



Kevin Anson, Chairman

January 24, 2016

Gulf of Mexico Fishery Management Council  
2203 North Lois Ave, Suite 1100  
Tampa, FL 33607

Dear Chairman Anson,

On behalf of the Gulf of Mexico Reef Fish Shareholders' Alliance (Shareholders' Alliance), please accept the following comments on the following issues to be discussed at the Gulf of Mexico Fishery Management Council (Gulf Council) meeting in Orange Beach, Alabama this week.

Amendment 36 (Red Snapper IFQ Modifications)

- **We believe that many of the potential actions in this Amendment 36 scoping document will impose undue economic and social harm on commercial reef fish fishermen and therefore we must oppose most of these items.** Restrictions on program eligibility, caps on allocation and share holdings, restrictions on share and allocation transfer, forced divestment and mandated redistribution of future allocation gains run counter to the goals of the individual fishing quota (IFQ) program and the results of the Five Year Review. These complicated and controversial proposals often result in actions that do more harm than good, frequently hurting more individuals than expected, especially a full decade into a successful and relatively stable management program. We urge the Gulf Council to consider whether these “solutions” really solve the intended “problem” at hand (and whether such a problem actually exists), and to articulate the unintended/intended consequences of these disruptive proposals.
- **If Amendment 36 moves forward, we could support inclusion of actions to improve enforcement of IFQ species (Action 7) and to close and redistribute accounts that have never been activated (Action 5), and strongly suggest additional Reef Fish Advisory Panel (AP) input on these actions.** We would recommend that in order to truly address regulatory discards, any redistributed allocation be put to use by industry-funded Quota Banks that promote conservation and accountability and are built around a specific goal of reducing red snapper regulatory discards in the Gulf of Mexico. These two proposed measures align with the goals of the IFQ program and the Five Year Review, as well as improve enforceability of management actions, promote conservation and accountability, should be simple to implement, and foster collaborative problem-solving within the industry.

Amendment 33 (Reef Fish LAPP).

- **We support the Gulf Council directing staff to proceed with the Amendment 33 document.** At this point, it's unclear whether or not an IFQ program would solve some of the problems seen with various reef fish species or that it would improve the performance of certain components of the fishery. But we do believe that the Reef Fish AP deserves the chance to review an updated document to decide whether or not to recommend moving forward and to start discussing IFQ issues like an updated list of appropriate species, allocation baselines, reporting requirements, access, leasing, monitoring, and enforcement.

*Stewardship Through Leadership*

[www.shareholdersalliance.org](http://www.shareholdersalliance.org)

Amendment 39 (Regional Management).

- **We continue to support Action 2 Alternative 2 - regional management for private anglers.** This alternative is endorsed by a vast majority of the charter/for-hire sector, and is also supported by the Reef Fish AP. The charter/for-hire fleet wants to remain under federal management and the protections it affords their businesses; they should not have this program imposed on them against their will.
- **We also support any move to eliminate the Sector Separation sunset provision, either through Amendment 39 or a separate stand-alone measure.** We believe this successful, lawful program should continue to demonstrate gains to the fishery.

Red Snapper ACT Buffer.

- **We support the continuation of the 20% buffer accountability measure (AM) as required by law.** The recreational sector has substantial sources of uncertainty, including but not limited to the thirteen factors addressed in the Gulf Council document Tab B No. 4(b). That, coupled with the fact that there has only been one year of data on the buffer effectiveness and that the second year of data predicts a recreational ACT overage, demonstrates the need to maintain this necessary provision.

Reef Fish Amendments 41 and 42.

- **We support the Gulf Council continuing to move forward with Amendment 41 and 42 to develop charter/for-hire and headboat red snapper and reef fish management plans.** Doing so will afford these groups the opportunity to develop accountable management plans that work for their businesses and promote sustainable harvesting.

Shrimp Permit Moratorium (Amendment 17A).

