



Orange Beach Fishing Association

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Peter Hood
NOAA Fisheries Service
Southeast Regional Office
Sustainable Fisheries Division
263 13th Ave. South
St. Petersburg, FL 33701
Sent Via Fax; 727-824-5308

RE: 0648-AT87

Dear Mr. Hood,

On behalf of over 2,000 members we wish to submit our comments regarding Amendments 27/14 and the economic devastation associated with these amendments.

The data that was used to disallow the 10% reduction in effort was flawed. The increase in landings associated with region 1 on the west coast of Florida was skewed due to questionable reporting on whether fish were landed in state or federal waters. Due to the fact that state waters experience the vast majority of effort when these fish were extrapolated throughout state water trips it showed an unrealistic amount of landings. As you are aware the State of Florida kept their waters at a 4 fish bag limit so when anglers were questioned where they fished they were forced to say state waters for fear of violations being brought against them.

According to the last stock assessment approximately 40% of recreational red snapper landings occurred off the state of Alabama. All of our charter vessel members have reported a loss of 30-50% of their business in 2007 and further reporting that business will be down more in 2008. In addition to that almost 10% of our member vessels have gone out of business. This reduction of effort coupled with recruitment of red snapper being three times the historical levels leaves us to believe that economics and hurricanes are over protecting this stock.

The economic impact associated with reducing the season by over 2 months and cutting the bag limit in half is resulting in small businesses closing their doors. As evidenced by 2007, the EIS associated with Amendment 27 grossly underestimates the losses both social and economic that will occur. Our coastal communities will suffer unnecessarily in 2008 with a shorter season and lower bag limit; however, by the end of the year it will be too late to say you were wrong and the reduction in effort was greater than 10%, these businesses will be gone!

We respectfully request that you reconsider the 10% reduction in effort, as we believe it is a conservative estimate.

Sincerely,

Bobbi M. Walker

Bobbi M. Walker
President