November 6, 2006

Via Electronic Mail

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RE: Agenda Item C-3: Exempted Fishing Permits

Dear Mr. McIsaac, Mr. Hansen and members of the Council:

The Center for Biological Diversity, Turtle Island Restoration Network, and Oceana submit the following comments regarding Agenda Item C-3 of the November 2006 meeting of the Pacific Fishery Management Council (“PFMC” or “Council”) concerning Exempted Fishing Permits (“EFPs”). Pursuant to PFMC policy as articulated on its website, we request that this letter be distributed to the Council at or before the onset of the November meeting.

The Agenda for the November meeting of the Council frames the issues before the Council as “Consider Drift Gillnet EFP (Status for 2006 and Guidance for 2007) and Preliminary Alternatives for 2007 Shallow Set Longline EFP.” According to the “Situation Summary” contained in the Briefing Book for the November meeting, “the HMSMT is scheduled to brief the Council on the results of the drift gillnet EFP during the 2006 season.” Based on numerous telephone conversations with, and written statements by officials with the National Marine Fisheries Service/NOAA Fisheries (“NMFS”), it is our understanding that the proposed Drift Gillnet EFP for 2006 has not yet been issued. Given the proposed EFP has not been issued, and the August 15 to November 15 permit season is virtually over, we do not see what “results” from the EFP could possibly be relayed to the Council for its

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consideration.\textsuperscript{1} The only relevant information to be gleaned from the proposed 2006 EFP is that NMFS did not issue the permit because NMFS could not lawfully do so. Since the same legal obstacles to issuing such a permit would also apply to any 2007 Drift Gillnet EFP to be considered by the Council and NMFS, we do not see any reason for the Council to waste the limited resources of NMFS by again recommending that such an unsafe and unlawful permit be issued. Nevertheless, given the track record of the Council and NMFS of supporting the proposed 2006 EFP, we offer the following comments regarding any Drift Gillnet EFP for 2007. Similarly, we believe the proposed 2007 longline EFP cannot lawfully be issued by NMFS, and therefore also does not warrant the further consideration of the Council. Our specific objections to both of these proposed EFPs follow.

I. THE 2007 DRIFT-GILLNET EFP MUST BE DENIED

As we have stated on numerous occasions in our comments to the Council and NMFS regarding the proposed 2006 EFP which would have allowed vessels currently permitted to participate in the California/Oregon Drift Gillnet Fishery (“Fishery”) to set drift-gillnet gear in the Pacific Leatherback Conservation Area from August 15 to November 15, notwithstanding the fact that existing law and regulation prohibit the setting of such gear during this period, any request to allow harmful fishing gear in the Pacific Leatherback Conservation Area while leatherbacks are likely to be in the area must be denied. Issuing such an EFP in 2007 would be wholly incompatible with the very purpose for which the Pacific Leatherback Conservation Area was created: to protect critically endangered Pacific leatherback sea turtles from entanglement and drowning in drift-gillnet fishing gear. In addition to being utterly misguided as a matter of policy and science, issuance of the 2007 EFP would be illegal, as doing so would violate the Endangered Species Act (“ESA”) (16 U.S.C. § 1531 \textit{et seq.}), Marine Mammal Protection Act (“MMPA”) (16 U.S.C. § 1361 \textit{et seq.}), Migratory Bird Treaty Act (“MBTA”) (16 U.S.C. § 706 \textit{et seq.}), National Marine Sanctuaries Act (16 U.S.C. § 1431 \textit{et seq.}), Coastal Zone Management Act (“CZMA”) (16 U.S.C. § 1451 \textit{et seq.}), Magnuson-Stevens Fishery Conservation and Management Act (“MSA”) (16 U.S.C. § 1801 \textit{et seq.}), and the National Environmental Policy Act (“NEPA”) (42 U.S.C. § 4321 \textit{et seq.}).

A. The Drift-Gillnet Fishery

The California/Oregon Drift Gillnet Fishery for Shark and Swordfish (“Fishery”) is currently primarily a federally-managed fishery, with the majority of the fishing effort occurring in federal waters within 200 miles of the coasts of California and Oregon. The fishery is governed pursuant to the overlapping provisions of a federal Highly Migratory Species Fishery Management Plan (“FMP”) under the MSA, and regulations promulgated by NMFS to implement that FMP, Biological Opinions drafted by NMFS under the ESA, regulations promulgated by NMFS pursuant to the ESA to implement the Biological Opinions, regulations promulgated by NMFS pursuant to the MMPA to implement a Take Reduction Plan developed for the Fishery, as well as several provisions of California and Oregon state law.

\textsuperscript{1} Given the stated purpose of the 2006 EFP was “data collection” we do not see how NMFS could justify issuing the EFP at this late date, as any “data” collected would be of such limited temporal and spatial scale that any results extrapolated from it would be of little statistical significance. Issuing the EFP at this point would simply place critically endangered leatherback sea turtles and other protected species at needless risk.
The Fishery consists of approximately 100 permitted vessels of which approximately 40 are active in a given year. These vessels use nets of approximately one mile in length with mesh sizes of 16 to 22 inches. The nets are generally set in the evening and retrieved in the morning, and theoretically allow small animals to pass through while trapping larger animals. Although termed “gillnets,” the nets used in the Fishery actually entangle fish and other animals rather than trap them by the gills. The majority of fishing effort in the Fishery occurs between August and the end of January.

Although the Fishery originally targeted thresher sharks, today it also targets both swordfish and shortfin mako sharks. Other species commonly caught and kept by this Fishery include opah, louver, and various species of tuna. The majority of the targeted catch in the Fishery now consists of swordfish taken off the California coast between San Diego and Cape Mendocino. Sunfish or mola and blue sharks are the two most common unwanted fish species or “bycatch” caught by the Fishery, with over ten thousand molas and one thousand blue sharks caught and discarded by the Fishery in 2005 alone.

Historically, the Fishery has resulted in the incidental bycatch of many species of marine mammals, sea turtles and seabirds. Several of these species are listed as endangered or threatened under the ESA, including sperm whales (*Physeter macrocephalus*), humpback whales (*Megaptera novaeangliae*), fin whales (*Balaenoptera physalus*), Steller sea lions (*Eumetopias jubatus*), leatherback sea turtles (*Dermochelys coriacea*), loggerhead sea turtles (*Caretta caretta*), green sea turtles (*Chelonia mydas*), and olive ridley sea turtles (*Lepidochelys olivacea*). Moreover, the critically endangered North Pacific right whale (*Eubalaena japonica*) occurs within the range of the Fishery and is at risk from it. Similarly, the recently listed Southern Resident population of killer whales (*Orcinus orca*), a species historically entangled and killed by the Fishery, seasonally occurs in the range of the Fishery. In addition, numerous non-ESA listed marine mammals protected by the MMPA have been ensnared and killed in gillnets used by the Fishery, including, for example, pilot whales, common, Pacific white-sided, and northern right whale dolphins, and several additional species of whales, sea lions and seals.

NMFS considers the Fishery a Category I fishery under the MMPA. A Category I fishery is a fishery that has “frequent incidental mortality and serious injury of marine mammals.” 16 U.S.C. § 1387(c)(1)(A); 50 C.F.R. § 229.2. Since at least 1990, NMFS has monitored the Fishery due to its high rate of bycatch. Mortality and entanglement rates are calculated based upon the number of individuals observed entangled or killed and the percentage of the fishing effort observed. Mortality and entanglement rates vary from year to year, with some species observed killed every year and others observed killed only every two or three years. Consequently, NMFS’s estimates of annual mortality and entanglement rates vary based upon which years are used to calculate the average.

In response to the high level of marine mammal mortality from the Fishery, in 1997 NMFS adopted the Pacific Offshore Cetacean Take Reduction Plan and accompanying regulations pursuant to Section 118(f) of the MMPA. The Take Reduction Plan and implementing regulations became effective October 30, 1997. 62 Fed. Reg. 51805 (Oct. 3, 1997). Despite the Take Reduction Plan, the Fishery continues to kill marine mammals at rates in excess of those authorized by the MMPA.

Because implementation of the Take Reduction Plan constitutes federal agency action within the meaning of the ESA, NMFS undertook an internal Section 7 consultation in connection with adoption of the Take Reduction Plan and implementing regulations, and issued a Biological Opinion on September 30, 1997, concluding that the Fishery would not jeopardize any listed marine mammal or sea turtle
species. However, NMFS also concluded that the requirements of Section 101 of the MMPA for permit issuance could not be met and that, therefore, no incidental take of ESA-listed marine mammal species could be authorized. Nevertheless, in spite of the fact that no take of ESA-listed marine mammals was authorized by NMFS, the Fishery continued to operate and take listed marine mammals. Additionally, take of listed sea turtle species occurred at levels in excess of that authorized by the 1997 Biological Opinion’s Incidental Take Statement.

In March 2000, the Center for Biological Diversity and Turtle Island Restoration Network brought suit against NMFS for violations of the ESA and MMPA related to the Fishery. In response, on October 23, 2000, NMFS issued a new Biological Opinion for the Fishery. NMFS also at this point issued a permit under Section 101 of the MMPA authorizing the Fishery to take ESA-listed marine mammal species. 65 Fed. Reg. 64670. The new Biological Opinion concluded that the Fishery would likely jeopardize both the loggerhead and leatherback sea turtles. With regard to the leatherback sea turtles, NMFS concluded that the projected take of the species from the Fishery, would jeopardize the species because any further mortality to leatherbacks from the western Pacific nesting population equated to jeopardy:

Therefore, any additional impacts to the western Pacific leatherback stocks are likely to maintain or exacerbate the decline in these populations. This would further hinder population persistence or attempts at recovery as long as mortalities exceed any possible population growth, which appears to be the current case, appreciably reducing the likelihood that western Pacific leatherback populations will persist. Additional reductions in the likelihood of persistence of western Pacific leatherback stocks are likely to affect the overall persistence of the entire Pacific Ocean leatherback population by reducing genetic diversity and viability, representation of critical life stages, total population abundance, and metapopulation resilience as small sub-populations are extirpated. These effects would be expected to appreciably reduce the likelihood of both the survival and recovery of the Pacific Ocean population of the leatherback sea turtle.

Biological Opinion at 94. (Emphasis added).

As required by Section 7(b) of the ESA, 16 U.S.C. § 1536(b), NMFS proposed a reasonable and prudent alternative that would avoid jeopardy to the leatherback. Id. The reasonable and prudent alternative required that a seasonal closure of the Fishery be implemented North of Point Conception in the fall. Specifically the Biological Opinion states:

By August 1, 2001, NMFS, or the states of California and Oregon, must implement regulations to close an area to drift gillnets from Point Conception, California (34°27'N), north to 45°N, and west to 129°W, from August 15th to October 31st.

Id. at 102. While NMFS illegally delayed the implementation of this closure, on August 24, 2001, after receiving a notice of intent to sue from the Center for Biological Diversity and Turtle Island Restoration
Network, NMFS finally implemented a modified version of the required closure through an interim final rule. 66 Fed. Reg 44549.\textsuperscript{2}

The closure ultimately implemented by NMFS runs from August 15 to November 15 each year and extends from Point Sur (36°18.5'N) in California to 45°N on the Oregon Coast.

Since the leatherback closure went into effect, no leatherback sea turtles have been observed taken in the Fishery.

In April 2004, NMFS finally promulgated regulations implementing the long overdue FMP for HMS fisheries on the West Coast. 69 Fed. Reg. 18453. Through these regulations, NMFS incorporated the existing leatherback and loggerhead closures into the FMP regulations.\textsuperscript{3} See 50 C.F.R. § 660.713(c)(1). The February 4, 2004 Biological Opinion for the FMP reached its no jeopardy conclusion for the leatherback based on the premise that the leatherback closure would remain in effect.

The February 4, 2004 Biological Opinion for the FMP contained an Incidental Take Statement estimating the likely take of listed sea turtles and marine mammals from the Fishery. However, due to the interplay of the MMPA and ESA, no take authorization for ESA-listed marine mammals was issued:

The ESA allows takings of threatened and endangered marine mammals only if authorized by section 101(a)(5) of the MMPA. Until the proposed action receives authorization for the incidental taking of marine mammals under section 101(a)(5) of the MMPA, the incidental takes of marine mammals described below are not exempt from the taking prohibition of section 9(a), pursuant to section 7(o) of the ESA.

February 4, 2004 Biological Opinion at 226. The MMPA Section 101 permit issued to the Fishery in October 2000 for the take of threatened and endangered marine mammals expired on October 24, 2003. See 65 Fed. Reg. 64670. No subsequent take authorization has been issued even though the Fishery continues to capture and kill ESA-listed marine mammals.\textsuperscript{4}

B. The Proposed 2007 Drift-Gillnet Exempted Fishing Permit

No EFP for the 2007 fishing season has yet to be officially authorized or proposed by the Council or NMFS. Nevertheless, it is our expectation that any proposed 2007 Drift-Gillnet EFP will be substantially similar to the proposed 2006 EFP. On July 11, 2006 NMFS published a notice in the Federal Register regarding an EFP which would allow vessels currently permitted to participate in the Fishery to set drift-gillnet gear in the Pacific Leatherback Conservation Area from August 15, 2006 to November 15, 2006 notwithstanding the fact that existing law and regulation prohibit the setting of such

\textsuperscript{2} The Biological Opinion also required a similar time/area closure to protect loggerhead sea turtles. NMFS failed to meet this requirement of the Opinion as well, and only implemented the closure over a year late following litigation by the Center for Biological Diversity and Turtle Island Restoration Network. See 67 Fed. Reg. 78388 (Dec. 24, 2002).

\textsuperscript{3} While the leatherback closure remained the same, the loggerhead closure was modified somewhat from the previous ESA regulation.

\textsuperscript{4} On July 28, 2006 NMFS published a notice of proposed issuance of a permit under Section 101(a)(5) of the MMPA for ESA-listed marine mammals taken by the Fishery. See 71 Fed. Reg. 42809. This permit has not been finalized and as such is currently of no legal effect.
gear during this period. See 71 Fed. Reg. 39055 (July 11, 2006). NMFS described the 2006 EFP as follows:

The EFP would authorize approximately 30 vessels to fish from August 15, 2006, to November 15, 2006, in an area off the U.S. West Coast of California and Oregon defined as the Pacific Leatherback Conservation Area within the Federal EEZ. The EFP would allow a maximum of 300 DGN sets, and would require 100 percent observer coverage for all fishing under the EFP. The fishery would be managed through limits on the amount of incidental take of protected species. The proposed EFP would impose a limit of two leatherback sea turtles that may be incidentally taken during the course of fishing under the EFP and limit to one the number of serious injuries or mortalities to humpback whale (Megaptera novaeangliae), short-finned pilot whale (Globicephala macrorhynchus), or sperm whale (Physeter macrocephalus). If any one of these limits is reached by the fishery authorized by the EFP, the EFP would be immediately revoked.

71 Fed. Reg. 39055. Our understanding is that NMFS has not issued the 2006 EFP and the intended permit duration of the proposed permit has already largely past. Given the Pacific Leatherback Conservation Area is closed to drift-gillnet gear from August 15 to November 15 each year, we anticipate the 2007 EFP would similarly run from August 15, 2007 to November 15, 2007.

C. Violations of Law

In our previous letters to NMFS and the Council we described how the current Fishery is in violation of numerous provisions of law, and how any expansion of that Fishery, including through a proposed EFP that would allow drift-gillnet fishing in the Pacific Leatherback Conservation Area when leatherbacks are present, would also violate numerous provisions of law.5 Unfortunately, neither the Council nor NMFS have adequately addressed these legal issues in the processing of the 2006 EFP or in the consideration of the 2007 EFP, rendering both the current operation of the Fishery and any proposed EFPs unlawful. We are confident that a reviewing court will not only set aside any EFP as arbitrary and capricious, but will also find NMFS’s management of the Fishery as a whole to legally infirm. NMFS must reject the proposed 2007 EFP and instead work towards ensuring that the current Fishery operates consistent with all existing law, or not at all.

1. Violations of the ESA

Section 2(c) of the ESA establishes that it is “…the policy of Congress that all Federal departments and agencies shall seek to conserve endangered species and threatened species and shall utilize their authorities in furtherance of the purposes of this Act.” 16 U.S.C. § 1531(c)(1). The ESA defines “conservation” to mean “…the use of all methods and procedures which are necessary to bring any endangered species or threatened species to the point at which the measures provided pursuant to this Act are no longer necessary.” 16 U.S.C. § 1532(3). Similarly, Section 7(a)(1) of the ESA directs that the Secretary review “…other programs administered by him and utilize such programs in furtherance of the purposes of the Act.” 16 U.S.C. § 1536(a)(1).

5 See our letters of August 10, 2006 (Comment letter to NMFS on proposed 2006 EFP), June 23, 2006 (60-day Notice of Intent to Sue), February 28, 2006 (Letter to Council urging rejection of EFP request), October 25, 2005 (Letter to Council regarding Fishery), and September 13, 2005 (Letter to Council regarding EFPs).
NMFS’s continued authorization of the Fishery is violating Sections 2(c) and 7(a)(1) of the ESA because the agency refuses to use its authorities to further the purpose of listed species conservation. Specifically, by not closing the Fishery or taking other measures to avoid unlawful take following the unpermitted taking of a humpback whale by the Fishery during the 2004/2005 fishing season, NMFS is violating these provisions. See Sierra Club v. Babbitt, 65 F.3d 1502, 1511, fn 15 (“If Seneca violates section 9, or any other environmental standard, the BLM need not consult with the FWS before exercising its right under the environmental stipulation to terminate the offending project. Indeed, section 7(a)(1) would appear to require the BLM to utilize its authority under the stipulation to suspend an activity that would result in a taking.”) (Emphasis in original). Moreover, issuing an EFP which would allow drift-gillnet vessels to fish in the Pacific Leatherback Conservation Area after previously finding that such fishing would jeopardize this critically endangered species, would run afoul of these provisions as well.

Section 7(a)(2) of the ESA requires federal agencies to “insure that any action authorized, funded, or carried out by such agency . . . is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the adverse modification of habitat of such species . . . determined . . . to be critical . . . .” 16 U.S.C. § 1536(a)(2); 50 C.F.R. § 402.14(a). To accomplish this goal, agencies must consult with the delegated agency of the Secretary of Commerce or Interior whenever their actions “may affect” a listed species. 16 U.S.C. § 1536(a)(2); 50 C.F.R. § 402.14(a). Where, as here, NMFS is both the acting agency and the delegated wildlife agency for purposes of the listed species in question, different branches of NMFS must undertake internal consultation with each other.

At the completion of consultation NMFS issues a Biological Opinion that determines if the agency action is likely to jeopardize the species. If so the opinion must specify a Reasonable and Prudent Alternative (“RPA”) that will avoid jeopardy and allow the agency to proceed with the action. 16 U.S.C. § 1536(b).

As described above, in the 2000 Biological Opinion, NMFS had the following to say about any further mortality to western Pacific leatherbacks:

Therefore, any additional impacts to the western Pacific leatherback stocks are likely to maintain or exacerbate the decline in these populations....These effects would be expected to appreciably reduce the likelihood of both the survival and recovery of the Pacific Ocean population of the leatherback sea turtle.

Biological Opinion at 94. (Emphasis added). NMFS then concluded that the estimated annual mortality of leatherbacks from the Fishery would likely jeopardize the species. NMFS therefore proposed as an RPA a seasonal closure of the Fishery in the waters off the Central and Northern California and Southern Oregon Coasts. NMFS adopted a variant of this RPA via an ESA rulemaking which instituted the current closure. 66 Fed. Reg. 44549. The closure was then reaffirmed by NMFS when it adopted the HMS FMP under its authorities under the MSA. 69 Fed. Reg. 18444; 50 C.F.R. § 660.713. Since the October 2000 biological opinion for the Fishery, the status of the leatherback in the Pacific has
further declined. We believe, as NMFS stated in 2000, that authorization of any leatherback take in the Pacific would violate the requirement to avoid jeopardy to the species. Therefore, any proposal, such as through an EFP, to allow the Fishery into currently closed areas occupied by the critically endangered leatherback sea turtle would violate Sections 7(a)(2) of the ESA.

Section 7(d) of the ESA, 16 U.S.C. § 1536(d), provides that once a federal agency initiates consultation on an action under the ESA, the agency, as well as any applicant for a federal permit, “shall not make any irreversible or irretrievable commitment of resources with respect to the agency action which has the effect of foreclosing the formulation or implementation of any reasonable and prudent alternative measures which would not violate subsection (a)(2) of this section.” The purpose of Section 7(d) is to maintain the environmental status quo pending the completion of interagency consultation. Section 7(d) prohibitions remain in effect throughout the consultation period and until the federal agency has satisfied its obligations under Section 7(a)(2) that the action will not result in jeopardy to the species or adverse modification of its critical habitat. Our understanding is that NMFS is still engaged in consultation over the issuance of the 2006 EFP to allow the Fishery to operate in the leatherback closure area. See 71 Fed. Reg. at 39055-56 (“NMFS is engaged in formal consultation to determine if the proposed action is likely to jeopardize the continued existence and recovery of any endangered or threatened species or result in the destruction or adverse modification of critical habitat.”). Continued authorization of the Fishery during this consultation constitutes a violation of this provision as well.

An agency’s duty to avoid jeopardy is continuing, and “where discretionary Federal involvement or control over the action has been retained or is authorized by law,” the agency must in certain circumstances reinitiate formal consultation. 50 C.F.R. § 402.16. An FMP is clearly a continuing agency action requiring reinitiation of consultation if any of the triggering circumstances occur. Among those circumstances is when the authorized take is exceeded. Id. The excessive take also constitutes “new information” triggering the reinitiation requirement.

In this case, no take of ESA-listed marine mammals is authorized by the February 2004 Biological Opinion. Nevertheless, take of humpback whales has occurred. The reinitiation requirements have been triggered. Moreover, the recent listing of the Southern Resident population of killer whales (Orcinus orca) as endangered also triggers the reinitiation requirement. Killer whales have historically been documented entangled and killed by the Fishery, and the newly listed population seasonally occurs in the range of the Fishery. Because NMFS has failed to reinitiate consultation it is in violations of its procedural and substantive mandates to insure against jeopardy to listed species.

The ESA prohibits any “person” from “taking” threatened and endangered species. 16 U.S.C. § 1538. The definition of “take”, found at 16 U.S.C. § 1532(19), states,

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6 Fortunately, the seasonal closure of portions of the Fishery for the protection of the leatherback sea turtles appears to be effective. The past three years of observer data show no bycatch of leatherback sea turtles. It would be criminal for NMFS to undue this apparently successful management measure and allow drift-gillnet vessels to set their nets in areas where they are likely to entangle and kill this critically endangered species.

7 NMFS’s ongoing consultation on the issuance of the 2006 EFP is no substitute for reinitiating consultation on the Fishery as a whole. Conner v. Burford, 848 F.2d 1441, 1453 (9th Cir. 1988) (“ESA requires the Biological Opinion to analyze the effect of the entire agency action.”)(emphasis in original).
The term "take" means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.

In a case dealing with fisheries, the Court ruled “the statute not only prohibits the acts of those parties that directly exact the taking, but also bans those acts of a third party that bring about the acts exacting a taking. We believe that...a governmental third party pursuant to whose authority an actor directly exacts a taking of an endangered species may be deemed to have violated the provisions of the ESA” Strahan v. Coxe, et al, 127 F.3d 155 (1st Cir. 1997).

NMFS’s continued authorization of the Fishery directly authorizes fishing activities that have been documented to take humpback whales, fin whales, sperm whales, and leatherback and loggerhead sea turtles and therefore fits the statute’s definition of take. Such take is ongoing. Similarly, issuance of any EFP will also cause such take. As discussed below, take of ESA-listed marine mammals by the Fishery is not authorized via either the ESA or MMPA, yet such take, as demonstrated by the entangled humpback whale in 2004/2005, is clearly occurring. NMFS is violating Section 9 of the ESA. The proposed 2007 EFP will violate this provision as well.

2. Violations of the MMPA

The Fishery entangles and kills ESA-listed marine mammals as well as numerous non-listed marine mammal species. It must therefore be operated in a manner consistent with the procedural and substantive mandates of the ESA and MMPA or not at all. The Fishery is currently operating without any take authorization for ESA-listed marine mammals. Take can be authorized via an Incidental Take Statement issued pursuant to the ESA only if such take is also authorized pursuant to Section 101 of the MMPA. On October 30, 2000, NMFS issued a three-year take authorization to the Fishery pursuant to Section 101(a)(5)(E) of the MMPA, 16 U.S.C. § 1371(a)(5)(E), allowing the take of ESA-listed marine mammals, specifically sperm, fin, and humpback whales, and the eastern stock of Steller sea lion. 65 Fed. Reg. 64670. While we believe this permit was improperly issued in the first instance, regardless of the infirmities of this permit, it is now expired and no take of any ESA-listed marine mammal is authorized for the Fishery, or for that matter any fishery under the HMS FMP. Unfortunately, the Fishery continues to entangle ESA-listed marine mammals. For example, observer data from the 2004-2005 fishing season shows the entanglement of a humpback whale. This take was not authorized under the ESA or the MMPA and therefore occurred in violation of both statutes. Continued operation of the Fishery, and certainly the proposed 2007 EFP allowing vessels into currently closed areas, violates the provisions of the ESA and MMPA prohibiting such take. Until and unless the Fishery as a whole receives a lawful Section 101 authorization pursuant to the MMPA, we believe that the Fishery must be suspended. Additionally, no EFP can be issued unless the take that will occur from the fishing pursuant to the EFP is also permitted pursuant to both the MMPA and ESA.8

The continued authorization of the Fishery and the proposed EFP also violate the unambiguous command of the MMPA that all fisheries “shall reduce incidental mortality and serious injury of marine mammals to insignificant levels approaching a zero mortality and serious injury rate” by April 30, 2001.

