



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

March 16, 2023

Re: National Oceanic and Atmospheric Administration Draft Seafood Strategy

To Whom It May Concern:

The Pacific Fishery Management Council (Pacific Council) appreciates the opportunity to provide comments on the Draft National Seafood Strategy (Draft Strategy). Sustainable seafood production for both commercial and recreational fisheries is the fundamental mission of the Pacific Council. We support the vision of the Draft Strategy, which prioritizes sustainable seafood production, climate-ready fisheries and communities, economic competitiveness, and opportunities for a growing and diverse workforce. We also have some suggested changes. Successful implementation of the Draft Strategy will be dependent on National Oceanic and Atmospheric Administration Fisheries' commitment to fund and execute regional implementation plans. We offer the following comments on the Draft Strategy.

The Pacific Council is well positioned to contribute to the Draft Strategy goals of increasing sustainable wild capture production, fostering access to domestic and global markets, and strengthening the seafood sector. Pacific Coast fisheries have experienced enormous challenges in recent decades, such as overfished stocks, habitat degradation, climate change, market disruptions, and infrastructure declines. Although nearly all Federally managed stocks have been rebuilt, our West Coast fleets are in some cases prevented from achieving full utilization of several species, due to catch constraints or other factors. Achieving Optimum Yield and increasing opportunities for greater attainment of underutilized species represents excellent opportunities to address Goal 1 of the Draft Strategy, while also supporting Goals 3 and 4.

Increasing seafood production capacity would also increase the resilience of fishing-dependent communities. Revitalizing the seafood capacity and supply chain would support Goals 1, 3, and 4 of the Draft Strategy.

We believe that the Draft Strategy could be more inclusive by not excluding the recreational sector. We suggest the following changes:

- in the "Fisheries Management" bullet within Goal 1: "Support the recreational and commercial fishing industries and fishing communities in their efforts to adapt to climate change and thrive in a changing ocean economy."
 - In the "Blue Economy" bullet in Goal 4: "Support the U.S. recreational fishing, commercial fishing, marine aquaculture, and seafood communities to adapt and thrive in a changing ocean economy and given new competing uses."
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- Under the “Strategy Drivers” heading, we recommend that the “Seafood is Good for People” bullet articulate recreational benefits and the “Seafood is Good for the Economy” bullet incorporate the recreational fishing economics.

The Draft Strategy highlights the importance of protecting and restoring habitats important to our nation’s fisheries, which in turn supports resilient coastal communities. The Pacific Council is proud of our actions to protect and conserve habitats vital to healthy and sustainable fisheries. We note that a vast majority of the benthic habitat within the Pacific Coast Exclusive Economic Zone is protected, and that nearly all the historic range (both ocean and freshwater) of Pacific salmon is designated essential fish habitat (EFH). However, more actions to protect fisheries habitat, especially in freshwater systems, should be a priority. These actions should include designating EFH in watersheds that are likely to become accessible to Pacific salmon via fish passage improvements, as well as ensuring more robust water quality standards in vital river systems such as the California Central Valley and Klamath systems. The final Strategy should include opportunities for NMFS to use its authorities to address these important habitat concerns. We note that improving habitats and water quality standards also benefits food security, food sovereignty, subsistence fishing, and traditional Tribal fishing rights, and supports resilient communities.

We would also like to emphasize the crucial role of scientific surveys and reliable stock assessments in fisheries management and seafood production. Best available scientific information is the foundation of sustainable fisheries management, and adequate funding is critical to support the surveys and the science that goes into sustainable fisheries management.

The Draft Strategy highlights many benefits of sustainable seafood production, which is good for food security and nutrition, for fishing-dependent communities, and for the U.S. economy. Goal 2 of the Draft Strategy addresses sustainable aquaculture production, which could play a role in seafood production. However, we strongly suggest that the most efficient and effective path to increasing seafood production is to capitalize on existing wild capture opportunities and utilize existing infrastructure.

Thank you for considering these comments, and please contact me with any questions or further discussion.

Sincerely,



Marc Gorelnik
Chairman

KFG:rdd

Cc: Pacific Council Members
Sarah Shoffler
Michael Rubino