future generations.

NMFS recognizes that fully achieving these goals will require thoughtful examination and integration of saltwater recreational fisheries considerations throughout the programs and activities of the Agency and the federal fisheries management system in combination with strong management partner and constituent relationships. In so doing, it is incumbent upon NMFS to fulfill its stewardship responsibilities in a broadly inclusive manner which seeks to minimize disruptions to, and burdens on, the regulated community, and facilitates public understanding of the natural and regulatory environment.

Within this context, this policy broadly pertains to non-commercial activities of fishermen who fish for sport or pleasure, as set out in the MSA definition of recreational fishing, whether retaining, consuming, sharing or releasing their catches, as well as the businesses and industries, such as the for-hire fishing fleet and tournaments, which support them.

This policy recognizes the authorities and responsibilities of natural resource management agencies, regional fishery management councils, interstate marine fisheries commissions, states, and advisory bodies and seeks partnership in its implementation.

POLICY

Recreational fisheries are fundamentally different from commercial fisheries, and should be managed in a system tailored to the recreational data currently available. In support of the stated goals of this document, it is the policy of NMFS to **foster, support, and enhance a broadly accessible and diverse array of sustainable recreational saltwater fishing opportunities for the benefit and enjoyment of all Americans.** To further this policy, NMFS will:

- 1) **Promote public access to quality fishing opportunities** by ~~supporting consideration of~~including relevant cultural, social, and economic factors in decision-making; ~~encouraging periodic~~regularly reviewing of fishery allocations using the best economic information available; ~~fostering expanded~~expanding fishing opportunities based on conservation gains (e.g., improved release survival, restored habitats, easing of regulatory fishery restrictions when conservation goals are achieved); and, understanding factors which affect fishing participation and angler satisfaction (e.g., changing and complex regulations, impediments to fishing) and ~~finding mechanisms to address~~ing them.
- 2) **Support ecosystem conservation and enhancement** which provide natural and, where appropriate, enhanced habitats to support diverse, healthy fisheries and fish populations including abundant and resilient forage fish stocks; and, encourage development and application of sustainable, safe aquaculture to support recreational fisheries consistent with existing agency policy.
- 3) **Coordinate with state and federal management partners** to align science, management, and enforcement priorities and strategies in support of stable, predictable, and well monitored recreational fisheries.
- 4) **Advance innovative solutions to evolving science, management, and environmental challenges** through partnership by supporting investigation and development of new scientific tools, methods, data collection techniques (e.g., electronic catch reporting), gear technology, and management approaches. However, as stated in the NOAA Catch Share Policy, catch shares are not an appropriate tool for recreational fisheries, nor in mixed use fisheries with a recreational component.

- 5) **Provide scientifically sound and trusted biological, cultural, social, and economic information** to enable balanced, well- informed decision-making bolstered by continuing programmatic improvements.
- 6) **Communicate and engage with the public** in a credible and transparent manner to build trust and promote public awareness of, and involvement in, science and management processes through active two-way dialogue, public-private collaboration (e.g., cooperative research and citizen science activities), and other approaches which complement NMFS's ongoing science programs.

AUTHORITIES AND RESPONSIBILITIES

NMFS' headquarters directorate and office directors, regional leadership (Regional Administrators and Science Directors), and the National Policy Advisor for Recreational Fisheries are responsible for Agency-wide implementation of this policy. NMFS Regional Administrators and headquarters Office Directors will play an especially critical role in effective policy implementation, management, and Agency compliance. Their responsibilities as Agency representatives to the regional fishery management councils and interstate marine fisheries commissions, principle liaisons to state and other federal agencies, and managers of personnel who interact with the public on a daily basis are key to success.

This policy is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees or agents or any other person.

IMPLEMENTATION

The NMFS National Policy for Saltwater Recreational Fisheries is effective upon release. This policy will henceforth guide NMFS' approach to saltwater recreational fishing until such time as it is amended or rescinded by the NOAA Assistant Administrator for Fisheries.

The policy will be implemented through consideration and integration of policy goals and supporting principles in agency, office, and program level planning, budgeting, and decisionmaking.



Mid-Atlantic Fishery Management Council

800 North State Street, Suite 201, Dover, DE 19901
Phone: 302-674-2331 | Toll Free: 877-446-2362 | FAX: 302-674-5399 | www.mafmc.org
Richard B. Robins, Jr., Chairman | Lee G. Anderson, Vice Chairman
Christopher M. Moore, Ph.D., Executive Director

December 31, 2014

Mr. Russell Dunn
NOAA National Policy Advisor for Recreational Fisheries
NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

Dear Russ:

Attached please find suggested edits and comments on the draft saltwater recreational fishing policy, made via track changes in an MS Word document.

Please call if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to be "C. Moore", written over a horizontal line.

Christopher M. Moore, Ph.D.
Executive Director

cc: Robins, Anderson, Didden

National Saltwater Recreational Fisheries Policy
of the
National Marine Fisheries Service
National Oceanic and Atmospheric Administration

INTRODUCTION

Saltwater recreational fishing is a traditional, important, and expanding thread in the social, cultural, and economic fabric of coastal communities in the United States.

Comment [DJT1]: Hasn't participation (Atlantic Coast at least) been declining in recent years?

With growing coastal populations, an increasing number of people are pursuing recreational opportunities afforded by this nation's expansive coastal and ocean resources. These and other shifts are changing the traditional economics and demographics of U.S. fisheries. Saltwater recreational fishing drives billions of dollars in economic activity each year, providing substantial benefits to the economy at ~~the~~ local, regional, and national scales.

Comment [DJT2]: ditto

Beginning with its roots as the Commission of Fish and Fisheries in 1871, NOAA's National Marine Fisheries Service (NMFS) has played a continuous leadership role in science-based stewardship of our nation's living marine resources, seeking to balance the needs of the resource, industry, people, and communities. The Agency's foremost responsibility is to achieve and maintain healthy marine and coastal ecosystems capable of supporting sustainable and productive fishery resources for the benefit of the American people. In pursuit of this goal, NMFS highlights the direct links between healthy habitats, sustainable fishery resources, and enduring, high quality fishing experiences. The Agency recognizes the important social, cultural, and economic benefits to the nation associated with saltwater recreational fishing, and is committed to pursuing a collaborative stewardship approach that supports~~promoting~~ public access, fishery ~~accountability~~conservation, and regulatory accountability/enforcement.