8 If NMFS finalizes the proposed issuance of a permit under Section 101(a)(5) of the MMPA for ESA-listed marine mammals taken by the Fishery, this permit would not authorize take of ESA-listed marine mammals by vessels fishing pursuant to the EFP. The proposed permit only covers the current Fishery, not any EFPs. See 71 Fed. Reg. 42809.
16 U.S.C. § 1387(b)(1). NMFS has defined ZMRG by regulation as ten percent of Potential Biological Removal (“PBR”). The Fishery’s take of marine mammal species remains above this threshold. For example, in the 2005 Pacific Stock Assessment Reports the Fishery was estimated to kill 23 northern right whale dolphins each year, in excess of a ZMRG level of 16. Similarly, take of the short-finned pilot whale is not just above ZMRG, but almost at PBR. Take of sperm, humpback and fin whales also remains well above 10% of PBR, thereby exceeding the definition of ZMRG. Because April 30, 2001 has come and gone without the Fishery reaching ZMRG, the continued authorization, or any expansion, of the Fishery violates the MMPA.9

The MMPA explicitly requires NMFS to “amend the take reduction plan and implementing regulations as necessary to meet the requirements of” the MMPA to reach ZMRG, and, when necessary, to “proscribe emergency regulations that, consistent with such plan to the maximum extent practicable, reduce incidental mortality and serious injury in the fishery.” 16 U.S.C. §§ 1387(f)(7)(F) & 1387(g)(1)(A). Given the Fishery continues to take marine mammals at levels in excess of ZMRG, NMFS failure to utilize this authority to amend the Take Reduction Plan violates these provisions of the MMPA as well. Issuing the proposed EFP would take NMFS further down the path away from compliance with this provision of the MMPA.

3. Violations of the MBTA

We believe that the Fishery as currently authorized is violating the MBTA. Obviously, any EFP would likewise violate the MBTA. Section 2 of the MBTA provides that “it shall be unlawful at any time, by any means or in any manner,” to, among many other prohibited actions, “pursue, hunt, take, capture, [or] kill” any migratory bird included in the terms of the treaties. 16 U.S.C. § 703 (emphasis added). The term “take” is defined as to “pursue, hunt, shoot, wound, kill, trap, capture, or collect.” 50 C.F.R. § 10.12 (1997). The primary species taken by the Fishery, the northern fulmar, is included in the list of migratory birds protected by the MBTA. See 50 C.F.R. § 10.13 (list of protected migratory birds). Other MBTA protected species such as the Cassin’s auklet are also taken by the fishery. The MBTA imposes strict liability for killing migratory birds, without regard to whether the harm was intended. Its scope extends to harm occurring “by any means or in any manner,” and is not limited to, for example, poaching. See e.g., U.S. v. Moon Lake Electric Association, 45 F. Supp. 2d 1070 (1999) and cases cited therein. Indeed, the federal government itself has successfully prosecuted under the MBTA’s criminal provisions those who have unintentionally killed migratory birds. E.g., U.S. v. Corbin Farm Service, 444 F. Supp. 510, 532-534 (E. D. Cal.), affirmed, 578 F.2d 259 (9th Cir. 1978); U.S. v. FMC Corp., 572 F.2d 902 (2nd Cir. 1978).

The MBTA applies to federal agencies such as NMFS as well as private persons. See Humane Society v. Glickman, No. 98-1510, 1999 U.S. Dist. LEXIS 19759 (D.D.C. July 6, 1999), affirmed, Humane Society v. Glickman, 217 F.3d 882, 885 (D.C. Cir. 2000) (“There is no exemption in § 703 for farmers, or golf course superintendents, or ornithologists, or airport officials, or state officers, or federal agencies.”). Following Glickman, FWS issued Director’s Order No. 131, confirming that it is FWS’s position that the MBTA applies equally to federal and non-federal entities, and that “take of migratory

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9 Even if NMFS could somehow construe the promulgation of the Pacific Offshore Cetacean Take Reduction Plan as relieving the Fishery of the April 30, 2001 ZMRG deadline, the five-year deadline contained in the MMPA for a fishery to reach ZMRG under a Take Reduction Plan has also come and gone. See 16 U.S.C. § 1387(f)(2).
birds by Federal agencies is prohibited unless authorized pursuant to regulations promulgated under the MBTA.” MBTA Section 3 authorizes the Secretary of the Interior to “determine when, to what extent, if at all, and by what means, it is compatible with the terms of the conventions to allow hunting, take, capture, [or] killing . . . of any such bird.” 16 U.S.C. § 704. FWS may issue a permit allowing the take of migratory birds if consistent with the treaties, statute and FWS regulations. NMFS however has not obtained, much less applied for such a permit authorizing any take by the Fishery (or any other fishery under the HMS FMP) or for fishing pursuant to the EFP.

NMFS cannot dispute that the Fishery kills birds protected under the MBTA. We believe that until such take is permitted, NMFS cannot lawfully allow any fishing, including that which would be authorized by the EFP, which is likely to result in death of such species.10

4. Violations of MSA

NMFS has promulgated regulations governing the issuance of EFPs. See 50 C.F.R. § 660.745. Under these regulations, NMFS may authorize fishing that would otherwise be prohibited by an FMP only in very limited circumstances. Specifically, NMFS may only authorize such fishing for “limited testing, public display, data collection, exploratory, health and safety, environmental cleanup, and/or hazard removal purposes.” 50 C.F.R. § 660.745(b). In attempting to shoehorn into this regulatory scheme a proposed EFP that would for all practical purposes eliminate the Pacific Leatherback Conservation Area, the Council claimed the 2006 EFP was for the purposes of “collecting data on the incidental take of ESA protected leatherback sea turtles to allow for informed management decisions in determining appropriate protective measures.” Such a rationale is absurd; NMFS has sufficient data on the impact of the Fishery on leatherbacks. Prior to the closure takes were occurring at a rate that NMFS determined jeopardized the species. Subsequent to the closure no takes have been documented. To kill more critically endangered leatherback sea turtles simply to “collect data” to reaffirm the well-established fact that unregulated gillnet fishing kills leatherbacks makes a mockery of any rational interpretation of the exempted fishing regulations. If the Council wishes to reopen the leatherback closure area to the Fishery, it must follow standard MSA procedures. It must not be allowed to do so under the guise of an EFP.

5. Violations of National Marine Sanctuaries Act

The proposed EFP also is in apparent violation of the National Marine Sanctuaries Act (“NMSA”) (16 U.S.C. § 1431 et seq.). Among the purposes of the NMSA are “to maintain the natural biological communities in the national marine sanctuaries, and to protect, and, where appropriate, restore and enhance natural habitats, populations, and ecological processes.” 16 U.S.C. § 1431(b)(3). To achieve these purposes, the NMSA requires that “Federal agency actions internal or external to a national marine sanctuary, including private activities authorized by licenses, leases, or permits, that are likely to destroy, cause the loss of, or injure any sanctuary resource are subject to consultation with the Secretary.” 16 U.S.C. § 1434(d)(1)(A) (emphasis added). This consultation provision requires the agency proposing the action to provide a written statement describing the action and the potential effects

10 In its response to comments on the FMP, NMFS claimed that the MBTA does not apply beyond the 3 nautical mile territorial sea and therefore it need not comply. This is simply wrong. As NMFS is or should be aware, in 2001 an Interior Solicitor’s Opinion concluded that the MBTA does in fact apply in the U.S. EEZ. NMFS’s conclusions to the contrary will not survive legal scrutiny.
on sanctuary resources no later than 45 days before the final approval of the proposed action. 16 U.S.C. § 1434(d)(1)(B). The action agency must follow the recommendations of the Secretary to avoid injury to any sanctuary resource or otherwise act to prevent and mitigate damage to such resources. 16 U.S.C. §§ 1434(d)(2), 1434(d)(3) & 1434(d)(4).

The Pacific Leatherback Conservation Area overlaps with the boundaries of three National Marine Sanctuaries, the Monterey Bay, Gulf of Farallones, and Cordell Bank National Marine Sanctuaries. The leatherback sea turtle as well as the marine mammals, seabirds and fish that will likely be caught by vessels fishing pursuant to the EFP are all resources protected by these sanctuary designations. The proposed EFP would clearly “destroy, cause the loss, or injure” these resources. We are unaware of any action by NMFS to comply with either the consultation provision of the NMSA or its substantive requirements. Absent such compliance, the proposed EFP cannot lawfully be issued.

6. Violations of Coastal Zone Management Act

The proposed EFP also is being processed in apparent violation of the Coastal Zone Management Act (“CZMA”) (16 U.S.C. § 1451 et seq.). CZMA requires that

[A]ny applicant for a required Federal license or permit to conduct an activity, in or outside of the coastal zone, affecting any land or water use or natural resource of the coastal zone of that state shall provide in the application to the licensing or permitting agency a certification that the proposed activity complies with the enforceable policies of the state’s approved program and that such activity will be conducted in a manner consistent with the program. At the same time, the applicant shall furnish to the state or its designated agency a copy of the certification, with all necessary information and data.

16 U.S.C. § 1456(c)(3)(A). The sea turtles, seabirds, marine mammals, and fish that will be caught and killed by vessels operating under the proposed EFP are all “natural resources” protected by California’s Coastal Management Program. Entangling and killing these animals clearly “affects” these resources triggering the consistency requirement of CZMA. We are unaware of the appropriate CZMA consistency certification in the application materials for either the 2006 or 2007 EFPs. Absent such a certification and evidence of California’s concurrence in that determination, the EFP applications must be rejected as violative of CZMA.

7. Violations of NEPA

While we believe that the proposed EFP is legally untenable because of the substantive requirements of the ESA, MMPA, MBTA, NMSA, CZMA and MSA, we also believe that the issuance of any such EFP would also violate the environmental review provisions of NEPA. NEPA’s fundamental purposes are to guarantee that: (1) agencies take a “hard look” at the environmental consequences of their actions before these actions occur by ensuring that the agency has, and carefully considers, detailed information concerning significant environmental impacts; and (2) agencies make the relevant information available to the public so that it may also play a role in both the decisionmaking process and the implementation of that decision. See, e.g., 40 C.F.R. § 1500.1. In this instance, NMFS has apparently completely reversed this process. NMFS has decided it wishes to allow drift-gillnet fishing in the area currently closed to such fishing to protect leatherback sea turtles. Such prejudging of
the outcome completely taints the NEPA process and is unlawful. See Metcalf v. Daley, 214 F.3d 1135, 1143 (9th Cir. 2000).

In addition to the flawed timing of the NEPA analysis, NMFS’s most significant violation of NEPA is its failure to prepare a full Environmental Impact Statement (“EIS”) for the EFP. Under NEPA:

an EIS must be prepared if “substantial questions are raised as to whether a project . . . may cause significant degradation of some human environmental factor.” To trigger this requirement “a plaintiff need not show that significant effects will in fact occur,” raising “substantial questions whether a project may have a significant effect is sufficient.”

Idaho Sporting Congress v. Thomas, 137 F.3d 1146, 1149-50 (9th Cir. 1998) (citations omitted) (emphasis in original).

In its processing of the 2007 EFP, we assume NMFS will rely on the same infirm EA as the agency used in its analysis of the 2006 EFP. 11 This EA itself explicitly or implicitly acknowledged that several of the Council on Environmental Quality (“CEQ”) “significance” factors triggering the need to prepare an EIS were met by the proposed 2006 EFP. See 40 C.F.R. § 1508. CEQ factors triggered by the 2006 EFP, included but were not limited to, whether the action involves “[u]nique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands [and] ecologically critical areas,” id. at § 1508.27(b)(3) (leatherback foraging areas); “[t]he degree to which the effects on the quality of the human environment are likely to be highly controversial,” id. at § 1508.27(b)(4) (EA at 6: “The proposed action is likely to be controversial”); “[t]he degree to which the action may establish a precedent for future actions with significant effects or represent a decision in principle about a future consideration,” id. at § 1508.27(b)(6) (the stated purpose of the EFP is to expand the Fishery); “the degree to which the action is related to other actions with . . . cumulatively significant impacts,” id. at § 1508.27(b)(7) (the related Longline EFP as well as all other impacts on the leatherback throughout its range); the “degree to which the action may adversely affect an endangered or threatened species,” id. at § 1508.27(b)(8) (previously found to jeopardize the leatherback); and whether “the action threatens a violation of Federal . . . law or requirements imposed for the protection of the environment.” Id. at § 1508.27(b)(10) (violates ESA, MMPA, MBTA, NMSA, CZMA and MSA). Each of these factors would also apply to the 2007 EFP now under considerations. Any of these factors, standing alone, is sufficient to require preparation of an EIS. Ocean Advocates v. United States Army Corps of Engineers, 402 F.3d 846, 865 (9th Cir. 2005). For the 2007 EFP, all of these factors require the preparation of an EIS.

In sum, reliance on an EA for the 2007 EFP is completely at odds with the letter and spirit of NEPA. Rather than cast aside compliance with NEPA in its rush to accommodate the gillnet industry in time for the upcoming fishing season, if NMFS wishes to consider modifications to the Fishery it must do so only in a careful manner after preparation of an EIS. We therefore believe that the only lawful course for NMFS to follow at this point is to either select the No Action Alternative in the Draft EA, or to forgo action until the completion of a full EIS that analyzes a full range of alternatives, including alternatives, such as the complete closure of the Fishery, which may be necessary to come into compliance with existing law.

11 In the Federal Register notice for the 2006 EFP NMFS stated that it would rely on the draft EA prepared for the Council’s consideration of drift-gillnet management measures. 71 Fed. Reg. 39055.
II. THE 2007 LONGLINE EFP MUST BE DENIED

The Council is also considering approval and recommendation of an EFP for 2007 which would allow the entry of a longline fishing vessel into the EEZ of California for the first time. As with the Drift-Gillnet EFPs, this proposed EFP is inappropriate and unwise as a matter of science and policy. Additionally, for reasons similar to those applicable to the 2006 and 2007 Drift-Gillnet EFPs, actual issuance of the Longline EFP by NMFS would violate a suite of laws, including the ESA, MMPA, MBTA, NMSA, CZMA, MSA, and NEPA. This proposed permit must also be denied.

A. The California Longline Fishery

Pelagic longline fishing involves the use of a monofilament line that stretches from 20 to upwards of 40 miles from a vessel and is set to given depth depending on the target species. Attached to the longline are additional lines to which are attached weights and baited hooks. A single longline fishing vessel may deploy several thousand hooks at one time.

In addition to the target species, usually swordfish, tunas, and sharks, longline gear catches non-target and undersized fish, sharks, sea turtles, marine mammals, and seabirds. Sea turtles, marine mammals, and seabirds all get caught on the baited hooks of longlines, or are entangled in the lines, and being air breathers, subsequently drown. Those that do not immediately drown often suffer serious injury, such as hook ingestion, condemning them to a slower death by starvation, internal bleeding, or infection.

Longlining for swordfish within the California EEZ has been prohibited since at least 1977 when the State of California promulgated regulations declaring that “Swordfish may be taken only with hand-held hook and line or handthrusted harpoon.” 14.C.C.R. § 107.12 Pelagic longlining more generally was prohibited by Fish and Game Code § 9028 which banned hook and line fishing gear longer than 900 feet. However, swordfish and other longline-caught fish caught outside the EEZ could be landed in California if a declaration indicating such intent was filed with the Department of Fish and Game prior to departure. F&G Code § 8113.

In light of this regulatory scheme effectively prohibiting longlining in the EEZ off California, but allowing the landing of longline-caught fish from outside the EEZ, the California-based longline fleet has historically been rather small, with most U.S. longline fishing in the Pacific being based out of Hawaii rather than California. From the 1980s to late 1990s, the California-based longline fleet fluctuated in size from about two to a couple dozen boats.

However, in November of 1999, the Court in Center for Marine Conservation, et al., v. National Marine Fisheries Service, et al., (Civ. No. 99-00152 DAE)(D. Hawaii) issued an injunction restricting longline fishing under the Hawaii FMP throughout much of the North Pacific. The injunction was designed to reduce sea turtle mortality, primarily to leatherbacks from shallow-set longlining targeting swordfish. In March 2001, NMFS issued an ESA Section 7 Biological Opinion on the Hawaii FMP and

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12 A separate provision of the Fish and Game Code, Section 8561, allowed fishing for swordfish with drift-gillnet gear, subject to numerous restrictions. These restrictions were largely carried over into federal regulations with the adoption of the HMS FMP in 2004.
concluded that continued operation of the FMP would jeopardize the continued existence of the leatherback, loggerhead, and green sea turtles. NMFS subsequently modified the Hawaii FMP, virtually eliminating for several years the Hawaii-based longline fishery for swordfish.

Subsequent to the Hawaii injunction and modification of the Hawaii FMP, numerous boats from Hawaii relocated to California, with up to 48 vessels operating out of California in 2000. Due to the fact that West Coast HMS fisheries were not subject to an FMP at that time, these vessels operated subject to virtually no federal regulation. Nevertheless, the California-based longline fishery caught and killed numerous federally protected species.

From August 1995 through 1999, California-based longline fishing vessels self-reported numerous interactions with sea turtles. Thirty-five leatherback, twenty-one loggerhead, nineteen olive ridley, and twelve green sea turtles were reported caught during this period. The self-reports of bycatch from this period also report the take of over one hundred albatross, a Hawaiian monk seal and an unidentified sea lion. From October 2001 to March 2003 NMFS placed limited observers on some of the California-based longline fishing vessels. These observers, monitoring only a fraction of the fishing effort, recorded entanglements of 23 loggerhead sea turtles, 2 leatherback sea turtles, and 1 olive ridley sea turtle. In August 2003, NMFS predicted (based on prior observer data and assuming that fishing effort remained the same as in 2002) that the California-based longline fishery was entangling 174 loggerhead sea turtles (47 killed) and 53 leatherback sea turtles (14 killed) each year.

In light of the high level of sea turtle take occurring in the California-based longline fishery, and given that NMFS was unwilling to enforce the ESA, and the Council was years behind schedule in finalizing the HMS FMP and bringing the fishery under federal management, in March 2000, the Center for Biological Diversity and Turtle Island Restoration Network filed suit under the ESA seeking to force NMFS to engage in Section 7 consultation on permits issued to California-based longline fishers pursuant to the High Seas Fishing Compliance Act of 1995 (“HSFCA”)(16 U.S.C.§ 5501 et seq.).

In August 2003, the Ninth Circuit ruled that NMFS was violating the ESA with regards to its management of the California-based longline fishery. Turtle Island Restoration Network, et al., v National Marine Fisheries Service, 340 F.3d 969 (9th Cir. 2003).

Shortly after the court ruled that the California-based longline fishery was operating in violation of the ESA, the Council and NMFS finally issued the long-overdue HMS FMP and accompanying regulations. 69 Fed. Reg. 18444 (April 7, 2004). The FMP brought the California-based longline fishery under federal management and included a provision prohibiting shallow-set longlining west of 150° W long. 50 C.F.R. § 660.712(2). However, in its biological opinion for the FMP, NMFS concluded that allowing shallow-set longlining east of 150° W long. would jeopardize the loggerhead sea turtle. NMFS therefore issued an RPA requiring the prohibition of shallow-set longlining east of 150° W long. NMFS instituted this closure pursuant to its authorities under the ESA. 69 Fed. Reg. 11540 (March 11, 2004); 50 C.F.R. § 223.206(d)(9).

Following the FMP and corresponding ESA regulations, most of the California-based longline fishers relocated to Hawaii where the formerly closed swordfish fishery was set to reopen with new management restrictions. A few vessels continued to fish intermittently from California using deep-set longlines to catch tuna outside the EEZ. However, deep-set longlining for tuna (either by California or
Hawaii-based vessels) has been suspended east of 150° W long. to address overfishing of bigeye tuna. 71 Fed. Reg. 38297 (July 6, 2006). Similarly, the Hawaii-based swordfish longline fishery has been suspended for exceeding authorized take of ESA-listed sea turtles. 71 Fed. Reg. 14416 (March 22, 2006).13

B. The Proposed 2007 Longline Exempted Fishing Permit

The Council is currently considering an EFP for the 2007 fishing season which would allow pelagic longlining within the EEZ off California for the first time. According to the “Situation Summary” contained in the Briefing Book for the November meeting, the Council has already effectively made its decision on the requested EFP.

The Council also preliminarily approved a second proposal for a single vessel to fish with longline gear within the West Coast Exclusive Economic Zone (EEZ), currently prohibited under the Fishery Management Plan for U.S. West Coast Fisheries for Highly Migratory Species (HMS FMP). That applicant originally proposed to start in the fall of 2006. But at the time of Council preliminary approval in March, he asked that his proposal be considered for the 2007 fishing season instead.

According to the EFP application, the “purpose of this EFP is to conduct a small scale (1 vessel) pelagic longline fishery within the West Coast EEZ to determine if longline gear is an economically viable HMS harvest substitute for drift gillnet (DGN) gear.” EFP App. at 1. The application describes the scale, location and duration of the EFP as follows.

EFP fishing will not occur within 30 miles of the coastline, or within the southern California bight. Each trip will consist of about 14 sets, approximately 14,000 hooks per trip (1,000 hooks per set x 14 sets). This EFP proposes 4 trips (56,000 hooks) during the period September thru December.

EFP App. at 6.

C. Violations of Law

In our discussion of the Drift-Gillnet EFPs above, we described how both the existing Drift-Gillnet Fishery and any proposed EFP violate numerous statutory provisions. We believe that the proposed Longline EFP is similarly infirm. Rather than repeat the statutory background for each violation, below we briefly described the likely violations of law associated with the processing and issuance of the proposed Longline EFP. Given these significant and largely insurmountable legal problems with the proposed EFP, it must be denied.

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13 While the closures of the deep-set longline fishery east of 150° W long., as well as of the Hawaii shallow-set longline fishery are both theoretically temporary measures, given the status of bigeye tuna and the dubious success of the mitigation measures for the Hawaiian fishery, we are doubtful that either of these fisheries can lawfully reopen.
1. **Violations of the ESA**

As with the Drift-Gillnet EFP, we believe issuance of the proposed Longline EFP would violate Sections 2, 7, and 9 of the ESA. Longline fisheries are known to hook, entangle, and kill ESA-listed sea turtles, marine mammals, and seabirds. As discussed above, NMFS itself has acknowledged that any further mortality to the critically endangered Pacific leatherback sea turtles would jeopardize the species. Until and unless technology is devised that eliminates the risk of injury or mortality to leatherbacks we cannot support any pelagic longline fishing in the Pacific. Such an approach is also consistent with the call put out by over 1000 international scientists from more than 100 countries and 300 non-governmental organizations from 62 countries calling on the U.N. to institute an immediate moratorium on pelagic longline fishing in the Pacific until measures can be put in place that eliminate such bycatch. See [http://www.seaturtles.org/press_release2.cfm?pressID=261](http://www.seaturtles.org/press_release2.cfm?pressID=261)

In addition to the Longline EFP’s impacts on the leatherback sea turtle, fishing pursuant to such a permit also puts at risk the loggerhead sea turtle. NMFS instituted the closure of shallow-set longlining east of 150° W long. in part to protect the Pacific loggerhead sea turtles. 69 Fed. Reg. 11540 (March 11, 2004); 50 C.F.R. § 223.206(d)(9). Given the take of loggerheads increases in El Nino years, and NOAA has declared El Nino conditions will continue to develop into 2007, the odds of a vessel fishing pursuant to the Longline EFP taking loggerheads are greatly increased. See [http://www.cpc.ncep.noaa.gov/products/analysis_monitoring/enso_advisory/](http://www.cpc.ncep.noaa.gov/products/analysis_monitoring/enso_advisory/)

The Longline EFP also puts at risk several species of ESA-listed marine mammals. Both sperm whales and humpback whales have observed entangled in identical fishing gear used by Hawaii-based pelagic longlining vessels. Killer whales are likewise known to interact with and become entangled in longline fishing gear. The Southern Resident population of killer whales (*Orcinus Orca*) was recently listed as endangered, and is known to seasonally occur in the range of the proposed EFP. Additionally, Steller sea lions and Guadalupe fur seals also may overlap with the proposed EFP and are subject to entanglement. In order to issue the proposed EFP, NMFS not only needs to undergo Section 7 consultation on each of these marine mammals, but also must obtain take authorization pursuant to both the ESA and Section 101 of the MMPA. We do not believe the EFP can meet the legal standards for such take authorization under either statute.

The issuance of the Longline EFP would likely violate the ESA based on impacts to the Short-tailed albatross. Self-reports of seabird interactions with the former California-based longline fishery acknowledged take of 100 albatross of various species. Dozens of albatross were also observed taken in the handful of trips with actual observer coverage. It is therefore reasonable to assume that Short-tailed albatross are likely to be entangled and killed if pelagic longline fishing is allowed off of California. Given the perilous status of the Short-tailed albatross, we do not believe than any additional take authorization for the species can be lawfully granted.

