



December 12, 2011

The Honorable Jay Rockefeller
Chairman
Committee on Commerce, Science, and Transportation
254 Russell Senate Office Building
Washington, DC 20510

The Honorable Kay Bailey Hutchison
Ranking Member
Committee on Commerce, Science and Transportation
254 Russell Senate Office Building
Washington, DC 20510

Dear Chairman Rockefeller and Ranking Member Hutchison:

The undersigned conservation, marine fishing and boating industry associations write to inform you of our strong and enthusiastic support for S.1916, the “Fisheries Science Improvement Act” (FSIA). In crafting and introducing this bill, your two committee members Senator Bill Nelson and Senator Marco Rubio of Florida have recognized the urgent need for Congress to head off a marine fisheries management debacle that will begin unfolding around the country January 1, 2012 without legislative action. You will note that several of the current S.1916 co-sponsors are on the Commerce Committee including Oceans, Atmosphere, Fisheries, and Coast Guard Subcommittee Chairman Mark Begich of Alaska. The very narrow, targeted technical fix in this concise bill will prevent waves of economically devastating consequences from hitting a fishing industry struggling its way through a recession and prevent needlessly closing off access to our public ocean spaces for millions of American anglers.

Some opponents of FSIA have felt compelled to paint a bill that requires stock assessments to set annual catch limits (ACLs) in the nation’s fisheries as somehow jeopardizing the future of science-based management. However, partial bits of information that perhaps add up to a guess will always fall short of the standards we as a nation have used for managing our fish and wildlife resources.

At its core, FSIA rejects the notion that a guess is good enough to be the foundation of management for hundreds of marine stocks that have either never had an assessment or have been deemed inadequately assessed by NOAA Fisheries. Federal fisheries managers have taken actions in the past to prevent overfishing in the absence of a quantitative assessment by proactive use of aggregate bag limits, vessel limits, minimum size limits, gear restrictions, seasonal and areal closures and other common-sense measures. Without passage of FSIA, managers will be forced to abandon these approaches and set an artificial quota based on a guess without the science to back such measures. In response to this conundrum, the regional fishery management councils currently are removing species from management plans and leaving them without any conservation measures for protection. We find that unacceptable.

Those same opponents of the bill would have you believe that FSIA will undercut improvements in fisheries science. In fact, FSIA will promote the development of the data and science necessary to determine the status of these data-poor stocks while allowing the fishery management councils to continue managing them with measures other than arbitrary caps on annual pounds landed. This will let the councils retain the ability to use existing tools, their backgrounds and experience, and common sense to forge a balanced management approach that provides protection to these stocks without unnecessarily crushing the economic engine provided to this country by the businesses that support the fishing industry. Contrary to the assertion that requiring stock assessments to set ACLs will somehow undercut improvements in fisheries science, it is more likely that once the catch limits are set without an assessment, there will be no motivation for managers to ever spend the money and resources to actually examine the state of the stock with an assessment. The example that most clearly demonstrates this danger can be found in red snapper in the South Atlantic, which had been managed by guess for decades. Only after a proper stock assessment was done was the condition of red snapper revealed.

Finally, those opponents would have you believe that FSIA will create a new loophole to exempt some species from the requirement to establish science-based catch limits. In fact, ecosystem management has been promoted by scientists and conservationists for years and is currently used by NOAA Fisheries. But to manage larger core groups of like-species as “ecosystem stocks” with aggregate bag limits, vessel limits, minimum size limits, gear restrictions, seasonal and areal closures and other common sense measures will provide broad protections for the greatest number of species while science catches up with specific quantitative assessments.

There are rational ways to manage wildlife resources that are employed all over this country and it is unfortunate that some groups refuse to acknowledge that our marine resources deserve the same consideration – no more, no less. But we are not going to get there by revising history and distorting reality. Let’s not abandon classic fishery management tools for one-size-fits-all ACLs when we do not have the data to inform that decision making. Let’s give improved science a chance to work for conservation.

We are grateful for your interest and that of the Commerce Committee in taking up consideration of this critically important legislation.

Sincerely,

Mike Nussman, President and CEO
American Sportfishing Association

Rob Kramer, President
International Game Fish Association

Jeff Angers, President
Center for Coastal Conservation

Thom Dammrich, President
National Marine Manufacturers Association

Pat Murray, President
Coastal Conservation Association

Ellen Peel, President
The Billfish Foundation

Jeff Crane, President
Congressional Sportsmen’s Foundation

cc: Members of the Committee