

David Bitts  
*President*  
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## PACIFIC COAST FEDERATION of FISHERMEN'S ASSOCIATIONS



Timothy R. Sloane  
*Executive Director*  
Glen H. Spain  
*Northwest Regional Director*  
Vivian Helliwell  
*Watershed Conservation Director*  
***In Memoriam:***  
Nathaniel S. Bingham  
Harold C. Christensen  
W.F. "Zeke" Grader, Jr.

### Please Respond to:

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14 June 2016

**Northwest Office**

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Dear Honorable Members,

We write to express our opposition to H.R. 3094, the Gulf States Red Snapper Management Authority Act. H.R. 3094 sets a dangerous precedent for America's commercial fisheries by undermining federal conservation responsibility for the nation's compromised fishery resources.

The Pacific Coast Federation of Fishermen's Associations (PCFFA) is the largest organization of commercial fishermen on the West Coast. For the last 40 years, PCFFA has led the industry in assuring the rights of individual fishermen and fighting for the long-term survival of commercial fishing as a productive livelihood and way of life.

H.R. 3094 would divest the Gulf of Mexico Fishery Management Council (GMFMC) of its authority to manage the Gulf Red Snapper fishery. As with all regional fishery management councils, GMFMC is comprised of stakeholders, state representatives, and scientific advisors. It recommends management measures supported by the best available science, while taking into account impacts on all sectors of local and regional fishing communities.

GMFMC's process and mission are prescribed by the Magnuson-Stevens Act (MSA), a bipartisan lodestar that memorializes the importance of rebuilding and protecting the nation's fisheries from overfishing. Under a GMFMC rebuilding plan imposed in 2007, the Red Snapper population has rapidly begun to rebound from chronic overfishing; the stock is expected to be rebuilt by 2032. This is strong evidence that the Council process is effective, and the ongoing rebuilding plan requires GMFMC's stakeholder- and science-driven management for years to come.

H.R. 3094 would transfer Red Snapper management authority to a panel of Gulf States' representatives, without the rebuilding or resource optimization directives required by the MSA. Transfer presents a risk of losing the stakeholder and scientific input that is critical to the success of any fishery management regime seeking long-term sustainability of the resource. H.R. 3094

contains no assurances that the new regime would feature the same inclusion and transparency as the GMFMC process.

No management paradigm is perfect. But under the MSA, the council process provides opportunity for all concerned fishermen to participate. It ensures that management measures are scientifically tailored to achieve sustainable productivity of the nation's fishery resources. We are suspicious of the underlying reasons for moving away from that process, especially when the fishery is on the road to recovery.

PCFFA therefore stands in solidarity with Gulf Coast commercial fishing communities in opposing H.R. 3094.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tim Sloane', with a stylized flourish at the end.

Tim Sloane  
Executive Director