

**North Gulfport Community Land Trust • Louisiana Environmental Action Network  
Association of Family Fishermen • Louisiana Shrimp Association  
Louisiana Bayoukeeper, Inc. • Gulf Restoration Network • Gulf Islands Conservancy Inc.  
Louisiana Charter Boat Association • United Commercial Fisherman's Association  
Hurricane Creekkeeper • Mississippi Coalition for Citizens with Disabilities  
Houston Big Game Fishing Club • Lake Pontchartrain Fishermen's Association  
Sierra Club • Environment Matters • Food & Water Watch  
AIFMA (Alaska Independent Fishermen's Marketing Association)  
Alaska Center for the Environment • Alaska Trollers Association  
Alaska Marine Conservation Council • United Southeast Alaska Gillnetters  
Puget Sound Harvesters Association • Mangrove Action Project  
Clean Catch • Go Wild Campaign • Environmental Action Committee of West Marin  
Ocean Conservancy • Mendonoma Marine Life Conservancy  
Institute for Fisheries Resources • Pacific Coast Federation of Fishermen's Associations  
Center for Food Safety • Pacific Marine Conservation Council  
Half Moon Bay Fishermens Marketing Association**

October 19, 2007

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

**Re: Offshore Aquaculture**

Dear Chairman Riechers and members of the Gulf of Mexico Fishery Management Council:

We, the thirty-three undersigned organizations, write to express our concerns about the Gulf Council's plan to consider the proposed Generic Amendment to the Coral and Coral Reef FMP, Coastal Migratory Pelagics FMP, Red Drum FMP, Reef Fish FMP, Shrimp FMP, Spiny Lobster FMP, and Stone Crab FMP (Amendment). Because of our serious concerns about the impacts of offshore aquaculture in the Gulf and elsewhere, and because of the limited time that the public has had to review this plan, we ask that the Council delay the adoption of the Amendment until it can investigate and address a number of key issues.

We are very concerned about the impacts that offshore aquaculture will have on the environment, human health, and the economies of local fishing communities in the Gulf of Mexico and elsewhere. Water flowing out of fish farms can carry excessive nutrients, particulates, metals, antibiotics, pesticides, and other chemicals. For example, in more shallow sites, the feed and fecal matter from aquaculture facilities can accumulate in the sediments below the facilities, lowering oxygen levels in the water and sediments and causing a reduction in the biological diversity of the seabed.

Further, marine fish farms could also introduce into the ecosystem non-native or genetically modified fish if they are permitted for culture. These organisms can compete with wild fish for resources and habitat, threaten the genetic integrity of wild fish, and introduce disease and parasites. Even if open ocean aquaculture facilities are designed and built well, farmed fish are bound to escape into the ocean. The consequences could be widespread and devastating.

In addition, farmed carnivorous finfish consume large quantities of fishmeal and fish oil. This is an inefficient use of the available protein resource from the wild. Increased catches of forage fish for aquaculture fishmeal reduce the amount of fish available for larger fish, marine mammals, and seabirds.

Finally, aquaculture off the U.S. coasts could harm the existing U.S. fishing industry by lowering prices for wild fish caught by U.S. fishermen. Since the 1990s, increased imports of low-cost farmed salmon contributed to financial instability of fishing communities along the Pacific Coast of the United States.

Some of these problems could be partially addressed by changing the Gulf Council's Amendment. For example, the Amendment should be changed to create allowable aquaculture zones to protect existing uses and fragile areas. It should ban the raising of genetically modified and non-native fish (as the Amendment currently states as one of its preferred alternatives), as well as ban endangered or threatened species and species of concern. It should require protections against hyper-domestication and detail strict feed-management methods. These are but some of the many problems with aquaculture. During the comment period in July 2007, a number of the undersigned organizations submitted comprehensive comments asking that significant changes be made to the Amendment.

We understand that the Council made significant changes to the plan over the summer. Despite this fact, it is our understanding that the Council is planning to take up the issue at its Oct. 29 – Nov. 2, 2007 meeting, without another public comment period or additional public hearings.

Given the recent changes made to the Amendment, we strongly recommend that the Council schedule an additional comment period and public hearings. Allowing the public more time to evaluate and work with the Council on the proposed Amendment could help minimize the negative impacts of offshore aquaculture in the Gulf. This is especially true given that the most recent draft of the Amendment was only available for public comment for a brief period during the summer, while many other important issues were also in process, like the effects of the proposed individual fishing grouper quota amendment.

In order to ensure that the Amendment protects ocean ecosystems, public health, and fishing communities, the Gulf Council should postpone any decision-making about offshore aquaculture until more information is gathered and the public is given adequate time to comment. We urge the Council to allow the public to comment on its most recent draft of the Amendment and to host additional, better publicized public hearings so that the Council can investigate and address the key issues involving offshore aquaculture.

Sincerely,

Jason Mackenzie  
North Gulfport Community Land Trust

Tracy Kuhns  
Louisiana Bayoukeeper, Inc

Susan Vuillemot  
Louisiana Environmental Action Network

Cyn Sarthou  
Gulf Restoration Network

Michael Roberts  
Association of Family Fishermen

Terese Collins  
Gulf Islands Conservancy Inc.

A.J. Fabre  
Louisiana Shrimp Association

Charlie Smith  
Louisiana Charter Boat Association

George Barisich  
United Commercial Fisherman's Association

John Wathen  
Hurricane Creekkeeper

Mary Troupe  
Mississippi Coalition for Citizens with Disabilities

Richard Richardson, Jr  
Houston Big Game Fishing Club

Pete Gerica  
Lake Pontchartrain Fishermen's Association

Vivian Newman  
Sierra Club

Marianne Cufone  
Environment Matters

Wenonah Hauter  
Food & Water Watch

David Harsila,  
AIFMA (Alaska Independent Fishermen's  
Marketing Association)

L.M. "Butch" Allen  
Alaska Center for the Environment

Dale Kelley  
Alaska Trollers Association

Paula Terrel  
Alaska Marine Conservation Council

Kenneth Duckett  
United Southeast Alaska Gillnetters

Peter Knutsen  
Puget Sound Harvesters Association

Alfredo Quarto  
Mangrove Action Project

Niaz Dorry  
Clean Catch

Anne Mosness  
Go Wild Campaign

Frederick Smith  
Environmental Action Committee of West Marin

Tim Eichenberg  
Ocean Conservancy

Rob Cozens,  
Mendonoma Marine Life Conservancy

Mitchell Shapson  
Institute for Fisheries Resources

W.F. "Zeke" Grader  
Pacific Coast Federation of Fishermen's Associations

Peter Huhtala  
Pacific Marine Conservation Council

George A. Kimbrell  
The Center for Food Safety

Duncan F MacLean  
Half Moon Bay Fishermens Marketing Association