



September 27, 2019

Ms. Lauren Waters  
Southeast Regional Office  
National Marine Fisheries Service  
263 13th Avenue South  
St. Petersburg, FL 33701

**RE: NOAA-NMFS-2017-0122 - Amendments 50A-F to the Fishery Management Plan for the Reef Fish Resources of the Gulf of Mexico**

Dear Ms. Waters:

On behalf of America's millions of recreational anglers and boaters, along with the fishing tackle and boat manufacturing industries, we thank you for the opportunity to comment on Amendment 50 - State Management of Recreational Red Snapper.

For the past two years, the Gulf Coast states have managed the private recreational red snapper fishery in the Gulf of Mexico under an exempted fishing permit (EFP) and it has been a tremendous success. We commend the state fish and wildlife agencies of the Gulf Coast not only for their willingness to take on this task but for developing a comprehensive plan for cooperatively managing this resource going forward. We have been greatly encouraged by the two-year effort put forth by the state fisheries directors to recognize and address the unique aspects of the recreational red snapper fishery in different regions of the Gulf. One-size-fits-all federal management of red snapper has proven to be functionally unworkable, with Gulf-wide recreational seasons decreasing to just three days prior to the implementation of the current EFP.

Under state management for the past two years, private recreational red snapper anglers have enjoyed longer red snapper seasons and become much more active partners in the states' data collection systems. The states have worked to provide greater flexibility to season timing and lengths, providing additional season days if adverse weather conditions in a region prevented anglers from catching expected numbers of fish or cutting seasons short if harvest estimates are higher early in the season. Under the exempted fishing permit, the states have created functional, flexible management regimes and data collection systems for recreational anglers that should serve as a model for other regions and

species. This experience has demonstrated without doubt the Gulf states' ability to successfully manage marine resources and we fully support implementation of Amendment 50.

The recreational fishing community has long advocated that natural resource management often works best when it is local, active and hands-on. With the successful implementation of Amendment 50, we fully expect that the states will continue to produce management that is timely, adaptable and based on the latest information. Going forward, we encourage the Gulf of Mexico Fishery Management Council to evaluate this example of state management and consider shifting all red snapper management responsibilities to the states. We believe allowing each state to manage its entire fishery as well as evaluating the health of the red snapper biomass off its coast will provide the best path to ensuring the proper conservation of the resource and enhancing the public's access to it.

Thank you for your consideration.

Sincerely,

Glenn Hughes, President  
American Sportfishing Association

Jeff Crane, President  
Congressional Sportsmen's Foundation

Chris Edmonston, VP Government Affairs  
BoatU.S.

Guy Harvey, Chairman  
Guy Harvey Ocean Foundation

Jeff Angers, President  
Center for Sportfishing Policy

Nehl Horton, President  
International Game Fish Association

Patrick Murray, President  
Coastal Conservation Association

Thom Dammrich, President  
National Marine Manufacturers Association