POLICY GOAL

Consistent with, and in furtherance of, the purposes of the Magnuson-Stevens Fishery Conservation and Management Act (MSA), the goals of this policy are to ~~promote~~manage recreational fishing for the cultural, social, and economic benefit of the nation through science-based conservation and management. ~~The end product will~~and to provide for wide-ranging participation in, and enjoyment of, recreational fishing for present and future generations.

ANMFS recognizes that fully achieving these goals will require thoughtful examination and integration of saltwater recreational fisheries considerations throughout the programs and

activities of ~~the Agency and~~ the federal fisheries management system in combination with strong ~~management partner and~~ constituent relationships. ~~In so doing, it is incumbent upon~~ NMFS ~~will to~~ fulfill its stewardship responsibilities in a broadly inclusive manner ~~which seeks to~~ minimize disruptions ~~to,~~ and burdens on, the regulated community. ~~Key parts of this effort involve, and facilitating~~ public understanding of ~~the the~~ science that drives decisions as well as ~~how the public can participate in the natural and~~ regulatory ~~process~~ environment.

Within this context, this policy broadly pertains to ~~the non-commercial~~ activities of fishermen who fish for sport or pleasure, ~~as set out in the MSA definition of recreational fishing,~~ whether retaining, consuming, sharing, ~~and/or~~ releasing their catches. ~~It includes,~~ as well as the ~~many and varied~~ businesses and industries ~~that support recreational fishing, including for-hire fishing,~~ ~~such as the for hire fishing fleet and tournaments, which support them.~~

This policy recognizes the authorities, ~~and~~ responsibilities, ~~and key roles~~ of ~~management partners such as natural resource management agencies, states,~~ regional fishery management councils, interstate marine fisheries commissions, ~~other federal agencies, states,~~ and advisory bodies. ~~Only through effective partnerships can NOAA efforts result in optimal outcomes for recreational fisheries management, and seeks partnership in its implementation.~~

POLICY

In support of the stated goals of this document, it is the policy of NMFS to **foster, support, and enhance a broadly accessible and diverse array of sustainable recreational saltwater fishing opportunities for the benefit and enjoyment of all Americans.** To further this policy, NMFS will:

- 1) **Finalize critical improvements to recreational data collection as soon as possible given the primary objective of achieving accurate estimates.** The complex nature of collecting unbiased recreational data has required substantial research and pilot testing, but NMFS realizes that having good recreational data is a cornerstone for all other goals. While communication is a separate goal below, we will specifically engage the public and management partners to explain how recreational data is collected and used for catch estimates, what changes have been made, what changes are expected, and how time series calibrations are being handled. We will conduct ongoing research to ensure that recreational data is being collected in an unbiased manner and work with management partners to focus available resources on critical management issues.
- 2) **Communicate and engage with the public** in a credible and transparent manner to build public awareness of, and trust in, the management process and supporting science. The engagement will be two-way, not just a distribution of information. NMFS will also evaluate options for where public-private collaboration (e.g., cooperative research and

Comment [DJT3]: All of these goals can be subverted by recreational data issues, which is why we recommend having the recreational data issue up front and center...

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citizen science activities) and other approaches can complement NMFS's ongoing science programs.

Comment [DJT4]: Too important to put last...

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4)3) **Promote Support public access to quality fishing opportunities** by considering a wide variety of factors relevant to recreational fishing. These include considering the cultural and socio-economic importance of recreational fishing experiences as well as addressing factors which hinder fishing participation and angler satisfaction (e.g. when overly complex regulations become an impediment to fishing). Once rebuilding/conservation goals are achieved, regulations should facilitate catches that maintain stock status. Supporting public access also involves indirect conservation activities that improve stocks, such as improving release survival and restoring habitats. We will also encourage periodic review of fishery allocations. supporting consideration of relevant cultural, social, and economic factors in decision making; encouraging periodic review of fishery allocations; fostering expanded fishing opportunities based on conservation gains (e.g., improved release survival, restored habitats, easing of regulatory fishery restrictions when conservation goals are achieved); and, understanding factors which affect fishing participation and angler satisfaction (e.g., changing and complex regulations, impediments to fishing) and finding mechanisms to address them.

Comment [DJT5]: If participation and/or catch rates increase due to higher abundance, may not be able to relax regs...Each situation will be different...

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2)4) **Support ecosystem conservation and enhancement** which provide natural and, where appropriate, enhanced habitats to support diverse, healthy fisheries and fish populations including abundant and resilient forage fish stocks; and, encourage development and application of sustainable, safe aquaculture to support recreational fisheries consistent with existing agency policy.

3)5) **Coordinate with state and federal management partners** to align science, management, and enforcement priorities and strategies in support of stable, predictable, and well monitored recreational fisheries.

4)6) **Advance innovative solutions to evolving science, management, and environmental challenges** through partnership by supporting investigation and development of new scientific tools, methods, data collection techniques (e.g., electronic catch reporting), gear technology, and management approaches.

5)7) **Provide scientifically sound and trusted biological, cultural, social, and economic information** to enable balanced, well- informed decision-making bolstered by continuing programmatic improvements.

6) **Communicate and engage with the public** in a credible and transparent manner to build trust and promote public awareness of, and involvement in, science and management processes through active two-way dialogue, public-private collaboration (e.g.,

~~cooperative research and citizen science activities), and other approaches which complement NMFS's ongoing science programs.~~

AUTHORITIES AND RESPONSIBILITIES

NMFS' headquarters directorate and office directors, regional leadership (Regional Administrators and Science Directors), and the National Policy Advisor for Recreational Fisheries are responsible for Agency-wide implementation of this policy. NMFS Regional Administrators' and headquarters Office Directors' ~~will play an especially critical role in effective policy implementation, management, and Agency compliance. Their~~ responsibilities ~~include being~~as 1) the Agency representatives to the regional fishery management councils and interstate marine fisheries commissions, 2) the principle liaisons to state and other federal agencies, and 3) the managers of personnel who interact with the public on a daily basis are key to success. As such they will play an especially critical role in effective policy implementation, management, and Agency compliance.

