



Southern Shrimp Alliance, Inc

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May 16, 2007

TAB E NO 8a

Mr. Robin Riechers,
Chairman
Gulf of Mexico Fishery Management Council
2203 N. Lois Avenue, Suite 1100
Tampa, FL 33607

Dear Chairman Riechers;

The Southern Shrimp Alliance (SSA) appreciates the opportunity to provide some brief thoughts and comments on the draft joint Amendment 27/14.

As you know, SSA has consistently and fully embraced the shrimp fishery's fair share of the conservation burden for ending overfishing and rebuilding the red snapper stock. We have also tried to emphasize what we feel is the responsibility of each Council member to consider and provide fairness and equity to all US fishermen consistent with the spirit of the Magnuson-Stevens Act. Although never an easy task, Congress has made crystal clear its expectation for the Councils to achieve a thoughtful and proper balance among the many competing policies, interests and objectives covered by the Act. We appreciate your leadership and efforts to achieve this result.

The Council's current Preferred Alternative 4 under Action 6 would set the fishing mortality rate reduction target for shrimp trawl bycatch at 74% below the 2001-2003 benchmark years. While this preferred alternative was chosen by a majority vote of the Council members, SSA remains concerned that it was chosen strictly for the purpose of setting the TAC for the directed fisheries at the highest possible level within the range of alternatives analyzed and presented to the Council by the NMFS at your January meeting. This management strategy raises questions of consistency with Congressional intent as expressed in a number of national standards and MSA requirements that are specifically intended to achieve a proper balance of competing interests; fairness and equity for all US fishermen; and to ensure that no measure has economic allocation as its sole purpose.

We recognize there are some unique aspects of this joint management strategy that thrust the competing interests of directed and bycatch fisheries into the forefront, perhaps as never before. This is both a challenge and an opportunity for the Council. While it may well come to pass that these difficult issues must ultimately be resolved by a federal Judge, our purpose here and now is not to present a detailed legal analysis or encourage that result in any way.

Instead, we appeal to the Council members and leadership to seriously consider these concerns and take the opportunity to define a policy that truly reflects what Congress

Southern Shrimp Alliance, Inc

made clear it was looking for. Within the range of alternatives presented by NMFS, is choosing the most extreme 74% mortality reduction target the correct choice for a preferred alternative, or would it be a better, more balanced policy to choose something in the middle of the range, such as 60 or 62 percent? Which alternative really does reflect Congressional expectations for balance, fairness and equity?

To another point, SSA believes that for joint Amendment 27/14 to be approvable by the Secretary, it must also come to grips with the need to provide some measure of benefit and flexibility to the shrimp fishery for accepting—particularly as a bycatch fishery-- what is an extraordinary share of the conservation burden for rebuilding red snapper.

As currently drafted, the preferred alternatives in joint Amendment 27/14 provide substantial, tangible economic benefits in the form of increased yield (TAC) to the directed red snapper fisheries as the red snapper fishery rebuilds. In stark contrast, the plan would permanently lock the shrimp industry into a level of fishing effort in the 10-30 fathom zone (stat areas 10-21) that is essentially the lowest level in recorded history. This zone is very important in terms of shrimp production. Virtually no benefit would accrue to the shrimp fishery from this rebuilding strategy. There is a fundamental lack of balance.

According to NMFS analysis, fishing effort in the offshore shrimp fishery is currently insufficient to achieve the shrimp Optimum Yield. In 2005, the offshore shrimp fishery was able to harvest only about 85 percent of its OY. This is, of course, due to external factors such as fuel and shrimp prices, and the 2005 storms.

However, by locking the shrimp fishery into this historically low level of fishing effort permanently—at least until year 2032— Amendment 27/14 may have the effect of preventing the shrimp fishery from achieving its OY for the next 25 years!

Aside from the obvious gross inconsistency with National Standard 1, is such draconian treatment of the shrimp fishery really necessary in order to also provide reasonable long-term benefits for the directed red snapper fisheries in this plan? SSA does not think so and strongly encourages the Council to adopt a preferred alternative that would provide flexibility and benefits to the shrimp fishery through specified modifications of the target fishing mortality rate reduction beginning in year 2011. SSA has suggested as one such alternative a phased F-target reduction for the shrimp fishery during fishing years 2011-2032.

Finally, SSA is concerned that the Council may not have the opportunity to adequately consider new and emerging scientific information concerning the natural mortality rate of red snapper. New research results strongly suggest that red snapper natural mortality may be 5 times greater than the current SEDAR assumptions on which Amendment 27/14 is currently based. If these results are verified through peer review, this would have profound, risk adverse implications for any management strategy such as Amendment 27/14 that is designed to maximize the TAC in the directed fisheries. It also may substantially diminish the relative importance to red snapper rebuilding of achieving large reductions in shrimp trawl bycatch mortality. SSA strongly encourages the Council

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to request a complete update on this new information before taking final action on joint Amendment 27/14.