Finally, given the closure of shallow-set longlining east of 150° W long. was promulgated pursuant to NMFS’ authorities under the ESA, rather than under the MSA, we do not see how an EFP issued under the MSA could lawfully be issued in direct contravention of ESA regulations prohibiting such fishing. See 69 Fed. Reg. 11540 (March 11, 2004); 50 C.F.R. § 223.206(d)(9). If the permit applicant for the EFP wishes to fish in contravention of ESA regulations, the applicant must also apply for a permit under Section 10 of the ESA. Our understanding is that the applicant has not done so.
Moreover, we do not see how the standards of Section 10 could possibly be met by the proposed activities. The EFP must be rejected as inconsistent with the intent and letter of the ESA.\textsuperscript{14}

2. **Violations of the MMPA**

The Longline EFP cannot be issued without also violating the MMPA. As discussed above, take of ESA-listed marine mammals must be authorized under both the ESA and MMPA if it is to lawfully occur. We do not believe that the necessary “negligible impact” finding under the MMPA can lawfully be made for the ESA-listed species likely to interact with pelagic longline gear deployed in the EEZ off California. Therefore, no such permit can be issued and any take will be in violation of both the ESA and MMPA.

For non-ESA listed marine mammals, take in violation of the MMPA is also likely to occur. Both the Hawaii and Atlantic longline fisheries are categorized as Category 1 fisheries on the 2006 List of Fisheries, while the remnant California-based deep-set longline fishery is listed as a Category 2 fishery. Only the Atlantic longline fishery has a take reduction team to address marine mammal bycatch. It would be unwise and unlawful to allow an additional marine-mammal killing fishery to operate without a take reduction team prior to at least initiating the take reduction process for these other two longline fisheries. Additionally, a Category 1 or 2 fishery is by definition taking marine mammals at levels above ZMRG. Given the statutory deadline for reaching ZMRG has already passed, we do not believe that issuing an EFP that would result in take of stocks of marine mammals where mortality and serious injury are already above ZMRG is consistent with the ZMRG mandate of the MMPA.

The most likely species of non-ESA listed marine mammals to be taken by fishing pursuant to the Longline EFP are Risso’s dolphins and short-finned pilot whales. Take of pilot whales from the Drift-Gillnet fishery is already near PBR, and is of course well over ZMRG. Take of even a single pilot whale by the Longline EFP would put mortality and serious injury to the stock over PBR. Pilot whales are the most frequent marine mammal species encountered by the Atlantic longline fishery. There is no reason to believe that they would not also be taken by a similar fishery off California. Until and unless, a take reduction plan is in place that that reduces pilot whale mortality to ZMRG, NMFS cannot authorize any fishing activity through an EFP which is likely to result in additional take of the species.

3. **Violations of the MBTA**

As explained above with reference to Drift-gillnets, the MBTA applies to U.S. fisheries that take migratory birds. It is undisputed that longline fishing kills seabirds protected by the MBTA. Fishing pursuant to the Longline EFP runs the significant risk of hooking and killing all three species of North Pacific albatross. Each of these species is recognized by the IUCN as imperiled. The most likely species to be killed by the EFP is the Black-footed albatross, a species under petition for listing under the ESA. Absent a permit under the MBTA authorizing the take of the Black-footed albatross and other migratory birds, the EFP cannot lawfully be issued.

\textsuperscript{14} All other violations of the ESA by the Longline EFP are substantially similar to those of the Drift-Gillnet EFPS and therefore will not be repeated here.
4. Violations of MSA

The proposed EFP is requested to “determine if longline gear is an economically viable HMS harvest substitute for drift gillnet (DGN) gear.” EFP App. at 1. This does not meet the regulatory criteria for issuance as it does not fall within the categories enumerated at 50 C.F.R. § 660.745. Moreover, given there is no way a longline fishery using current technology can lawfully operate in the EEZ off California, such a fishery is not “viable” by definition. NMFS cannot issue the permit.

5. Violations of National Marine Sanctuaries Act

The proposed Longline EFP states that “EFP fishing will not occur within 30 miles of the coastline, or within the southern California bight.” This language is vague enough that it does not completely foreclose fishing within designated marine sanctuaries. Any EFP issued must include such geographical limitations so as to explicitly preclude its operation with any National Marine Sanctuary. To do otherwise would violate the procedural and substantive provisions of the NMSA as discussed above with reference to the Drift-Gillnet EFPs.

6. Violations of Coastal Zone Management Act

The proposed Longline EFP suffers from the same legal deficiencies under CZMA as the Drift-Gillnet EFPs discussed above. The Council and NMFS must reject the proposed EFP until and unless compliance with CZMA is assured.

7. Violations of NEPA

While we believe that the proposed Longline EFP would be legally untenable because of the substantive requirements of the ESA, MMPA, MBTA, NMSA, CZMA and MSA, we also believe that the issuance of any such EFP would violate the environmental review provisions of NEPA because there is no indication that the Council or NMFS has prepared a full EIS as required by law. The factors triggering the EIS requirements of NEPA are discussed in the Drift-Gillnet section above. These same factors are implicated by the Longline EFP. NMFS and the Council must prepare an EIS, and solicit public review and comment on it before taking any further action with regard to the Longline EFP.

III. CONCLUSION

As the above makes clear, we believe that issuance of either the Drift-Gillnet EFP or the Longline EFP would violate numerous statutory provisions, including the ESA, MMPA, MBTA, MSA, NMSA, CZMA, and NEPA. We therefore recommend the Council and NMFS reject each of the proposed EFPs. Thank you for your concern

Sincerely,

/s/
Brendan Cummings
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cc

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RE: Agenda Item C-3: EFP Application for Longline Fishery

Dear Mr. McIsaac, Mr. Hansen and members of the Council:

On behalf of the undersigned organizations we are writing to oppose the issuance of a proposed exempted fishing permit (EFP) for a longline fishery within the US West Coast Exclusive Economic Zone (EEZ). The proposed EFP will undermine successful conservation measures protecting the critically endangered leatherback sea turtle, valuable fish stocks, and other marine life by allowing this non-selective gear type into areas where it is currently prohibited.

Pelagic longlining is a fishing method with a low degree of selectivity that consists of a main line up to 60 miles in length from which over a thousand hooks can be deployed that are left to soak for up to 10 hours. As a result a significant part of a pelagic longline fishery is bycatch that is caught on the hooks or entangled in the lines. Bycatch species of longline fishing include critically endangered leatherback sea turtles, loggerhead sea turtles, whales, dolphins, seals, sea lions, sea birds, sharks, billfish, and other fish species. This bycatch is either thrown back, often dead or injured, or alternatively commercialized, and places additional pressures on protected species and already depleted fisheries.

Due to concerns of the effects of such an indiscriminate fishing method on the marine environment, pelagic longline fishing has been prohibited within 200 miles of the California and Washington coast for over 15 years. In March 2004, this ban was extended to the entire West Coast Economic Exclusive Zone (EEZ) for all pelagic longlining, and to the high seas for West Coast-based shallow-set swordfish pelagic longlining. These important conservation measures have been successful in helping to protect the target and non-target species caught or entangled by this non-selective gear type. The detrimental effects of pelagic longlining on marine species have been demonstrated by the US
domestic Atlantic and Hawaii-based longline fisheries, both of which have a long history of closures and regulations due to bycatch problems and the depletion of target species.

We note that although the applicant initially requests an EFP for a single longline vessel, the applicant also proposes the possibility of expanding and developing this longline fishery within the US West Coast EEZ to include up to 70 or more vessels. Given the above outlined concerns we believe the development and expansion of such a pelagic longline fishery within the US West Coast EEZ would be inappropriate. The EFP would weaken successful conservation measures for endangered sea turtles and other protected species, place increased pressure on already overfished and depleted fish stocks, and undermine the health and integrity of the marine ecosystem. Therefore, we respectfully request that the PFMC rejects the EFP application for a pelagic longline fishery.

Sincerely,

Karen Steele
Save the Leatherback Campaign Coordinator
Sea Turtle Restoration Project

Sharon B. Young
Marine Issues Field Director
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The following two letters, previously sent to Rodney McInnis, were submitted to the Council as part of public comment by Karen Steele, Save the Leatherback Campaign Coordinator, Sea Turtle Restoration Project.
August 9, 2006

RE: EFP Application for the Drift-Gillnet Fishery (I.D. 070506D)

Dear Mr. McInnis:

On behalf of the undersigned organizations and our more than 15 million combined members and activists worldwide, we are writing to oppose the issuance of a proposed exempted fishing permit (EFP) to expand the swordfish/thresher shark drift-gillnet fishery into current time/area closures. The proposed EFP will undermine successful conservation measures protecting critically endangered leatherback sea turtles and other marine wildlife by allowing drift-gillnets to be used in areas along the California and Oregon coastline in which this highly indiscriminate gear type is currently prohibited.

The California/Oregon drift-gillnet fishery has a long history of bycatch problems. According to observer data from the National Marine Fisheries Service (NMFS), the fishery has discarded more than half of its fish catch each year for the past 15 years. Those discards include recreationally valuable and depleted species, such as striped marlin, as well as many fish species that have no active management measures, harvest caps or even stock assessments. The fishery also entangles and kills protected and endangered species, including dolphins, whales and sea turtles.

Since 2001, portions of the California and Oregon coastline have been closed to drift-gillnet fishing from August 15th through November 15th to protect endangered leatherback sea turtles which seasonally inhabit these waters. Scientists warn that unless fishing pressure is significantly reduced, leatherback turtles whose nesting population has plummeted from 91,000 in 1980 to fewer than 5,000 in 2002, will likely become extinct. Since the time/area closure was instituted, there have been no observed takes of leatherbacks in the drift-gillnet fishery. Satellite tracking data affirms that the existing closed area functions as an important foraging spot for migratory leatherback turtles. We do not believe there is sufficient evidence to justify rolling back these critical protective measures to allow increased drift-gillnet fishing.

Given the success of the closure, it is wholly inappropriate to weaken protections and allow drift-gillnet vessels in areas where they are likely to entangle and kill protected and critically endangered marine species. The existing time/area closures comply with domestic and international conservation mandates and are consistent with the best available scientific information. The EFP will compromise sea turtle conservation efforts and undermine the health and integrity of the marine ecosystem. Therefore, we respectfully request that NMFS reject the exempted fishing permit application.
Sincerely,

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RE:  EFP Application for the Drift-Gillnet Fishery (I.D. 070506D)

Dear Mr. McInnis:

On July 11, 2006 the National Marine Fisheries Service (NMFS) announced their preliminary determination that an application for an exempted fishing permit (EFP) for the California/Oregon Drift Gillnet Fishery warrants further consideration. The EFP, if issued, will undermine conservation measures protecting the critically endangered leatherback sea turtle as well as seabirds, marine mammals, sharks and other fish by allowing drift-gillnets to be used in areas along the California and Oregon coastline in which this destructive gear type is currently prohibited.

Since 2001, areas north of Point Conception to an intersect with the Oregon coast and out beyond the Exclusive Economic Zone (EEZ) to 129° West longitude have been closed to drift-gillnet fishing from August 15th through November 15th in order to protect leatherback sea turtles which seasonally inhabit these waters. The proposal under consideration by NMFS would allow drift-gillnets back into the seasonally closed area when leatherbacks are present. Recent satellite tracking data affirms that the current closures reflect critical foraging areas for the migratory leatherback populations.

The leatherback sea turtle (*Dermochelys coriacea*) tops the list of species being driven to the brink of extinction in the Pacific by the global expansion of industrial fishing. The Pacific leatherback turtle’s nesting population has plummeted from 91,000 in 1980 to fewer than 5,000 in 2002. Leatherback sea turtles are listed as endangered under the U.S. Endangered Species Act and critically endangered by the World Conservation Union’s (IUCN) red list of threatened species. In 2006, the IUCN’s Marine Turtle Specialist Group’s “State of the World’s Sea Turtle” Report identified leatherbacks in the Pacific as the leading issue in Global Sea Turtle Conservation and that conservation measures are more urgently needed in the Pacific.

Leading scientists warn that unless immediate and significant steps are taken, the leatherback sea turtle, which has inhabited the oceans since the time of the dinosaurs 100 million years ago, will soon become extinct. Moreover, the plight of the leatherback sea turtle, the world's largest and most wide-ranging sea turtle, may foreshadow a host of extinction events that may significantly alter the oceans’ ecosystem functions.

The current drift-gillnet closure has provided a successful working balance between the interests of fishers and the urgent need to protect the critically endangered leatherback
sea turtle. During the drift-gillnet closures, this fishery, which targets swordfish, tuna and sharks, had no recorded takes of leatherback sea turtles. Such successful time/area closures, which eliminate the overlap of drift-gillnet fishing gear with the presence of leatherback sea turtles, should remain in place in the Pacific where the leatherback is at the greatest risk of extinction.

The existing time/area closures illustrate compliance with domestic and international conservation mandates and are consistent with the best available scientific information.

We, the undersigned, urge the National Marine Fisheries Service to disapprove the EFP application for the drift-gillnet fishery and maintain the current time/area closures that prohibit the deployment of drift-gillnet fishing gear in areas off the California and Oregon coasts when leatherback sea turtles are likely to inhabit these waters.

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As of August 7th, 224 scientists from 39 countries have signed this letter. Affiliation for identification purposes only. Listing of affiliation does not imply endorsement by that institution.

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Virginia  
United States of America

Sue Sargent  
Coastal and Marine Coordinator  
Burnett Mary Regional Group for NRM Inc.  
Australia

Dr. Raymond A. Saumure  
Senior Conservation Biologist  
Shark Reef at Mandalay Bay  
Nevada  
United States of America

C. Thomas Schaefer  
Lecturer  
University of Washington School of Oceanography  
Washington  
United States of America

Dr. Christiane Schelten  
Programme Officer  
Frankfurt Zoological Society  
Tanzania

Beatrix G. Schramm  
Conservation Biologist  
Independent  
United States of America

David Sinn, Ph.D.  
Research Fellow  
University of Tasmania  
Australia
Tim Skelton M.Sc.
Head of Reptiles & Amphibians
Bristol Zoo Gardens
Bristol
England
United Kingdom

Jason Schratwieser
Conservation Director
International Game Fish Association
Florida
United States of America

Marina Sequeira
Biologist
Institute for Nature Conservation
Lisbon
Portugal

F. Richard Sheffield, Ph.D.
General Curator
Parque Zoologico de Leon
Mexico

Dr Rob Simmons
Research Associate
FitzPatrick Institute
University of Cape Town
Rondebosch
South Africa

Jennifer Slate
Assistant Staff Scientist
Entrix, Inc.
Texas
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Birgith Sloth
Nature Conservation and Species Management Specialist
Danish Section
Society for the Conservation of Marine Mammals
Humlebaek
Denmark

Ronald M. Smith
Instructor
Mercer County Community College Department of Biology
New Jersey
United States of America

Gill M Sorg, MS, TSP
President
Mesilla Valley Audubon Society
Las Cruces
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James R. Spotila, PhD
Betz Chair professor of Environmental Science
Drexel University
Pennsylvania
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Ed Standora, Ph.D.
Biology Department
State University College
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United States of America

Dr. Jonathan Stark
Research Scientist
Environmental Protection and Change Program
Australian Antarctic Division, Department of Environment and Heritage, Australian Government
Tasmania
Australia

Dr. Scott Charles Stark
Environmental Chemist
Australian Antarctic Division, Department of Environment and Heritage
Tasmania
Australia

Nadia Halina Stegeman
DVM/MPH student
Tufts School of Veterinary Medicine
Massachusetts
United States of America

Todd Steiner
Director
Turtle Island Restoration Network
California
United States of America

Edna Stetzar
Biologist
Department of Natural Resources and Environmental Control
Division of Fish and Wildlife
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United States of America

Anthony Steyermark
Assistant Professor
University of St. Thomas
Minnesota
United States of America

Joanna Stockill
Research Associate/Project Coordinator
'The North Sea: A Sustainable Future'
The Dove Marine Laboratory
School of Marine Science and Technology
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United Kingdom

Philip Stoddard
Professor
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Dr. Mei Sun
Associate Professor
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Hong Kong

Jack S. Suss
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United States of America
Andrea Swensrud  
Program Manager  
Marine Science Institute  
California  
United States of America

Paul Switzer  
Associate Professor of Biological Sciences  
Eastern Illinois University  
Illinois  
United States of America

Eileen Taft  
Florida  
United States of America

Simon Talbot  
Boating, Diving & Field Officer  
University of Tasmania & Tasmanian Aquaculture and Fisheries Institute  
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Hobart TAS 7001  
Australia

Dr. John Terborgh  
James B. Duke Professor of Environmental Science  
Co-Director of the Center for Tropical Conservation  
Duke University  
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Allen To Wai-Lun  
Research Postgraduate  
Department of Ecology & Biodiversity  
The University of Hong Kong  
Hong Kong

Elaina Todd  
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UnderWater World  
Guam  
United States of America

Linda V. Martin Traykovski  
Research Associate  
Biology
Woods Hole Oceanographic Institution  
Massachusetts  
USA  

Dr. Marcus Trett  
Scientific Director  
Physalia Limited Consultant & Forensic Ecologists  
United Kingdom  

Marcelino I. Tumanda, Jr. Ph.D.  
Chancellor  
Mindanao State University at Naawan  
Misamis Oriental  
Philippines  

Sue Tuxbury  
Restoration Ecologist  
Save The Bay Narragansett Bay  
Rhode Island  
United States of America  

Enriqueta Velarde  
Centro de Ecología y Pesquerías  
Universidad Veracruzana  
Boca del Río, Veracruz  
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Mário E. C. Vieira, Ph.D.  
Associate Professor  
Oceanography Department  
US Naval Academy  
Maryland  
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Dr Rachel Warren  
Senior Research Fellow  
Tyndall Centre  
Zuckermann Institute
University of East Anglia
Norwich
United Kingdom

Dr. Andreas Weber
Berlin
Germany

Fran Weiss
United States of America

Dr. W Hugh Wheir, DVM
Founder/President
Animal Alliance
New Mexico
United States of America

Dr. Nerida Wilson
Department of Biological Sciences
Auburn University
Alabama
United States of America

John Zardus
Research Fellow at Kewalo Marine Lab
University of Hawaii
Hawaii
United States of America

Douglas Zeppelini, PhD.
Scientific Board
Sea Turtle Management
Paraiba
Brazil

Carmel Zetts
Sunset Beach
Turtle Coordinator
Florida
United States of America

Dr. Frank Zindel
Turtle Foundation
Germany
October 26, 2006

Mr. Donald McIsaac
NOAA Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland OR 97220

Dear Donald,

As a Friend of the Pacific, you’re aware that all is not perfectly well with the immensely rich and diverse ecosystem off the West Coast. For instance, all turtles and most species of large whales are still considered threatened or endangered. One of the main activities that threatens their continued survival or ability to rebound is fishing with indiscriminate gears.

The West Coast fishery most deadly to these animals is the drift gillnet fishery for swordfish, tuna and thresher shark. Unfortunately a proposal is currently in front of the National Marine Fisheries Service to re-open the fishery in an area closed five years ago to protect one of the most endangered animals in the sea, the Pacific leatherback sea turtle. As of this writing, the decision had not been publicly made, but all indications are that the proposal is seriously being considered.

Today, Oceana released a report “Net Casualties” that further expands on turtle casualties nationwide – nearly 10,000 are known to be killed and more than 334,000 injured. To see a full copy of the report please visit http://www.oceana.org/index.php?id=1684.

We also hope you find the attached OpEd, which appeared in a recent commentary section of the Sunday Monterey Herald, interesting, informative, and useful in your efforts to help conserve the Pacific coast. Please spread the word to help end the consideration of reopening the Pacific Leatherback Conservation Area, for 2006 and for the years to come.

Sincerely,

[Signature]

Susan Murray
Acting Director, Pacific

Enclosure
By SANTI ROBERTS
Guest commentary

Pacific leatherback sea turtles have survived on this planet for nearly 100 million years. They have endured ice ages, major volcanic events, meteor impacts, and most every predator in the sea. However, they, and other endangered marine life, cannot survive being caught and drowned in drift gillnets.

Knowing this, in 2001, the National Marine Fisheries Service put into place a three-month drift gillnet closure in a large area off the coast of California that would allow leatherback turtles to safely migrate and feed in U.S. waters, including Monterey Bay. The closure—the Pacific Leatherback Conservation Area—has been so effective that no leatherback turtles have been reported drowned in the entire fishery since protections were put in place.

So, why then is the Fisheries Service now considering reopening this area year round to up to 30 drift gillnet vessels?

It's not because the gear has improved. Drift gillnets remain as destructive as they were prior to the 2001 closure. In addition to endangered turtles, dolphins and porpoises, seals and sea lions, and even large whales drown in this fishery. Between 1996 and 2002, more than 50 turtles, 700 seals and sea lions, over 1,000 dolphins and porpoises, and 35 large whales were killed.

These air-breathing animals often die when caught in these huge nets, long enough to loop around a football...
field six times. In fact, drift gillnets are so harmful to ocean life that they are banned on the high seas and in the waters of several states, including Washington, Georgia and Florida. The proposal before the Fisheries Service would open up the protected area as long as there are fishery observers on each vessel and caps on the number of leatherbacks and some whale species that can be killed. These controls will help limit the number of leatherback turtles and certain large whales killed.

Unfortunately, with these critically endangered species, the survival of every single one counts. What is more, there will be no caps on the number of other sea turtles, fin whales, gray whales, elephant seals, California sea lions and dolphins killed. Nor will there be any caps on the amount of fish simply discarded, dead and dying, which in this fishery amounts to more than is kept.

It is also not because of economics; the proposed reopening is not expected to provide significant economic benefit. The industry folks argue that the closed area has directly led to the decline in the drift gillnet fishery. But this fishery was waning long before the closure was implemented, with the number of active vessels dropping by half between 1994 and 2000. The Fisheries Service has concluded that the "economic impact of an increase in (drift gillnet) effort is likely to differ little from zero." In other words, there is no predicted economic gain from this proposed opening.

The proposed opening therefore makes no sense for either scientific or economic reasons. It also makes no sense for political reasons, as the public has shown overwhelming opposition. Further, it would seem to fly in the face of the recent Governors' Agreement on Ocean Health, where the states of California, Oregon and Washington have explicitly recognized the need for addressing the declining health of our ocean and the need to sustain marine wildlife populations.

In California, we pride ourselves on being progressive in ocean management. If the Fisheries Service approves the opening of the Pacific Leatherback Conservation Area, it will be a hugely irresponsible step backward. Just as we are protecting areas in our state waters through the Marine Life Protection Act, we would be re-opening areas in our federal waters to a wasteful and destructive way of fishing.

The question ought not to be how do we open this area, but rather, how can we catch swordfish, tuna and thresher shark without sacrificing so many other marine creatures? If we don't take the time to find that answer, Pacific leatherback sea turtles may go extinct on our watch.

This was written by Larry Crowder, director of the Duke Center for Marine Conservation at Duke University; Michael Sutton, director of the Center for the Future of the Oceans at the Monterey Bay Aquarium; Cindy Walter of Passionfish restaurant in Pacific Grove; and Santi Roberts, California project manager for Oceana.

What do you think? Those concerned about the proposed reopening should fax comments to William Hogarth, director of NOAA Fisheries Service, at (301) 713-2384, or e-mail bill.hogarth@noaa.gov or Jim Lecky at jim.lecky@noaa.gov.
November 7, 2006

Mr. Donald McIsaac  
Executive Director, Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 200  
Portland, OR 97220-1384

RE: Agenda Item C.3 - 2007 Shallow Set Longline Exempted Fishing Permit Application

Dear Mr. McIsaac and the Council:

The Ocean Conservancy submits the following comments opposing the exempted fishing permit (EFP) application to reestablish a Pacific longline fishery. Pelagic longline fishing has been banned within 200 miles of the California coast for well over a decade, and in March 2004 this ban was extended to the entire west coast EEZ for all pelagic longlining, and to the high seas beyond the EEZ for west coast-based shallow-set pelagic longlining. The proposal currently before the Pacific Fishery Management Council (“Council”) for consideration would permit an "exempted" longline fishery within the EEZ off of California. We do not believe there is sufficient evidence to justify allowing a renewed longline fishery. Therefore, we urge the Council and the National Marine Fisheries Service (NMFS) to reject the longlining EFP.

We are concerned that reintroducing pelagic longlining off the U.S. west coast poses a grave threat to endangered and protected species including marine mammals, seabirds and Pacific loggerhead and leatherback populations. In recent decades, incidental and intentional take throughout the Pacific has affected sea turtles to the point that some populations are hovering on the brink of extinction. Fisheries mortality has been especially problematic for loggerheads and leatherbacks, with overall nesting population reductions in excess of 80 percent. Although the World Conservation Union (IUCN) has not yet evaluated loggerheads regionally, Pacific loggerheads, like Pacific leatherbacks, will qualify as “Critically Endangered” on the Red List of Threatened Species, based on nesting population reductions of 80 percent or more in the last three generations. Both loggerheads and leatherbacks have suffered precipitous declines in less than three generations. The two major loggerhead populations in the Pacific are found in Japan and Australia, with less than 1,000 and 300 turtles, respectively, nesting annually. While the status of the leatherback has been the focus of much attention in recent years, conservation protection and support is as critical for the loggerhead as for the leatherback. According to the latest surveys, there are more nesting leatherbacks in the Pacific than nesting loggerheads.