This policy is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees or agents or any other person.

IMPLEMENTATION

The NMFS National Policy for Saltwater Recreational Fisheries is effective upon release. This policy will henceforth guide NMFS' approach to saltwater recreational fishing until such time as it is amended or rescinded by the NOAA Assistant Administrator for Fisheries.

The policy will be implemented through consideration and integration of policy goals and supporting principles in agency, office, and program level planning, budgeting, and decision-making.

Eileen Sobeck
Assistant Administrator for Fisheries
National Oceanic and Atmospheric Administration
1315 East-West Highway
Silver Spring, MD 20910

December 31, 2014

Dear Ms. Sobeck:

On behalf of our one million members and supporters, thank you for the opportunity to comment on the National Marine Fisheries Service's (NMFS) draft national saltwater recreational fisheries policy. We agree that recreational fishing is a key component of the nation's fisheries and as such deserves careful consideration by NMFS as it implements the Magnuson-Stevens Fishery Conservation and Management Act (MSA). We believe, along with many others, that existing approaches to recreational management do not adequately leverage the conservation values of anglers nor reward them for conscientious management. To the contrary, many recreational fishermen abide by the strict regulations imposed on them, only to find that their quotas have been exceeded and fishing opportunities reduced further. The resource and its users deserve better.

In our September 12, 2014, letter on the policy, we identified several issues that merited consideration as we work to meet the challenges of managing recreational fisheries in the 21st century. We believe the draft policy permits the kind of innovative approaches that are necessary to provide a high-quality fishing experience for anglers.

First, the draft policy promotes management that aligns access and conservation interests by asserting that NMFS will "[p]romote public access to quality fishing opportunities by . . . fostering expanded fishing opportunities based on conservation gains." The draft policy also commits NMFS to "[a]dvanc[ing] innovative solutions to evolving science, management and environmental challenges." Implementing management innovations such as improved accounting, sector-specific management measures and delegation of authority and responsibility for management to the local level would advance these objectives, and we appreciate their inclusion in the draft policy.

Second, the draft policy promotes more direct involvement by anglers in the management and data collection process by stating that NMFS will "engage with the public in a credible and transparent way to build trust and promote public . . . involvement in . . . science and management." Cooperative research and management can lead to better outcomes and more buy-in from anglers, thus improving compliance, the condition of the resource, and the fishing experience.

Third, the draft policy explicitly calls out electronic monitoring as an “innovative solution [] to evolving science . . . challenges.” We agree that NOAA should encourage the efforts by many anglers to develop and use various recreational catch reporting tools to provide more accurate, timely and verifiable data and information to scientists and fishery managers, including involving anglers in the design of the data collection systems. Comprehensive and cost-effective monitoring and accountability is central to sustainable fisheries management.

Thank you for NMFS’s leadership in developing a national saltwater recreational fisheries policy. We look forward to working with you and other stakeholders to secure a better fishing future for the anglers of today and for generations to come.

Very truly yours,



Matt Tinning
Senior Director, U.S. Oceans Program



2005 Market Street, Suite 1700 215.575.9050 Phone
Philadelphia, PA 19103-7077 215.575.4939 Fax

901 E Street NW, 10th Floor 202.552.2000 Phone
Washington, DC 20004 202.552.2299 Fax
www.pewtrusts.org

Dec 31, 2014

Russell B. Dunn
National Policy Advisor for Recreational Fisheries
National Marine Fisheries Service
263 13th Avenue South
St. Petersburg, FL 33701

Re: Comments on the draft National Saltwater Recreational Fisheries Policy

Mr. Dunn:

Please accept these comments from The Pew Charitable Trusts on the draft National Saltwater Recreational Fisheries Policy, released Nov 19, 2014.

Recreational saltwater fishing in the United States provides recreational opportunities, significant economic benefits, and serves a vital cultural role for many Americans. Angler's needs are different than their counterparts in the commercial fishing industry, and thus effectively managing this segment of a fishery presents unique management opportunities and challenges. This draft policy affords NOAA's Fisheries Service an opportunity to articulate both its responsibilities for using the best available science in sustainably managing recreational fisheries under the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act), and its goals for increasing participation in and improving the stability of those fisheries to ensure their long-term socioeconomic and ecological sustainability.

We are encouraged that the agency has identified conservation of the forage base and protection of important fish habitat as priorities, as these are shared concerns for many anglers and conservationists. However, while the policy acknowledges the economic, cultural and social importance of recreational fishing, it fails to similarly acknowledge the ecological impact of recreational fishing on the health of our fishery resources. Given the fact that recreational landings account for the majority of landings for many popular species (for example, gag grouper in the Gulf of Mexico, black sea bass in the South Atlantic region, and ling cod in the Pacific region), and millions of anglers participate in recreational fishing, effectively managing this sector is critical to the health of our ocean resources.

Data collection, accountability measures, and interagency coordination of recreational fisheries management all need improvement to ensure sustainable fisheries and healthy ocean ecosystems for present and future generations of Americans. Thus, the agency must elevate the importance of conservation in the recreational fisheries policy. Doing so will reinforce that conservation is the critical management driver behind most agency actions.

We recommend revisions to the draft policy as noted below to better balance the agency's stewardship mandates with its efforts to improve recreational fishing opportunities. In addition to comments, we have edited the text of the draft policy for your consideration; suggested additions are in red and deletions are crossed out.

The introduction should delineate the impacts of recreational fishing upon a shared, managed resource.

