



National Marine
Manufacturers Association



November 28, 2012

Dr. Jane Lubchenco
Under Secretary of Commerce for Oceans and
Atmosphere and NOAA Administrator
Herbert Clark Hoover Building
14th Street & Constitution Avenue, N.W.
Room 5128
Washington, DC 20230

Dear Dr. Lubchenco:

We in the sportfishing community were appreciative of the effort you and Eric Schwaab made to improve communication and relationships through the Saltwater Recreational Summit held in Virginia at the beginning of your term as Administrator of NOAA. There were many important commitments made at that meeting, particularly ones made by you. While you have followed through on some of those commitments, there is one very notable exception that is quite concerning to us.

At that meeting in 2010, you noted that the allocation process between sport and commercial fisheries was "rusted shut" and many mixed sector fisheries are operating on outdated allocations based on history rather than optimizing socioeconomic values for the future. You stated that if we are really serious about maximizing jobs and economic value for the future, we have to address this issue regularly and with a standardized, analytical approach.

While we were pleased to have Eric follow up and commission former State Director George Lapointe to survey many of us as to what approaches would be needed, we were concerned that many on the Fishery Management Councils and some NOAA Fisheries Service staff opposed this effort and did not want the issue of allocation systematically reviewed. This pushback was expected, and is symptomatic of the agency culture that has always favored a stable commercial fishery and regarded the sportfish industry as an after-thought. It is this culture that locked in allocations in the first place.

We understand that the report prepared by Mr. Lapointe was submitted to NOAA Fisheries almost a year ago and, as far as we can tell, no meaningful action has been taken on it since submission. We are writing you to express our continuing apprehension that your first term as NOAA Administrator may expire without action on reallocation. There is still time to follow through and complete the development of a systematic framework to regularly review allocation, but it clearly requires your continuing commitment and leadership to unlock the inner workings of NOAA Fisheries that are rusted shut on this issue.

Please review this important situation and ensure that your commitment to us at the Summit has not been lost in process. Good progress on this issue was made initially, but we must guard against defenders of the status quo smothering this initiative with inertia and inaction.

You have asked us to hold you and Eric accountable to these commitments and while we are respectfully doing that, we are also offering our assistance to keep this process moving forward.

Thank you for your attention to this important issue.

Sincerely,

Mike Nussman, President
American Sportfishing Association

Pat Murray, President
Coastal Conservation Association

Jeff Angers, President
Center for Coastal Conservation

Jeff Crane, President
Congressional Sportsmen's Foundation

Rob Kramer, President
International Game Fish Association

Thom Dammrich, President
National Marine Manufacturers Association

Jim Martin, President
Berkley Conservation Institute