The Pacific longline fisheries out of California and Hawaii were both previously found to cause jeopardy to leatherback and loggerhead sea turtle populations under the Endangered Species Act.
(ESA). Consequently, a moratorium on pelagic longline fishing east of 150 degrees West longitude was imposed by NMFS in 2004 to guard against jeopardy to loggerheads even after the Pacific Council banned longlining west of 150 degrees West longitude. These far reaching closures demonstrate just how vulnerable threatened and endangered sea turtles are to the impacts of fishing. As the Council is well aware, the Hawaii-based shallow-set longline fishery was closed for a number of years because of its impacts on sea turtles. It was allowed to re-open in 2004 subject to the conditions that only large 18/0 circle hooks be used, that an effort cap be established to control the number of longline sets, and that a hard cap on turtle take be established to close the fishery if it approached the limits of its take authorization. The annual hard cap on take of loggerheads was reached in March of this year, after the fishery operated for less than three months. See 71 Fed. Reg. 14824 (March 24, 2006).

The Ocean Conservancy has repeatedly called for a comprehensive evaluation of the impacts of all U.S. longlining in the Pacific on imperiled sea turtle populations, yet that essential step toward understanding the effects of Pacific longlining on Pacific turtle populations still has not occurred. It would be inappropriate, to say the least, to consider allowing the capture of turtles by a California based fishery – EFP or otherwise – when the Hawaii fishery was closed for exactly this reason just 6 months ago. The Hawaii and California based fleets fish in the same manner, often in the same area, and catch the same turtles. See 69 Fed. Reg. 11540, 11543 (March 11, 2004) (preamble to final rule closing Pacific longline fishery east of 150 degrees West long.). In addition, the fleets consist of many of the same boats as they have had a history of moving back and forth to avoid the closures to protect sea turtles that have alternated between Hawaii and California in recent years. A standard “cumulative effects” analysis is not enough in this case where the fisheries often act as a single unit.

The Council also must consider the collective impact of the proposed longlining EFP along with the currently pending drift gill-net EFP. With only one week remaining for the 2006 permit period, NMFS has yet to issue a final approval for the drift gillnet EFP. Presumably, the applicant will be seeking approval of the drift gillnet EFP for 2007, and managers will be faced with two new exempted fishing permits coming into effect at the same time, and the additional impacts for Pacific turtles that they will entail. As such, we urge the Council to proceed with caution as far as taking any steps to reestablish longlining on the California coast. If the Council does approve the EFP, it should ensure that it includes stringent conservation measures that will minimize the impact of the fishery on loggerhead and leatherback sea turtles, including requiring the use of 18/0 circle hooks, 100% observer coverage, and hard caps on both fishing effort and turtle take.

To the extent that Pacific Council is interested in transitioning away from destructive gill-net fishing to a more selective gear type in order to target swordfish and other highly migratory fish stocks, we recommend that the Council and NMFS reframe this issue as a broader policy discussion, rather than approaching it in piecemeal fashion through the exempted fishing permit process. Current longline closures have provided a successful working balance between the interests of fishers and the urgent need to protect critically endangered leatherback and loggerhead sea turtles. It would be irresponsible to re-establish the longline fishery without the
necessary conservation safeguards and a thorough environmental impacts analysis. The EFP application currently under review is not predicated on a comprehensive assessment of sea turtle populations and fishery interactions and does not adequately consider the associated impacts on endangered and protected species and the marine ecosystem. Therefore, we respectfully request that the PFMC and NMFS reject the proposal to reestablish the Pacific longline fishery.

Sincerely,

Meghan Jeans
Pacific Fish Conservation Manager
The Ocean Conservancy

Dr. Wallace J. Nichols
Senior Scientist
The Ocean Conservancy
Dear Mr. Hansen and Dr. McIsaac,

I support the continued closure of the Pacific Leatherback Conservation Area to drift gillnets. Since the closure, not a single leatherback sea turtle has been caught and killed in the entire fishery.

As you consider the Drift Gillnet Exempted Fishing Permit for 2007 and beyond, please remember the critically endangered Pacific leatherback sea turtle may be within 30 years of extinction. It would be irresponsible to dissolve the conservation measures currently in place to protect them.

Sincerely,

Name: Catherine Carlson
Address: 5623 NE Caddy Dr.
City: Hillsboro
State: OR Zip: 97124
Email: catenka@hotmail.com

Date: 11/3/2006

Mr. Don Hansen, Chair
Dr. Donald McIsaac, Director
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

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For more information, please visit:
WWW.OCEANA.ORG

Photo: hatchling Pacific Leatherback sea turtle; by Suzanne Livingstone

As of the close of the supplemental public comment deadline (5:00 p.m., November 6, 2006) the Council had received 84 postcards with this message.
As of the close of the supplemental public comment deadline (5:00 p.m., November 6, 2006) the Council had received more than 220 emails with a message opposing the issuance of the exempted fishing permit for the drift gillnet fishery because of concern for the impact on leatherback sea turtles, marine mammals, and other protected species. A representative sample of the email messages is included here. All of the emails may be accessed on the Council’s website at http://www.pcouncil.org/bb/2006/bb1106.html#highly as Agenda Item C.3.c, Supplemental Public Comment.
I want this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed. This closure should remain in place far into the future -- not just for 2006. Thank you for listening.

Jennifer Spiller
Membership Assistant
Monterey Bay Aquarium
1800-840-4880
(831) 648- 4926
jspiller@mbayaq.org

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hi. my name is priya and im just a teen but i understand the importance of sealife, as u may not. sea turtles...they've been around for a pretty long time. but if you continue to allow their population to decline, they wont be around anymore...will they? they are gentle creatures. what did they do to deserve this? probably nothing except for laying their eggs on beaches. but that hardly violates any law. death sentence is cruel and disgusting. evil men get condemned to this punishment. but the sea turtles...what the hell did they do?
Subject: Agenda Item C. 3  
From: "Margaret Fawcett" <mgfawcett@earthlink.net>  
Date: Tue, 31 Oct 2006 15:03:20 -0800  
To: <pfmc.comments@noaa.gov>

Dear Pacific Fishery Management Council:

This email is to urge you to keep closed, during the 3 month migration period of Pacific leatherback turtles, the fishery off the coast of California and Oregon to the use of drift gillnets. This ancient specie continues to need protection and with their numbers so low, the world cannot afford to lose to drowning even one such turtle. Your willingness to keep this area closed during this migratory three month period has helped protect this critically endangered specie as well as all the other mammals which also can die from drowning from drift gillnets.

Please once again, and for subsequent years until the species level is no longer endangered or until drift gillnets have been modified so as to no longer be a threat, close this area for at least this 3 month migratory period.

Thank you for your consideration of my request.

Sincerely,

Margaret Fawcett  
72 Cypress Place  
Sausalito, CA 94965
To Pacific Fishery Management Council member:

I am writing to voice my concern about the proposal to reopen areas on the California coastline to gillnet vessels. When the National Marine Fisheries Service put into place a three-month drift gillnet closure in a large area off the coast of California it allowed leatherback turtles to safely migrate and feed in U.S. waters. The closure -- the Pacific Leatherback Conservation Area -- was very effective.

I do not understand why the Fisheries Service is now considering reopening this area year round to up to 30 drift gillnet vessels.

As a volunteer at the Marine Mammal Center in Sausalito, California, I have seen marine mammals encased in gillnets. It is clearly a painful death for these animals caught inside netting so strong that it can cut into their braincase. Once they are caught, there is no way out. I also have seen photos and heard stories from marine biologists about the extensive damage that gillnets have done to pelagic birds, harbor porpoises, dolphins, seals and whales.

We have evolved away from using gillnets. The fishing industry has adapted to these changes. I urge National Marine Fisheries Services to keep with the current policy.

Thank you,

Beth Cataldo
692 8th Ave.
San Francisco, CA 94118
Subject: Pacific Leatherback Conservation Area Closure  
From: Starry Sprenkle <starry_s2002@yahoo.com>  
Date: Tue, 31 Oct 2006 14:42:53 -0800 (PST)  
To: pfmc.comments@noaa.gov  

Dear Pacific Fishery Management Council:

The struggles that migratory species like the Pacific Leatherback turtle face to survive are astounding. If we do not do our part to protect them off of the coasts of the US, how can we expect poorer countries to protect them?

Please keep California and Oregon waters safe for turtles by keeping the Pacific Leatherback Conservation Area closed during the migratory season for the turtle, as it has been successfully for the last years. It is not a permanent closure of the fishery, just a temporary one every year. The fishermen can find ways to cope with this closure and secure other income, or increase the price of their goods.

The drift gillnet fishery is simply not compatible with the survival of this species. It is far too destructive. As an ecologically vital step in the conservation of this species, this closure should remain in place far into the future -- not just for 2006. Please don’t allow all sides to waste time and energy year after year debating this—make a multiple year closure, to encourage fishermen to find permanent solutions elsewhere.

Sincerely,

Starry Sprenkle  
Salinas/Monterey, CA

Starry Dawn Sprenkle

Want to start your own business? Learn how on Yahoo! Small Business.
Dear Pacific Fishery Management Council:

The struggles that migratory species like the Pacific Leatherback turtle face to survive are astounding. If we do not do our part to protect them off of the coasts of the US, how can we expect poorer countries to protect them?

Please keep California and Oregon waters safe for turtles by keeping the Pacific Leatherback Conservation Area closed during the migratory season for the turtle, as it has been successfully for the last years. It is not a permanent closure of the fishery, just a temporary one every year. The fishermen can find ways to cope with this closure and secure other income, or increase the price of their goods.

The drift gillnet fishery is simply not compatible with the survival of this species. It is far too destructive. As an ecologically vital step in the conservation of this species, this closure should remain in place far into the future -- not just for 2006. Please don't allow all sides to waste time and energy year after year debating this - make a multiple year closure, to encourage fishermen to find permanent solutions elsewhere.

Sincerely,

Starry Sprenkle
Salinas/Monterey, CA

Starry Dawn Sprenkle

Want to start your own business? Learn how on Yahoo! Small Business.
Subject: Gil net fishing
From: "Stacy Wilson" <wilson.stacy@gmail.com>
Date: Tue, 31 Oct 2006 14:10:54 -0800
To: pfmc.comments@noaa.gov

Dear Sirs,
How can you even consider lifting restraints on gillnet fishing??? There are so many species that rely on us to help them survive. Letting this practice continue would permanently harm and eliminate these beautiful creatures from our oceans forever. Do the right thing; please continue the gillnet fishing restrictions and continue to impose more and more restrictions on their usage in our oceans. Hopefully one day there will be no gillnets and our oceans will thrive once again.
Thank you for your consideration.
Stacy Wilson
344 Colville Dr
San Jose, CA 95123
408.449.0313

--
Be Yourself
Everyone Else Is Already Taken
Pacific leatherback sea turtles have survived on this planet for nearly 100 million years. They have endured ice ages, major volcanic events, meteor impacts, and most every predator in the sea. However, they, and other endangered marine life, cannot survive being caught and drowned in drift gillnets.

Knowing this, in 2001, the National Marine Fisheries Service put into place a three-month drift gillnet closure in a large area off the coast of California that would allow leatherback turtles to safely migrate and feed in U.S. waters, including Monterey Bay. The closure -- the Pacific Leatherback Conservation Area -- has been so effective that no leatherback turtles have been reported drowned in the entire fishery since protections were put in place.

So, why then is the Fisheries Service now considering reopening this area year round to up to 30 drift gillnet vessels?

It's not because the gear has improved. Drift gillnets remain as destructive as they were prior to the 2001 closure. In addition to endangered turtles, dolphins and porpoises, seals and sea lions, and even large whales drown in this fishery. Between 1996 and 2002, more than 50 turtles, 700 seals and sea lions, over 1,000 dolphins and porpoises, and 35 large whales were killed.

These air-breathing animals often die when caught in these huge nets, long enough to loop around a football field six times. In fact, drift gillnets are so harmful to ocean life that they are banned on the high seas and in the waters of several states, including Washington, Georgia and Florida.

The proposal before the Fisheries Service would open up the protected area as long as there are fishery observers on each vessel and caps on the number of leatherbacks and some whale species that can be killed. These controls will help limit the number of leatherback turtles and certain large whales killed.

Unfortunately, with these critically endangered species, the survival of every single one counts. What is more, there will be no caps on the number of other sea turtles, fin whales, gray whales, elephant seals, California sea lions and dolphins killed. Nor will there be any caps on the amount of fish simply discarded, dead and dying, which in this fishery amounts to more than is kept.

It is also not because of economics; the proposed reopening is not expected to provide significant economic benefit. The industry folks argue that the closed area has directly led to the decline in the drift gillnet fishery. But this fishery was waning long before the closure was implemented, with the number of active vessels dropping by half between 1994
Leatherback Sea turtles

and 2000. The Fisheries Service has concluded that the "economic impact of an increase in (drift gillnet) effort is likely to differ little from zero." In other words, there is no predicted economic gain from this proposed opening.

The proposed opening therefore makes no sense for either scientific or economic reasons. It also makes no sense for political reasons, as the public has shown overwhelming opposition. Further, it would seem to fly in the face of the recent Governors' Agreement on Ocean Health, where the states of California, Oregon and Washington have explicitly recognized the need for addressing the declining health of our ocean and the need to sustain marine wildlife populations.

In California, we pride ourselves on being progressive in ocean management. If the Fisheries Service approves the opening of the Pacific Leatherback Conservation Area, it will be a hugely irresponsible step backward. Just as we are protecting areas in our state waters through the Marine Life Protection Act, we would be re-opening areas in our federal waters to a wasteful and destructive way of fishing.

The question ought not to be how do we open this area, but rather, how can we catch swordfish, tuna and thresher shark without sacrificing so many other marine creatures? If we don't take the time to find that answer, Pacific leatherback sea turtles may go extinct on our watch.

__________________________________________________

Do You Yahoo!?
Tired of spam? Yahoo! Mail has the best spam protection around
http://mail.yahoo.com
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "LLOYD DENT" <lloyddent@adelphia.net>
Date: Tue, 31 Oct 2006 13:47:25 -0800
To: <pfmc.comments@noaa.gov>

I am distressed by the threat to Pacific leatherback sea turtles from the proposed action of the National Marine Fisheries Service. If the annual 3-month drift gillnet closure is eliminated only temporarily, the Pacific leatherback may be eliminated forever. What kind of world are we leaving for our children and grandchildren? What is the benefit to the public? Since the economic impact of an increase in drift gillnet effort is likely to differ little from zero, according to the Fisheries Service, but the danger of extinction will differ significantly, the closure must be continued.

Lloyd A. Dent
Attorney at Law
4431 Laurel Grove Avenue
Studio City, CA 91604
(818) 763-0700
I want to inform you that I support the continued closure of the drift gillnet fishery off the coast of California and Oregon for three months during the migration of the Pacific leatherback turtle.

I do not see how this will impact the drift gillnet fishery since it has been in effect since 2001. But I do however see the negative impact this will have on the population of the leatherback turtle/other mammals if this closure does not continue.

Patti Llorin
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: Kim Galeazzi <kgaleazzi@yahoo.com>
Date: Tue, 31 Oct 2006 13:21:27 -0800 (PST)
To: pfmc.comments@noaa.gov

Dear Sir/Madam
Please ensure that our coasts retain their natural resources and provide for this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed.
Thank you for your consideration.
Kim Galeazzi
Subject: Agenda Item C.3.Drift Gillnet FMP Comment
From: GDFlowers@aol.com
Date: Tue, 31 Oct 2006 15:50:45 EST
To: pfmc.comments@noaa.gov

Dear Council:
I urge you to continue to ban gill net fishing off the coast of California and Oregon each year during the three month Pacific Leatherback Turtle migration period. The ban in the past has proven to be effective in saving the Turtles.
Sincerely,
Gerald D. Flowers, LTC retired, U.S. Army
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "Janet Kessin" <jkessin@juilliard.edu>
Date: Tue, 31 Oct 2006 15:22:43 -0500
To: <pfmc.comments@noaa.gov>

Dear Council Members,

This year my family and I spent 5 weeks vacationing on the West Coast. Almost exclusively, our time was spent within 10 - 20 miles of the coastline, the entire length from Seattle to Los Angeles. We’d planned the vacation specifically to enjoy the sea life, bird life, and the remarkable old growth forests that are so absent from the East Coast where we live. I can't describe to you our thrill to see so close at hand sea lions, turtles, seals, pelicans, and so much more. We were amazed and grateful that the fragile line differentiating existence or extinction hasn't been crossed, and were impressed at to learn about some forward-thinking protections that have been initiated.

It's easy to think of 'just one program' as not-particularly necessary. But I wonder how you know when you've let slip one protection too many. I'd like to think we'll be able to visit many more times and experience that same joy of being so close to nature.

Please continue the closure of gillnet fisheries during the 3 months of the leatherback turtle migration. Every creature counts.

Thank you,

Janet Kessin
Director of Communications
The Juilliard School
(212) 799-5000 ext. 207
Gentlepersons:

Gill net fishing off the California and Oregon Coast should continue to be banned, indefinitely. It endangers many species, especially sea turtles. As an attorney for 25 years, I have had years of experience in balancing competing interests, and know that some types of environmental impacts are so devastating that they create public reactions that lead to prohibitions on much lesser impact activities. Please continue with the restraints previously imposed upon Gill net fishing, as failure to do so may inspire greater scrutiny that will ultimately result in an even worse economic impact to the industry.

Yours Truly,
Doug Allen
Burnett, Burnett & Allen
160 West Santa Clara St. 12th flr.
San Jose, CA. 95113
(408) 298-6540
I am a college student speaking out to you, the Management Council. You seem to forget that if we continue to ignore the fact that we are day by day wiping out homes of hundreds of animals; someday they will be completely wiped out. Get rid of the drifting gillnets along the California and Oregon coasts. Find alternative ways. GET RID OF THE NETS. Save the turtles because they count too.

Nicole
Subject: Agenda Item C.3. Drift Gillnet FMP Comment  
From: Robert Harkins <rharkinswillflyforfood@yahoo.com>  
Date: Tue, 31 Oct 2006 11:56:27 -0800 (PST)  
To: pfmc.comments@noaa.gov

To whom it may concern:

It has come to my attention that the 3-month closure of the Pacific Leatherback Conservation Area is not automatically a yearly closure as I had believed.

I am therefore requesting that you keep this area safe for turtles by keeping the Pacific Leatherback Conservation Area 3-month closure in effect- not just for 2006, but for as far into the future as possible; permanently would be my desire.

Once the species is extinct, it's too late too increase the closure duration, and we can never get them back.

Sincerely,

Robert W. Harkins
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: Michael Mullany <mmullany@yahoo.com>
Date: Tue, 31 Oct 2006 11:42:54 -0800 (PST)
To: pfmc.comments@noaa.gov

Please keep the the Pacific Leatherback Conservation Area closed until a verifiable rebound in the populations of pacific leatherback turtles can be ascertained. It would also help if this decision was not revisited every year but reconsidered at five year intervals.

Thank you.

Michael Mullany
415-824-1799
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: Bud Vieira <bud_vieira@yahoo.com>
Date: Tue, 31 Oct 2006 11:42:22 -0800 (PST)
To: pfmc.comments@noaa.gov

Dear Council Members,

Drift gillnetting is a horribly indiscriminate fishing practice that is terribly damaging to ocean life. I speak to you as the son of a fishing family who has seen bad fishing practices destroy stocks in the Grand Banks and George's Banks in the Northeast. There has to be a better, more sustainable way to fish.

I understand that the current ban on drift netting off the California and Northwest coast is up for review. While the ban was rightly instituted to stop the near extinction of the Pacific Leatherback sea turtle, many other forms of marine life are also threatened by these nets. With increasing pressure on fish stocks, and habitat change increasing from El Nino conditions and global warming, this inefficient, "let's throw a net across three miles of the sea and see what gets caught" approach is unconscionable.

I urge you to not only re-instate the ban for the coming year, but make the ban permanent. We not only stand to lose the Leatherback, which predates us by more than 60 million years, but also countless marine mammals, important predators like sharks, and adequate fish stocks for our future needs.

Alfred Vieira
Oakland, California

Everyone is raving about the all-new Yahoo! Mail (http://advision.webevents.yahoo.com/mailbeta/)
I received a most devastating letter from the Monterey Ocean Action Team stating the dire threat of Pacific Leatherback's impending extinction, due to lack of caution on the part of fishermen with drift gillnets.

Our ocean's future depends on the great care that we take in preserving that which is absolutely necessary to preserve. The needless killing of animals such as these, makes me ashamed of the human race, and it's inability to preserve nature and it's precious lifeforms, especially when such simple measures can be taken to avoid the unnecessary devastation and demise of such lovely creatures.

We urge you to keep the Pacific Leatherback Conservation Area closed, so that these great creatures may continue to thrive, and our children's children will also be able to enjoy them...and the generations to come.

Thank you for caring!

C Ziegler
Subject: Agenda Item C.3. Drift Gillnet FMP Comment  
From: "George Perry" <gmperry@redshift.com>  
Date: Tue, 31 Oct 2006 11:09:25 -0800  
To: <pfmc.comments@noaa.gov>

Gentlemen:

I am writing to ask that you retain the ban on drift gillnet fishing within the Pacific Leatherback Conservation Area. Gillnet fishing destroys not only the endangered Leatherback Turtles but countless other marine mammals and fishes that are not the target of the fishery. Survival of the Leatherback Turtle depends on eliminating any taking or killing of these animals, and no procedures can be crafted that would guarantee that result if gillnet fishing is allowed in their feeding and migration areas. Furthermore, since the Fisheries Service itself has concluded that there is little or no economic benefit to lifting the gillnet ban in the Conservation Area, there is no sound reason for lifting the ban.

Thank you.

George Perry  
1211 Pico Ave.  
Pacific Grove, CA
Greetings,
I am very concerned about the decline of Pacific leatherneck turtles. I understand that you will be considering whether or not to extend the 3month closure of gillnetting in the area of their annual migration. I urge you to continue the closure—frankly I do not understand why this is not permanently in place. Why should this have to be decided every year? It would seem to be common sense to continue one of the few practices that seems to work for the future of these wonderful creatures, and to make it a permanent practice.

As a teacher, I am speaking on behalf of my fourth graders, and my grandchildren—all of whom are passionate about turtles! Thank you very much.

Sincerely,
Barbara Carmichael
blcarm@yahoo.com

Want to start your own business? Learn how on Yahoo! Small Business.
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: Karen <hsunhsun_us@yahoo.com>
Date: Tue, 31 Oct 2006 10:29:07 -0800 (PST)
To: pfmc.comments@noaa.gov

Dear Fisheries Managers,

You have done a great job saving the Pacific Leatherback Turtles; please keep up your good job.

You and your predecessors saw the danger of Drift Gillnet Fishing towards these turtles, that in 2001, you, the Federal fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure coincides with the leatherback turtle migration, allowing the turtles to safely feed in these waters.

On behalf of the turtles, we ask your help to keeping the Pacific Leatherback Conservation Area closed to fishing. We further ask that you make this closure remain in place far into the future, not just for 2006.

Humbly yours,

Karen Downing

Access over 1 million songs - Yahoo! Music Unlimited Try it today.
The Pacific Leatherback Conservation Area should stay closed to drift gillnet vessels for at least 3 months but gillnets should not be allowed at all - they kill everything.
Drift gillnets should be banned everywhere. If California would ban the gillnets, that's a start - but only a start.

Tami Shiotani
Thousand Oaks, CA
Subject: Please continue to help leatherback turtles
From: "Eric Nardone" <enardone@mbayaq.org>
Date: Tue, 31 Oct 2006 10:04:58 -0800
To: <pfmc.comments@noaa.gov>

Dear Pacific Fisheries Management Commission,

Please continue to enforce the 3 month ban on drift gillnet fishing off the coast of California and Oregon. It is my understanding that this ban greatly reduces the number of Leatherback sea turtles killed as by catch. I have a one yr. old son and another child on the way. It is my sincerest hope that they can grow up in a state where the leaders and regulator bodies understand that steps taken to protect our natural world for the long term may outweigh short term economic gains. Please help protect the Leatherback Sea turtle and all the species of the Pacific, so my kids and all the kids in California may inherit an ocean world in at least as good of shape as our generation did.

Thank you,

Eric J. Nardone
Subject: Agenda Item C.3. Drift Gillnet FMP Comment  
From: "Ava Ferguson" <AFerguson@mbayaq.org>  
Date: Tue, 31 Oct 2006 09:57:57 -0800  
To: <pfmc.comments@noaa.gov>  

Dear Pacific Fishery Management Council,

In 2001, fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year to coincide with the leatherback turtle migration. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then. That's why I support closing these waters to drift gill nets on a permanent basis--and not just for 2006. Pacific leatherbacks are on the brink of extinction. Won't you do your part to ensure that they survive for future generations?