The introduction rightly establishes the economic, social, and cultural importance of recreational fisheries, and notes that growing human populations along our coasts are changing the dynamics of recreational fishing. However, it fails to connect those changing dynamics to new or increased demands on shared, public fishery resources, instead only noting changing economics and demographics. The agency must acknowledge the ecological dimensions of recreational fishing along with the socioeconomic dimensions. Recreational fishing can be a significant source of mortality in certain fisheries, through both landings and discards. While the actions of an individual angler have only a small impact on the resource and its ecosystem, the combined effects of millions of anglers must be monitored and managed to effectively control fish mortality, avoid overfishing, prevent ecosystem degradation, and rebuild depleted fish populations. The policy must also recognize that recreational fishing is only one component of managing fisheries, and that commercial and subsistence fishing also provide economic, social, and cultural benefits to the Nation.

INTRODUCTION

Saltwater recreational fishing is a traditional, important, and expanding thread in the social, cultural, and economic fabric of coastal communities in the United States.

Saltwater recreational fishing drives billions of dollars in economic activity each year providing substantial benefits to the economy at the local, regional, and national scales. With growing coastal populations, an increasing number of people are pursuing recreational opportunities afforded by this nation's expansive coastal and ocean resources. These and other shifts are changing the traditional economics and demographics of U.S. fisheries. **While individual anglers may catch only a few fish, the large number of total anglers in a region can have a significant collective impact on the health of fish populations and marine ecosystems.** ~~Saltwater recreational fishing drives billions of dollars in economic activity each year providing substantial benefits to the economy at the local, regional, and national scales.~~

Beginning with its roots as the Commission of Fish and Fisheries in 1871, NOAA's National Marine Fisheries Service (NMFS) has played a continuous leadership role in science-based stewardship of our nation's living marine resources, seeking to balance the needs of these **shared, public resources and ecosystems,** with those of industry, people and communities. The Agency's foremost responsibility is to achieve and maintain healthy marine and coastal ecosystems capable of supporting sustainable and productive fishery resources for the **long-term** benefit of the American people. In pursuit of this goal, NMFS highlights the direct links between healthy habitats, sustainable fishery resources,

and enduring, high quality fishing experiences. The Agency recognizes the important social, cultural, and economic benefits to the nation associated with saltwater recreational fishing, and is committed to pursuing a collaborative stewardship approach promoting public access, fishery accountability, and regulatory enforcement.

The policy goal should assert the stewardship responsibility of the agency.

The draft policy goal, as written, subsumes the conservation and management responsibilities of the agency into the goal of recreational fishing promotion. But the agency has a responsibility to take necessary conservation and management actions to sustain our fishery resources under the Magnuson-Stevens Act irrespective of the promotion of one sector of fishing. Thus, the agency must give, at a minimum, equal weight to the policy goal of ensuring the sustainability of the resource through science-based conservation and management of recreational fishing. In addition, the policy goal should be linked with advancing all the requirements of the Magnuson-Stevens Act, not just the Act's purposes.

POLICY GOAL

Consistent with, and in furtherance of, ~~the purposes of~~ the Magnuson-Stevens Fishery Conservation and Management Act (MSA), the goals of this policy are to promote recreational fishing for the cultural, social, and economic benefit of the nation, **to ensure the sustainability of the resource** through science-based conservation and management **of recreational fishing**, and to provide for wide-ranging participation in and enjoyment of recreational fishing for present and future generations.

NMFS recognizes that fully achieving these goals will require thoughtful examination and integration of saltwater recreational fisheries considerations throughout the programs and activities of the Agency and the federal fisheries management system in combination with strong management partner and constituent relationships. In so doing, it is incumbent upon NMFS to fulfill its stewardship responsibilities **by implementing necessary conservation and management measures** in a broadly inclusive manner **that strives for workable, effective approaches which seeks to minimize disruptions to, and burdens on, the regulated community**, and facilitates public understanding of the natural and regulatory environment.

Within this context, this policy broadly pertains to non-commercial activities of fishermen who fish for sport or pleasure, as set out in the MSA definition of recreational fishing, whether retaining, consuming, sharing or releasing their catches, as well as the businesses and industries, such as the for-hire fishing fleet and tournaments, which support them.

This policy recognizes the authorities and responsibilities of natural resource management agencies, regional fishery management councils, interstate marine fisheries commissions, states, and advisory bodies and seeks partnership in its implementation.

The policy requires numerous changes to ensure the conservation responsibilities of the agency are met and communication with the recreational fishing community is improved.

The draft policy contains six action items for the agency. In general, the overall topics identified are appropriate and important considerations for recreational fisheries management. However, we have suggestions for improving each item to ensure the agency is giving adequate weight to the conservation mandates of the Magnuson-Stevens Act and more effectively communicating with the public. We will address each action item individually.

1) Promote public access to quality fishing opportunities

The agency should consider not only the relevant cultural, social and economic factors in decision-making, but also the relevant ecological factors. The quality of fishing opportunities will be improved by further integrating the best available understanding of the fishery ecosystem, so that recreational fishermen can access sustainable, well-managed fish populations. There are certainly cases where it is appropriate to increase fishing opportunities as conservation gains are made, but this should be done in a way that does not jeopardize progress in restoring and maintaining healthy fish populations.

1) Promote public access to quality fishing opportunities by supporting consideration of relevant **ecological**, cultural, social, and economic factors in decision-making; encouraging periodic review of fishery allocations; fostering expanded fishing opportunities based on **scientifically-supported** conservation gains (e.g., **rebuilt populations, increased stock biomass, restored age structure improved release survival, restored habitats, easing of regulatory fishery restrictions when conservation goals are achieved**); and, understanding factors which affect fishing participation and angler satisfaction (e.g., changing and complex regulations, impediments to fishing) and finding mechanisms to address them.

2) Support ecosystem conservation and enhancement

This section of the draft policy essentially conflates ecosystem conservation with habitat conservation. While habitat identification, protection, and restoration are vital components of ecosystem conservation, there are additional, separate components which are also of great importance. Notably, the policy fails to mention the prevention of overfishing and the restoration of overfished populations as keystone components supporting ecosystem conservation. While the draft policy connects forage fish conservation to habitat protection, forage fish management is more than simply identifying relevant habitats; forage fish should be managed to not only meet the demands of the fishery but also the important role those fish play as prey to marine species, including commercially- and recreationally-targeted fish. The draft policy also fails to mention the importance of improving release survival and reducing the incidence and mortality of bycatch and discards. These four components – preventing overfishing and restoring depleted stocks, protecting and restoring habitat, managing forage fish in an ecosystem context, and

avoiding unnecessary mortality from discarding and bycatch – are all necessary to “support ecosystem conservation and enhancement” and should be included in the policy.

