

**American Sportfishing Association · Center for Coastal Conservation
Coastal Conservation Association · Environmental Defense Fund
International Game Fish Association · National Marine Manufacturers Association
Natural Resources Defense Council · Ocean Conservancy · Oceana
Pew Environment Group · The Billfish Foundation
Theodore Roosevelt Conservation Partnership**

October 22, 2009

Dr. Jane Lubchenco
Under Secretary of Commerce for Oceans and Atmosphere
National Oceanic and Atmospheric Administration
1401 Constitution Avenue, NW
Room 6217
Washington, DC 20230

Dear Dr. Lubchenco:

As the Administration works on its FY 2011 budget, we would like to bring to your attention the need to improve the collection and analysis of marine recreational fishing data. According to the National Oceanic and Atmospheric Administration (NOAA), marine recreational fishing contributes some 80 billion dollars annually to the U.S. economy. The single most important element in generating this revenue is not the actual catching of fish, but the revenue from the fishing experience — expenditures related to travel, food, lodging, purchase of gear, and boat rental. In short, much of the value of recreational fishing comes from the broader experience of “going fishing” rather than the actual catching of fish.

Recent news articles have pointed out that federal recreational fishing quotas have been exceeded and leave the impression that recreational fishermen are at fault. As a general matter, individual recreational fishermen are not to blame for this result. The average recreational fisherman lives within the bag, season and size limits set by the federal government. Moreover, many are committed to fisheries conservation and are members of our organizations.

Recently NOAA announced an emphasis on recreational fisheries and acknowledged the importance of its contribution to the nation’s economy. While there were many positive and welcome features in the new initiative, the current data collection improvement program does not adequately emphasize the importance of providing timely data necessary to implement the new requirements of the revised Magnuson-Stevens Fishery Conservation and Management Act (MSA). Many councils are beginning to put these requirements in place. The result on the water is likely to be shortened seasons, reduced bag limits and increased size limits. If these quotas are exceeded, the seasons and bag limits will likely be reduced further and the size limits increased. One way to avoid this never-ending spiral of further restrictions is to put in place a data collection system that makes the timely collection and analysis of recreational catch data a priority so that managers are able to take action before quotas are exceeded.

Recently representatives of NMFS gave representatives of the undersigned organizations a presentation on the proposed Marine Recreational Information Program’s (MRIP) ability to improve data collection and analysis for recreational fishing. While MRIP seeks to address the

shortcomings identified in the 2005 National Research Council report, as presently focused it fails to address the central management emphasis in the MSA revisions of 2006. Those amendments require an end to overfishing by a time certain through the establishment of annual catch limits for individual sectors and the development of enforceable accountability measures. Recreational fishermen are to be held accountable for these annual catch limits, and although the new MRIP will produce better estimates of recreational catch, the data will often arrive too late for managers to prevent quotas from being exceeded.

The existing data collection system is the best scientific information available and therefore legally sufficient, but recreational fishermen deserve better than that. NOAA needs to redouble its efforts to enhance timeliness as a goal for the MRIP process. We strongly urge NOAA to develop and fund a data collection system adequate to provide the timely and accurate catch data necessary to properly manage this sector in compliance with the Magnuson-Stevens Act. This would be one key step in the overall improvement in management of recreational fishing designed to keep fishermen on the water and ensuring abundant fish populations. We ask that such a system be included in the President's FY 2011 budget, and look forward to working with you in pursuit of this critical objective.

Sincerely,

Mike Nussman
President and CEO
American Sportfishing Association

Sarah Chasis
Director, Ocean Initiative
Natural Resources Defense Council

Jeff Angers
President
Center for Coastal Conservation

Chris Dorsett
Director, Fish Conservation and Management
Ocean Conservancy

Patrick Murray
Executive Vice President
Coastal Conservation Association

Michael F. Hirshfield, Ph.D.
Senior Vice President, North America, and
Chief Scientist
Oceana

Diane Regas
Associate Vice President for Oceans
Environmental Defense Fund

Lee Crockett
Director, Federal Fisheries Policy
Pew Environment Group

Rob Kramer
President
International Game Fish Association

Ellen Peel
President
The Billfish Foundation

Thomas J. Dammrich
President
National Marine Manufacturers Association

George Cooper
President and CEO
Theodore Roosevelt Conservation Partnership