Sincerely,

Ava Ferguson  
PO Box 1989  
Aptos, CA 95001
I received an email from the Monterey Bay Aquarium about the closure of the Pacific Leatherback Conservation Area. I would like to see the enclosure closed during turtle migration so that the turtles can safely migrate and feed. I have been working with herpetological organizations for several years and have several rescued turtles of my own. I do not think that 3 months is too much to ask to protect these animals. I think these animals deserve protection from the fishing industry and that they should be more than willing and cooperative to help in any way they can. Since we are encroaching on more and more animal habitats, I think we should be respectful and responsible when we are in their habitat. The last thing we want is to lose these beautiful turtles! Thank you for your time and considering my request.

Michelle (Shelley) Hall
To the Pacific Fishery Management Council:

It has come to my attention that the Pacific leatherback turtle is in deep trouble -- yet again. The information I encountered stated that over the past 20 years, the population of Pacific leatherbacks has plummeted by 97%. Destructive fishing practices, especially drift gillnets have pushed Pacific leatherbacks close to extinction.

To address this dire threat, in 2001 Federal fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure coincides with the leatherback turtle migration, allowing the turtles to safely feed in these waters. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then! Great news!!

Unfortunately, I have also come to know that fisheries managers are preparing to allow drift gillnet fishing again – with potentially devastating consequences for leatherback sea turtles.

I would like to tell you that I want this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed. It is my understanding that every year the Pacific Fishery Management Council decides whether or not to continue closing this area so I would like to emphasize that this closure should remain in place far into the future -- not just for 2006.

Thank you so much for your time and consideration on this matter and for helping to protect our natural resources for generations to come.

Sincerely,

Kristen Liming
kmliming@yahoo.com
Subject: Agenda Item C.3. Drift Gillnet FMP Commenta  
From: "shawn harstad" <shawnharstad@gmail.com>  
Date: Tue, 31 Oct 2006 11:38:06 -0600  
To: pfmc.comments@noaa.gov

To whom it may concern:

When will it end? When will we learn? ...When its too late. Nothing is worth the extinction of another species...Nothing.

-Shawn Harstad
Subject: agenda item c.3. FMP drift net comment  
From: "CarlaSue Hanson" <carlasueh@msn.com>  
Date: Tue, 31 Oct 2006 09:18:15 -0800  
To: <pfmc.comments@noaa.gov>

it is imperative that the pacific leather back turtle conservation area be kept closed to give these magnificent animals a chance at survival. Drift gill nets are destructive to the complete marine environment killing everything in their wake. Commercial fishing has a strong lobby but if we do not protect our waters, our resources will be decimated and fishermen will be out of a job permanently!
Please do not be short-sighted. This area needs to protected for the long term stabilization of the marine habitat.  
Sincerely,  
CarlaSue Hanson  
Newport Beach, Ca

----- Original Message -----  
From: Ocean Action Team  
To: carlasueh@msn.com  
Sent: Monday, October 30, 2006 4:12 PM  
Subject: Monterey Bay Aquarium:Sea Turtle Alert

Monterey Bay Aquarium  
OAT Logo  

Turtle Speak Out NOW for Pacific Leatherback Turtles  
The Pacific leatherback turtle urgently needs your help. Your voice by November 7th could help save this struggling species.

The Pacific leatherback turtle, the largest of the sea turtles and a species that predates the dinosaurs, is in deep trouble. Over the past 20 years, the population of Pacific leatherbacks has plummeted by 97%. Destructive fishing practices, especially drift gillnets, have pushed Pacific leatherbacks close to extinction.

To address this dire threat, in 2001 Federal fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure coincides with the leatherback turtle migration, allowing the turtles to safely feed in these waters. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then!

Now fisheries managers are preparing to allow drift gillnet fishing again – with potentially devastating consequences for leatherback sea turtles.

What you can do
Send an email or a fax to the Pacific Fishery Management Council today. Tell them you want this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed. Every year the Pacific Fishery Management Council decides whether or not to continue closing this area so please emphasize that this closure should remain in place far into the future -- not just for 2006.

Your comments must be received by Tuesday, November 7th.
your comments to pfmc.comments@noaa.gov or fax them to 503- 820- 2299. Use the subject line: 'Agenda Item C.3. Drift Gillnet FMP Comment'.

If you do send an email or fax, we’d love to know! Simply respond to this email, or included us as a Bcc on your comments. Thanks!

**Learn more**

Please read this recent Op-Ed that appeared in the Monterey County Herald. Feel free to draw on language from the article or this alert while writing your comments.

**Tell a friend**

Forward this email to a friend and urge them to write a letter on behalf of the turtles! Encourage them to become Ocean Action Team members so that we can contact them when it is time to speak out on other critical ocean issues.

Thank you for weighing in on behalf of the Pacific leatherback turtles!

Sincerely,

Aimee David and Ken Peterson
Ocean Action Team

email: oceanaction2@mbayaq.org
web: http://www.oceanactionorg

*Forward email*

This email was sent to carlasueh@msn.com, by oceanaction2@mbayaq.org

*Update Profile/Email Address | Instant removal with SafeUnsubscribe™ | Privacy Policy.*
Subject: protect the turtles
From: Wildini@aol.com
Date: Tue, 31 Oct 2006 12:11:38 EST
To: pfmc.comments@noaa.gov
CC: oceanaction2@mbayaq.org

Please do not allow drift gillnet fishing start again. I support having a responsible policy for fishing that does not harm the turtles. Please keep the Pacific Leatherback Conservation Area closed. This closure should remain in place far into the future -- not just for 2006.
Kathy Whilden
98 Via Campana
Monterey, CA 93940
Subject: Agenda Item C.3  
From: Kate Gudmundson <kgudmunds0n@yahoo.com>  
Date: Tue, 31 Oct 2006 09:10:46 -0800 (PST)  
To: pfmc.comments@noaa.gov

Please protect the Pacific Leatherback Turtles from drift gillnets during their 3 month migration period. This issue is of great importance to my family and me. Please, please, please do your best to protect these magnificent and precious sea creatures.
Sincerely,
Catherine Gudmundson  
129 Christopher Avenue  
Campbell CA 95008

Low, Low, Low Rates! Check out Yahoo! Messenger's cheap PC-to-Phone call rates.
To whom it may concern:

I am requesting that the area accessible to leatherback turtles remain safe for them by keeping the Pacific Leatherback Conservation Area closed!!! Every year the Pacific Fishery Management Council decides whether or not to continue closing this area. Please keep this area closed far into the future -- not just for 2006.

Now fishery managers are preparing to allow drift gillnet fishing again - with potentially devastating consequences for the leatherback sea turtles. Please do not allow drift gillnet fishing again, so that these turtles can repopulate!

Thank you for your cooperation and understanding!!!!

David P. Weil
The Weil Group

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Please keep this area safe for turtles by keeping the Pacific Leatherback Conservation Area closed. This closure should remain in place far into the future -- not just for 2006, because it is essential for the future of our planet and the turtles who roam it. Please have consideration for this endangered species!

Thanks
To whom it may concern,
by writing this, I urge you to keep the Pacific Leatherback Conservation Area closed for the three month of their migration each year, allowing the turtles to safely pass through and feed in these waters and not become extinct. In my opinion it is crucial to keep this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed.

Thank you for your time.
Sincerely,
Brian

..............................................................
Agility Graphics
Brian Forstat

405 - 33rd Avenue #303
San Francisco, CA 94121

415.386.1142
brian@agilitygraphics.com
http://www.agilitygraphics.com

..............................................................
Subject: ‘Agenda Item C.3. Drift Gillnet FMP Comment’
From: gemela katz <katzz137@yahoo.com>
Date: Tue, 31 Oct 2006 08:31:08 -0800 (PST)
To: pfmc.comments@noaa.gov

October 31, 2006

To the Pacific Fishery Management Council:

Hello, My name is Susan Orth and I am an elementary school teacher in California. As an educator I have an obligation to teach my students about the natural environment and to be good stewards of it. We start studying about dinosaurs in the beginning of the year. It is a great reminder to show students about how species become extinct. I strive to teach them about the importance of the natural world and how we depend so much on the natural resources to survive.

I am writing this email to address the Pacific Leatherback Turtle which is the largest sea turtles that predate dinosaurs. These turtles are endangered due to destructive fishing practices, mainly using drift gillnets. It was great legislation to restrict drift gillnet fishery of the coasts of California and Oregon during the migration so they can safely feed in these waters. This has tremendously saved the Pacific Leatherback Turtle from extinction because they are not being caught in these nets.

I urge you to seize the use of these gillnets during those 3 months during the Pacific Leatherback Turtle's migration not just for 2006, but indefinately. Please help save the fate of these turtles so future generations will have them to enjoy! I don't want yet another species to be extinct due to man's actions.

Thank you,

Susan Orth
Elementary School Teacher

Do You Yahoo!?
Tired of spam? Yahoo! Mail has the best spam protection around
http://mail.yahoo.com
Subject: Keep Pacific Leatherback Conservation Area Closed!
From: "Staci Peters" <stacina@gmail.com>
Date: Tue, 31 Oct 2006 08:24:32 -0800
To: pfmc.comments@noaa.gov

As a California resident, I pride myself on the fact that California is a very progressive state, finding new and environmentally beneficial ways to do things. This includes keeping our waters as free as possible from destructive fishing practices, and drift gillnet fishing is one of the most destructive practices we face. The bycatch (mostly sea lions, turtles, dolphins, etc) is staggering. Opening the Pacific Leatherback Conservation Area would be a huge step backward. Instead of allowing something so destructive, it would benefit all of us (and our oceans) to find more progressive, sustainable means of fishing. Please keep the Leatherback Conservation area closed to give these species (especially the endangered Leatherback sea turtles) a fighting chance.

Thank you for your consideration,

Staci Peters
Long Beach, California
Subject: 'Agenda Item C.3. Drift Gillnet FMP Comment'.
From: Sister4136@aol.com
Date: Tue, 31 Oct 2006 11:19:21 EST
To: pfmc.comments@noaa.gov

Please keep the drift gillent areas closed so that the leatherback turtles can remain safe by keeping the Leatherback Conservation Area closed. Thank you for your time,
Aja LiVigni
Hello,

I am writing to request that we follow in the footsteps of Washington, Georgia, and Florida in protecting California’s marine life. How can those with the decision making power consciously reopen the Pacific Leatherback Conservation area knowing the automatic destruction to ANY and ALL marine life that will result. Also, I ask that serious consideration needs to be given to banning drift gillnets as they have no significant scientific or economic benefits.

Please help make the right decision to protect these animals that can not protect themselves.

Sincerely,

Allison Herrera
Subject: Agenda Item C.3 Drift Gillnet FMP Comment  
From: "Jennifer Comeau" <jcomeau@hhdainc.com>  
Date: Tue, 31 Oct 2006 08:09:36 -0800  
To: <pfmc.comments@noaa.gov>

Please keep the area off the California/Oregon coast safe for turtles by keeping the Pacific Leatherback Conservation Area closed. I hope that this area can also remain closed for these months in years to come!! Thank you-

Jennifer Comeau  
Hurkes|Harris Design Associates, Inc.  
1510 Front Street, Suite 300, San Diego, CA 92101  
Direct: (619) 702-0380 ext. 30 | Fax: (619) 702-0383  
E-mail: JComeau@hhdainc.com | Web: www.hhdainc.com

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* * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * *
The Pacific Leatherback Conservation Area should stay closed to the approx. 30 drift gillnet vessels for the 3 month closure. In addition to endangered turtles, dolphins and porpoises, seals and sea lions, and even large whales drown in these gillnets. That is too much marine life wasted. Drift gillnets are banned on the high seas and in the waters of several states, including Washington, Georgia and Florida. I wish California would join those states in banning this harmful way of fishing. The question ought not to be how do we open this area, but rather, how can we catch swordfish, tuna and thresher shark without sacrificing so many other marine creatures?

Stephanie Takahashi
Sunland, California
I do not agree with your proposal to reopen the Pacific Leatherback Conservation Area for fishing while utilizing drift gillnetts. It is an inefficient way to fish in that although you may catch all the fish you need, hundreds of other types of marine life will be killed for no good reason at all. It has also been shown that using the drift gillnet will not give your industry the economic boost that it needs. As I said before, I am very against this proposal that will allow hundreds of animals to be killed when they don't have to be.

Thank you, Cassandra Matthews
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "Dan Tudor" <dantudor@tudorwines.com>
Date: Tue, 31 Oct 2006 07:57:13 -0800
To: <pfmc.comments@noaa.gov>

Dear Pacific Fishery Management Council,

Our planet is being destroyed at every corner of the globe. With thousands of species driven to extinction every year this is no time to relax regulations.

The ban on drift gillnets should remain!! If we can’t even protect a few turtles, what species is next? Humans. That’s right. Take a stand for the turtles and biodiversity on our only planet.

Sincerely,

Dan Tudor

Tudor Wines
Winemaker/Owner
P.O. Box 830
Pacific Grove, CA 93950
831-224-2116 mobile
831-855-0147 fax
dantudor@tudorwines.com
www.tudorwines.com

--
No virus found in this outgoing message.
Checked by AVG Free Edition.
Version: 7.1.409 / Virus Database: 268.13.18/506 - Release Date: 10/30/2006
I am writing to implore you to please allow the Pacific Leatherback Sea Turtle to live.

Please think for just a moment that these creatures have survived nearly 100 million years! They have endured ice ages, major volcanic events, meteor impacts, and most every predator in the sea. Do you really want to be known as the one entity that was able to bring down the Pacific Leatherback Sea Turtle to extinction?

Your Concern should not be how can you open the Pacific Leatherback Conservation Area, but how can you catch swordfish, tuna and thresher shark without sacrificing so many other marine creatures.

Do you really want to contribute to the extinction of the Pacific Leatherback Sea Turtle? I PRAY YOU DO NOT!

Sincerely Concerned
Dawn E. Bleau R.N.
Subject: Agenda Item C.3. Drift Gillnet FMP Comment'.
From: Kendra Wilson <kenwildrason@sbcglobal.net>
Date: Tue, 31 Oct 2006 07:54:27 -0800 (PST)
To: pfmccommments@noaa.gov

Dear Pacific Fishery Management,

Please do not allow drift gill nets to open during the migratory months of the highly endangered leatherback. As you already know their numbers have dropped 95% and they have been on this earth 100,000 years!! It would be a sacrilege to lose these wonderful creatures to extinction for a fishing practice that shouldn't be allowed in the first place.

Thank you for your time,
Kendra Wilson
755 14th ave
Santa Cruz, Ca 95062
kenwildrson@sbcglobal.net
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "Dan Tudor" <dantudor@tudorwines.com>
Date: Tue, 31 Oct 2006 07:53:58 -0800
To: <pfmc.comments@noaa.gov>

Dear Pacific Fishery Management Council,

Our planet is being destroyed at every corner of the globe. With thousands of species driven to extinction every year this is no time to relax regulations.

The ban on drift gillnets should remain!! If we can’t even protect a few turtles, what species is next? Humans. That’s right. Take a stand for the turtles and biodiversity on our only planet.

Sincerely,

Dan Tudor
Tudor Wines
Winemaker/Ower
P.O. Box 830
Pacific Grove, CA 93950
831-224-2116 mobile
831-855-0147 fax
dantudor@tudorwines.com
www.tudorwines.com

--
No virus found in this outgoing message.
Checked by AVG Free Edition.
Version: 7.1.409 / Virus Database: 268.13.18/506 - Release Date: 10/30/2006
Subject: Leatherback turtles
From: "Erica Hutchinson" <ehutchinson1@gmail.com>
Date: Tue, 31 Oct 2006 07:48:48 -0800
To: pfmc.comments@noaa.gov

To Whom it may concern:

I am writing on behalf of the Leatherback turtles off the Pacific Coast. I understand harmful fishing practices could be reinstated and I am begging you to help keep this area safe by keeping the Pacific Leatherback Conservation Area closed. I would urge you, the Pacific Fishery Management Council, to continue to keep this area closed and let it remain closed well into the future. These animals have made it a long way- let them live!

Thank you for taking the time to read my plea.
I know you'll make the right decision!

Erica Hutchinson
ehutchinson1@gmail.com
San Diego, CA
Hello,

I am writing to request that we follow in the foot steps of Washington, Georgia, and Florida in protecting California’s marine life. How can those with the decision making power consciously reopen the Pacific Leatherback Conservation area knowing the automatic destruction to ANY and ALL marine life that will result. Also, I ask that serious consideration needs to be given to banning drift gillnets as they have no significant scientific or economic benefits.

Please help make the right decision to protect these animals that can not protect themselves.

Sincerely,

Lori VanOteghem
Subject: leather back turtles  
From: "john fischer" <johnfischmsn@hotmail.com>  
Date: Tue, 31 Oct 2006 07:44:37 -0800  
To: pfmc.comments@noaa.gov  
CC: oceanby@earthlink.net  
BCC:

To whom it may concern -  
Please do not allow gill netting during the turtle's migratory season. What a shame it would be to lose such wondrous creatures for forever. Gill netting treats such wonderful creatures as nothing more than trash. With their population decimation, they need every bit of help that we can give them. Let's make the freeze on gill netting during this season far into the future, if not permanent.

Get FREE company branded e-mail accounts and business Web site from Microsoft Office Live  
http://clk.atdmt.com/MRT/go/mcrssaub0050001411mrt/direct/01/
Dear Council,

Please do not allow the reopening of the drift gillnet fishery during the leatherback turtle migration. It is our responsibility to preserve the eco-balance of the sea by intelligent management of this resource. Endangering turtles during their migration by the use of gillnets is unacceptable. Gillnets also have a by-catch problem for many species, especially marine mammals including many threatened species and should be prohibited. If we do not fish responsibly today there will be no fishing in the future.

Thanks!
Kathy
Conservation today makes a better world tomorrow.
Kathy Werblo
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "Heidi C. Quan" <heidicue@yahoo.com>
Date: Tue, 31 Oct 2006 07:34:45 -0800 (PST)
To: pfmc.comments@noaa.gov

PLEASE DO NOT ALLOW DRIFT GILLNET FISHERY OFF THE COAST OF CALIFORNIA AND OREGON DURING THE MIGRATION MONTHS OF THE LEATHERBACK TURTLE. THIS CLOSURE SHOULD REMAIN IN PLACE WELL INTO THE FUTURE SO AS TO AVOID RE-VISITING THIS ISSUE YEAR AFTER YEAR. THE EFFECTIVENESS SPEAKS FOR ITSELF.

KEEP THE PACIFIC LEATHERBACK CONSERVATION AREA CLOSED!
Please keep the Pacific Leatherback Conservation Area closed. This closure should remain in place for many years to come -- not just for 2006.

Thank you for caring about the future of all species.

Lisa Hoffner
Subject: agenda item C.3. deift gilnet FMP comment
From: "Bonnie whisler" <johnwhi@redshift.com>
Date: Tue, 31 Oct 2006 06:39:44 -0800
To: <pfmc.comments@noaa.gov>

I urge you to continue to keep the Pacific Leatherback Turtle Conservation Area free of the fishery’s drift gillnets by keeping it closed to this activity during the turtles’ migration period.

Bonnie Whisler
1985 Military Ave.
Seaside, CA
Good morning:

My children have read often of all the wonderful, different species of sea turtle. Now, your actions could endanger, or protect again the largest, and oldest of these creatures, the Pacific leatherback turtle.

Please continue to protect this species by continuing to keep the conservation area closed.

Schoolchildren all across the country know much more about sea turtles than the average American. I'd hate to have to explain to my children how this species became extinct, so that we could enjoy cheap frozen fish sticks.

Thank you for your work, and consideration of this important issue.

Dean R. Koch
Vice President, Marketing
Adeza
408-745-0975 x130
www.adeza.com
Good morning -

I am not an activist by any stretch of the imagination, but every so often an issue arises to which I feel the need to respond. I've recently read of the pending decision on drift gillnetting off the Pacific coastline and wanted to send my plea not to reopen this issue. It is a cruel practice, not just for the fish it intends to catch, but for the untended sealife it entraps.

Please spare the marine creatures any further unnecessary deaths to assist the "efficiency" of man's commerical fishing trade. I enjoy eating a good piece of fish, but I would rather pay more at the store, to ensure that the ocean's balance begins to return to a more natural state. True, mankind has managed to sit at the top of the food chain through the use of his innovative brain and dexterous hands, but unlike most other predators, we don't just take what we want to eat. We take everything in our path, and then pick and choose from the catch.

Please rethink allowing gillnetting to resume off California and Oregon.

Thank you -

Katri Hakola
Principal Engineer - JTS Nav Services
Jeppesen Sanderson
desk: (303) 328-6503
Blackberry: (303) 489-8300
This e-mail is to request that the Pacific Leatherback Conservation Area remain closed to the gillnet fisherman. The turtles need many more years of protection to keep them from extinction.
Thank you for listening.

Glenna R Merriott
8760 Tropical Ct.
Fort Myers, Fl. 33908
949-842-6289
Hello,

I've recently read that the Pacific Leatherback Conservation Area may be reopened to drift gillnet fishing. Please keep this area closed! Please don't let these animals become extinct. My hope would be that this area would remain safe for the turtles indefinitely, though I understand this decision is reviewed every year. If so, I'll write every year. One more year of keeping the area closed is another chance they have for life.

Thanks very much,

Alan Troup
I want the area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed. We need to help these beautiful animals from getting caught on nets, thank you.

Jon

Want to start your own business? Learn how on Yahoo! Small Business.
I just received this...
"The Pacific leatherback turtle, the largest of the sea turtles and a species that predates the dinosaurs, is in deep trouble. Over the past 20 years, the population of Pacific leatherbacks has plummeted by 97%. Destructive fishing practices, especially drift gillnets, have pushed Pacific leatherbacks close to extinction.
To address this dire threat, in 2001 Federal fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure coincides with the leatherback turtle migration, allowing the turtles to safely feed in these waters. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then!

Now fisheries managers are preparing to allow drift gillnet fishing again – with potentially devastating consequences for leatherback sea turtles."

...and since I am a protector of Oceans now I’m asking of you, please do not make the same mistake twice. If the sea turtles die, that will be a wound that never heals... Please, do not hurt Pacific Ocean nor humankind like that... PLEASE!!

Miriam

ps. if you knew me you’d know it’s unusual for me to ask like that.
Subject: Leatherback sea turtles
From: "John Castle II" <JRCastleII@msn.com>
Date: Mon, 30 Oct 2006 23:25:41 -0800
To: <pfmc.comments@noaa.gov>

Pacific Fishery Management Council

My name is John Castle II. I am a Biologist in Oregon. I firmly believe that we need to preserve our wildlife and in doing so takes a great deal of cooperation. I believe the the Leatherback Sea Turtle is in need of protection. I feel something need to be done about the drift gillnet fishery off the coast of California and Oregon. I want this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed. The turtles takes a long time to make a come back. This closure should remain in place far into the future -- not just for 2006. Help to protect the remaining turtles for future generations. I know you'll do the right thing and keep the Pacific Leatherback Conservation Area closed.

Sincerely,

John R. Castle II
629 SE Morrison #314
Portland, Oregon 97231
Subject: sea turtles
From: "kendall s" <kendalls@hotmail.com>
Date: Mon, 30 Oct 2006 23:19:31 -0800
To: pfmc.comments@noaa.gov
BCC:

please do not allow the return of gillnets to our oceans and seas. these things are highly destructive and unnecessary. please help to protect the security of the leatherback sea turtle and other animals whose home we fish in.

Elias and Kendall Rodriguez
Subject: Gillnets
From: "Steve & Jill Tyler" <styler@cyberhotline.com>
Date: Mon, 30 Oct 2006 22:59:11 -0800
To: <pfmc.comments@noaa.gov>

Please leave our CA coastline closed to gillnets forever. It is extremely critical to preserve our oceans that are in such dire straights. Thank you.
Steve Tyler
2564 Franki St
Orange, CA 92865
Phone...714 283-4404
styler@cyberhotline.com
Subject: (no subject)
From: AJCASEY@aol.com
Date: Tue, 31 Oct 2006 01:44:08 EST
To: pfmc.comments@noaa.gov

Please close the drift gillnet fishery off the coast of California and Oregon for three months of the year to keep this area safe for turtles.

By keeping the Pacific Leatherback Conservation Area closed you continue to preserve a great natural treasure.

Thank you

Art Casey
351 Flamingo Drive
Campbell CA 95008
From: Jaya Srinivasan <oujaya23@yahoo.com>
Date: Mon, 30 Oct 2006 21:45:28 -0800 (PST)
To: pfmc.comments@noaa.gov

Please save the turtles! Do not take the three month grace period off for business and materialistic items sake. Every animal on our planet contributes to the homeostatic environment and we need to keep it that way! Protect the turtles because if it was the other way around they would protect us!!! Thank you for listening, Jaya
To Whom It May Concern,

I would like to request that your office continue to support the practice of halting Drift Gillnet fishing during Leatherback Turtle migration. It is important that we continue to protect these important creatures.

Thank you.

Trisha Milazzo
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "Chris Carpenter" <Carpenter@pilot.pprune.com>
Date: Mon, 30 Oct 2006 21:39:36 -0800
To: <pfmc.comments@noaa.gov>

Dear Pacific Fishery Management Council,

I would like to voice my concern regarding the Pacific Leatherback Turtles. I understand PFMC is considering reopening the drift gillnet fishery during a 3 month period that is critical to the lifecycle of this species. Please consider the importance of maintaining a viable population base and refrain from letting yet another industry impose their economic demands on a natural resource that belongs to us all. This closure must remain in place permanently. For wildlife and the environment, it is always a losing proposition where encroachment and economics are concerned. Please let the wildlife have a reprieve.

