



Gulf of Mexico Fishery Management Council

Managing Fishery Resources in the U.S. Federal Waters of the Gulf of Mexico

2203 N. Lois Avenue, Suite 1100

Tampa, Florida 33607 USA

Phone: 813.348.1630 • Toll free: 888.833.1844 • Fax: 813.348.1711

www.gulfcouncil.org

24 April 2013

Sally Jewell, Secretary of the Interior
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Dear Ms. Jewell,

The Gulf of Mexico supports recreational and commercial fisheries of immense economic, cultural, and social value. Reef fishes including prized species such as red snapper, greater amberjack, and gray triggerfish are common inhabitants around petroleum platforms in the Gulf of Mexico. Moreover, these species are currently considered overfished by the U.S. Secretary of Commerce and stock rebuilding plans are in progress. The Gulf of Mexico Fishery Management Council is concerned about the impact of petroleum platform removals on reef fish and associated fisheries in the Gulf of Mexico. An abundance of individuals of managed reef fish species have come to associate with these structures over the past several decades. Fisheries, both recreational and commercial, have come to utilize these platforms as sites to catch these fish. Regardless of whether or not these structures serve as merely attractants to these fishery resources or as sites that enable increases in fish stock biomass, the removal of these platforms can have negative effects on these fish populations and community of fishers that utilize them." However, many platforms are removed by way of explosive devices that cause directly of large numbers of reef fishes. This process alone may have negative consequences on reef fish populations and impair, or delay the mandated rebuilding of overfished species. The Gulf Council offers its objection to the use of explosives to remove these structures because their use causes a significant loss of valuable fishery resources. This loss results in considerable decline in revenue, increased unemployment, and under-employment to the greater Gulf community. We request that BOEM require non-explosive methods be used to remove these structures in the future.

Sincerely,

Douglas Boyd,
Council Chair

JF

C: Gulf Council, Council technical staff



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23 June 2011

Mr. Michael R. Bromwich
Director of the Bureau of Ocean Energy Management
Regulation and Enforcement (BOEMRE)
1849 C Street NW
Mail Stop 5438
Washington, DC 20240

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Dear Mr. Bromwich:

The Gulf of Mexico Fishery Management Council is concerned about the effect that the removal of oil platforms may have on reef fish fisheries in the Gulf of Mexico. An abundance of individuals of managed reef fish species have come to associate with these structures over the past several decades. Fisheries, both recreational and commercial, have come to utilize these platforms as sites to catch these fish. Regardless of whether or not these structures serve as merely attractants to these fishery resources or as sites that enable increases in fish stock biomass, the removal of these platforms can have negative effects on these fish populations and community of fishers that utilize them.

Consequently, the Gulf Council respectfully asks your office (BOEMRE) to act to decrease the current rate of oil platform removal in the Gulf of Mexico until such time as a thorough evaluation of the biological implications of these removals, especially with regard to reef fish resources, has occurred.

Thank you for considering this request. The Gulf Council staff stands ready to help your office in gathering any information you may need to help conduct this evaluation.

Sincerely,

Robert L. Shipp
Chair

C: Gulf States Congressional Delegates
Gulf States Natural Resource Directors
Gulf Council
Technical Staff



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May 23, 2012

Dr. Alan Thornhill
Chief Environmental Officer
Bureau of Ocean Energy Management
U.S. Department of Interior
1849 C Street, NW, Mailstop 5438
Washington, D.C. 20240

006057 MAY 20 12

Mr. John Rodi
Gulf of Mexico Regional Director
Bureau of Ocean Energy Management
Gulf of Mexico OCS Region & Atlantic Activities
1201 Elmwood Park Blvd.
New Orleans, LA 70123-2394

Dear Dr. Thornhill and Mr. Rodi:

As Executive Director for the Gulf of Mexico Fishery Management Council, I have been asked by the members of the Gulf Council to address you with regard to the Council's concerns over the removal of oil and gas platforms from the Gulf of Mexico.

First, the removal of oil and gas platforms often makes use of explosives. The explosions resulting from their use in the removal of platforms causes the destruction of a substantial portion of the associated reef fish biomass. Among the species destroyed are red snapper, greater amberjack and gray triggerfish – all species that are currently considered as “overfished” and experiencing “overfishing” by the U.S. Secretary of Commerce. The Gulf Council offers its objection to the use of explosives to remove these structures because their use causes a significant loss of valuable fishery resources. This loss results in considerable decline in revenue, increased unemployment, and under-employment to the greater Gulf community. We respectfully request that BOEM require non-explosive methods be used to remove these structures in the future.

