October 18, 2006

William T. Hogarth
Director, NOAA Fisheries
1315 East West Highway, 9th Floor
Silver Spring, MD 20910

Dear Dr. Hogarth:

The ACSF applauds your decision to support the Pacific Fishery Management Council’s recommendation to conduct an exempted fishery permit (EFP) for the west coast swordfish drift-net fishery.

We view your support of this EFP as an outstanding example of resource management leadership in balancing the often times conflicting mandates to protect our nations’ marine resources, as well as to promote sustainable fishing opportunities. The above mentioned EFP accomplishes both these goals.

The EFP gives the drift-net swordfish fishermen an opportunity to demonstrate that the time/area closure enacted to protect leatherback sea turtles was based on assumptions that did not take into account the reduced leatherback interaction rate since the implementation of a regulatory requirement for drift-nets to be set a minimum distance of 36 feet below the sea surface. It also limits fishing opportunity through the EFP, and ensures the highest levels of leatherback protections by requiring 100% observer coverage, real-time monitoring, and fixed leatherback and marine mammal take caps.

It is not often that such a win-win scenario is encountered, and you are to be congratulated for supporting your staff at the Southwest Region for their role in facilitating the successful implementation of this EFP.

Sincerely,

Frank Emerson
Co-Chair, ACSF

C: Don Hansen, Chairman PFMC
Mark Helvey, NOAA Fisheries
Rodney McInnis, South West NOAA Fisheries Regional Administrator
Supporting Associations & Organizations
  Pacific Coast Federation of Fishermen’s Association
  Port San Luis Commercial Fishermen’s Association
  Morro Bay Commercial Fishermen’s Association
  Monterey Commercial Fishermen’s Association
  Fishermen’s Association of Moss Landing
  Santa Cruz Commercial Fishermen’s Marketing Association
  Half Moon Bay Fishermen’s Marketing Association
  Fishermen’s Alliance
  Western Fishboat Owners Association
  Ventura County Commercial Fishermen’s Association
  Federation of Independent Seafood Harvesters
  Golden Gate Fishermen’s Association
  Port San Luis Harbor District
  City of Morro Bay Harbor
  City of Monterey Harbor
  Moss Landing Harbor District
  Santa Cruz Port District
  Pillar Pt. Harbor, San Mateo County Harbor District