

Congress of the United States
Washington, DC 20515

March 26, 2021

The Honorable Gina Raimondo
Secretary of Commerce
1401 Constitution Avenue N.W.
Washington, D.C. 20230

Dear Secretary Raimondo:

We wanted to make you aware of the critical juncture in management of recreational fisheries in the Gulf of Mexico. The five Gulf States have done an exemplary job leading the Gulf of Mexico Fishery Management Council to better recreational fisheries management in the Gulf. State Management of Gulf Red Snapper has been a remarkable success ensuring these resources are available for anglers today and in the future and remain the iconic fishery and economic driver of years past. According to NOAA Fisheries, 2.6 million Gulf anglers took 58.6 million fishing trips in 2017 and spent \$13.5 billion on trips and durable goods. However, continuation of this success is only possible with sustained unity between the States and within the council, and a continued focus on the goal of equitable management based on the best-available science.

Over the past several years, all five Gulf States and their recreational anglers have funded and developed new systems to provide timely, higher quality data than had been available under the federal Marine Recreational Information Program (MRIP). These individual State programs were developed with guidance and, in most cases, funding from NOAA Fisheries. All were certified and used in management by NOAA Fisheries. These extraordinary efforts to better collect data were necessary, because MRIP failed to generate accurate and timely information needed for management. Moreover, according to multiple studies, including in an examination by the National Academies of Science, MRIP has been deemed to have “fundamental” flaws. In designing more accurate and timely landings data on a state-by-state basis, it was known that calibrating these different data “currencies” would be a challenge. However, we must not allow that challenge to impede the long-term vision for the role of each of the States in recreational fisheries management.

While everyone agrees on the need for common currency, Congress intentionally provided no requirement for instituting a calibration by a particular date. Similarly, Amendment 50 (State Management) to the Reef Fish Plan set forth no such requirement, deadline, nor benchmark for calibration (i.e. to MRIP). NOAA Fisheries is under an obligation to use the best-available science. We firmly believe and can

demonstrate the State data collection systems are the best-available science. NOAA Fisheries apparently shared that belief when Amendment 50 was implemented: *Because many of the states have more timely data collection programs, NMFS believes they are well suited to prevent the private angling component from exceeding its quota and the entire recreational sector from exceeding the ACL (page 162).*

The recently completed Great Red Snapper Count (GRSC) provides an independent, authoritative count on population abundance three times larger than NOAA Fisheries estimates. Indeed, the overall biomass of red snapper “found” by the GRSC is roughly 800 million pounds. By contrast, the private recreational quota currently being managed by the States based on previous inaccurate assessments is just 4.26 million pounds. We believe the Great Red Snapper Count is the best-available science and more importantly, it demonstrates the risk of overfishing is low; thus, negating the need for drastic changes in the fishery while giving ample opportunity in the near future to calibrate the State programs to a common currency. The rushed scenarios currently proposed will unnecessarily and irresponsibly undermine the economic engine underlying this fishery. This is especially the case given the clear fluidity within the fishery, such as effort recalibration, new abundance estimate, and full benchmark stock assessment on the horizon.

Any rushed recalibration which fails to properly incorporate the most accurate and up-to-date data would be premature and in direct violation of congressional intent in the Magnuson-Stevens Fishery Management and Conservation Act (MSA) and the Modern Fish Act. It would also serve as an unnecessary, punitive step and would threaten to devalue the historic work of the Gulf States and the anglers who tax themselves to fund accurate and timely data collection programs. With only two months before the opening of the 2021 red snapper season, now is not the time for NOAA Fisheries to act in such rash fashion. With the new State data systems, a new, unprecedented state-of-the-art independent stock assessment, and ongoing questions in NOAA Fisheries’ own historical recreational data system, this may be one of the most uncertain periods in the management of any fishery in the nation’s history. The only thing that is undeniably clear is that the red snapper population is far healthier than anyone at NOAA Fisheries ever suspected. Why would we force a recalibration that regresses to less-accurate data, resulting in punitive management decisions which are contrary to macro data sets?

We offer a simple viable solution for the short term that will allow the time necessary for a permanent solution for successful management of this iconic fishery. We urge the Council and NOAA to use the flexibility it has available to avoid any unnecessary and potentially destructive courses of action in the short term. At the very least, the Council and NOAA should begin by adopting motions that recognize the State data collection systems and the Great Red Snapper Count as the best-available science for management. It should embrace status quo in the fishery until a benchmark stock assessment can fully incorporate the new information presented by that best-available science. National Standard 6 was expressly designed and written for adaptative management recognizing the fluidity of fishery management situations. As unlikely as it may be, if that process ultimately determines that a Gulf State has overfished its quota in the interim, then the Council can then begin a rational process of paybacks or deferred increases in quota until that State comes into alignment.

We see no need for the Council to force a bad decision based on less-accurate data that may have many unintended consequences or to allow itself to be painted into a corner by NOAA Fisheries’ faulty

historical assumptions. We remind you, the current data collection by the five Gulf States is one of the most accurate data collection networks ever established. With the incredible investments by the Gulf States, Congress, and anglers to put this fishery on a stable footing with new information, it is the responsibility of the Council to take the time to properly act on it. We believe the path offered above ensures a workable solution for our recreational fishing community and ensures continued conservation and proper management by each of the five Gulf States.

Sincerely,



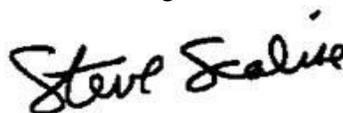
Garret Graves
Member of Congress



Bruce Westerman
Ranking Member



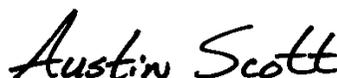
Bennie Thompson
Member of Congress



Steve Scalise
Member of Congress



Steven M. Palazzo
Member of Congress



Austin Scott
Member of Congress



Brian Babin, D.D.S.
Member of Congress



Clay Higgins
Member of Congress



Michael Cloud
Member of Congress



Jerry L. Carl
Member of Congress

cc: Andy Strelcheck, NOAA Fisheries Acting Regional Administrator
Dr. Thomas Frazer, Chair, Gulf of Mexico Fishery Management Council
Dr. Carrie Simmons, Executive Director, Gulf of Mexico Fishery Management Council