Finally, the aquaculture language should be removed from the policy. The recreational fishing policy is not the appropriate venue for promoting this separate consideration.

2) Support ecosystem conservation and enhancement **by identifying, protecting, and restoring** ~~which provide~~ natural and, where appropriate, enhanced habitats to support diverse, healthy fisheries **and protect key lifecycle stages and activities (such as spawning); managing forage fish stocks for abundance, resilience, and their importance as prey; improving release survival and reducing the incidence and mortality of bycatch and discards; ensuring overfishing does not occur through use of science-based annual catch limits and effective accountability measures; and rebuilding depleted fish stocks. ;** ~~and fish populations including abundant and resilient forage fish stocks. ; and, encourage development and application of sustainable, safe aquaculture to support recreational fisheries consistent with existing agency policy.~~

3) *Coordinate with state and federal management partners*

This is a laudable goal, and the agency should strive to work more cooperatively with its management partners. However, this action item should include the objective of creating sustainable recreational fisheries, in addition to stable, predictable, and well-monitored ones.

3) Coordinate with state and federal management partners to align science, management, and enforcement priorities and strategies in support of **sustainable**, stable, predictable, and well monitored recreational fisheries.

4) *Advance innovative solutions to evolving science, management, and environmental challenges*

The growing challenges of climate change, acidification, pollution, and competing ocean users demand the consistent application of existing best practices in science and management in addition to new and innovative solutions. The agency should take a stronger leadership role in these fields, as well as working through partnerships with state and federal managers, academic institutions, fishermen, and other stakeholders. NOAA Fisheries should create or enhance its management infrastructure and methodology to ensure timely incorporation of the data developed through these partnerships into the stock assessment and quota setting processes, or risk losing the goodwill and cooperation of partners.

4) Advance innovative solutions to evolving science, management, and environmental challenges through **direct agency initiatives, as well as partnerships, by identifying, developing, and disseminating existing best practices and** supporting investigation and development of ~~new technical guidance~~, scientific tools, methods, **infrastructure**, data collection techniques (e.g., electronic catch reporting), gear technology, and management approaches.

5) *Provide scientifically sound and trusted biological, cultural, social, and economic information*

Improving the depth and breadth of both the biological and socio-economic scientific information available to the fishery management process is vital to creating more sustainable and predictable fisheries for all users. However, the lack of information, the existence of uncertainty, or pending new information should not be used to delay necessary management actions.

5) Provide scientifically sound and trusted biological, cultural, social, and economic information to enable balanced, well-informed decision-making bolstered by continuing programmatic improvements **while ensuring scientific uncertainties do not lead to management inaction, consistent with the Magnuson-Stevens Act.**

6) *Communicate and engage with the public*

Better communication is one of the most important actions the agency can take to improve relations with recreational fishermen and the success of fishery management. Recreational fishermen can be important allies in conservation, and many are passionate about improving the quality and quantity of their recreational fishing opportunities through science-based, sustainable management. But too often, the agency communicates the “what” of a management action without sufficiently engaging stakeholders in the “why.” The additional language that we’ve suggested below outlines the types of information that should be communicated to anglers so that they better understand why a management action is being taken. Finally, the policy should not suggest the dialogue may be limited to two interests, but instead, be more inclusive.

6) Communicate and engage with the public in a credible and transparent manner **by ~~to~~ build building trust in and understanding of the science and management process, including, but not limited to, what data is needed, the rationale behind the use of various data collection methods, how that information is used to assess and manage fisheries, the process of assessment, and the necessity of management actions; ~~and promote~~ promoting public awareness of, and involvement in, science and management processes through active ~~two-way~~ dialogue, public-private collaboration (e.g., cooperative research and citizen science activities), and other approaches which complement NMFS’s ongoing science programs.**

Summary

The draft National Saltwater Recreational Fisheries Policy could be a useful to clarify the agency’s efforts to better manage recreational fisheries and communicate with recreational fishermen. But overall, the agency should better incorporate ecological considerations through the draft policy to ensure it is meeting its stewardship responsibilities under the Magnuson-Stevens Act. Recreational saltwater fishing is socially, culturally, and economically significant to our coast, and the best way to enhance and increase recreational fishing opportunities is to make sure there are enough fish in the water.

Thank you for the opportunity to comment on this draft proposal.

Sincerely,

A handwritten signature in black ink that reads "Ted Morton". The signature is written in a cursive style with a large, sweeping initial "T" and a long, horizontal flourish at the end.

Ted Morton
Director, U.S. Oceans
The Pew Charitable Trusts



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Jessica McCawley
Director

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December 31, 2014

Sent via Electronic Mail

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

Re: FWC Comments on the Draft National Saltwater Recreational Fisheries Policy

Dear Ms. Sobeck:

The Florida Fish and Wildlife Conservation Commission (FWC) has reviewed the Draft National Saltwater Recreational Fisheries Policy (Policy), and provides the following comments to support further development of this Policy by the National Marine Fisheries Service (NMFS).

Policy Statement – Promote public access to quality fishing opportunities...

The FWC would like to see NMFS further define and expand on each individual concept of “public access” and “quality fishing opportunities”. More specifically, we believe it is important for NMFS to provide a commitment in this Policy to advocate for public access in the context of keeping physical areas open to recreational fishing activities when contributing to internal agency management actions (e.g., NOAA, National Marine Sanctuaries), and communicating with other federal agencies (e.g., National Park Service). We also believe it is important for NMFS to recognize that “quality fishing opportunities” potentially has different meanings for managers than for recreational fishers. “Quality fishing opportunities” for recreational fishers is dependent on both the quality of fishing and the opportunity to fish, which does not appear to mesh with traditional marine fisheries management goals such as optimum sustainable yield (OSY) and maximum sustainable yield (MSY). It is important that this Policy clearly identify and focus on the needs and wants of recreational fishers in order to guide development of future management approaches that will achieve both conservation and recreational fishing goals.

