



October 22, 2009

The Honorable Gary Locke
Secretary
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

Dear Secretary Locke:

As governors of Gulf Coast states, we are concerned at the direction and rapidity in which the National Oceanic and Atmospheric Administration (NOAA) is moving to implement "catch shares" programs for fisheries in the Gulf of Mexico. Our concerns center on the potential negative impacts catch shares programs could have on our states' economies, as well as how such programs could restrict citizens' access to the fisheries resources that should be shared by all.

While much emphasis is placed on the beneficial economic impact of commercial fishing, it is important to keep in mind that recreational fishing generates some \$24 billion to the economies of the Gulf States.

We understand that catch shares systems for resource management can be effective when applied to purely commercial fisheries. However, we are concerned about the impact catch shares could have when also applied to recreational fishers. The fisheries being discussed in the Gulf of Mexico are managed jointly by the relevant coastal states and the federal government. As such, the states and our citizens are partners in the stewardship of these resources and the benefits of their use. Each of our states enjoys the benefit of productive fishery resources, which generate significant recreation and seafood revenues for our citizens. A healthy marine resource is vital to the local economies of our coastal communities and is a significant contributor to the overall economy of each of our states.

We have already seen negative impacts from the Gulf red snapper catch share system and are concerned about negative impact from the pending program for Gulf grouper. Creating an exclusive harvesting right for a small group of commercial fishermen inherently marginalizes other users who do not have the same access privileges. Those other users, recreational fishermen and commercial fishermen without access rights, would be excluded. In purely commercial fisheries this effect can have both economic and management benefits. But when applied in mixed-use fisheries, recreational anglers are forced to focus their efforts in limited state waters or not participate in the fishery at all. Neither of these outcomes is desirable.

Access and opportunity are the lifeblood of recreational fishing. Catch shares limit accessibility for those who do not have an opportunity to participate. While this does not create a problem when the resource is targeted exclusively by one segment, such as commercial fishers, it squeezes out other users when applied to a mixed-use fishery. We would like to be able to give assurances to our constituents that NOAA will not attempt to extend catch shares policies to the recreational fishing sector.

It is also important to point out that each of our states has had great successes in the management of recreational fisheries, and have never required limiting public access to the resource through exclusive rights. In almost every case, the resource has enjoyed great recovery while recreational fishing opportunities have actually been expanded.


We are concerned that in the desire to adopt and implement catch share systems NOAA has forgotten its most fundamental responsibility under the Magnuson-Stevens Fishery Conservation and Management Act—to maximize the net economic value from the use of a public resource. Recreational fishing is an important activity in all of our states, and one that we would like to see continue to grow as a healthy activity for the public. However, we are concerned that NOAA policies could frustrate our ability to do that.


We are confident that you, as a former Governor, understand our perspective. We request that you allow each of the Gulf States to be able to protect its citizens' access to public fishery resources by allowing us to serve a key role in the decision process as to which fisheries will have a catch share program, how those programs would be structured, in determining the length of the subsidies in the program to the commercial fishery and assuring proper allocation of the resource in advance of implementing any catch share program.

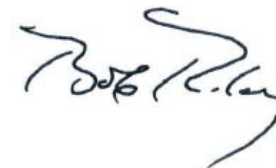
We look forward to working with you to find a system that will balance your goals for catch share systems with the needs of our citizens.

Sincerely,


Governor Rick Perry
State of Texas


Governor Bobby Jindal
State of Louisiana


Governor Haley Barbour
State of Mississippi


Governor Bob Riley
State of Alabama