



February 23, 2010

Jane Lubchenco, Ph.D.
Administrator
National Oceanic and Atmospheric Administration
1401 Constitution Avenue, NW
Washington, DC 20230

Dear Dr. Lubchenco:

Given the impending breakdown of recreational saltwater fisheries management in this country, the nation's recreational fishing and boating community urges you to take immediate action within your administrative authority to address the severe, and escalating, restrictions on recreational saltwater fishing. We ask that you:

- Take decisive, immediate action to improve recreational fisheries data by redirecting existing funds and personnel to focus on real-time management data.
- Collect socio-economic data on recreational fishing in the communities most likely to be impacted by near-term or expected fisheries closures.
- Provide federal-level direction to the fishery management councils to use common-sense in their management approaches while the administration collects the requisite data to make sound management decisions.

Following decades of inadequate data collection, stock monitoring and assessment, we believe that the recent closure of the South Atlantic red snapper fishery and the proposed closure of over 12,000 square miles to all fishing from 98 feet to 300 feet, is the tipping point of what we view as a fisheries management "train wreck" that calls for immediate administrative and fiscal action.

At stake are more than 500,000 jobs that depend on recreational saltwater fishing and \$250 million a year in excise tax and fishing license revenue which provide substantial funding for coastal states' fisheries management programs and an outdoor recreational activity supported by 94 percent of the American public.

The foundation of the sportfishing industry and the broader sportfishing community is sound fisheries management that results in public access to sustainable fisheries. From the industry's continuing support of the federal manufacturers' excise tax, which constitutes the cornerstone of the states' fisheries programs, to myriad actions that promote and support essential habitat programs, to efforts that maintain and increase access to fishable waters; America's sportfishing community has steadfastly approached conservation challenges and opportunities in a deliberate and collaborative fashion.

Saltwater recreational fishing has increased in popularity in recent years as people migrate to the nation's coastal areas. As you know, unlike most freshwater resources where the states have full authority for fisheries management, saltwater fisheries management is a shared responsibility between the National Oceanic and Atmospheric Administration's (NOAA) National Marine Fisheries Service (NMFS) and state agencies. Over the years, while state natural resource agencies have enhanced their fisheries and angler data, NMFS has done little to improve recreational fishing angler and stock assessment data. It is so "data poor" that the U.S. Commission on Ocean Policy has called for a substantial investment in fisheries data and stock assessments. Further, in 2006 the National Academy

of Science's National Research Council called the Marine Recreational Fisheries Statistics Survey conducted by NMFS "fatally flawed."

As required by the 2006 reauthorization of the Magnuson-Stevens Fishery Conservation and Management Act (MSA), NMFS has increased the regulatory measures applied to recreational fishing but has yet to measurably improve either the data collection or its basic understanding regarding recreational saltwater fishing. This is despite repeated requests by the recreational fishing community to improve important recreational fishing data, such as fishery independent stock assessments for key species, angler catch data and economic data. We respectfully assert that the agency simply does not have the tools to successfully manage recreational fisheries as envisioned by the Magnuson-Stevens Act.

According to NMFS and the regional fishery management councils, the only option available to them and the regional fisheries councils is to close fisheries, thereby eliminating recreational fishing opportunities and jobs. The January 2010 Atlantic red snapper fishery six-month interim closure, on the heels of the first stock assessment in 10 years, is only one example of what is a looming fisheries management "train wreck." Mandated annual catch share limits for the Gulf of Mexico reef fish complex is another example; more than 30 of the 44 species found there have never been assessed and basic biological information is lacking. Along with black sea bass, summer flounder, South Atlantic and Gulf Grouper, amberjack and other fisheries, these are prime examples of NMFS's inability to reconcile inadequate data collection, stock monitoring and infrequent stock assessments which the Magnuson-Stevens Act mandates.

