



October 20, 2015

The Honorable John Fleming  
Chairman  
Committee on Natural Resources  
Subcommittee on Water, Power,  
and Oceans  
1324 Longworth HOB  
Washington, D.C. 20515

The Honorable Jared Huffman  
Ranking Member  
Committee on Natural Resources  
Subcommittee on Water, Power,  
and Oceans  
1329 Longworth HOB  
Washington, D.C. 20515

Dear Chairman Fleming and Ranking Member Huffman,

We represent commercial and charter fishermen in the Gulf of Mexico and throughout the United States, and write to you today to voice our unified opposition to H.R. 3094 (Gulf States Red Snapper Management Authority Act).

Every year tens-of-millions of Americans enjoy fresh caught seafood from their favorite restaurants and grocery stores, and millions of tourists travel to the coasts for a day of fishing on charter boats. Fish and shellfish are public resources, and our four fishing industry organizations work hard to provide your constituents and the rest of the American public with sustainable access to the bounty of the Gulf of Mexico and other coastal regions of the nation. Here's who we are:

- The [Charter Fisherman's Association](#) (*Corpus Christi, TX*) represents charter captains from Texas to Florida that works to ensure American public access to fishing, to engage and represent the Charter for Hire industry, and to ensure long-term sustainability of our fisheries.
- The [Gulf Fishermen's Association](#) (*Clearwater, FL*) is the largest organization of offshore fishermen in the Southeastern US, with members in Texas and Florida, that strives to put healthy, sustainable seafood on America's table.
- The [Gulf of Mexico Reef Fish Shareholders' Alliance](#) (*Galveston, TX*) is an organization of commercial reef fish fishermen and other stakeholders from Texas

to Florida that strives to stabilize and improve fishery management to ensure that we can continue to provide the American public with a sustainable source of domestically-caught Gulf of Mexico seafood. Everything we do is founded in our belief that conservation and stewardship protect fish populations *and* fishermen's businesses.

- The [Seafood Harvesters of America](#) (*Washington, DC*) is a broadly-based national organization that represents 17 commercial fishing organizations from the Gulf of Alaska to the Gulf of Maine south to the Gulf of Mexico. The Harvesters strive for accountability in our fisheries, encourage others to do the same, and speak out on issues of common concern that affect the U.S. commercial fishing industry, the stewardship of our public resources and the many millions of Americans who enjoy seafood.

Together, our organizations and the thousands of fishermen we represent have embraced science and management tools that promote conservation and sustainable fishing practices, reduce wasteful bycatch, operate safer and more stable small businesses, and protect fishing and shoreside jobs. We strive for sustainability, accountability, and access to some of the world's best seafood; and we do so through active and progressive campaigns that bring fishermen, stakeholders, and regulators together to solve problems.

H.R. 3094 poses a clear and imminent threat to our jobs, our fishing communities, and the red snapper resource that we have helped rebuild to some of the highest levels on record. Here's why we cannot support H.R. 3094 and any other similar legislation:

- **H.R. 3094 creates loopholes that will erode the commercial red snapper fishery and access to red snapper by millions of American consumers.** Commercial management of red snapper in the Gulf is a success story – overfishing was stopped, wasteful discarding was all-but-eliminated, and fishing businesses and jobs are profitable and stable. This is all due to the core conservation and management protections that are afforded to us under federal law (the Magnuson-Stevens Conservation and Management Act). Turning this fishery over to the Gulf states strips us of these protections and we have unanimously opposed this proposal every time it appears. We want to also point out that H.R. 3094 allows the Gulf states to take away nearly 10% of the commercial quota every year without conferring with the Congressionally-approved and stakeholder-comprised Gulf of Mexico Fishery Management Council (Gulf Council). This doesn't just hurt commercial fishermen, it impacts the public because commercial fishermen don't keep what they catch – it goes to American seafood consumers who purchase red snapper from restaurants and grocery stores. To add insult to injury, H.R. 3094 deceives the public by claiming it will not change the individual fishing quota (IFQ) shares in this fishery. However, those who developed this language fail to point out that the "shares" are a percentage of the whole commercial allocation, and that any reduction in commercial allocation will reduce the quota associated with the shares.
- **H.R. 3094 undermines the management of the charter fishery and access to red snapper by millions of recreational fishermen who don't own a boat.**

