

April 18, 2013

Mr. Sam Rauch
Interim Assistant Administrator
NOAA Fisheries
1315 East West Highway
Silver Spring, Maryland 20910

Dear Mr. Rauch,

I am writing to express serious concerns I have regarding the recent NOAA Fisheries saltwater recreational fishing outreach effort in the Northwest Region, and the implications it might have on emerging policy development within NOAA Fisheries. Specifically, I have concerns associated with the lack of full representation of recreational fishery perspectives from the Washington and Oregon areas, and concerns about an over-emphasis on the review of allocations between recreational and commercial salmon fisheries.

First, let me express some concerns about the process of gaining input on the issues at hand. The outreach meeting was held in Portland, Oregon on March 21, 2013. The list of invitees, apparently submitted by northwest MAFAC members, was not representative of northwest saltwater recreational fishermen. In fact, I was the only ocean recreational fishing representative on the original invitation list of 13. The others we're primarily freshwater anglers with little or no saltwater involvement nor any recent history of participation in the Pacific Council process. Ultimately, after applying a lot of pressure, I was able to add two more ocean recreational representatives. It became suspicious to a number of folks, including some NW Region NOAA fishery managers and many uninvited ocean recreational representatives, that the outreach process was more designed to target a specific policy strategy than provide broad input. Additionally, there was no public notification of the meeting nor of its purpose by NOAA Fisheries.

I and some others who attended this meeting consider it to be a failure from the standpoint of gathering balanced viewpoints or priorities on issues. Council recreational advisors had minimal (and after the fact) input to the list of invitees and virtually no input to the formation of an agenda. This meeting failed from a process perspective in many regards.

Second, from a substance perspective, any conclusion that a review of recreational allocations are of immediate and broad-based concern are ill founded. The original proposed agenda sent to me by a MAFAC member contained a number of important current issues. However, subsequently, and at the meeting, the obvious primary topic was the Jim Martin paper entitled "Allocation between Recreational and Commercial sectors in US marine fisheries: a Recommended Approach". This paper will be presented by Mr. Martin at the "Managing Our Nations Fisheries 3" conference in May. The views contained therein do not reflect the views of saltwater recreational advisors to the Pacific Council and in general are strongly opposed by all Council advisors. The assertions of failure on the part of the Pacific Council to address allocation issues and the proposal for a potentially massive, expensive, and acrimonious process to address allocation issues every five years are not supported by the facts.

At the 2011 annual CCC meeting in Charleston I made a plea for restraint in forcing allocation review processes on the regional Councils. We in the Northwest have suffered through years of allocation battles between commercial, sport, and Tribal interests, and between the states. Those battles were bitter, time consuming, and detrimental to other initiatives to protect and enhance fishery resources. Virtually no one actively engaged in the Council process is interested in having such reconsideration reviews forced upon them. Having said that, the Council process is open and transparent and any individual or entity, on an advisory body or outside the formal process, has ample opportunity to inject allocation into Council deliberations.

Regarding a potential cure for this presumed allocation situation, it should come from a more structured, open process to find out where such reviews are in high public demand and potentially worthy of the high cost in money and staff time that would ensue. It is not clear the survey done in the George LaPointe contract garnered representative feelings of all those involved in the fisheries, or certainly the West Coast. It is clear that the March 21, 2013 outreach should not qualify as a barometer of saltwater recreational fishing opinions on this issue. A more structured, open process would involve asking the Councils to schedule an agenda item at a future Council meeting that is a call to all involved or affected by a change in fishery allocations to come forward and state their request and why. This would allow an open, transparent discussion of the pros and cons of doing so, challengeable by those that might lose allocation.

In summary, I would propose

- That the outcome of the March 21 meeting have no official weight in fishery management nor in the outreach process.

- That a process using a broader regional representation than NW MAFAC recreational representatives be used for input to any outreach initiative. Specifically, I recommend utilizing more Pacific Council advisors in addition to MAFAC representatives.
- That future small scale outreach meetings designed to measure the perspectives of the recreational fishing industry be open to the public and federally noticed.
- That no allocation review mandate be put forward to the Regional Fishery Management Councils without first determining that the review is desired from a broad regional perspective, and that the results might be significant enough to warrant the potentially extreme cost in funding and staff resources to conduct the review, and any subsequent reallocation decision-making process.

I request that my letter be made available to the attendees of this year's CCC meeting.

Respectfully yours,

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Current recreational member of the PFMC Groundfish Advisory Panel
Former member of the Pacific Council, Chairman 2010-2011
Former member and Chairman of the Salmon Advisory Subpanel

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