The FWC appreciates the opportunity to comment on the Draft National Saltwater Recreational Fisheries Policy. Please let us know if we can be of any further assistance.

Sincerely,

Jessica McCawley
Director

jm/je/lg

cc: Russell Dunn



Pacific Fishery Management Council

7700 NE Ambassador Place, Suite 101, Portland, OR 97220-1384
Phone 503-820-2280 | Toll free 866-806-7204 | Fax 503-820-2299 | www.pcouncil.org
Dorothy M. Lowman, Chair | Donald O. McIsaac, Executive Director

December 31, 2014

Mr. Russell Dunn
National Policy Advisor for Recreational Fisheries
National Marine Fisheries Service
1315 East-West Hwy
Silver Spring, MD 20910-3282

RE: National Recreational Fishing Policy

Russ
Dear Mr. Dunn:

The Pacific Fishery Management Council (Pacific Council) met November 12-19, 2014 in Costa Mesa, California and reviewed the Public Review Draft of the National Saltwater Recreational Fisheries Policy (draft Policy) of the National Marine Fisheries Service (NMFS). The Pacific Council received written statements from six of its advisory bodies and took public comment on November 19 prior to discussion of formal positions on relevant issues on this important draft Policy initiative. This letter formally transmits the Pacific Council's comments with the request that NMFS consider them as this draft Policy is refined and finalized.

First, we want to thank you and all involved for the effort to release the draft Policy for consideration at our ongoing Pacific Council meeting. Mr. Barry Thom, Mr. Bob Turner, and Mr. Craig Heberer did an excellent job dealing with lack of advance Briefing Book availability issues to optimize consideration of this important matter in the Pacific Council process. There should be no doubt that the comments received from this Pacific Council meeting process will be superior to what would have been generated from a Council staff exercise conducted between Council meetings had the draft Policy not been made available. Its availability at the Council meeting also generated a positive public relations reaction among the few hundred people involved in this Council meeting, as opposed to what would have been a negative reaction if the draft Policy had not been exposed to the Pacific Council process for comment. We view the higher quality and more authoritative comments in this letter as a partnership reward for the work done by NMFS staff working this issue in a timely manner through the public interface of an open Pacific Council meeting, and appreciate the extra effort expended to optimize a good co-management relationship.

In general, we would like to highlight a few points prior to providing specific comments on draft Policy language and additional considerations related to draft Policy adoption.

1. The Pacific Council supports the adoption of a well-articulated national policy that recognizes the cultural and economic importance of marine recreational fishing and advances improved management of recreational fisheries in a fair and equitable manner

consistent with the conservation and management provisions of the Magnuson-Stevens Act.

2. The Pacific Council is concerned that the final Policy statement properly clarifies expectations about allocation or reallocation of quantities of fish to be caught by recreational fisheries and how such allocation decisions would be made. This topic accounted for the majority, by far, of the discussion on the substance of the current draft language.
3. The Pacific Council recommends that there be additional language added to address protection of domestic recreational fishing opportunity that is subject to the vagaries and repercussions of international fishery management decision-making.

Conceptual Support

The Pacific Council supports the adoption of a national recreational fishery policy that properly recognizes the long standing importance of recreational fishing as a cultural pastime and economic industry of national significance. The Pacific Council has a proud history of considering recreational, tribal, and commercial fisheries together as having common responsibility in the conservation and management of fish stocks, and feel many of the narrative sections in the draft Policy are appropriate as policy statements. If not addressed in this letter, the Pacific Council feels such components in the draft Policy are appropriate and important.

Fish Allocation and Reallocation Expectation Clarification

As a prerequisite to clarifying allocation expectations, the Pacific Council felt it was important to understand that fisheries on the U.S. West Coast operate somewhat differently than fisheries in other parts of the U.S, and that any national policy language not impair processes that have been broadly viewed as successful. For example, treaty tribal fishing rights, international agreements for species such as halibut and salmon, rationalization and catch share program arrangements create unique governance relationships and allocation formulas. As another example, except for groundfish species that are only available to commercial trawl fishing gear, the Council reviews the allocation between sectors every two years as part of our biennial regulatory process. Therefore, the Pacific Council recommends that final Policy language not act to supersede processes that are currently working well on the U.S. West Coast, and not put into place requirements that complicate existing legal or process activities.

A central topic of concern discussed by the Pacific Council was the portion of Commitment #1 on page two of the draft Policy calling for emphasis in "...encouraging periodic review of fishery allocations;...". There was concern that the term periodic review would mean a regularly scheduled review of all allocation decisions/frameworks would become a categorical mandate. The Pacific Council felt that such an interpretation would be overly prescriptive and recommends either simply deleting "periodic" or adding alternative phraseology that would encourage consideration of allocation issues on an as-needed basis or encouraging evaluation of the need for allocation review(s) prior to actually conducting a review. Such language should be associated with a bottom-up identified need, not a top-down scheduled timetable unassociated with a demonstrable need. We agree that Regional Fishery Management Councils (RFMC) should be responsive to reallocation concerns, and as mentioned above, the Pacific Council process already reviews allocations in a need-driven manner responsive to issues brought

forward as an open invitation during scheduled regulatory consideration processes. As a contemporary example, at this very meeting where the draft national recreational Policy was a scheduled agenda item, the Pacific Council took final or incremental action on four potential reallocation issues that had come up in the normal, open, course of business: a re-allocation of Pacific halibut to the California recreational fishery from Oregon and Washington commercial and recreational fisheries; widow rockfish reallocation within the commercial trawl catch share fishery; blackgill rockfish reallocation between commercial fishery sectors; curtailments for both recreational and commercial fisheries for bluefin tuna without current formal allocations.

In addition to the question of formal periodicity to allocation reviews referred to in Commitment #1 on page 2 of the draft Policy, the Pacific Council recommends clarity in how such allocation reviews are conducted. Please consider adding the following language emphasized by underlining:

- 1) **Promote public access to quality fishing improvements** by supporting consideration of relevant cultural, social, and economic factors in decision-making; encouraging periodic reviews of fishery allocations through the processes and procedures of the Regional Fishery Management Councils; fostering....