Charter fishermen strive to run successful small businesses and have spent years working towards management solutions with the Gulf Council that give them stability and the flexibility they need under federal fishery laws and conservation guidelines. These federally-permitted vessels operate in federal waters, and have been near-unanimous in their vocal support for federal management – they do not want to be managed by the Gulf states. They have worked too hard to build a better federal management system for their sector to have the rug pulled out from under them by H.R. 3094

- **H.R. 3094 removes essential transparency and public input, and fails to provide necessary information.** The language in this bill was hatched from a plan that was developed by the five Gulf state fishery directors in a secret meeting with no fishermen informed or present. Rather than run this proposal through the Gulf Council – which is made up of fishery stakeholders and is legally required to allow for public input and review – the proposal is being imposed on the fishermen by Congress. This sounds like government overreach to us. In addition, through H.R. 3094, management authority for red snapper caught between the beaches of the Gulf of Mexico and the 200 nautical mile exclusive economic zone would be concentrated into the hands of 3 Gulf state fishery directors. Furthermore, H.R. 3094 only requires this new body to report performance to the Secretary of Commerce once every 5 years, whereas the current federally-managed commercial fishery can be publically evaluated daily. H.R. 3094 also fails to explain how the fishery would be enforced, how the public will be allowed to participate, and how this plan would be funded.
- **H.R. 3094 fails to protect and continue to rebuild the red snapper population.** Federal law clearly lays out how unhealthy fisheries must be rebuilt to healthy levels using accountability measures and catch limits, and identifies the timeline by which this should happen. H.R. 3094 fails to explain how it will promote conservation and the long-term health of the red snapper resource. It only vaguely refers to “necessary measures” and “proper management” that would be implemented to rebuild the fishery.
- **Gulf of Mexico private recreational anglers have not proposed management system improvements for their own fishery that would extend their fishing season.** Gulf commercial and charter red snapper fishermen developed alternative management and catch reporting systems that have allowed them to extend their seasons without taking red snapper allocations from other fishing sectors. Instead of trying to steal red snapper allocations from the commercial and charter fishing sectors, private recreational anglers should develop their own management and reporting alternatives that would allow them to extend their season as well.
- **H.R. 3094 is a controversial, ill-advised, unfunded, and precedent-setting measure that would ripple from the Gulf of Mexico to Alaska and New England.** Over 40 commercial fishing organizations from throughout the U.S. have signed on opposing this plan to sidestep federal fisheries law and undermine

the commercial red snapper fishery in the Gulf of Mexico. This is about more than red snapper – it's about protecting the small businesses that deliver our nation's seafood to the American consumer and providing sustainable access to this public resource to the millions of Americans who don't own a boat. This Bill undermines the Magnuson-Stevens Act and could set a dangerous national precedent that could unravel the successes of this landmark piece of legislation.

State management of red snapper is not the right solution for commercial and charter fishermen and they should not be forced into this form of regulation. If the private red snapper angler wants to be managed by the Gulf states, then let's do it the way it's supposed to be done – through the Congressionally-approved Gulf Council, with a public and transparent stakeholder-driven process, under federal conservation requirements, and with the support of the private recreational fishermen themselves. H.R. 3094 is not the answer, and we hope you consider voting against this proposal.

Thank you very much for your time and thoughtful consideration of our position.

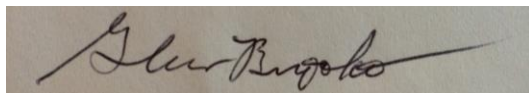
Sincerely,



Shane Cantrell, Executive Director  
Charter Fisherman's Association



Buddy Guindon, Executive Director  
Gulf of Mexico Reef Fish Shareholder's Alliance



Glen Brooks, President  
Gulf Fishermen's Association



Brett D. Veerhusen, Executive Director  
Seafood Harvesters of America