Thank you again for the opportunity to provide these comments and suggestions to the Council. SSA appreciates your and the Council's thoughtful consideration. We look forward to continuing working together to achieve the best result possible for Amendment 27/14.

Sincerely,

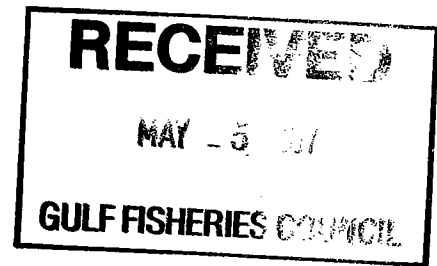
John Williams,
Executive Director

cc: Wayne Swingle,
Executive Director
Trish Kennedy
Administrative Assistant

TAB E NO 8b

NICOLE C. KIBERT
207 W. Genesee St.
Tampa, FL 33603

May 12, 2007



Gulf of Mexico Fishery Management Council
2203 N. Lois Avenue, Suite 1100
Tampa, FL 33607

Dear Members of the Gulf of Mexico Fishery Management Council,

My name is Nicole C. Kibert and I have been a proud Florida resident for 19 non-consecutive years, and a current resident of Tampa, Florida for nearly 4 years. As a scuba diver and marine photographer, the health of fisheries is very important to me personally. Overfishing of red snapper is specifically worrisome because they are such an important part of the Gulf of Mexico ecosystem.

As an Ocean Conservancy supporter, I write to urge the Gulf of Mexico Fishery Management Council to implement management measures in Amendments 27 & 14 (as part of the Draft Supplemental Environmental Impact Statement, or "DSEIS") that will end the overfishing of red snapper and rebuild red snapper as quickly as possible.

In order to restore the health of the Gulf red snapper population, I urge you to adopt measures that: (1) set a scientifically based catch limit that will end overfishing by 2009 and rebuild red snapper as soon as possible; (2) greatly reduce bycatch in the red snapper fishery, as well as bycatch from shrimp trawls to levels necessary to end overfishing and restore red snapper; (3) enforce catch and bycatch limits so that they are not exceeded as they have been in the past; and (4) provide economic incentives for fishermen to achieve conservation benefits.

In conclusion, I am very concerned about overfishing of red snapper in the Gulf of Mexico because of the negative impact on the Gulf of Mexico ecosystem. I urge you take the actions necessary to allow the red snapper population to rebuild as quickly as possible. As members of the Gulf of Mexico Fishery Management Council, you have a public responsibility to enact rules that will result in sustainable fishing practices and protect these valuable resources for all users of the Gulf of Mexico.

Sincerely,

A handwritten signature in black ink that reads "Nicole C. Kibert". The signature is fluid and cursive, with a long horizontal stroke at the end.

Nicole C. Kibert

CC: Peter Hood, NOAA Fisheries Service
Bill Blome, Ocean Conservancy

May 12, 2007
2305 Edgewater Dr. #1201
Orlando, FL 32804-5323

Gulf of Mexico Fishery Management Council
2203 N. Lois Av., Suite 1100
Tampa FL 33607


Ladies and Gentlemen;

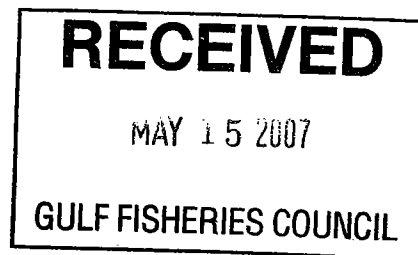
My husband and I were born in Alabama and have lived in Florida for most of our adult lives, so we have a longstanding interest in the health of Gulf waters. As avid fishermen who practice catch and release, we are concerned about the dramatic decline in many species of fish, including red snapper, due to overfishing and to the damage done by shrimp trawlers.

At this critical time we urge you to take the responsible position of supporting laws to protect the health of the inhabitants of the Gulf of Mexico. Future generations of sportfishermen will be indebted to you.

Thank you for your attention.

Very truly yours,


Jerol Gardner



TAB E NO 8c

Dear Gulf of Mexico Fishery Management Council,
Cc Peter Hood

TAB E NO 8d

My name is Jacqueline Minniti, and I moved to Treasure Island, Florida from New Jersey three years ago. One of the primary reasons my husband and I chose to relocate to coastal Pinellas County was our love of the sea. We get great enjoyment from boating, diving, and fishing (catch and release) in the Gulf of Mexico. Therefore, maintaining a healthy, vibrant ocean is extremely important to us.