We believe it is important that readers of a national recreational fishery policy understand the key co-management partnership between the NMFS and the RFMC under the MSA, as well as where and how a comprehensive allocation review would be initiated. This would also provide non-recreational fishery interests understanding of where and how "...expanded (recreational) fishing opportunities based on conservation gains (e.g. improved release survival, restored habitats, easing of regulatory fishery restrictions when conservation goals are achieved);..." would be expected to be addressed.

International Fishery Connections

The Pacific Council recommends additional language be placed in the listing of specifics within Commitment #1 on page 2 to foster support of recreational fisheries nationwide, for the purpose of instituting policy clarity for protection of recreational fishing during international discussions on highly migratory or straddling stocks. The recommendation is to insert as the fourth point of policy emphasis after "...when conservation goals are achieved);..." the following language:

"advocate in international and bilateral relations for the protection of current U.S. recreational fishing opportunities and benefits;"

Examples where this is important on the West Coast include impromptu bilateral meetings with Mexico and scheduled international meetings that include Mexico where there can be discussions about the U.S. recreational fishery currently operating under bilateral agreement along the northern Pacific coast of Mexico; annual negotiations with Canada in the International Pacific Halibut Commission; renegotiation of the US-Canada Pacific Salmon Treaty. There may be additional examples in other RFMC areas.

Additional Comments

The Pacific Council suggests the draft Policy acknowledge safety at sea as an objective, and list some law enforcement considerations for enhanced recreational opportunity, such as the effects of derby type fisheries on U.S. Coast Guard, state and federal enforcement agencies. We also

note the importance of adequate fishery monitoring in effectively managing fisheries, and recommended any enhanced opportunity should be contingent on the ability to assess the effects on resources. Perhaps these ideas could be addressed in Commitment #3 on page 2 of the current draft Policy.

We suggest that you consider adding recognition of the boat building and bait-and-tackle sectors in the listing of support businesses and industries in the second paragraph on page 2 of the current draft Policy.

Lastly, the Pacific Council also recommends that NMFS consider developing a commercial fishing policy. Given the adopted aquaculture policy and the impending adoption of a recreational fishery policy, it would seem adopting a commercial fishery policy would complete full relative context. We note the six commitment points in the current draft Policy may be generally applicable to all fisheries managed by the RFMC and NMFS. Providing some clarity as to how implementation of these commitment points would differ between recreational and commercial fisheries in terms of content and priority would help the Pacific Council provide more specific comments, and ultimately, better implement the Policy.

For informational purposes, we attach the six Pacific Council advisory body statements received on this agenda item at our November 2014 Council meeting. These statements do not in themselves represent adopted Pacific Council policy positions, or supersede the comments presented in this letter. However, they provide some context of stakeholder perspectives, for your information.

Thank you for your consideration of these comments and recommendations. Should your staff have any questions on this matter, please contact Mr. Chuck Tracy at the Council office.

Sincerely,



D. O. McIsaac, Ph.D.
Executive Director

Enclosures (6)

CAT:csp

Attachments

C: Council Members
Eileen Sobeck
Sam Rauch
Alan Risenhoover
Russell Smith
Barry Thom
Craig Heberer
Council Staff
Coastal Pelagic Species Advisory Subpanel

Enforcement Consultants
Groundfish Advisory Subpanel
Groundfish Management Team
Highly Migratory Species Advisory Subpanel
Salmon Advisory Subpanel

ENFORCEMENT CONSULTANTS REPORT ON
RECREATIONAL FISHERIES POLICY UPDATE

The Enforcement Consultants (EC) have reviewed Agenda Item C.2.b, National Saltwater Recreational Fisheries Policy of the National Marine Fisheries Service (NMFS), and have the following comments.

Item #3 under the Policy section of Agenda Item C.2.b addresses coordination with state and Federal management partners for purposes including aligning enforcement priorities and strategies, "...in support of stable, predictable, and well monitored recreational fisheries." The EC appreciates NMFS' recognition of the role of enforcement in successful recreational fisheries and we are committed to working with NMFS and other stakeholders to ensure enforcement priorities are aligned for the purposes quoted above as the National Saltwater Recreational Fisheries Policy continues to be developed.

PFMC
11/18/14

SALMON ADVISORY SUBPANEL REPORT ON
RECREATIONAL FISHERIES POLICY UPDATE

The Salmon Advisory Subpanel (SAS) met with Ms. Heidi Taylor of the National Marine Fisheries Service regarding the draft National Saltwater Recreational Fisheries Policy (Agenda Item C.2.b, Supplemental NMFS Report). Regarding the periodic review of fishery allocations, the SAS recommends that any such review be conducted through the public and transparent process of the Regional Fisheries Management Councils. To that end, the SAS recommends the following changes to the first bullet point on page 2 of the policy:

- 1) **Promote public access to quality fishing opportunities** by supporting consideration of relevant cultural, social, and economic factors in decision-making; encouraging periodic review of fishery allocations through the processes and procedures of the Regional Fishery Management Councils; fostering expanded fishing opportunities based on conservation gains (e.g., improved release survival, restored habitats, easing of regulatory fishery restrictions when conservation goals are achieved); and understanding factors which affect fishing participation and angler satisfaction (e.g., changing and complex regulations, impediments to fishing) and finding mechanisms to address them.

PFMC
11/18/14

HIGHLY MIGRATORY SPECIES ADVISORY SUBPANEL REPORT ON
RECREATIONAL FISHERIES POLICY UPDATE

There is little doubt that the Recreational Saltwater Fisheries proposed policy is about allocation issues. The Highly Migratory Species Advisory Subpanel (HMSAS) suggests that the Council has been managing allocation issues between commercial and recreational fishermen successfully for years. We need to leave these allocation issues to the Regional Fishery Management Councils (RFMCs) and their advisory committees. The HMSAS would also like to know if there is a national policy for Saltwater Commercial Fisheries.

