



# Southern Shrimp Alliance, Inc

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Lisa P. Jackson,  
Administrator  
Environmental Protection Agency  
Aerial Ross Building  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

Dr. Jane Lubchenco,  
Administrator  
National Oceanic and  
Atmospheric Administration  
1401 Constitution Ave., NW  
Washington, DC 20230

Dear Administrator Jackson and Administrator Lubchenco:

The Southern Shrimp Alliance deeply and sincerely appreciates the extraordinary efforts ongoing by your agencies and others to address the Deepwater Horizon oil spill. Our industry stands-by to assist in any way it can to mitigate the adverse impacts of this terrible accident.

Nevertheless, the Southern Shrimp Alliance is extremely concerned about the serious effects on marine life of chemical dispersants being used to treat this spill. Recent reports indicate that nearly 170,000 gallons of toxic dispersants have been applied both at the surface and underwater in the direct vicinity of the leak. BP further reports that it has plans to increase its use of dispersants in the immediate future.

While such dispersants may be useful in reducing but not eliminating a surface oil slick and the associated damage to marine life and shoreline habitats, their use also creates an entirely new set of environmental hazards that may be more pernicious and even more difficult to mitigate. Removing oil from the surface certainly has its benefits, but it may also promote an "out-of-sight, out-of-mind" perception of the spill's true ongoing and long lasting impacts.

Our first concern is the direct toxicity to vertebrate and invertebrate marine life which may present itself over time throughout the food chain-- from plankton-- to some of the nation's most valuable fish and shellfish species- to protected marine mammals, sea birds and endangered species of sea turtles. Obviously, we are extremely concerned with the toxic effects on the shrimp resource --both directly and indirectly through their feed. As you know, shrimp are now at their most vulnerable life stages as larvae move from offshore spawning areas to inshore nursery areas and then return offshore. Much of this activity takes place in the water column as well as on the bottom.

In addition, like many US fisheries, the Gulf shrimp fishery operates under a very aggressive and costly federal regulatory regime that protects sensitive species of marine life including those

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such as sea turtles likely to be exposed to the toxic effects of dispersants now being used in unprecedented amounts. Our fishery has an extraordinary record of sea turtle protection and restoration in the Gulf which could be severely undermined by the massive use of dispersants.

Our second major area of concern lies with the physical effects of dispersants on the oil itself. We understand that the very purpose of dispersants is to cause the spilled oil to disperse into the water column rather than rise to the surface. Again, we recognize this may have the benefit of reducing shoreline habitat impacts and speeding-up the natural degradation of oil.

However, the result that cannot be seen on television is that both toxic dispersants and the oil itself (which can also be toxic to marine life) is dispersed throughout the water column where the eggs and larvae of countless species of marine life as well as the plankton and other small organisms on which such larvae feed are present in very large numbers. As mentioned, this is indeed a critical time for shrimp larvae. It is also a critical time for bluefin tuna spawning and larvae in the Gulf. Along with the Mediterranean, the Gulf of Mexico is one of only two spawning areas in the entire Atlantic Ocean basin for a species now receiving very serious global conservation concern. It further occurs to us that injecting the dispersant at the point of the spill at a depth of 5000 feet will guarantee these adverse impacts are maximized throughout the entire water column which serves a critical habitat for so many species.

We further understand that dispersants cause a certain amount of oil to sink and remain on or near the ocean floor presenting yet another invisible hazard to the benthic ecosystem that cannot be tracked or cleaned-up. Based on our understanding of Gulf currents, oil on or near the bottom may well spread to and literally smother the western Gulf in the opposite direction of the surface currents and winds now carrying the spill more to the east. This may vastly expand the ecological and economic impacts of the spill. Again, releasing huge quantities of dispersants directly at the sea floor would seem to exacerbate these environmental hazards.

Given your Agencies' paramount responsibilities for protecting the marine environment and marine life on behalf of the American people, we ask you to give our concerns your most serious consideration. We can certainly appreciate the pressures and demands on all federal agencies and BP itself to respond as quickly and aggressively as possible to what may become an unprecedented environmental catastrophe, but we must ask you to ensure that those actions will not create an even greater and more long lasting hazard that is even more difficult to monitor or to clean-up.

Thank you for your consideration. We look forward to your response.



John Williams,  
Executive Director