



May 27, 2015

Honorable John Boehner
Speaker
U.S. House of Representatives

Honorable Kevin McCarthy
Majority Leader
U.S. House of Representatives

Honorable Nancy Pelosi
Minority Leader
U.S. House of Representatives

Honorable Rob Bishop, Chair
Honorable Raul M. Grijalva, Ranking Member
U.S. House of Representatives Committee on Commerce

Honorable John Fleming, Chair
Honorable Jared Huffman, Ranking Member
U.S. House of Representatives Sub-committee on Water, Power, and Oceans

Dear Representatives Boehner, McCarthy, Pelosi, Bishop, Grijalva, Fleming, and Huffman;

I am writing regarding **H.R. 1335, the “Strengthening Fishing Communities and Increasing Flexibility in Fisheries Management Act,”** on behalf of Slow Food USA to share our concerns regarding the bill. We believe that H.R. 1335 will un-do much of the outstanding progress made in United States fisheries management under the present Magnuson Stevens Fishery Conservation and Management Act (MSA).

Slow Food USA is a national, non-profit organization with more than 200,000 supporters nationally and 48 local chapters in Arizona, California, Louisiana, Ohio, and Utah. We are dedicated to food, farming, ranching, and fishing that are good, clean, and fair. We believe that everyone must have access to sustainably and humanely produced food that is good for their health and well-being, good for the planet, including our fisheries, and good for those who put food on our tables, including small and mid-scale, community-based fishers.

The MSA currently provides the flexibility needed to effectively manage the Nation's marine commercial, recreational, and subsistence fisheries. H.R. 1335 would impose arbitrary and unnecessary requirements that would harm the environment and the economy, undermine the use of science-based management to end and prevent overfishing, introduce uncertainty and delays in rebuilding fisheries, weaken the protections provided by important environmental statutes, and generate fishing sector and interstate conflicts.

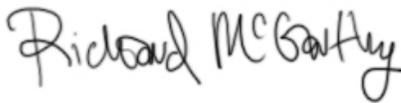
The current MSA is working – the percentage of stocks that are subject to overfishing and the percentage that are overfished are at historic lows. H.R. 1335 would permit rebuilding targets that are not based on sound, credible science and would extend rebuilding periods, thereby delaying the significant economic and environmental benefits of rebuilt fisheries to both fishers and eaters.

H.R. 1335 would exempt fishery management actions from requirements for environmental analysis under the National Environmental Policy Act and replace them with a new set of standards. This provision is unnecessary, as the regional fishery management councils have integrated environmental analyses into an overall framework that is both timely and effective. For similar reasons, the provisions regarding the Endangered Species Act, the National Marine Sanctuaries Act, and the Antiquities Act are unnecessary and likely to give rise to confusion. Rather than reducing burdens on fishery management councils, H.R. 1335 would interfere with a well-established and integrated system and create confusion, delay, and the potential for litigation.

H.R. 1335 also would severely undermine the authority of the Gulf of Mexico Regional Fishery Management Council by extending State jurisdiction over the recreational red snapper fishery to nine miles in the Gulf of Mexico. This proposed extension of jurisdiction would create an untenable situation where recreational and commercial fishers would be subject to different regulatory regimes. Absent an agreement among the States as to how to allocate recreationally caught red snapper, the bill would encourage interstate conflict and jeopardize the sustainability of this Gulf-wide resource. This provision also has the potential to establish a precedent that would undermine the authority of other Regional Fishery Management Councils.

Knowing that, in January, the National Oceanic and Atmospheric Administration issued a proposed rule that would update key MSA implementation guidelines, thereby ameliorating many of the concerns that H.R. 1335 seeks to address, without undermining its fundamental, science-based provisions, we urge Congress to support the current MSA, thereby ensuring there are sustainable fisheries in our Nation's future.

Sincerely,

A handwritten signature in black ink that reads "Richard McCarthy". The signature is written in a cursive, slightly slanted style.

Richard McCarthy
Executive Director