Sincerely,

Chris Carpenter, M.Sc.
Wildlife Biology, Fishery Biology, Environmental Science
(778) 846-9033

Sign up for FREE email from The Professional Pilots Rumour Network at http://www.pprune.org The most widely read professional pilots website.
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "Heather" <uclaheather@hotmail.com>
Date: Mon, 30 Oct 2006 21:30:20 -0800
To: <pfmc.comments@noaa.gov>

The Pacific leatherback turtle, the largest of the sea turtles and a species that predates the dinosaurs, is in deep trouble. Over the past 20 years, the population of Pacific leatherbacks has plummeted by 97%. Destructive fishing practices, especially drift gillnets, have pushed Pacific leatherbacks close to extinction.

To address this dire threat, in 2001 Federal fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure coincides with the leatherback turtle migration, allowing the turtles to safely feed in these waters. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then!

Please continue to keep this area closed during the leatherback turtle migration, this year and every year. We cannot afford to lose another precious species from our planet. We have the knowledge and the power to keep these gentle creatures safe, and we must use it.

Thank you,
Heather Norem
8452 Wicklow Lane
Dublin, CA  94568
Subject: Agenda Item C.3. Drift Gillnet FMP Comment'
From: "Margo Hohulin" <ashland95@comcast.net>
Date: Mon, 30 Oct 2006 21:20:49 -0800
To: <pfmc.comments@noaa.gov>

Pacific Fishery Management Council:

I have just learned that the National Marine Fisheries Service is considering reopening a large area off the coast of California to drift gillnet fishing which would potentially kill hundreds, if not thousands of endangered leatherback turtles as well as, dolphins and porpoises, seals and sea lions, and whales. As a resident of California, I find this totally unacceptable.

The controls in place (fishery observers on each vessel and caps on the number of leatherbacks and some whale species that can be killed) are not enough to protect these critically endangered species and the other species where there are no proposed caps.

From what I read the proposed opening makes no sense from a scientific, economic, or political standpoint, so why do this? In addition, there is overwhelming public opposition, including mine. Recently in the Governors' Agreement on Ocean Health, the states of California, Oregon and Washington explicitly recognized the need for addressing the declining health of our ocean and the need to sustain marine wildlife populations. Is this being ignored here?

As a resident of California, I always thought our state was progressive when it came to managing the ocean. This proposed action does not seem progressive, but very backward.

I respectfully urge you to keep this area safe for turtles by keeping the Pacific Leatherback Conservation Area closed, not only in 2006 but indefinitely for the sake of the ocean and all that call it home.

Sincerely,

Margo K. Hohulin
Date: Mon, 30 Oct 2006 19:12:36 -0500 (EST)
From: Ocean Action Team <oceanaction2@mbayaq.org>
To: ishi717@cox.net
Subject: Monterey Bay Aquarium:Sea Turtle Alert
Monterey Bay Aquarium

~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
Speak Out NOW for Pacific Leatherback Turtles

The Pacific leatherback turtle urgently needs your help. Your voice by November 7th could help save this struggling species.

The Pacific leatherback turtle, the largest of the sea turtles and a species that predates the dinosaurs, is in deep trouble. Over the past 20 years, the population of Pacific leatherbacks has plummeted by 97%. Destructive fishing practices, especially drift gillnets (http://rs6.net/tn.jsp?t=cb47rzbab.0.oggszbab.nz4lxrbab.7014&t=00211ip=http3A%2F%2Fwww.montereybayaquarium.org%2Fcr%2Fcr_seafoodwatch32Fsfw_gear.asp) have pushed Pacific leatherbacks close to extinction.

To address this dire threat, in 2001 Federal fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure coincides with the leatherback turtle migration, allowing the turtles to safely feed in these waters. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then!

Now fisheries managers are preparing to allow drift gillnet fishing again with potentially devastating consequences for leatherback sea turtles.

What you can do

Send an email or a fax to the Pacific Fishery Management Council today. Tell them you want this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed. Every year the Pacific Fishery Management Council decides whether or not to continue closing this area so please emphasize that this closure should remain in place far into the future -- not just for 2006.

Your comments must be received by Tuesday, November 7th. Email your comments to pfmc.comments@noaa.gov or fax them to 503-820-2299. Use the subject line: Agenda Item C.3. Drift Gillnet FMP Comment.

If you do send an email or fax, we'd love to know! Simply respond to this email, or included us as a Bcc on your comments. Thanks!

Learn more

Feel free to draw on language from the article or this alert while writing your comments.

Tell a friend

Forward this email to a friend and urge them to write a letter on behalf of the turtles! Encourage them to become Ocean Action Team members so that we can contact them when it is time to speak out on other critical ocean issues.

Thank you for weighing in on behalf of the Pacific leatherback turtles!

Sincerely,
Aimee David and Ken Peterson
Ocean Action Team

~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
email: oceanaction2@mbayaq.org
web: http://www.oceanaction.org
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
Fwd: Monterey Bay Aquarium: Sea Turtle Alert

This email was sent to ishi717@cox.net, by oceanaction2@mbayaq.org

Update Profile/Email Address
http://ui.constantcontact.com/d.jsp?p=oo&m=1101180305197&ea=ishi717@cox.net&reset=1101442973730

Instant removal with SafeUnsubscribe(TM)
http://ui.constantcontact.com/d.jsp?p=un-m=1101180305197&ea=ishi717@cox.net&reset=1101442973730

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Constant Contact(R)
www.constantcontact.com

Monterey Bay Aquarium | 886 Cannery Row | Monterey | CA | 93940
Subject: Agenda Item C.3. Drift Gillnet FMP Comment  
From: Stephanie Roberts <steffroberts0926@sbcglobal.net>  
Date: Mon, 30 Oct 2006 21:03:08 -0800 (PST)  
To: pfmc.comments@noaa.gov

Imagine my surprise when today I opened my e-mail and learned that it was possible for drift gillnet's to be legally used during such a crucial period for the leatherback turtle.

What a wonderful success for the turtles banning the drift gillnets has been. Let's continue this well into the future and NOT just for 2006. Saying yes to the closure means saying yes to the turtles.

Thank you,  
Stephanie Roberts
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "Janice Oliver" <janice@the-olivers.com>
Date: Mon, 30 Oct 2006 20:33:16 -0800
To: <pfmc.comments@noaa.gov>
CC: <bill.hogarth@noaa.gov>, <jim.lecky@noaa.gov>

Dear Sirs,

I am writing to urge you to keep the Pacific Leatherback Conservation Area closed!

Pacific leatherback sea turtles have survived on this planet for nearly 100 million years and predate the dinosaurs. However, they, and other endangered marine life, cannot survive being caught and drowned in drift gillnets. In addition to endangered turtles, dolphins and porpoises, seals and sea lions, and even large whales drown in this fishery.

When the National Marine Fisheries Service put into place a three-month drift gillnet closure in a large area off the coast of California, the closure allowed leatherback turtles to safely migrate and feed in U.S. waters, including Monterey Bay. The closure has been so effective that no leatherback turtles have been reported drowned in the entire fishery since protections were put in place.

Thank you for your consideration of this very important matter!

--------------------------------------------------------------------------------
Janice C. Oliver
38720 Adcock Dr
Fremont CA 94536
www.serendipcity.com

Vallejo Mill PTA, Vice President
Girl Scouts: Building girls of courage, confidence, and character.
CENTURY 21 Oliver-Jackson: www.richardnoliver.com
http://bookcrossing.com/friend/JaniceO
Subject: Agenda Item C.3. Drift Gillnet FMP Comment  
From: "stacy m. boyd" <sboyd9ql@umw.edu>  
Date: Mon, 30 Oct 2006 23:31:57 -0500  
To: pfmc.comments@noaa.gov

Pacific Fishery Management Council-

I am writing to you today in hopes that the Pacific Leatherback Conservation Area remain closed, due to the safety of the sea turtles. The Pacific Leatherback turtle is the largest of the sea turtles and over the past 20 years, their population has plummeted by 97%. Destructive fishing practices have helped this decrease in population and has pushed the Pacific Leatherback turtles close to extinction.

I understand that in 2001, Federal fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure coincides the the leatherback turtle migration and allows the turtles to safely feed in these waters. The close has been so effective that not one Leatherback turtle has been recorded as being caught in the fishery since then.

If the close in the drift gillnet fishery has proven to be successful for the sea turtles, I am a little confused as to why the fisheries managers would want to reopen it. The sea turtles are already close to extinction and I am afraid that if it is reopened, it will not be much longer until they are extinct.

This issue is not only important for this year, but also in the years to come. The safety and survival of these sea turtles depends on this decision, and I hope you will think about the decision you are making and think about the sea turtles that will be affected.

Thank you for taking your time,

Stacy Boyd  
sboyd9ql@umw.edu
Subject: Agenda Item C.3. Drift Gillnet FMP Comment  
From: Ken Peterson or Paulette Lynch <lyncherson@sbcglobal.net>  
Date: Mon, 30 Oct 2006 20:31:51 -0800 (PST)  
To: pfmc.comments@noaa.gov

Please RETAIN and EXTEND the total ban on drift gillnet fishing in the Pacific Leatherback Conservation Area so that these endangered ocean giants do not slide a step closer to extinction. The small potential gain for a few commercial fishing crews is not worth the potential risk to a species whose numbers have already plummeted by 97 percent.

It's imperative that the closure remain in place, and not just for another year. Act now to extend the closure into the forseeable future to assure that our grandchildren live in a world with leatherback sea turtles.

The threat to leatherbacks is dire. The risk of doing anything that compromises their survival is far, far too great.
Ken Peterson, Paulette Lynch & Gabriel Peterson
1215 Josselyn Canyon Road
Monterey, CA 93940
lyncherson@sbcglobal.net
831-646-8054
Subject: Agenda Item C.3. Drift Gillnet FMP Comment’.
From: RLSGMAN@aol.com
Date: Mon, 30 Oct 2006 23:28:34 EST
To: pfmc.comments@noaa.gov

To Whom It May Concern:

Please keep the Pacific Leatherback Conservation Area closed to drift gillnet fishing so the Leatherback Turtle remains safe. I am very concerned about the drastic decrease in the Pacific Leatherback population. Having closed it for 2006 has had some very positive results and keeping it closed for a longer period of time will help the Pacific Leatherback recover from the devastation of unmonitored gillnet fishing.

Raymond L. Stevenson
3795 Whitman Circle
Carmel, CA 93923
Subject: Agenda Item C.3. Drift Gillnet FMP Comment  
From: T McBroom <tami@hairballdesign.com>  
Date: Mon, 30 Oct 2006 20:27:42 -0800  
To: pfmc.comments@noaa.gov

Please don't allow drift gillnet fishing again in the Pacific Leatherback Conservation Area. The survival of the Leatherback Turtles depend on this area staying closed - not just now but for years to come.

Regards - Tami McBroom  
Pioneer, CA
My family wants this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed.

The closure has been so effective that **not a single leatherback turtle has been recorded caught** in the fishery since then!

Please continue your efforts to help the leatherback turtle to survive for the ecosystem of that ocean.

Sonya Adams
The following quote from the Monterey Herald dated Monday October 30 nicely sums up why opening the gill net fishery makes no sense. Please for the sake of yet another on the verge of extinction species, do not reopen the gill net fishery.

"The proposed opening therefore makes no sense for either scientific or economic reasons. It also makes no sense for political reasons, as the public has shown overwhelming opposition. Further, it would seem to fly in the face of the recent Governors' Agreement on Ocean Health, where the states of California, Oregon and Washington have explicitly recognized the need for addressing the declining health of our ocean and the need to sustain marine wildlife populations.

In California, we pride ourselves on being progressive in ocean management. If the Fisheries Service approves the opening of the Pacific Leatherback Conservation Area, it will be a hugely irresponsible step backward. Just as we are protecting areas in our state waters through the Marine Life Protection Act, we would be re-opening areas in our federal waters to a wasteful and destructive way of fishing.

The question ought not to be how do we open this area, but rather, how can we catch swordfish, tuna and thresher shark without sacrificing so many other marine creatures? If we don't take the time to find that answer, Pacific leatherback sea turtles may go extinct on our watch."

Sincerely,

Leesa Watt
Dear Pacific Fishery Management Council Representative:

Please keep the Pacific Leatherback Conservation Area closed so that the turtles and many other marine animals will not be harmed unnecessarily by drift gillnet fishing practices. I visited the California coast several years ago, traveling from my home in New Jersey, and was impressed greatly by its beauty. Please continue to protect species like the Pacific Leatherback Turtle that I believe cannot afford to lose even one individual, and help prevent future horrific decreases in populations of other species.

Regards,
Liz Peterson
Subject: Agenda Item C.3. Drift Gillnet FMP Comment’.
From: bandit97@comcast.net
Date: Tue, 31 Oct 2006 03:40:29 +0000
To: pfmc.comments@noaa.gov

Please do not let the turtles be endangered again by allowing the coast of California and Oregon to be open to drift gillnet fishery. All of us who care about this issue want this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed.

Thankyou and sincerely

Therese Breen
To the Pacific Fisheries Marine Council:
On behalf of the Ocean Action Network of the Monterey Bay Aquarium, I am writing to request that you consider keeping the Pacific Leatherback Conservation Area closed. Hopefully this will become a permanently protected area because these turtles, as well as other marine mammals, will be subject to even further endangerment. Instead of reenacting the use of drift gillnets, maybe there can be other options considered before ensuring the possible extinction of this ancient species. As an Environmental Studies student, and a person raised around the beauty of the ocean, I am writing to ask you to protect species that fall into harm because of this fishing practice. The research has shown that without these gillnets in use, there were no leatherback turtle deaths and with them, there were more than 50 deaths between 1996 and 2000, not to mention 700 seal and sea lion deaths, 1000+ dolphins and porpoises, and 35 whales. These animal populations cannot sustain anymore casualties, especially due to a fishing tactic that does not necessarily add any economic benefit. So I urge you to please consider keeping this a protected area in order to benefit the balance and the survival of our oceans. Thank you very much.
Sincerely,
Justine Grajski

Access over 1 million songs - Yahoo! Music Unlimited
(http://music.yahoo.com/unlimited)
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "Tom Foster" <foster.tom.m@gmail.com>
Date: Mon, 30 Oct 2006 19:15:44 -0800
To: pfmc.comments@noaa.gov

To Whom It May Concern:

I am writing to you regarding the Pacific Leatherback Turtles and allowing drift gillnet fishing. I think it would be a huge mistake allowing gillnet fishing to occur during the Leatherback turtle migration. These species are important to the global earth system and are only struggling species due to mankind.

Please close the drift gillnet fishery off the coast of California and Oregon for the 3 months of Leatherback Turtle migration!

Sincerely,

Tom Foster
Although by no means an expert of the economic impact by keeping a ban of drift grill-net fishing in-place off the coast of CA and Oregon I do understand a bit of the impact on nature if we do not keep areas protected during key times of the year.

The loss of any species of animal, although unavoidable due to environmental impacts at times, must be fought at all possible costs when it can be avoided by simple actions on the part of American industry. In this situation, if we believe the latest scientific data that the world is truly down to below 3,000 Pacific Leatherback turtles left of this species we are dangerously close to reducing the gene pool to a level that would make it virtually impossible to bring back this animal.

Why is this important? Besides the fact that we never know what critical piece of history or human medical research we will find from some remote animal, frankly it is the right thing to do (cliché but something even children understand).

I urge the board to consider holding the ban for drift gilnet fishing until such time as this animal is off the endangered species list or newer safer technology is developed for this type of fishing.

I appreciate your time and your consideration.

Matthew Stein
Cisco Systems
408-853-7207
Subject: protected our turtles
From: Ladyshiningstar2@aol.com
Date: Mon, 30 Oct 2006 21:29:08 EST
To: pfmc.comments@noaa.gov

Dear Pacific Fishery Management Council,

Please remain safe for turtles by the keeping the Pacific Leatherback Conservation Area closed. Please protect the turtles so our grandchildren and next generation will see turtles for years to come. Thank you

Pam
The Pacific leatherback turtle, the largest of the sea turtles and a species that predates the dinosaurs, is in deep trouble. Over the past 20 years, the population of Pacific leatherbacks has plummeted by 97%. Destructive fishing practices, especially drift gillnets, have pushed Pacific leatherbacks close to extinction.

To address this dire threat, in 2001 Federal fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure coincides with the leatherback turtle migration, allowing the turtles to safely feed in these waters. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then!

I would like this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed. Every year the Pacific Fishery Management Council decides whether or not to continue closing this area so please keep this closure in place far into the future -- not just for 2006.

Thank you,

Adam B. Wells
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: Kay Schroer <kschroer@sbcglobal.net>
Date: Mon, 30 Oct 2006 18:07:01 -0800 (PST)
To: pfmc.comments@noaa.gov

I am writing to urge you not to open the California and Oregon coastal area during the season when the Pacific Leatherbacks are migrating. The fishermen destroyed the population before and since the area was off limits in 2001 no turtles have been caught. Turtles take years to mature so it is way premature to open the area again.

The health of the oceans is at the will of man and it is up to us to responsibly protect fish and marine mammals.

Thank you,

Kay Schroer
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: Marilyn Wells <beachwitch@mac.com>
Date: Mon, 30 Oct 2006 17:45:39 -0800
To: pfmc.comments@noaa.gov

I want this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed. PLEASE make this closure permanent, or keep it in place as long as possible, not just for 2006.

All the best,

Marilyn Wells
Dear Pacific Fishery Management Council,

We would like to encourage you to continue the ban on drift gillnet fishing to protect the Pacific Leatherback turtles. It would really be a shame to lose these ancient turtles forever.

Thank you for your time.

Sincerely,

Phil and Susie Kaplan
100 N. Rodeo Gulch Rd. #29
Soquel, Ca. 95073
Subject: preserve leatherback turtles
From: "ra3ajw" <ra3ajw@sbcglobal.net>
Date: Mon, 30 Oct 2006 17:34:07 -0800
To: <pfmc.comments@noaa.gov>

This op-ed says it all. Please read it and make the right decision.

Al Bonvouloir
Posted on Sun, Oct. 15, 2006
✉️ email this
¶ print this

KEEP AREA CLOSED FOR TURTLES' SAKE

By SANTI ROBERTS

Guest commentary

Pacific leatherback sea turtles have survived on this planet for nearly 100 million years. They have endured ice ages, major volcanic events, meteor impacts, and most every predator in the sea. However, they, and other endangered marine life, cannot survive being caught and drowned in drift gillnets.

Knowing this, in 2001, the National Marine Fisheries Service put into place a three-month drift gillnet closure in a large area off the coast of California that would allow leatherback turtles to safely migrate and feed in U.S. waters, including Monterey Bay. The closure -- the Pacific Leatherback Conservation Area -- has been so effective that no leatherback turtles have been reported drowned in the entire fishery since protections were put in place.

So, why then is the Fisheries Service now considering reopening this area year round to up to 30 drift gillnet vessels?

It's not because the gear has improved. Drift gillnets remain as destructive as they were prior to the 2001 closure. In addition to endangered turtles, dolphins and porpoises, seals and sea lions, and even large whales drown in this fishery. Between 1996 and 2002, more than 50 turtles, 700 seals and sea lions, over 1,000 dolphins and porpoises, and 35 large whales were killed.

These air-breathing animals often die when caught in these huge nets, long enough to loop around a football field six times. In fact, drift gillnets are so harmful to ocean life that they are banned on the high seas and in the waters of several states, including Washington, Georgia and Florida.

The proposal before the Fisheries Service would open up the protected area as long as there are fishery observers on each vessel and caps on the number of leatherbacks and some whale species that can be killed. These controls will help limit the number of leatherback turtles and certain large whales killed.

Unfortunately, with these critically endangered species, the survival of every single one counts. What is more, there will be no caps on the number of other sea turtles, fin whales, gray whales, elephant seals, California sea lions and dolphins killed. Nor will there be any caps on the amount of fish simply discarded, dead and dying, which in this fishery amounts to more than is kept.

It is also not because of economics; the proposed reopening is not expected to provide significant economic
benefit. The industry folks argue that the closed area has directly led to the decline in the drift gillnet fishery. But this fishery was waning long before the closure was implemented, with the number of active vessels dropping by half between 1994 and 2000. The Fisheries Service has concluded that the "economic impact of an increase in (drift gillnet) effort is likely to differ little from zero." In other words, there is no predicted economic gain from this proposed opening.

The proposed opening therefore makes no sense for either scientific or economic reasons. It also makes no sense for political reasons, as the public has shown overwhelming opposition. Further, it would seem to fly in the face of the recent Governors' Agreement on Ocean Health, where the states of California, Oregon and Washington have explicitly recognized the need for addressing the declining health of our ocean and the need to sustain marine wildlife populations.

In California, we pride ourselves on being progressive in ocean management. If the Fisheries Service approves the opening of the Pacific Leatherback Conservation Area, it will be a hugely irresponsible step backward. Just as we are protecting areas in our state waters through the Marine Life Protection Act, we would be re-opening areas in our federal waters to a wasteful and destructive way of fishing.

The question ought not to be how do we open this area, but rather, how can we catch swordfish, tuna and thresher shark without sacrificing so many other marine creatures? If we don't take the time to find that answer, Pacific leatherback sea turtles may go extinct on our watch.

This was written by Larry Crowder, director of the Duke Center for Marine Conservation at Duke University; Michael Sutton, director of the Center for the Future of the Oceans at the Monterey Bay Aquarium; Cindy Walter of Passionfish restaurant in Pacific Grove; and Santi Roberts, California project manager for Oceana.
The Pacific leatherback turtle, the largest of the sea turtles and a species that predates the dinosaurs, is in deep trouble. Over the past 20 years, the population of Pacific leatherbacks has plummeted by 97%. Destructive fishing practices, especially drift gillnets, have pushed Pacific leatherbacks close to extinction.

To address this dire threat, in 2001 Federal fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure coincides with the leatherback turtle migration, allowing the turtles to safely feed in these waters. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then!

I would like this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed. Every year the Pacific Fishery Management Council decides whether or not to continue closing this area so please keep this closure in place far into the future -- not just for 2006.

Thank you,

Stacey Duffy
Subject: help preserve leatherback sea turtles
From: "Tom & Jayne Knecht" <browndogz@comcast.net>
Date: Mon, 30 Oct 2006 18:20:16 -0700
To: <pfmc.comments@noaa.gov>

Dear Pacific Fishery Management Council,

We are writing to implore you to not allow drift gillnet fishing off the California and Oregon coasts during the months the leatherback sea turtles migrate through this area. As you know, gillnet fishing is to the point of evil for the deaths it causes to species that are of no "commercial value". Leatherback sea turtles sadly have a prominent place on that list. As scuba divers, underwater photographers, and environmentalists, we beseech you to not lift the ban on drift gillnet fishing in this region during the months the turtles are present. From the standpoint of right and wrong, we beseech you to permanently disallow gillnet fishing in general. Thank you for your consideration. Please do the right thing.

Sincerely,
Thomas P Knecht, MD, PhD, FACP
Jayne R Knecht
3661 S. Gilroy Rd.
Salt Lake City, UT  84109
801-424-3172
browndogz@comcast.net
It is important to the future of the Pacific leatherback turtle that you do not allow drift gillnets to be used during the turtles migration. Please take into consideration that we all want our children and grandchildren to enjoy these magnificent animals. You have the power to help save them from extinction and I pray that you will do so.
Subject: Agenda Item C.3. Drift Gillnet FMP Comment'
From: "Simpson, Barrie" <barrie.simpson@verigy.com>
Date: Mon, 30 Oct 2006 19:15:31 -0600
To: <pfmc.comments@noaa.gov>

It is my understanding that due to the closure of drift gillnet fishery off the coast of California and Oregon for three months of the year, during the turtle migration, that not a single leatherback turtle has been recorded caught in the fishery since this closure.

I also understand that you may be considering changing this. Please look carefully at the data before you make this decision.

My kids want these turtles around in the future.

Thanks,

Barrie

**************************************************************************
Barrie Simpson
Verigy Ltd
10100 North Tantau Ave
Cupertino, CA  95014
408-864-2910
barrie.simpson@verigy.com
**************************************************************************

“This year, make peace with life’s challenges, cultivate your ability to be amazed and keep your spirit open to all that shines.”
To the Pacific Fishery Management Council:

The closure of the Pacific Leatherback Conservation Area off the coast of California has effectively protected Pacific Leatherback sea turtles and the lives of other marine animals since it was implemented in 2001. The proposed reopening of this area to drift gillnet fishing should be rejected. Drift gillnet fishing remains as destructive to marine life as it was in 2001 when the closure was implemented. There is no scientific basis or predicted economic gain to justify reopening this area to drift gillnet fisheries. The proposed observers and caps on numbers certain animals to be killed are not adequate to protect the declining health of the ocean and to sustain marine wildlife populations.

The reopening of this conservation area would be hugely irresponsible. Please reject the proposed reopening of this area to a wasteful and destructive way of fishing. Please continue to enforce the drift gillnet closure.

Sincerely,
Jenn Holsten
As a resident of Pacific Grove I am more aware of the ocean than someone who lives in the center of the country. Therefore I feel obligated to request for us and future generations of the entire U.S. that you not open up the Pacific Leatherback Conservation Area. We are poorer for each turtle that is lost and we are responsible to future generations. If we do not do what we can now, it cannot be undone.