Second, the Gulf Council is concerned with the overall issue of oil and gas platform removal in the Gulf of Mexico. To quote a previous letter sent to Mr. Michael R. Bromwich by me on behalf of the Council on June 23, 2011 regarding our concern with the removal of oil platforms (to which the Council has not received a reply):

Dr. Alan Thornhill and Mr. John Rodi
May 23, 2012
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“The Gulf of Mexico Fishery Management Council is concerned about the effect that the removal of oil platforms may have on reef fish fisheries in the Gulf of Mexico. An abundance of individuals of managed reef fish species have come to associate with these structures over the past several decades. Fisheries, both recreational and commercial, have come to utilize these platforms as sites to catch these fish. Regardless of whether or not these structures serve as merely attractants to these fishery resources or as sites that enable increases in fish stock biomass, the removal of these platforms can have negative effects on these fish populations and community of fishers that utilize them.”

The Gulf Council respectfully asks your offices within BOEM to abate oil and gas platform removal in the Gulf of Mexico until such time as a thorough evaluation of the biological implications of these removals, especially with regard to the associated reef fish resources, has occurred.

The members of the Gulf Council and I appreciate your attention to these requests. My colleagues and I stand ready to help your offices in gathering any information you may need to address these issues.

Sincerely,



Stephen A. Bortone, Ph.D.
Executive Director

SAB:plk

c: Gulf Council



GULF OF MEXICO FISHERY MANAGEMENT COUNCIL

Airport Executive Center

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July 6, 2009

005804 JUL 20 09

Lars Herbst, Regional Director
Minerals Management Service
Gulf of Mexico Region
1201 Elmwood Park Boulevard
New Orleans, Louisiana 70123-2394

Gregg Gitschlag, Program Manager
Platform Removal Observer Program
National Marine Fisheries Service
4700 Avenue U
Galveston, Texas 77551

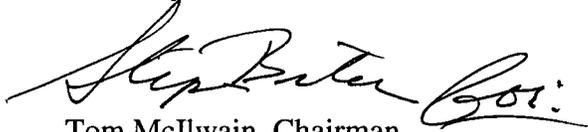
Dear Mr. Herbst and Mr. Gitschlag,

The Gulf of Mexico Fishery Management Council is responsible for creating fishery management plans (FMPs) for the fishery resources of the Gulf of Mexico in the EEZ. At its recent meeting in Tampa, Florida, the Council became aware of the attached photograph showing what was reported as a large kill of red snapper resulting from the explosive removal of a platform off the Alabama coast.

Some of the stocks that the Council manages are classified as overfished or undergoing overfishing including: red snapper, greater amberjack, and gray triggerfish. For those stocks, the Council's FMPs have strict fishing restrictions designed to reduce mortality, end overfishing, and rebuild the stocks. Fish kills from explosives such as the one pictured impede the Council's ability to reduce mortality on stressed stocks and are a source of frustration to the fishing community. In light of the strict management measures that are currently in place for red snapper and other stocks that are overfished or undergoing overfishing, we ask that you consider alternative methods of platform removal that will reduce or eliminate unnecessary kills of these stocks.

The Council is aware that the Minerals Management Service and NMFS have requirements in place to reduce kills of endangered and threatened species. As part of this requirement, NMFS has had a Platform Removal Observer Program in effect since 1987 to monitor the impacts of such removals on sea turtles and marine mammals. We ask that NMFS add monitoring of fish kills, particularly of red snapper and other stocks that are overfished or undergoing overfishing, to this observer program, and that it report such kills to the Council and to the NMFS Southeast Fisheries Science Center. Such reports would enhance NMFS's ability to assess the status of such stocks and the Council's ability to prepare appropriate management plans.

Sincerely,


Tom McIlwain, Chairman

Attachment: Photograph of Fish Kill

c: Jim Lecky, Director NMFS Office of Protected Resources
David Bernhart, SE Assistant Regional Administrator for Protected Resources
Roy Crabtree, NMFS Regional Administrator
Council and Technical Staff

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