



December 14, 2023

The Honorable Garret Graves
United States House of Representatives
2077 Rayburn House Office Building
Washington, DC 20515

The Honorable Marc Veasey
United States House of Representatives
2348 Rayburn House Office Building
Washington, DC 20515

Dear Congressman Graves and Congressman Veasey:

On behalf of the nation’s recreational fishing community, we thank you for your leadership to protect diverse marine ecosystems and important angling access through the Marine Fisheries Habitat Protection Act.

The saltwater recreational fishing community is comprised of 10 million angler conservationists and thousands of businesses who strongly support healthy marine resources. As part of both its conservation mission and providing access to sustainable fisheries, the recreational fishing community has long advocated for, and contributed to, efforts to enhance fisheries populations through habitat protection, restoration, and creation.

Since the late 1940’s, the development of offshore oil and gas infrastructure has been enhancing marine habitats in coastal waters of the United States. Energy infrastructure on the Outer Continental Shelf (OCS) has boosted fish, coral, and other marine animal productivity by providing an otherwise absent hard substrate on which organisms can colonize and begin developing local reef ecosystems. Over time, these structures have been the catalyst for teeming communities of fish and marine life that serve as incredibly important destinations for recreational anglers, divers, and commercial fishermen alike.

The importance of the OCS platforms and supporting infrastructure on enhancing marine ecosystems is well documented. A study by Sammarco et al. in 2004 found 11 species of coral commonly inhabit oil

and gas platforms in the northern Gulf of Mexico¹, two of which are currently listed on the International Union for Conservation of Nature's (IUCN) critically endangered list. Likewise, an article published in the Proceedings of the National Academy of Sciences concluded oil and gas platforms off the coast of California have the highest secondary fish production per unit area of seafloor of any marine habitat that has been studied². Similarly, a 2020 study report commissioned by the Bureau of Ocean Energy Management estimated that as much as 48% of the total biomass of greater amberjack in the Gulf of Mexico, a currently depleted fishery, is associated with OCS oil and gas infrastructure³.

Unfortunately, less than 25% of these original structures remain nationally, and due to recent bankruptcies in the oil and gas industry or expired mineral leases, many more of these important habitats for recreationally and commercially important fish and marine animals will be unnecessarily lost in the next few years. The Marine Fisheries Habitat Protection Act seeks to stem that loss and convert many of these platforms to state Rigs-to-Reefs programs, ensuring their contribution to fisheries productivity endures for future generations.

Specifically, the bill requires an evaluation of the remaining structures for the presence of important reef organisms, and once found, allows for more time for the structures to be converted to a Rigs-to-Reefs program, provided the associated wells are safely plugged just as they would be if they were decommissioned on land. Furthermore, it encourages oil and gas companies to consider the Rigs-to-Reefs program as a decommissioning option by designating the area in the immediate vicinity of the platforms as reef planning areas with the goal of conserving important localized marine ecosystems. Essentially, the bill uses a science basis to facilitate the voluntary conversion of oil and gas platforms to permanent reef fish habitat.

Thank you again for your leadership in preserving important marine fisheries habitat and angler access to healthy fisheries for future generations. We look forward to working with you in support of the Marine Fisheries Habitat Protection Act as it moves through the legislative process.

Sincerely,

American Sportfishing Association
Bonefish & Tarpon Trust
Center for Sportfishing Policy
Coastal Conservation Association
Congressional Sportsmen's Foundation
The International Game Fish Association
National Professional Anglers Association
Theodore Roosevelt Conservation Partnership

¹ "Expansion of coral communities within the Northern Gulf of Mexico via offshore oil and gas platforms." 2004 https://www.researchgate.net/publication/234046738_Expansion_of_coral_communities_within_the_Northern_Gulf_of_Mexico_via_offshore_oil_and_gas_platforms

² "Oil platforms off California are among the most productive marine fish habitats globally." 2014 <https://www.pnas.org/doi/suppl/10.1073/pnas.1411477111>

³ "Explosive Removal of Structures: Fisheries Impact Assessment." 2020. https://espis.boem.gov/final%20reports/BOEM_2020-038.pdf