The recreational fishing industry is faced with massive fisheries closures, and the attendant job loss, because the appropriate investment in recreational fishery economics data and angler catch data has not been made. In addition, stock assessments for recreationally important species have been a lower priority for NMFS than is justified by the economic contribution of the recreational fishing community. Recreational fishing accounts for only three percent of the marine finfish harvested by weight, yet it produces 56 percent of the jobs from all saltwater fisheries. Unquestionably marine recreational fishing is a coastal economic engine that deserves an investment commensurate with the jobs and economic output it provides to the nation, not to mention the millions of hours of recreation it provides to 13 million saltwater anglers who have an \$83 billion impact on the nation's economy. The agency needs to focus on the sector that has the least environmental impact but provides the largest economic return to the nation's economy and allocate fisheries on that basis.

We urge the implementation of measures that not only address short-term needs but also set in place a strong and effective infrastructure for federal marine fisheries management. We have not come to these decisions lightly or quickly. Our coalition has analyzed the challenges that face NOAA, NMFS and marine fisheries management in general. We have considered many scenarios and we believe the comprehensive package we are proposing is the best approach.

We look forward to the opportunity to discuss potential administrative and funding mechanisms which include:

- Substantially increasing funding for improved recreational data and statistics programs focusing on catch data, economics and stock assessments for each of the next five fiscal years, as well as funding for permanent and continuing data collection and analysis.
- Creating a multi-pronged program to promote and implement angler catch-and-release techniques that will reduce release mortality; improve fisheries conservation; and expand and improve ethical angling practices.
- Making potential regulatory changes to provide regional fishery management councils the authority to include adaptive management and experimental alternatives in rebuilding plans.

- Developing a program within NMFS to assist in the restoration and enhancement of a fishery and its habitat using techniques such as artificial reefs, hatchery operations and other proven programs.
- Expanding the required economic impact analysis of fishery management measures to include impacts on all associated industries, such as tackle shops, manufacturers, marinas, restaurants and other affected businesses, and require fishery management councils to adjust management measures to mitigate for these impacts.
- Identifying and consistently implementing fishery independent stock assessment technologies (e.g., acoustic technology, DNA tagging, underwater video and other technologies) to improve the accuracy of stock assessments. Efforts should include a pilot project through the Cooperative Research Program that focuses on improving data for the South Atlantic red snapper fishery.
- Convening a blue ribbon panel with NMFS, industry, states and interested nongovernmental organizations to identify the long-term data, statistical, research and funding needs of the regional fishery science centers. The outcomes of this panel will help to inform the appropriation needs related to recreational fishing data and statistics for NMFS and coastal state fishery agencies.
- Developing a recreational fishing program and staff within NMFS that is commensurate with the national economic contribution of recreational fishing.

These are necessary first steps that must be taken quickly to address all the challenges before us, especially the data and science deficit and the systemic fisheries management problems. Should these administrative remedies prove insufficient, or should NOAA be unable or unwilling to provide relief promptly in these critical areas, then in order to address this fisheries "train wreck" and ensure that we avoid further crashes, it will be necessary to examine those existing statutory requirements on overfishing that cannot be reasonably met with existing data and management tools.

Dr. Lubchenco, last October during the American Sportfishing Association's annual meeting, you stood before the sportfishing and boating community and pledged to be our champion saying that you are personally committed to a national policy which recognizes the importance of recreational fishing and ensures that it can continue to thrive. Many of the proposals we submitted will require additional appropriations from Congress, and we urge your support for our efforts.

We look forward to the opportunity to discuss these and other solutions at your earliest possible convenience.

Sincerely,

Mike Nussman, President and CEO
American Sportfishing Association

Jeff Angers, President
Center for Coastal Conservation

Pat Murray, President
Coastal Conservation Association

Rob Kramer, President
International Game Fish Association

Thom Dammrich, President
National Marine Manufacturers Association

Ellen Peel, President
The Billfish Foundation

cc: The Honorable Gary Locke, Secretary, U.S. Department of Commerce
Mr. Eric Schwaab, Director, National Marine Fisheries Service