Part of a healthy marine ecosystem is a sustainable level of aquatic life. Populations of many species of fish, red snapper in particular, have been decimated by overfishing. This is an issue we must address before we reach the point of no return.

As an Ocean Conservancy supporter, I write to urge the Gulf of Mexico Fishery Management Council to implement management measures in Amendments 27 & 14 (as part of the Draft Supplemental Environmental Impact Statement, or "DSEIS") that will end the overfishing of red snapper and rebuild red snapper as quickly as possible.

In order to restore the health of the Gulf red snapper population, I urge you to adopt measures that: (1) set a scientifically based catch limit that will end overfishing by 2009 and rebuild red snapper as soon as possible; (2) greatly reduce bycatch in the red snapper fishery, as well as bycatch from shrimp trawls to levels necessary to end overfishing and restore red snapper; (3) enforce catch and bycatch limits so that they are not exceeded as they have been in the past; and (4) provide economic incentives for fishermen to achieve conservation benefits.

As members of the Gulf of Mexico Fishery Management Council, it is incumbent upon you to be stewards of our gulf waters. Please do whatever possible to maintain healthy populations of gulf fish, including red snapper, so that our children and their children can continue to experience the joys of healthy, abundant oceans.

Thank you for your attention.

Sincerely yours,

Jacqueline Minniti
Jacqueline Minniti
12275 4th Street East
Treasure Island, FL 33706

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MAY 15 2007

GULF FISHERIES COUNCIL

RECEIVED

APR 23 2007

GULF FISHERIES COUNCIL

TAB E NO 8e

April 10, 2007

Re: Management Plan for Red Snappers

Robin Richers, Chairman
Duff of Mexico Fishery Mgt. Council
2203 North Lois Ave, #1100
Tampa, FL 33607

Dear Mr. Chairman:

I am a Marco Island resident (year round) and a recreational fisherman in the Gulf and the backwaters of the Ten Thousand Islands. I am deeply concerned about the dramatic decline in the red snapper population.

Please urge your Duff Council to approve a management plan to limit the annual catch and bycatch waste so that this species will rebuild in the foreseeable future. We must reduce both commercial and recreational overfishing and waste or this species will soon be threatened and unavailable.

Thanks for your interest and concern.
Respectfully,

Tom Menaker (tommenaker@206.com)

220 S. Collier Blvd., #705

Marco Island, FL 33981

3: Gulf of Mexico Fishery Management Council
Re: Red Snapper Management.

Being in the New South, the Gulf of Mexico is my hobby. One of the pleasures of the area is the opportunity to fish, but with the decline of fish populations especially the red snapper. This pleasure has almost disappeared. Now is the time for action. A long term management plan is urgently needed.

I urge you to consider:

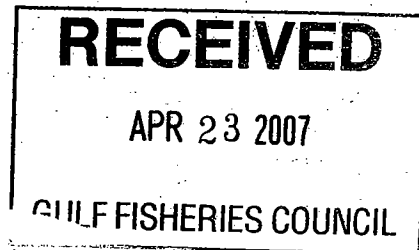
1. A total annual allowable catch goes more than 6 million pounds
2. Open recreational & commercial size limits to reduce the number of fish killed as bycatch.
3. Requirements to use venting & de-hooking devices and also circle hooks where applicable to help reduce bycatch.

4. A zero bag limit for Captains and crew on recreational for live toasts.
5. A means to further reduce bycatch of young red snapper in the shrimp fishery.
6. no reduction in responsibility for recreational fishing sector long term on red snapper based on consequences from recent hurricanes.

Thank You for your consideration.

Security

Just Hladik Hladik
1595 Main St.
St. Marys Beach Fl. 33931
239-463-5556



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APR 23 2007

GULF FISHERIES COUNCIL

April 11, 2007

Gulf of Mexico Fishery Mgmt. Council
2203 N. Lois Avenue, #1100
Tampa, FL 33607
Attn - Chairman Robin Riechers

TAB E NO 8f

Subject: Red Snapper Mgmt. Plan

Dear Chairman Riechers:

I live on the Gulf Coast of Florida, and I am very concerned about red snapper; they have been poorly managed for many years. As a result, their stocks are currently at 3% of the historic reproducing population, according to recent studies.

In an effort to address effective long term management, I recommend adoption of measures including: total annual allowable catch of no more than 6 million pounds

Requirement to use venting and de-hooking devices and also circle hooks, to reduce bycatch
zero bag limit for captain and crew on recreational for hire vessels

No reduction in responsibility for recreational fishing sector long term on red snapper based on consequences from recent hurricanes.

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I believe that these measures will work together to help end overfishing and rebuild red snapper populations.

Sincerely,

Scott McCarthy

1315 Sweetwater Cove #104

Naples, FL 34110