- **We support the continuation of the Gulf's shrimp permit moratorium for 10 years (Preferred Alternative 2b).** Expansion of the shrimp fleet at this time could have negative consequences in the reef fish fishery, especially with bycatch, that could jeopardize rebuilding and protection of reef fish species.

Ad Hoc Private Angler Advisory Panel AP.

- **We support the immediate development, implementation, and population of this AP.** The chance for private anglers to come together in an organized, public and transparent setting to discuss solutions for their fishery is long overdue. We've been told that there have been a series of meetings outside the Gulf Council process to discuss private angler options; however, not knowing when these meetings were happening, where they were happening, who organized them, how they came together, who was in the room, why those individuals were chosen, who chose them, what the charge was, what the goals and objectives of this group are, and what the results of these meetings are, it's not really possible to tell whether progress is being made or not. We look forward to the AP vetting these and any other legitimate ideas through a public, transparent, and accountable Gulf Council AP process.

Thank you for the opportunity to comment.

Sincerely,




Eric Brazer, Deputy Director  
Gulf of Mexico Reef Fish Shareholders' Alliance

*Stewardship Through Leadership*

[www.shareholdersalliance.org](http://www.shareholdersalliance.org)

 Reply all |   Delete Junk |  ... 

# GOM Shrimp Fishery Permit Holder

AF April Foret <april@bjmartininc.com>  
To:  Gulf Council; 

 Reply all | 

Wed 10/7/2015 9:33 AM

Inbox (Gulf Council)

As a current permit holder, my opinion is to keep the current permits & process in place as it now and DO NOT issue new permits.

—Jimmie Martin  
Galliano, LA



BOBBY JINDAL  
GOVERNOR

*State of Louisiana*  
DEPARTMENT OF WILDLIFE AND FISHERIES  
OFFICE OF SECRETARY

ROBERT J. BARHAM  
SECRETARY

March 23, 2015

Kevin Anson  
Chairman, Gulf of Mexico Fishery Management Council  
2203 N. Lois Avenue, Suite 1100  
Tampa, Florida 33607

Chairman Anson,

As the Gulf of Mexico Fishery Management Council considers the scoping document for Amendment 17 to the Shrimp Fishery Management Plan at its upcoming meeting, the Louisiana Department of Wildlife and Fisheries (LDWF) recommends the Shrimp Committee and the Council to work toward a solution that provides for the best use of the resource and allows for sustained participation in the fishery.

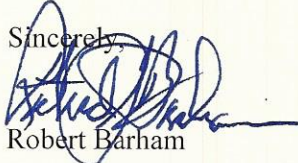
As Louisiana is consistently the number one harvester of penaeid shrimp in the nation, LDWF adamantly objects to any action that further constrains the shrimp fishery. As a solution, we recommend that the Council extend the moratorium but also increase the available permits to 2008 levels (1,933 permits) and create a reserve permit procedure and system that makes expired permits available to fishermen. This will allow marginal growth in this fishery while ensuring no overcapitalization and no overfishing, consistent with the purpose of and need for Amendment 17. Further shrinking the fleet will not accomplish these goals.

Shrimp are a very short-lived, annual crop. Their populations are influenced more by environmental factors than fishing. Unlike long-lived reef fish that can contribute to the spawning population for decades, once shrimp recruit to offshore waters, they are either harvested or they die. When you limit the capacity of offshore shrimp fleet, you limit harvest of this annual crop below optimum yield and essentially waste harvestable shrimp. This is especially unfortunate at a time when more than 90 percent of the shrimp eaten in the United States is imported, and these imports control the market.