Another issue focused on the lack of science that was being implemented by the RFMCs. However, the RFMCs already DO use science-based management practices using mortality and bycatch reduction plans (BRPs) to support decisions based on quotas or annual catch limits (ACLs).

There was also a statement in the proposed policy that the RFMCs' advisory groups are mostly agency people, and the recreational fishermen at the conference wanted more representation. They did not mention the HMSAS or any other advisory committees at all. The HMSAS feels that the recreational/commercial/charter representation is fair and equitable on the Advisory Committees, at least as far as this Council is concerned. Also, concerning forage fish – they have just barely begun to be managed, and management should improve over time as the scientific data needed to manage them is collected. The report asks NOAA to pay more attention to the economic benefits of recreational fishing, and HMSAS has no problem with that if the information collected is not used to justify taking quota from the commercial sector.

Many suggestions in this policy are in line with what all commercial and charter representatives have been addressing for years such as “the mismatch between data and fishermen’s experience on the water, the general underfunding of fisheries science and management, promoting the use of recreational Exempted Fishing Permits (EFPs), and improving fishery independent data.” This recreational policy should not be used to divide commercial and recreational fishermen. We have too many issues in common and need to support each other and not create unnecessary allocation battles.

PFMC
11/18/14

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

GROUND FISH MANAGEMENT TEAM REPORT ON THE RECREATIONAL SALTWATER FISHERY POLICY

The Groundfish Management Team (GMT) reviewed the 2014 Recreational Saltwater Fishing Summit Summary Report ([Agenda Item C.2.a, Attachment 1](#)) and the Public Comment Draft of the National Saltwater Recreational Policy ([Agenda Item C.2.b, Supplemental NMFS Report](#)) and received a joint briefing with the Groundfish Advisory Subpanel by Mr. Craig Herberer. Given the timing of receiving the draft policy and the other items on the GMT's agenda, the GMT had limited time for discussion. If there is opportunity to comment on future drafts, the GMT may have further comments at that time.

Fisheries on the U.S. West Coast operate somewhat differently than fisheries in other parts of the U.S. For example, treaty tribal fishing rights, international agreements for species such as halibut and salmon, rationalization and quota share programs, etc. create unique governance relationships and allocation formulas. As an example, for groundfish species that are not trawl dominant, the Council reviews the allocation between sectors every two years as part of the biennial process. Therefore, the GMT recommends that this new recreational policy does not supersede processes that are working on the U.S. West Coast, and under the purview of the Pacific Council, or in other areas. The Pacific Council has a history of cooperative management between and within various industry sectors (commercial, recreational, and tribal) and management entities. The GMT suggests that the Council should comment to the National Oceanic and Atmospheric Administration (NOAA) that this policy should not put into place requirements that change what is already working through the Pacific Council or that might complicate existing legal or process requirements.

PFMC
11/18/14

GROUND FISH ADVISORY SUBPANEL REPORT ON
RECREATIONAL FISHERIES POLICY UPDATE

The Groundfish Advisory Subpanel (GAP) heard a presentation by Mr. Craig Heberer on the Draft National Recreational Fisheries Policy.

The GAP notes that the goals of this policy, “to promote recreational fishing for the cultural, social, and economic benefit of the nation through science-based conservation and management, and to provide for wide-ranging participation in and enjoyment of recreational fishing for present and future generations...” are consistent and in furtherance of the purposes of the Magnuson-Stevens Act.

However, the GAP wishes to comment on the paragraph stating the following... “This policy recognizes the authorities and responsibilities of natural resource management agencies, **Regional Fishery Management Councils (RFMCs)**, interstate marine fisheries commissions, states, and advisory bodies and seeks partnership in its implementation.” This paragraph is particularly important in that it **clearly recognizes the authority and responsibilities of the RFMCs**.

This recognition of Council authority is crucial for Goal 1, which mentions, “encouraging periodic review of fishery allocations.” The GAP and the Council have been and will be an essential forum for this kind of discussion. Allocation review should be based on need as a transparent regional process, and not set to some sort of automatic timetable. **The GAP does not see any need for an external directive regarding allocations between recreational and commercial sectors. The Pacific Council has addressed allocations within its normal process for years. It has been a successful collaborative effort and the GAP prefers the status quo. Councils have the proper tools for considering allocation questions.**

The GAP supports Goal 2, “Supports ecosystem conservation and enhancement.” This continues to be an important concern of the GAP and the Council as a whole. In addition, it is noted that the policy “encourages development and application of sustainable, safe aquaculture to support recreational fisheries consistent with existing agency policy.” Examples of this are, the white sea-bass hatchery program in Southern California and the proposed redbird and red snapper hatcheries in the Panhandle of Florida.

Goal 3 discusses coordination with state and federal management partners to align science, management, and enforcement priorities and strategies in support of stable, predictable and well-monitored recreational fisheries. This goal is similar to desired outcomes in commercial fisheries and will be a useful way to improve monitoring of recreational fisheries.

Goal 4 addresses innovative solutions using “new tools, methods, data collection techniques (electronic catch reporting), gear technology and management approaches.” Similar to advances in commercial fishery monitoring, these emerging technologies will inform managers and councils to provide for more real time and adaptive management. This also speaks to the need for greater catch accountability in recreational fisheries.

Goal 5 commits to providing “scientifically sound and trusted biological, cultural, social and economic information to enable balanced, well-informed decision-making bolstered by continuing programmatic improvements.” The GAP supports this commitment.

The GAP also underscores the importance of Goal 6 regarding communicating and engaging with the public.

The GAP agrees that good agency-representative communication with the RFMCs is key to success.

GAP members queried Mr. Heberer about NOAA now having a written policy for the recreational fishing sector. This apparently grew out of commitments NOAA made during the Recreational Fishing Summit in Alexandria, Virginia. A member of the GAP, who is also on Marine Fisheries Advisory Committee (MAFAC), reported that there is no national commercial fishing policy. The GAP was concerned by the lack of written policies for commercial sectors. The GAP emphasizes that commercial fishing considerations should not be pushed aside with this new emphasis on recreational fishing and aquaculture.

PFMC

11/18/14