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Topic: Recreational Harvest Control Rule Framework/Addenda

Comments: I recently participated in an online webinar organized by the NOAA Fisheries Northeast Fisheries Science Center- Woods Hole Laboratory Population Dynamics scientists on the Black Sea Bass stock assessment and supporting science. Both saltwater anglers and a commercial fishermen commented on how abundant BSB were along the East coast and how the head/charter vessels were constrained by the state catch quota's for individuals which limited the catch for other target species. In addition, since BSB are voracious predators and benefit from structured landscapes like off shore wind farms, the natural mortality that they exert on other target fish species is not considered adequately in the catch quotas and various state restrictions under the Conservation Equivalency Approach. The fishermen were concerned about the effort estimates from the MRIP surveys of those seeking recreational target species (which has lead to numerous stocks being evaluated as overfished or subject to overfishing mortality). I gather that the discard mortality estimate for many recreational fishing species has been increased to 13-15% (up from the 10% when I was the Recreational Fisheries Coordinator)

As the former Recreational Fisheries Coordinator in the Northeast and somebody who chaired two NEFSC Task Forces on the Bottom Trawl Surveys and Scientific monitoring programs for the stocks managed by the MAFMC/NEFMC, I was surprised to find that the NEFSC scientists lacked good data on the current status of the BSB stock and that the natural/fishing mortality rates required additional information from the saltwater anglers involved in the webinar. Part of this maybe due to the COVID-19 pandemic curtailing some of the at sea sampling programs. I used to purchase seafood at the Cataumet Fish Market where the owner purchased BSB from local fishermen/women and shipped them to New York City for sale due to the higher prices there. Because of low prices locally, BSB are not available in restaurants or seafood markets.

I had scientific concerns that the effect of climate change on BSB and other recreational target stocks on natural mortality was not being included in the BSB stock assessment, even though there is good evidence that the base of the marine food chain has been altered (microbial food web replacing diatom-based grazing food chain) and predator/their prey have shifted differentially in space and time altering predation & competition. BSB would appear to be a good candidate for the June 21-23, 2022 Climate Scenario Planning Workshop in Washington, DC (a topic not discussed at this webinar). Another topic that was not discussed was the Productive Capacity of Essential Fish Habitat for pelagic species which should be part of the supporting scientific framework for the BSB stock assessment. Since BSB are managed by the MAFMC, but moving into New England FMC waters where they appear to have prospered, a re-evaluation of the recreational harvest allocations will be required.

Since the NEFSC stock assessments provide the basis for the recreational and commercial fishing quotas and estimate of stock recruitment and growth to determine overfished or overfishing reference points, how will the Recreational Harvest Control Work Framework address these scientific uncertainties and the concerns of the saltwater anglers that their harvests or individual catch & release practices are constrained by state/Federal regulators ?