When the Council established the current permit moratorium in 2006, it limited the number of permitted vessels to 2,666, a number thought appropriate to prevent overcapacity and promote economic stability in the fishery. Only 1,933 permits were issued at the beginning of the moratorium. In addition, when these permits expire, they are terminated and cannot be allotted to other vessels. As of November 2014, only 1,476 permitted vessels were operating in the fishery, with a number of these reporting little to no harvest activity; 457 permits have expired and are no longer available to the fishery. Many Louisiana shrimpers operate vessels large enough to fish offshore, but the current permit system leaves them little means to obtain a permit to do so. These shrimpers are limited to fishing state inland and coastal waters and have been denied access to fishing even in nearshore federal waters for a number of years. This passive reduction of available permits has taken away opportunities to participate in the fishery and constrained fishing capacity—the fishery is currently operating well under the established cap, and therefore well under the effort needed to achieve optimum yield.

Again, LDWF urges the Council to adopt Option 2, with permits capped at 2008 levels and with the addition of a reserve permit procedure and system. This approach would help achieve optimum yield and promote economic stability for this fishery.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Barham", written over the word "Sincerely,".

Robert Barham

c     Randy Pausina  
       Doug Gregory  
       Carrie Simmons



2021 Lakeshore Drive, Suite 310  
New Orleans, Louisiana 70122

March 23, 2015

Kevin Anson  
Chairman, Gulf of Mexico Fishery Management Council  
2203 N. Lois Avenue, Suite 1100  
Tampa, Florida 33607

Chairman Anson,

Louisiana's Shrimp Task Force represents the state's shrimp industry and is responsible for studying and monitoring the shrimp industry and making recommendations on improving production and the economic sustainability of the industry. With these responsibilities in mind, the Shrimp Task Force recommends that the Gulf of Mexico Fishery Management Council and Shrimp Committee work toward a solution that provides for the best use of the resource and allows for sustained participation in the fishery as they consider the scoping document for Amendment 17 to the Shrimp Fishery Management Plan at the upcoming Committee and Council meetings.

Louisiana's shrimp industry is the top producer of penaeid shrimp in the nation. On behalf of this valuable industry, the Shrimp Task Force adamantly objects to any action that further constrains the shrimp fishery and threatens our culture and way of life. As a solution, we recommended that the Council extend the moratorium but also increase the available permits to 2008 levels (1,933 permits) and create a reserve permit procedure and system that makes expired permits available to fishermen. This will allow marginal growth in this fishery while ensuring no overcapitalization and no overfishing, consistent with the purpose of and need for Amendment 17. Further shrinking the fleet will not accomplish these goals.

Shrimp are a very short-lived, annual crop. Their populations are influenced more by environmental factors than fishing. Unlike long-lived reef fish that can contribute to the spawning population for decades, once shrimp recruit to offshore waters, they are either harvested or they die. When you limit the capacity of offshore shrimp fleet, you limit harvest of this annual crop below optimum yield and essentially waste harvestable shrimp. This is especially unfortunate at a time when more than 90 percent of the shrimp eaten in the United States is imported, and these imports control the market.

When the Council established the current permit moratorium in 2006, it limited the number of permitted vessels to 2,666, a number thought appropriate to prevent overcapacity and promote economic stability in the fishery. Only 1,933 permits were issued at the beginning of the moratorium. In addition, when these permits expire, they are terminated and cannot

be allotted to other vessels. As of November 2014, only 1,476 permitted vessels were operating in the fishery, with a number of these reporting little to no harvest activity; 457 permits have expired and are no longer available to the fishery. Many Louisiana shrimpers operate vessels large enough to fish offshore, but the current permit system leaves them little means to obtain a permit to do so. These shrimpers are limited to fishing state inland and coastal waters and have been denied access to fishing even in nearshore federal waters for a number of years. This passive reduction of available permits has taken away opportunities to participate in the fishery and constrained fishing capacity—the fishery is currently operating well under the established cap, and therefore well under the effort needed to achieve optimum yield.

Again, as representatives of Louisiana’s shrimp industry, we urge the Council to adopt Option 2, with permits capped at 2008 levels and with the addition of a reserve permit procedure and system. This approach would help achieve optimum yield and promote economic stability for our shrimping community.

Sincerely,

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

Mark Abraham  
Chairman, Louisiana Shrimp Task Force