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The Honorable Rob Bishop  
Chairman  
Committee on Natural Resources  
U.S. House of Representatives  
Washington, DC 20515

The Honorable Raúl M. Grijalva  
Ranking Member  
Committee on Natural Resources  
U.S. House of Representatives  
Washington, DC 20515

Dear Chairman Bishop and Ranking Member Grijalva:

On behalf of The Pew Charitable Trusts, I write to relay our strong opposition to legislative efforts to remove Gulf of Mexico red snapper from the tested management system of the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) and transfer responsibility for that population's stewardship to the Gulf States. These proposals would likely risk the species' recovery after decades of overfishing.

Under the Magnuson-Stevens Act, U.S. ocean fish are on the rebound. Since 2000, 37 fish populations have been rebuilt from unsustainably low levels (overfished). In the Gulf of Mexico, gag grouper was removed from the overfished list in 2014. Populations of Gulf red snapper, an iconic fish which is highly sought after by commercial fishermen, recreational anglers, and charter boat captains and clients, are recovering. Science-based management under the Magnuson-Stevens Act has allowed for the largest red snapper quota ever for the 2015 fishing season.

Although the ongoing Gulf red snapper recovery is encouraging, significant progress is still needed before this population is rebuilt to a healthy level. The population is in year 14 of a 27-year rebuilding plan, and scientific estimates of its spawning potential are only 57 percent of what is necessary to support a rebuilt population. It is imperative to keep this species on the road to recovery. A fully rebuilt Gulf red snapper population would afford fishing opportunities not seen in generations and provide significant long-term economic value to coastal communities, in addition to ecological benefits to the Gulf of Mexico.

The stakes for sound management of red snapper are incredibly high, which is why a legislative proposal transferring the management to the Gulf States is so troubling, and why so many invested in the population's recovery, such as commercial fishermen, charter boat captains, restaurateurs, and conservation organizations oppose such a move. State management of Gulf red snapper could jeopardize the progress that has been made to rebuild this important species.

The Gulf of Mexico Fishery Management Council, composed of Gulf commercial and recreational fishermen, scientists, state wildlife managers, and the National Oceanic and

Atmospheric Administration's Fisheries Service, is responsible for establishing science-based catch limits to prevent red snapper overfishing, ensuring fair and equitable allocations among fishing sectors, and providing opportunities for public involvement in managing the resource. The Council developed and plays a central role in overseeing the successful red snapper rebuilding plan. These, and other, responsibilities derive from the authority of the Magnuson-Stevens Act.

Under the proposals to shift management of red snapper to the states, it is unclear whether these well-established management standards would continue. Tellingly, the Gulf States' current approach to managing red snapper foreshadows the risk such a transfer poses. The lengths of recreational fishing seasons in State waters are inconsistent, often dramatically, with the needs of sustainable management, and have contributed to the shorter seasons for recreational fishermen in federal waters. We also question whether the Gulf States have the capacity to increase the scope of their management of red snapper. Currently, the Gulf States manage red snapper in an area spanning approximately 31,000 square miles. Under this proposal, that management area would balloon to nearly 710,000 square miles.

Developing the Gulf States' capacity to effectively regulate and enforce Gulf red snapper management over such a vast area would require a significant amount of time and investment of resources. Such a system would be duplicative and waste U.S. taxpayer dollars, as overlapping federal management would continue for other reef fish populations that coexist and are often caught with red snapper. It is also unclear whether states would have the funding and expertise to scientifically assess the health of red snapper in this expanded area.

Finally, legislating the management of a single species, particularly one of national importance, fundamentally erodes the intent of the Magnuson-Stevens Act. The enactment of such legislation would pave the way for carve outs in other regions. The U.S. management system for ocean fish, often cited as one of the best models for the world, would be at risk of unraveling.

In sum, we believe that this legislative proposal is misguided, as it would undercut the significant progress being made to restore the Gulf red snapper population. Congress should oppose it. Our concerns are also shared with many others in the Gulf of Mexico region, as noted in the attached articles. Thank you for considering our views on this issue.

Sincerely,



Lee R. Crockett  
Director, U.S. Oceans

cc: Members of the House Committee on Natural Resources