Who benefits from this threat to the leatherbacks?

I eat fish and love it. But we must be aware of what we are doing and take responsibility for our actions. We share this planet.

There is not much that I personally can do, but I can make this request: Please keep the Pacific Leatherback Conservation Area closed to drift gillnets. This should remain closed for as long as the Pacific leatherback is endangered.
Subject: Agenda Item C.3. Drift gillnet FMP comment
From: "Susan Thamer" <sbthamer1933@msn.com>
Date: Mon, 30 Oct 2006 17:06:48 -0800
To: <pfmc.comments@noaa.gov>

To Whom it May Concern:

An urgent request to keep the Pacific Leatherback Conservation Area **CLOSED** so it will remain safe for the Leatherbacks.

On a trip to the Farallones, I was fortunate enough to view these magnificent creatures at close range - they are beautiful and deserve the chance to revive there numbers without drowning in a gillnet. Thank you for your consideration in this urgent matter. Sincerely, Susan B. Thamer
To whom it may concern,

I am disturbed to hear that the indiscriminate killing machines, known as drift gill nets are possibly going to be reintroduced off the California and Oregon coasts. Please do not allow this to happen. The closure for the 3 month period (during migration) has proven to protect the species. Ending the closure would only wipe out all the good that has been accomplished.

sincerely,

Rick Hadley
mairne wildlife enthusiast
Pacific Fishery Management Council:

This letter is to urge you to continue to keep the Pacific Leatherback Conservation Area closed. Closing this area gives the Leatherbacks the opportunity to continue their cycle of life which is necessary if we are to keep these wonderful creatures as part of our active ecosystem. Please decide that the Leatherbacks are worthy of our help to help them thrive.

Thank you,  Mike King
3047 Whalers Way
Pebble Beach, CA
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "Susan Wishon" <susan@wishon.org>
Date: Mon, 30 Oct 2006 16:50:26 -0800
To: pfmc.comments@noaa.gov

I am writing you today to ask that you continue the protection of the Pacific leatherback turtle, the largest of the sea turtles and a species that predates the dinosaurs. You can do this by keeping this area safe for turtle migration by banning drift gillnets from the coast of California and Oregon at least during their migration season. These turtles have a long way to go before their back to their natural numbers, as within the last 20 years, their population declined by 97%. To regain their population numbers, please keep the ban on drift gillnets.

Thanks,

Susan Wishon
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: Cynthia Race <race@stanford.edu>
Date: Mon, 30 Oct 2006 16:38:25 -0800
To: pfmc.comments@noaa.gov
CC: oceanaction2@mbayaq.org

Dear Council Members:

I am writing today to urge you to continue to keep the Pacific Leatherback Conservation Area closed to gill net fishing. To open the area would serve no economic purpose, and would only endanger further not just the Leatherback turtles, but also dolphins, porpoises, seals, sea lions and whales (many of which are endangered or threatened species).

Personally I would love a complete ban on gill net fishing year round similar to Washington, Georgia or Florida, however until such time as that could be instated, we should continue with the progress that has been made in the past to close it for three months of the year during the critical migration period of the Leatherback turtles which are on the Endangered Species List. As there have been no recorded deaths in the fishery since this ban was put in place, it appears to be an effective first step in helping this species try and recover.

Again, I urge you to keep the ban in place as a healthy ocean environment benefits everyone.

Regards,

Cynthia Race
I strongly urge you to keep the three month ban on drift gillnet fisheries in place! There are too few leatherbacks still living to risk another one destroyed and the ban has thus far been completely successful. Please don't destroy this species. Keep the Pacific Leatherback Conservation Area closed!

Dr Tod Likins
130 Anita St
Santa Cruz
CA 95060
Dear Pacific Fishery Management Council,

I am writing to strongly encourage you to keep the Pacific Leatherback Conservation Area off the coast of California and Oregon closed to gill-net fishing. It is so important to keep this area safe for this endangered species. The closure of this area will also protect many other marine species, helping to ensure the ecosystem and the health or our ocean which is important not only environmentally, but economically. Since the proposed reopening of the fishery is not expected to provide a specific economic benefit, the reopening would only be a step backward in the progress we have made to protect our oceans and keep them stable. By keeping this area closed we can set an example for other fisheries using this dangerous and destructive fishing method. Thank you for your time and consideration.

Sincerely,
Nalani Ludington

______________________________
Do You Yahoo!?
Tired of spam? Yahoo! Mail has the best spam protection around
http://mail.yahoo.com
Dear Pacific Fishery Management Council,

I understand that the population of Pacific leatherbacks has been pushed close to extinction due to destructive fishing practices, especially drift gillnets.

I applaud the efforts you have made to address this dire threat, by closing the drift gillnet fishery off the coast of California and Oregon for three months of the year beginning in 2001. The closure coinciding with the leatherback turtle migration, has allowed the turtles to safely feed in these waters. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then!

This is success, but the success will not last unless you continue the closure during the migration time. Please ensure that this area remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed. I know you struggle with the decision whether or not to continue closing this area every year, so please continue the closure to ensure that this magnificent being, largest of the sea turtles and a species that predates the dinosaurs, survives and thrives -- not just for 2006, but far into the future.

Sincerely,
Denise Ludington
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: Juli Gumbiner <jag2@sonic.net>
Date: Wed, 1 Nov 2006 06:36:25 -0800
To: pfmc.comments@noaa.gov
CC: Tracy Ross <tmr@sonic.net>

Dear Pacific Fishery Management Council:

Please reject any attempt to reinstitute drift gill net fishing off the coast of California and Oregon during the three months of the Leatherback Turtle migration.

The Pacific leatherback turtle, the largest of the sea turtles and a species that predates the dinosaurs, is in deep trouble. Over the past 20 years, the population of Pacific leatherbacks has plummeted by 97%. Destructive fishing practices, especially drift gillnets, have pushed Pacific leatherbacks close to extinction.

To address this dire threat, in 2001 Federal fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure coincides with the leatherback turtle migration, allowing the turtles to safely feed in these waters. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then!

This fishing practice not only endangers turtles, but is destructive to marine mammals, who become entangled in these nets and suffer terribly. I urge you to keep our coastline closed.

Thank you for your consideration.

Sincerely,

--Juli Gumbiner
To the Pacific Fishery Management Council:

As a participant in Earthwatch's leatherback turtle recovery program, I would like to express my staunch opposition to allowing drift gillnet fishing back into U.S. Pacific waters currently protected by time/area closures.

As you probably know, the population of Pacific leatherbacks has plummeted by 97%. As you also know, needlessly destructive fishing practices, especially the use of drift gillnets, have pushed Pacific leatherbacks close to extinction and recklessly pillaged other marine populations.

So to address this dire threat, in 2001 Federal fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure has been so effective that not a single leatherback turtle has been recorded caught since then!

Now fisheries managers are preparing to allow drift gillnet fishing again – why, when this will certainly have devastating consequences for leatherback sea turtles? Why, when drift gillnets are so harmful to ocean life that they are banned on the high seas and in the waters of several states, including Washington, Georgia and Florida? Why allow drift gillnet fishing again, when the Fisheries Service has concluded that the "economic impact of an increase in {drift gillnet} effort is likely to differ little from zero"?

The fishing industry has sadly become notorious for its short-sighted greed, but drift gillnets and bottom trawling top the industry’s list of lazy and stupid choices.

So I’m contacting the Pacific Fishery Management Council today to tell you that I (along with the majority of other Americans) want this area to remain safe for turtles and other marine populations by keeping the Pacific Leatherback Conservation Area closed – not just for 2006, but for good, so populations can finally (hopefully) begin to recover in the years to come!

Thank you for your time and attention,

Beth Jones
Rettenpacher Strasse 19A
A5020 Salzburg, Österreich/Austria
Tel & Fax (011)-43-662-646437
blj1@direkt.at
http://www.proz.com/translator/9270 (CV in English)
oder/or
http://www.foreignword.biz/cv/3548.htm (Lebenslauf auf Deutsch)
In California, we pride ourselves on being progressive in ocean management. If the Fisheries Service approves the opening of the Pacific Leatherback Conservation Area, it will be a hugely irresponsible step backward. Just as we are protecting areas in our state waters through the Marine Life Protection Act, we would be re-opening areas in our federal waters to a wasteful and destructive way of fishing.

Please reconsider!

Best,

Mike Chamberlain
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: jturner95014@comcast.net (Jackie Turner)
Date: Wed, 01 Nov 2006 08:10:38 +0000
To: pfmcomments@noaa.gov

Please keep the Pacific Leatherback Conservation Area closed to help preserve the leatherback turtles. This closure should remain in place far into the future -- not just for 2006.

Destructive fishing practices, especially drift gillnets, have pushed these wonderful animals close to extinction. They must be able to feed safely in these waters.

Jacqueline Turner
Cupertino, California
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: Judy Skipworth <booksmart91@yahoo.com>
Date: Tue, 31 Oct 2006 22:47:46 -0800 (PST)
To: pfmc.comments@noaa.gov

Dear Fishery Management Council,

I'm sure, that you are receiving loads of E-mails about the extinct Leatherback Pacific Turtles, or at least hoping. So as you might guess that's exactly what this E-mail is about. It's so funny how many animals go extinct each year just because people become lazy and look for an easier way out. Now 97% is a HUGE number to drop your species down in. I mean why would we want to kill off an animal that is so important and historicly fascinating?

Now in 2001 the driftgill fishery was shut down because you recognized what was happening and promptly dealt with it, I Thank-you for that and hope that you will once again step up to the plate and make this little part of the world balanced again. Besides it was so effective and good for your image, so why not again? Your doing so much by this, so please keep this policy going, vote to close the fisheries again for this year and the next. Besides has man really sank to that level of wiping out entire species because we don't care? Isn't man supposed to be the dominant species of the world? There are other, smarter, and resourceful ways to go about things. Doing this act won't hurt, but it will surely help.

Please keep this practice going, for those three months close the drift nets and let the turtles continue to thrive, populate, and be free. Thank-you for reading this and at least considering it.

Sincerely,

Judy Skipworth

We have the perfect Group for you. Check out the handy changes to Yahoo! Groups.
Subject: Save the turtles
From: "Steve Schreifels" <stevesch@sbcglobal.net>
Date: Tue, 31 Oct 2006 22:11:16 -0800
To: <pfmc.comments@noaa.gov>

I want this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed. Every year the Pacific Fishery Management Council decides whether or not to continue closing this area so I emphasize that this closure should remain in place far into the future -- not just for 2006.

Thank you,

Steve Schreifels
The closure of the drift gillnet fishery off the coast of California for 3 months a year since 2001 has obviously been very successful in eliminating the destruction of the Pacific leatherback turtle. It appears that an effort is underway to again allow drift gillnet fishing in the protected areas.

We strongly urge that this area continue to be closed for the foreseeable future.

We owe it to our planet and its ecosystems to avoid the indiscriminate destruction of endangered species.

Thank you,

Earl and Kay Rubell
Please keep the sea turtles safe by continuing to ban the harmful fishing during their migration season. Thank you.
Subject: Agenda Item C.3. Drift Gillnet FMP Comment¹.
From: Elin Kelsey <elin@redshift.com>
Date: Tue, 31 Oct 2006 19:49:26 -0800
To: <pfmc.comments@noaa.gov>
CC: <oceanaction2@mbayaq.org>

Dear Pacific Fishery Management Council,

There is no place for drift gill net fisheries in California and Oregon. This indiscriminate fishing practice results in extraordinarily wasteful by-catch, including Pacific Leatherback turtles. I implore you to keep the Pacific Leatherback Conservation Area closed in perpetuity. The short-sighted strategy of effecting year to year closures are surely past. Please close the area now and leave it that way for the future.

Sincerely,

Elin Kelsey, PhD

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Elin Kelsey, Ph.D.
Elin Kelsey & Company
The Studio
123 - 17th Street
Pacific Grove, California, 93950
(831) 648-1039
elin@iname.com

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NO Gillnetting!! The Pacific leatherback turtle needs to be saved. If gillnetting is allowed I feel the Pacific leatherback won't have a chance. It was here long before us - it should be here long after we are gone.

Karen Shaw
4747 Wander Lane
Holladay, Utah 84117
kshaw@xmission.com
Subject: nets
From: "A. chapman" <momchap@hotmail.com>
Date: Wed, 01 Nov 2006 03:34:49 +0000
To: pfmc.comments@noaa.gov
BCC:

We who are alive today have an opportunity to save sea turtles from extinction by banning all fishing nets that trap turtles and drown them. It is critical that we act responsibly by maintaining the ban on all such dangerous nets.

I care about this issue. I want you to care about this issue too.
Sincerely,
A. Chapman
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: George Haye <geohaye@yahoo.com>
Date: Tue, 31 Oct 2006 16:56:35 -0800 (PST)
To: pfmc.comments@noaa.gov

Pacific Fishery Mgmt Council,
Good day. I would like to humbly request that as a Council, you do everything in your power to keep the Pacific Leatherback Conservation Area closed not just for the upcoming year, but for at least 10 years. This is a species which must be protected in this manner.

Best regards,
George Haye
13766 Long Ridge Road #A
Los Gatos, CA, 95033
geohaye@yahoo.com
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "Nick Colin" <nickcolin@gmail.com>
Date: Tue, 31 Oct 2006 16:44:34 -0800
To: pfmc.comments@noaa.gov

Please ensure that no drift gillnets will be used by keeping the Pacific Leatherback Conservation Area closed! It has been determined that there would be very little economic gain by allowing their use. Leatherback population has dropped by 97% in the past few decades, and we can't afford to lose another animal to careless and destructive fishing practices. Please think of the struggling, endangered species and ban drift gillnets!

Thanks for your time and attention at this critical time in the survival of so many marine mammals.

Nick Colin
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: Sandilands Brian <briansandilands@comcast.net>
Date: Tue, 31 Oct 2006 16:15:46 -0800
To: pfmccomments@noaa.gov

I have just heard that you are considering relaxing the drift gillnet ban during the migration of the Pacific leatherback turtle. From what I have read, this closure has had a very positive effect on leatherback conservation.

This closure should remain in effect for the foreseeable future. We continue to see these magnificent creatures decline and we owe it to our descendants that we continue to do all we can to save the last remnants of the leatherback turtles.

Please assure me of your continued enforcement of this closure.

Brian Sandilands
Subject: No gillnetting
From: diane marciniak <finallywest@yahoo.com>
Date: Tue, 31 Oct 2006 16:04:52 -0800 (PST)
To: pfmc.comments@noaa.gov

Please do not allow gillnetting in the PACIFIC LEATHERBACK CONSERVATION AREA. Please keep it closed to gillnets.

Having the ban on gillnets has done good things, let's keep it up. Please DO NOT ALLOW GILLNETS IN THE PACIFIC LEATHERBACK CONSERVATION AREA.

Thank you.

Check out the New Yahoo! Mail - Fire up a more powerful email and get things done faster.
Hi,

As a divemaster and underwater photographer I've traveled all over the pacific. I've seen hundreds of hawksbill turtles but very few leatherbacks.

Please "stay the course" and maintain the annual drift gillnet restrictions during leatherback turtle migrations!

The oceans are beautiful and fragile. I have personally witnessed a decline in large fish populations on the California coast over the last 10 years. (no, I haven't done scientific studies, but I know what I see now, and what I saw in the mid 90's...)

In the long run, giving the turtles (and the fish) a break for just 3 months a year will help the fishing industry remain viable. Allowing year round fishing without regulation makes about as much sense as clear cutting our national forests!

Please resist the pressure from the fishing industry to allow over fishing. Say 'NO!' to junk science! Whatever you do, make sure it is based on valid studies and is in the best long term interest of the oceans and the planet.

Thanks for listening and taking care of our oceans!

Regards,

- Ralph Wolf
601 Wellsbury Way
Palo Alto CA 94306
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "William" <william@uts-hawaii.com>
Date: Wed, 1 Nov 2006 06:46:19 -0800
To: <pfmc.comments@noaa.gov>

Dear Pacific Fishery Management Council,

I am writing because I am concerned that drift gillnets might once again be in the paths of Pacific leatherback sea turtles migrating along the coasts of Oregon and California. To reestablish the minefield of gillnets that sea turtles must face would be a crime against our planet and most certainly does not reflect the interests and desires of the people of our great country. The corridor you helped establish is but a small reprieve to a species that faces threats almost everywhere else during its life-cycle and, especially, during its annual migration. Please consider the greater good and continue the annual 3 month drift gillnet closure in perpetuity.

Sincerely,
William Hewson
2908 Blue Spruce Cir.
Thousand Oaks, CA 91360
Subject: Gillnet Closure Policy
From: lindajosher@netscape.net
Date: Thu, 02 Nov 2006 12:51:51 -0500
To: pfmc.comments@noaa.gov
CC: oceanaction2@mbayaq.org

Dear Sir or Madam,

I am writing you today to ask you to keep the three-month drift gillnet closure policy. This policy has been effective in preventing the deaths of not only Leatherback Turtles, but many other marine mammals as well. There is no need to get rid of the policy; it has not hurt fishermen or the economy. Keeping a sensible gillnet policy helps to ensure that Leatherback Turtles will not become extinct.

Thank you,

Linda Osher
Santa Rosa, CA

Check Out the new free AIM(R) Mail -- 2 GB of storage and industry-leading spam and email virus protection.
To whom it may concern,

I am writing to strongly urge you to continue the practice of closing the drift gillnet fisheries off the coast of California and Oregon during the winter, so as to allow free and safe passage to the leatherback turtles during their migration. It is essential that we conserve the lives of these ancient animals, animals which we have brought before to the brink of extinction. One may argue that the economy of the fishing industry is at risk, but the greater risk is to the turtles, who if we take no action in their name, might be lost forever along with countless other species. By closing the area to gillnet fishing, we not only allowing the turtles to migrate and breed safely, but also allow the local fish to regain their numbers.

It is extremely important that we ACT NOW to aid the species in trouble, as we can prevent their demise. Please continue to close the coastal area of California and Oregon for three months during the year, and preserve the lives of the leatherback turtles. Please keep this as regular practice, and not just for this year. It is imperative that we as a stronger species look out for those who we have caused harm in the past.

Thank you for your time,
Katie Phelan
Paris, France
Hello,

I want to let you know that I believe it is absolutely necessary for you to continue the ban on drift gillnet fishing as this practice will inevitably lead to the destruction of the Pacific Leatherback Turtle species. I don't think you want to be responsible for the elimination of a species in order to forward commercial gain. Any commercial loss due to the ban on drift gillnet fishing cannot possibly outweigh the cost of eradicating an entire species of turtle. Not only that, to allow this harmful practice once again would negatively affect the natural and delicate environment of the leatherbacks ultimately snowballing into a larger problem affecting many other species and their habitat. Please take action to keep the ban on drift gillnet fishing alive!!

Nichole Wong
Prenovost, Normandin, Bergh & Dawe
2122 North Broadway, Suite 200
Santa Ana, CA 92706
(714) 547-2444 ext. 144
fax: (714) 835-2889
Hello,
I am writing to request that we follow in the foot steps of Washington, Georgia, and Florida in protecting California's marine life. How can those with the decision making power consciously reopen the Pacific Leatherback Conservation area knowing the automatic destruction to ANY and ALL marine life that will result.

Also, I ask that serious consideration needs to be given to banning drift gillnets as they have no significant scientific or economic benefits.

Please help make the right decision to protect these animals that can not protect themselves.
Sincerely,

Sabrina Troyer
Scottsdale, AZ

This message is confidential, intended only for the named recipient(s) and may contain information that is privileged or exempt from disclosure under applicable law. If you are not the intended recipient(s), you are notified that the dissemination, distribution, or copying of this message is strictly prohibited. If you receive this message in error or are not the named recipient(s), please notify the sender and delete this message. Thank you.
Subject: Pacific Leatherback Turtles
From: "Nichole Wong" <NWong@pnbd.com>
Date: Thu, 2 Nov 2006 09:03:33 -0800
To: <pfmc.comments@noaa.gov>
CC: "Jamaica Weiler \(E-mail\)" <jweiler@mryanlegal.com>,
<gluzerman@legal.occoxmail.com>, <canitbe3000@hotmail.com>

Hello,

I want to let you know that I believe it is absolutely necessary for you to continue the ban on drift gillnet fishing as this practice will inevitably lead to the destruction of the Pacific Leatherback Turtle species. I don't think you want to be responsible for the elimination of a species in order to forward commercial gain. Any commercial loss due to the ban on drift gillnet fishing cannot possibly outweigh the cost of eradicating an entire species of turtle. Not only that, to allow this harmful practice once again would negatively affect the natural and delicate environment of the leatherbacks ultimately snowballing into a larger problem affecting many other species and their habitat. Please take action to keep the ban on drift gillnet fishing alive!!

Nichole Wong
Prenovost, Normandin, Bergh & Dawe
2122 North Broadway, Suite 200
Santa Ana, CA 92706
(714) 547-2444 ext. 144
fax: (714) 835-2889
Subject: Agenda Item C.3. Drift Gillnet FMP Comment  
From: kimberly martin <acidblues5000@yahoo.com>  
Date: Thu, 2 Nov 2006 08:51:29 -0800 (PST)  
To: pfmc.comments@noaa.gov

Please don't allow drift gillnet fishing again. It does more harm than good. We will probably lose our entire Leatherback Turtle population, along with a countless number of other sea turtles, fin whales, gray whales, elephant seals, California sea lions and dolphins.

Also, the Fisheries Service has concluded that the "economic impact of an increase in (drift gillnet) effort is likely to differ little from zero." In other words, there is no predicted economic gain from this proposed opening.

I urge you to take responsibility, and protect our earth, its animals, and our future by not allowing drift gillnet fishing ever again.

Respectfully,

Kimberly Martin

Everyone is raving about the all-new Yahoo! Mail (http://advision.webevents.yahoo.com/mailbeta/)
Subject: Agenda Item C.3 - Drift Gillnet FMP Comment
From: Findlay Jamie <jfindlayesq@yahoo.ca>
Date: Thu, 2 Nov 2006 10:40:30 -0500 (EST)
To: pfmc.comments@noaa.gov

Dear Sir/Madam,

I am writing to add my voice to those of the many California citizens who urge that the Pacific Leatherback Conservation Area remain closed to drift gillnet fishing. I live in Canada, but I have been to that area of California and my sister currently resides there. I think it is one of the most wonderful areas for marine life in North America. Please keep the ban on gillnet fishing in place, and keep on protecting the Pacific Leatherback Turtle. Thank you.

Sincerely,

Jamieson Findlay
Ottawa, ON
CANADA

Do You Yahoo!
Tired of spam? Yahoo! Mail has the best spam protection around http://mail.yahoo.com
Subject: 'Agenda Item C.3. Drift Gillnet FMP Comment'.
From: Karen Rosenstein <karetaker@catsincharge.com>
Date: Thu, 2 Nov 2006 00:02:14 -0800
To: pfmc.comments@noaa.gov
CC: karetaker@catsincharge.com

HI!

Please include me with the many hundreds if not thousands of marine mammal lovers who do not want to see drift gillnets being used anywhere along the California coast. As humans, we need to find better more humane ways of fishing than using these types of nets.

Please keep the area designated for the Pacifica Leatherback turtles closed not just for now but for the foreseeable future. We are only now discovering how much damage has been done to our oceans that needs to be dealt with. Let's not continue to damage but begin to repair by keeping this animal habitat area safe for all of its residents.

Sincerely,

Karen Rosenstein
200 Troglia Terrace
Pacifica, CA 94044
Please chose to help the leatherback seaturtle - keep the conservation area to help the turtles. Thank you!
Hello,

I am writing to request that we follow in the footsteps of Washington, Georgia, and Florida in protecting California’s marine life. How can those with the decision making power consciously reopen the Pacific Leatherback Conservation area knowing the automatic destruction to ANY and ALL marine life that will result. Also, I ask that serious consideration needs to be given to banning drift gillnets as they have no significant scientific or economic benefits.

Please help make the right decision to protect these animals that can not protect themselves.

Sincerely,
Tamara A. Reddy
Subject: Agenda Item C.3. Drift, Gillnet FMP Comment
From: Irene DE <irenede@pacbell.net>
Date: Wed, 01 Nov 2006 21:03:53 -0800
To: pfmc.comments@noaa.gov

Dear Sir or Madame,

In 2001 Federal fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure coincides with the leatherback turtle migration, allowing the turtles to safely feed in these waters. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then!

Please do not open this important area to drift gillnet fishing again. It will have potentially devastating consequences for leatherback sea turtles.

Sincerely Yours,

Irene S. Dick-Endrizzi, PMP
CA homeowner and SCUBA diver
Member, Planet Earth Life
Hello This is Josh G,
I agree with the Monterey Bay Aquarium that the Drift Gillnet should not be allowed. This will save many lives of the leatherback turtles and the drift gillnet should be prohibited for not only 2006, but for a longer extended period of time. The drift gillnet kills the lives of animals that are close to extinction that are not intended to be killed.

