



American Sportfishing Association Comments on  
West Coast Governors' Agreement on Ocean Health  
Discussion Paper Regarding the Seven Priority Areas

July 28, 2007

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The American Sportfishing Association (ASA) is the sportfishing industry's trade association, uniting more than 650 members of the sportfishing and boating industries with state fish and wildlife agencies, federal land and water management agencies, conservation organizations, angler advocacy groups, and outdoor journalists. It safeguards and promotes the enduring conservation, social, and economic values of sportfishing. ASA also represents the interests of America's 44 million anglers, who contribute \$41.5 billion annually in retail sales toward the sportfishing industry's \$116 billion-a-year impact on the nation's economy.

After review of the "Discussion Paper Regarding the Seven Priority Areas," which was released by the West Coast Governors' Agreement on Ocean Health on March 15, 2007, ASA offers the following comments.

ASA and the Governors of California, Oregon, and Washington share a common goal – to protect the health of the ocean and coastal environment to ensure enjoyment by future generations. Anglers are conservationists by nature and the sportfishing industry depends on a clean environment and healthy and sustainable fish stocks. It actively seeks and supports programs that improve fish populations, such as scientifically-based regulations to manage stocks (e.g., bag limits and fishing seasons). And since 1950, the industry has paid a 10-percent federal excise tax on the equipment it manufactures, contributing over \$5 billion to support conservation efforts throughout the United States. The most significant portion of this money goes to state fish and wildlife/natural resources agencies. California, Oregon, and Washington are currently receiving a total of approximately \$32.5 million a year from these excise taxes.

Therefore, ASA applauds the efforts of Governors Schwarzenegger, Kulongoski, and Gregoire to manage the ocean and coastal resources along the west coast on a regional basis. It is also supportive of a comprehensive, collaborative approach that does not focus on just one aspect of ocean health – there is no one issue at the core of ocean and

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coastal management. As the governors move forward in developing and implement their plan, ASA urges them to adopt the following underlying principles:

- *Collaboration and Transparency.* The most effective management strategies are those that are created bottom – up, not top – down. All stakeholders and user groups should be involved in a collaborative process that is transparent and open to the public. The West Coast Governors’ Agreement on Ocean Health has started in such a fashion, but the involvement of all user groups and the opportunity for public comment must continue throughout both the development and implementation of all aspects of this strategy.
- *Scientifically-Based Policy Making.* ASA supports the current inclusion of expanded scientific information, research, and monitoring in the discussion paper. However, this science must also be used as the basis of policy and management decisions. Given the implications management decisions can have on both the resources and the economy, decisions should not be based solely on emotion. The sportfishing industry will act in the best interest of the resource, but the actions must have scientific reasoning behind them.
- *Monitored and Adaptable.* The ocean and coastal environments, as with all other aspects of the environment are highly dynamic. A management decision made today may not prove to be needed or even effective five years from now. With this in mind, both this strategy and any management decision made under it must be periodically reviewed and changes should be made accordingly.

ASA also offers the following additional comments regarding specific portions of the discussion document.

*Priority Area #2: Protect and Restore Ocean and Coastal Habitats.* The desire to protect habitat should not result in a complete paradigm shift in fisheries management where access is denied to anglers. Closing off swathes of the ocean to fishing will do little to protect habitat itself, and is counter to decades of fisheries management practices implemented under the federal Magnuson-Stevens Fisheries Conservation Act. Catch and size limits, seasons, and temporary closures have been successful in either restoring troubled fish stocks or getting them on the road to recovery. Closures in the name of habitat protection should only be implemented when it has been scientifically determined that they are necessary and effective, are developed in a transparent open, process involving all user groups; and are monitored and changed as fish stocks recover.

*Priority Area #3: Promote Effective Implementation of Ecosystem-Based Management.* The goal of ecosystem-based management (EBM) is laudable, but as the states are working toward this goal they must recognize and address the great complexity and uncertainty that comes with implementation. There needs to be clear science on the causal connection in the oceans before EBM is implemented. The basis of any strategy must be an increase into the science of EBM and its implementation.

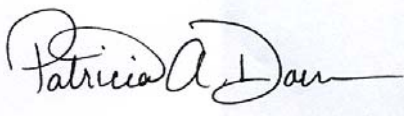
*Priority Area #6: Expand Ocean and Coastal Scientific Information, Research, and Monitoring.* The draft discussion paper lists as a possible action the establishment of science advisory bodies to enhance individual state efforts to address ocean health. Science advisory bodies can be extremely useful as government develops and implements a variety of initiatives, but only if the bodies represent a comprehensive set of scientists – including fishery and socioeconomic scientists – and are free to chart their own course. They should not be given a mandate as to the outcome of their deliberations.

*Priority Area #7: Foster Sustainable Economic Development.* Considering the economic impacts of ocean and coastal management decisions on impacted areas should be a top priority in implementing a regional strategy. As stated in the discussion paper, “for many coastal communities, most of their economic base is directly related to the quality and sustainability of the coastal and ocean environment.” ASA emphatically supports this statement. But economic impacts can also be seen outside of the coastal communities. Consideration must also be given in the strategy to those industries that rely on the ability of users to access the ocean and coastal areas. For example, if anglers are unable to access key portions of marine waters, the trickle-down effect could be felt not only by local bait and tackle shops, but also by bait, tackle and boat manufactures.

Last, but not least it is important to remember the resource conservation model in this Nation is user-pay and envied around the world. Access to fishery resources is key to this model and to the continued payments that the tackle industry and recreational anglers make to sustain the management and health of marine fisheries.

Thank you for the opportunity to comment on the “Discussion Paper Regarding the Seven Priority Areas” for the West Coast Governors’ Agreement on Ocean Health. ASA looks forward to working with the governors as this important initiative moves forward.

Sincerely,

A handwritten signature in black ink that reads "Patricia A. Doerr". The signature is written in a cursive style with a horizontal line extending to the right.

Patricia A. Doerr  
Director for Ocean Resource Policy