Thank you for listening and i hope you follow the advice of the Monterey Bay Aquarium,
Josh Gatti

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http://imagine-windowslive.com/minisites/searchlaunch/?locale=en-us&source=hmtagline
I have read this email over several times and agree entirely, I could not have written it better myself. Therefore, I am signing my name and passing the letter on to other individuals who I believe agree with how disgraceful it is for fisheries managers to allow drift gillnet fishing again – with potentially devastating consequences for leatherback sea turtles and other creatures of the ocean. For those of you who agree with this email please take a minute to copy/paste it, sign your name and resend it to: pfmc.comments@noosa.gov

Dear Mr. Hogarth:

It has recently been brought to my attention that the NOAA plans to reintroduce the drift gillnet vessels to the Pacific Leatherback Conservation Area during the migration season of endangered sea turtles. If my research in the matter is correct, it is my understanding that despite conclusive evidence that conservation effort was a success and can continue to be fruitful, the NOAA plans to push forward and potentially devastate the recovering population of the leatherback turtles and many other ocean species that have existed long before man was roaming the Earth.

This email is being composed in an effort to express my dissatisfaction with this decision and disgust for the disregard of the fragile environment that we now live in. I understand that there is a human factor behind this decision. Fishermen are struggling to support their families and fishing communities are waning away but it must be understood that man has taken this planet and ravished it for centuries. Our commercialism and its impact is present now more than ever. Humans need to evolve with our changing environment and realize that we cannot continue to gain riches (or even a living) off of something that has proven to hurt our wildlife so dramatically.

I am interested to know what research the NOAA has performed in an effort to find alternative methods of swordfish, tuna and thresher shark fishing. Is it proven impossible? If so, I vow to boycott buying swordfish, tuna, thresher shark and any other fish life that is caught and sold from the use of gillnets.

Why can't California join Florida, Georgia and Washington in setting an example of awareness and care for our oceans and ban the use of drift gillnets altogether? I understand that our coast is among the most rich in the world but we cannot continue to gain off another species demise.

It is our time and our duty as human beings and residents of planet Earth to start changing and thinking about what we are doing and how it will impact our children's children. There will be great sacrifices made and there will be errors along the way but we cannot look away at the devastation we face in the future if we continue living as we have.

I have taken the liberty of informing my 300 or so closest friends and family of this matter and I expect them to turn around and inform their friends and family and so forth. It is my hope that they will provide you with emails, faxes and letters showing their strong opposition to interfering with the leatherback turtle's migration.
I beg of you Mr. Hogarth, if you have children or grandchildren, you think about the big picture here and what you can do to change it.

Respectfully,

Jamaica Rose Weiler
Santa Monica, California
cc: Karen Steele karen@seaturtles.org
Jim Lecky jim.lecky@noaa.gov.

Also with respect,
Katheryn Rhiannon Bwyer
Redondo Beach, California
Subject: pacific leatherbacks
From: Rebecca Kessin <rebeccakessin@yahoo.com>
Date: Wed, 1 Nov 2006 19:01:23 -0800 (PST)
To: pfmc.comments@noaa.gov
CC: oceanaction2@mbayaq.org

Council,

The Pacific leatherback turtle, the largest of the sea turtles and a species that predates the dinosaurs, is in deep trouble. Over the past 20 years, the population of Pacific leatherbacks has plummeted by 97%. Destructive fishing practices, especially drift gillnets, have pushed Pacific leatherbacks close to extinction.

To address this dire threat, in 2001 Federal fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure coincides with the leatherback turtle migration, allowing the turtles to safely feed in these waters. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then!

I understand that these fishing practices are going to be reinstated. I abhor this pointless act. I strongly encourage that you keep the fishery closed during turtle migration, and allow this species to continue unharmed.

I am a registered, regular voter.

Rebecca Kessin

Everyone is raving about the all-new Yahoo! Mail
(http://advision.webevents.yahoo.com/mailbeta/)
Gentlemen,

I have read of the success of the project to keep gillnetters out of leatherback habitat. Please continue the exclusion. Every species provides a service to the Earth none other can provide. Edward O. Wilson spoke in San Francisco a few weeks ago, and stated our most important task currently is to protect diversity: protect habitat, protect species, provide corridors. We are in the early years of the earth's 6th period of mass extinctions; scientists predict half the planet's species will be gone by the end of the century. Please, with the success of your recent program offering a powerful precedent to other areas, please do not take away this safety for these charismatic and deserving animals!

Thank you.

Sincerely,

Katherine Kumli
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "Lesly Higgins" <lesly@leslyhiggins.com>
Date: Wed, 1 Nov 2006 18:00:31 -0800
To: <pfmc.comments@noaa.gov>

Please keep the closure of drift gillnet fisheries off the coasts of California and Oregon in effect during leatherback turtle migration.

LESLY HIGGINS, M.S.
Executive Coach and OD Consultant
75 Fernwood Drive
San Anselmo, CA 94960-2124
Ofc (415) 457-1644 Cell (415) 336-8478
Fax (415) 457-2894
Email lesly@leslyhiggins.com
Url www.leslyhiggins.com
Subject: Agenda Item C.3. Drift Gillnet FMP Comment  
From: "J Weiler" <jweiler@mryanlegal.com>  
Date: Wed, 1 Nov 2006 17:40:30 -0800  
To: <pfmc.comments@noaa.gov>, <bill.hogarth@noaa.gov>  
CC: <jim.lecky@noaa.gov>, <karen@seaturtles.org>

Dear Mr. Hogarth:

It has recently been brought to my attention that the NOAA plans to reintroduce the drift gillnet vessels to the Pacific Leatherback Conservation Area during the migration season of endangered sea turtles. If my research in the matter is correct, it is my understanding that despite conclusive evidence that conservation effort was a success and can continue to be fruitful, the NOAA plans to push forward and potentially devastate the recovering population of the leatherback turtles and many other ocean species that have existed long before man was roaming the Earth.

This email is being composed in an effort to express my dissatisfaction with this decision and disgust for the disregard of the fragile environment that we now live in. I understand that there is a human factor behind this decision. Fisherman are struggling to support their families and fishing communities are waning away but it must be understood that man has taken this planet and ravished it for centuries. Our commercialism and its impact is present now more than ever. Humans need to evolve with our changing environment and realize that we cannot continue to gain riches (or even a living) off of something that has proven to hurt our wildlife so dramatically.

I am interested to know what research the NOAA has performed in an effort to find alternative methods of swordfish, tuna and thresher shark fishing. Is it proven impossible? If so, I vow to boycott buying swordfish, tuna, thresher shark and any other fish life that is caught and sold from the use of gillnets.

Why can't California join Florida, Georgia and Washington in setting an example of awareness and care for our oceans and ban the use of drift gillnets altogether? I understand that our coast is among the most rich in the world but we cannot continue to gain off another species demise.

It is our time and our duty as human beings and residents of planet Earth to start changing and thinking about what we are doing and how it will impact our children's children. There will be great sacrifices made and there will be errors along the way but we cannot look away at the devastation we face in the future if we continue living as we have.

I have taken the liberty of informing my 300 or so closest friends and family of this matter and I expect them to turn around and inform their friends and family and so forth. It is my hope that they will provide you with emails, faxes and letters showing their strong opposition to interfering with the leatherback turtle's migration.

I beg of you Mr. Hogarth, if you have children or grandchildren, you think about the big picture here and what you can do to change it.

Respectfully,

Jamaica Rose Weiler

Santa Monica, California

cc: Karen Steele karen@seaturtles.org
Agenda Item C.3. Drift Gillnet FMP Comment

Jim Lecky jim.lecky@noaa.gov
To Whom This Concerns

I deeply urge you not to restart the drift gillnet fishing. This turtle is a very important part of the marine ecosystem. The potential chance of you starting this again is extremely alarming and unacceptable.

I want my children to grow up and know that all life is precious little or small, human or mammal, etc. This turtle has lasted and adapted to its environment since before the ages of the dinosaurs. How many know creatures alive today have lasted that long?

Please take this into consideration before making such an impactive decision.

Regards,

Jennifer Rhodes & Family
510-557-1641
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: Tanya Smart and Brent Wright <wrismart@mcn.org>
Date: Wed, 01 Nov 2006 14:17:51 -0800
To: pfmc.comments@noaa.gov

Dear Pacific Management Council,

I strongly object to reopening the Pacific Leatherback Conservation Area to any drift gillnet vessels as is currently being considered by the National Marine Fisheries Service.

In 2001, the fragile status of Leatherback turtles prompted the National Marine Fisheries Service to put in place a seasonal drift gillnet closure in a large area off the coast of California that would allow leatherback turtles to safely migrate and feed in U.S. waters, including Monterey Bay. The closure -- the Pacific Leatherback Conservation Area -- has been so effective that no leatherback turtles have been reported drowned in the entire fishery since protections were put in place.

The consideration to re-open this area to gillnet vessels is not logical. The gear has not improved. In addition to endangered turtles, dolphins and porpoises, seabirds, seals and sea lions, and even large whales drown in these nets. Between 1996 and 2002, more than 50 turtles, 700 seals and sea lions, over 1,000 dolphins and porpoises, and 35 large whales were killed by drift gillnets. Drift gillnets are so harmful to ocean life that they are banned on the high seas and in the waters of several states, including Washington, Georgia and Florida.

The proposal before the Fisheries Service would open up the protected area as long as there are fishery observers on each vessel and caps on the number of leatherbacks and some whale species that can be killed. These controls may help limit the number of leatherback turtles and certain large whales killed, but for these critically endangered species, even one avoidable death is one too many. My understanding is that there will be no caps on the number of other sea turtles, fin whales, gray whales, elephant seals, California sea lions and dolphins killed or any caps on the amount of fish simply discarded, dead and dying, which in this fishery amounts to more than is kept. This is an irresponsible waste of resources and life.

The proposed reopening is not expected to provide significant economic benefit. The Fisheries Service has concluded that the "economic impact of an increase in (drift gillnet) effort is likely to differ little from zero."

The proposed opening therefore makes no sense for either scientific or economic reasons. It also makes no sense for political reasons, as the public has shown overwhelming opposition. Multi-state agreements such as the Governors' Agreement on Ocean Health, between the states of California, Oregon and Washington have explicitly recognized the need for addressing the declining health of our ocean and the need to sustain marine wildlife populations. The will of this large constituency must be recognized.

Opening the Pacific Leatherback Conservation Area to drift gillnet fishing is irresponsible. We would be re-opening areas in our federal waters to a wasteful and destructive way of fishing, contradicting the recently approved Marine Life Protection Act.

Healthy fisheries are important to California but we need to find ways to have healthy fisheries without wasting the resource or depleting the oceans of other valuable marine organisms. Pacific Leatherback turtles are too valuable to risk for a fishery that has no economic benefit and does such environmental harm.

Sincerely,
Tanya Smart
17660 Redwood Springs Drive
Fort Bragg, CA 95437
Dear Pacific Fisheries Management,

Don't let leatherback turtles become extinct...please continue the drift gillnet ban during their migration season this year (2006), next year (2007), and FOREVER.

Thanks for your care/concern for these cool critters,

Erik Wilmot
290 Joaquin Ave
San Leandro, CA 94577
510-352-5421
erik_wilmot@yahoo.com
Dear ladies and gentlemen,

we are very concerned about the Sea Turtle Alert we received. 
So please KEEP AREA CLOSED FOR TURTLES' SAKE

Sincerely

Ständer Family
Ulrich, Christel, Elisabeth, Susanne

Johann Weibhauser Straße 22
D 83413 Fridolfing

Member of Monterey Bay Aquarium Community since august 2006

----Ursprüngliche Nachricht-----

Von: Ocean Action Team [mailto:oceanaction2@mbayaq.org]
An: uc.staender@t-online.de
Betreff: Monterey Bay Aquarium:Sea Turtle Alert

Monterey Bay Aquarium

Speak Out NOW for Pacific Leatherback Turtles

The Pacific leatherback turtle urgently needs your help. Your voice by November 7th could help save this struggling species.

The Pacific leatherback turtle, the largest of the sea turtles and a species that predates the dinosaurs, is in deep trouble. Over the past 20 years, the population of Pacific leatherbacks has plummeted by 97%. Destructive fishing practices, especially drift gillnets, have pushed Pacific leatherbacks close to extinction.

To address this dire threat, in 2001 Federal fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure coincides with the leatherback turtle migration, allowing the turtles to safely feed in these waters. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery.
since then!

Now fisheries managers are preparing to allow drift gillnet fishing again - with potentially devastating consequences for leatherback sea turtles.

**What you can do**

Send an email or a fax to the Pacific Fishery Management Council today. Tell them you want this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed. Every year the Pacific Fishery Management Council decides whether or not to continue closing this area so please emphasize that this closure should remain in place far into the future -- not just for 2006.

**Your comments must be received by Tuesday, November 7th.** Email your comments to pfmc.comments@noaa.gov or fax them to 503- 820- 2299. Use the subject line: 'Agenda Item C.3. Drift Gillnet FMP Comment'.

If you do send an email or fax, we'd love to know! Simply respond to this email, or included us as a Bcc on your comments. Thanks!

**Learn more**

Please read this recent Op-Ed that appeared in the Monterey County Herald. Feel free to draw on language from the article or this alert while writing your comments.

**Tell a friend**

Forward this email to a friend and urge them to write a letter on behalf of the turtles! Encourage them to become Ocean Action Team members so that we can contact them when it is time to speak out on other critical ocean issues.

Thank you for weighing in on behalf of the Pacific leatherback turtles!

Sincerely,

Aimee David and Ken Peterson
Ocean Action Team

email: oceanaction2@mbayaq.org
web: http://www.oceanactionorg

Forward email

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This email was sent to uc.staender@t-online.de, by oceanaction2@mbayaq.org
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Monterey Bay Aquarium | 886 Cannery Row | Monterey | CA | 93940
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "Kelly Bush" <kelly_bush@hotmail.com>
Date: Wed, 01 Nov 2006 12:34:12 -0800
To: pfmc.comments@noaa.gov
BCC:

Dear Members of the Pacific Fishery Management Council,

I am deeply concerned about the future of the Pacific Leatherback Turtle. This area must remain safe for these turtles and this can be accomplished by keeping the Pacific Leatherback Conservation Area closed. During your annual review of this policy please consider continuing to keep this area closed during this critical time of year as well as many years into the future. Thank you for considering this feedback.

Best regards,
Dr. Kelly Bush

Dear Pacific Fishery Management Council –

Please continue to close the drift gillnet fishery off the coast of California and Oregon all year long far into the future – not just until 2006. This will protect the leatherback turtle migration, allowing the turtles to safely feed in these waters all year long. The past closure has been so effective that **not a single leatherback turtle has been recorded caught** in the fishery.

Thanks,
Toni Montoya
650.723.6952
Subject: Agenda item C.3
From: Kathryn Paddock <kadalap@sbcglobal.net>
Date: Wed, 1 Nov 2006 10:45:56 -0800 (PST)
To: pfmc.comments@noaa.gov

Over the past 20 years, the population of Pacific leatherbacks has plummeted by 97%. Destructive fishing practices, especially drift gillnets, have pushed Pacific leatherbacks close to extinction.

To address this dire threat, in 2001 Federal fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure coincides with the leatherback turtle migration, allowing the turtles to safely feed in these waters. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then!

I want this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed. This closure should remain in place far into the future -- not just for 2006.

Thank you for considering my opinion.

Kathryn Paddock
Greetings,

My name is Amanda Kahn. I have been keeping track of developments in fisheries management in California and other parts of the world. California has always been at the forefront of innovation, especially regarding the environment. Though our state has lagged in the regulation of its fisheries, it is now aiming for sustainable management, as evidenced by the recently passed Marine Life Protection Act.

Californians are viewing the Marine Life Protection Act as a step toward a more sustainable relationship with our ocean communities. While I understand that the decision to allow gillnetting during turtle migration time is a federal decision, I think that Californians' input is important. Most people, myself included, are seeing this as a step backward in ecological sensitivity. The degree of bycatch that results from drift gillnetting cannot be ignored.

Sustainable fishery practices such as those advocated by the Monterey Bay Aquarium Seafood Watch (including harpooning, hook and lining, and trolling) should be the only practices that receive increased fishing time. Other destructive methods, once restricted, should not be permitted to expand again. It would be analogous to banning smoking inside of restaurants, and then allowing it a few years later. It is not a healthy practice and, once restricted, should not be released from such restrictions.

In addition to my letter, I would like to refer you to a commentary written by Santi Roberts for the Monterey County Herald. It is another letter that, more eloquently than I have, examines the possible rationale for lifting restrictions on drift gillnetting.

Thank you for your time, and I hope you decide to keep drift gillnetting restricted during times of turtle migration (or, even better, restrict it further and replace its catch with that obtained from more sustainable fishing practices).

Amanda Kahn
Student, California State University, East Bay
a_manahue@yahoo.com
Please don't allow drift gillnet fishing again in the Pacific Leatherback Conservation Area! The closure of this area has been so effective over the past five years, it would be a shame to endanger Pacific Leatherback turtles even more by reopening this area to drift gillnet fishing. Please continue to protect these beautiful animals. They've been around longer than we have! Thank you.
Deborah

Deborah Goldstein
Grants Manager
Monterey Bay Aquarium
886 Cannery Row, Monterey, CA 93940
P: 831-647-6859  F: 831-644-7554
www.montereybayaquarium.org
We strongly urge that this area remain safe for turtles by keeping the Pacific Leatherback conservation area closed.

Ed & Gloria Witucki
gloed98@aol.com
To the Pacific Fishery Management Council:

I have lived in the Monterey Bay Area (Santa Cruz County) for over 30 years and was born and raised in towns on the California Coast. I have seen what protections in place have done to help restore the valuable marine life that lives along our California Coast. I have also seen what over fishing has done to jeopardize the health of our oceans. I realize that there are many families that rely on the fishing industry to provide their livelihood, but I feel that over fishing is the root cause of the decimation of their own profession. There are other food sources that do not require decimation of marine life and we simply don't need this resource at this ecological cost. Allowing Gillnets back in to the waters will not improve the livelihood of fishermen significantly and will have such a negative effect on the already unstable populations of the non-targeted animals that I urge you to continue to ban them, for all of our sakes.

Sincerely,

Terri Bartos
312 Dakota Ave.
Santa Cruz, CA 95060
To whom it may concern,

This should be a no-brainer! This area must remain in protection at all times! Please accept this response as a constant reminder as to how delicate our waters are and it is up to US to make sure that they are protected.

Sincerely,

Robert Lyon

615-476-1006
I'd have to agree with the Monterey Bay Aquarium, please continue to protect the leatherback turtles by keeping the drift gillnet fishery off the coast of California and Oregon.

Here's the full message from the Monterey Bay Aquarium:

Speak Out NOW for Pacific Leatherback Turtles

The Pacific leatherback turtle urgently needs your help. Your voice by November 7th could help save this struggling species.

The Pacific leatherback turtle, the largest of the sea turtles and a species that predates the dinosaurs, is in deep trouble. Over the past 20 years, the population of Pacific leatherbacks has plummeted by 97%. Destructive fishing practices, especially drift gillnets, have pushed Pacific leatherbacks close to extinction.

To address this dire threat, in 2001 Federal fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure coincides with the leatherback turtle migration, allowing the turtles to safely feed in these waters. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then!

Now fisheries managers are preparing to allow drift gillnet fishing again with potentially devastating consequences for leatherback sea turtles. What you can do...
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "Margaret (P.J.) Webb" <pjwebb@inreach.com>
Date: Wed, 1 Nov 2006 09:27:41 -0800
To: <pfmc.comments@noaa.gov>
CC: "Beth Cataldo" <bcataldo@ccsf.edu>

Dear People,

With no expected economic gain expected from opening drift gillnet fishing and the extreme hazards to so many species by the use of these nets, I strongly urge you to keep this type of fishing closed. I have seen the effects of wildlife maimed and killed in these destructive nets. The successful protection of the Pacific Leatherback Turtles by the closure proves that we can prevent this needless devastation.

You have it in your power to protect endangered turtles, dolphins, porpoises, endangered seals, sharks, seal lions and whales. Please protect our ocean life.

Sincerely,
Margaret (P.J.) Webb
P.O. Box 702
Cambria, CA 93428
Subject: Drift Gill Net Fishing
From: <susan.tripp@charter.net>
Date: Wed, 1 Nov 2006 9:22:40 -0800
To: pfmc.comments@noaa.gov

Dear PFMC:

Please do not allow drift gill nets back in the waters off the Oregon and California coast. These nets are lethal to many marine mammals and have devastated the leatherback turtle population that needs the nutrient-rich waters of our coast in which to feed. When these animals are gone, they are gone forever. We cannot continue to heavily harvest an ocean that is overexploited. Please give our ocean habitats a chance to recover.

Thank you,

Susan Tripp
654 Mountain View Street
San Luis Obispo, CA 93405
Subject: Agenda Item C.3. Drift Gillnet FMP Comment  
From: "Carla de Mos" <carlademos@hotmail.com>  
Date: Wed, 01 Nov 2006 17:05:20 +0000  
To: pfmc.comments@noaa.gov  
CC: oceanaction2@mbayaq.org  
BCC:  

Dear Sir/Madam,

I am writing to ask you to continue the closure of the drift gillnet fishery in the Leatherback Conservation Area during the turtle's migration period indefinitely. As this closure has proved to be effective against the bycatch of this rare and ancient species, it is imperative that we maintain it.

Sincerely,

Carla de Mos  
347 Massol Avenue #207  
Los Gatos, CA 95030

Stay in touch with old friends and meet new ones with Windows Live Spaces  
Dear Council members,

I am writing to urge you to keep the Pacific Leatherback Conservation Area closed to gillnet fishing this year and in years to come. Opening this area to such a destructive fishing method will put far too much pressure on the dwindling population of Pacific Leatherbacks, a species so close to extinction. I fully support methods of fishing that are sustainable both economically and ecologically, methods that will not adversely impact non-commercial species as “by-catch”. I thank you for your consideration.

Sincerely,

Pablo Ramudo
Water Quality Supervisor
Laboratory Director
North Marin Water district
999 Rush Creek Place
Novato CA, 94945
(415) 897-4133 ext.8521
Subject: NO DRIFT NETS IN CALIFORNIA WATERS
From: David Ellis <davielli22@yahoo.com>
Date: Wed, 1 Nov 2006 08:47:23 -0800 (PST)
To: pfmc.comments@noaa.gov

Seriously... with all of the technology humans have available to them - all of the different kinds of fishing equipment that can be modified to reduce bycatch... you seriously think we still need drift nets?

And you really think we need them in CALIFORNIA WATERS??! All kinds of species are harmed by these things, including the Pacific Leatherback Turtle which has had its population reduced by 97%, in large part because of these nets.

Really... is that the best you can do?

DO NOT allow drift gill nets anywhere... and ESPECIALLY in California waters!

Dave

______________________________
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I wish to make a public comment on the proposed reintroduction of drift gillnet fishing off some parts of the California coastline. I oppose it and see no logical or strong economic reason for its re-introduction.

The use of drift gillnets has had devastating impacts on the Pacific Leatherback turtle and numerous forms marine mammal life. These nets are not well managed and in all cases there are alternative forms of fishing that are effective and do not have the negative impacts. We have lost over 90% of the Leatherback Turtle and thousands of dolphins and whales to these nets. In 2001 Federal fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure was so effective that not a single leatherback turtle has been recorded caught in the fishery since.

Reintroducing these nets now makes no sense and is tantamount to an agreement to further harm these endangered animals.

I want to request that you keep this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed to drift gillnets and make this a permanent policy during these critical three months.

Thank you.

Michael Kleeman
410 Hilldale Way
Mill Valley, CA  94941
Subject: save the endangered turtles
From: george cosentino-roush <gcr@stanford.edu>
Date: Wed, 1 Nov 2006 08:07:51 -0800
To: pfmc.comments@noaa.gov

--

Dear Sirs,

Please leave the Oregon and California coasts closed to the terrible practice of drift netting, for the complete year of 2006, and ultimately permanently for all time. Let's save these turtles while we can.

Also, the sport anglers I observed are all coming in with huge limits of rockfish and red snapper. I sincerely doubt that these fellows will eat these fish. (Also Ling Cod, and Sturgeon)

While commercial fishermen are starving with restrictions, these anglers are seriously impacting the health of these stocks. At least with the commercial fishermen the resource is put to good use.

So, you see I have mixed feelings about some commercial fisheries--please stop bottom trawling and lets protect the rock cod fish stocks.

PLEASE BAN DRIFT NETTING AND BOTTOM TRAWLING!

George Cosentino-Roush

gcr@stanford.edu
To whom it may concern,

I am writing to urge you to maintain the current effective policy of keeping the Pacific Leatherback Conservation Area closed to drift gillnet fishing during their migration. It seems like this approach has worked successfully so I’m unclear as to why the closure is being reconsidered. Please consider extending this closure far into the future to help these magnificent ocean ambassadors who cannot help themselves.

Sincerely,

Steven S. Yalowitz
Subject: drift gill net fishing
From: Tracy Ross <tmr@sonic.net>
Date: Wed, 1 Nov 2006 06:48:37 -0800
To: pfmc.comments@noaa.gov

Please reject any attempt to reinstitute drift gill net fishing off the coast of California and Oregon during the three months of the Leatherback Turtle migration.

The Pacific leatherback turtle, the largest of the sea turtles and a species that predates the dinosaurs, is in deep trouble. Over the past 20 years, the population of Pacific leatherbacks has plummeted by 97%. Destructive fishing practices, especially drift gillnets, have pushed Pacific leatherbacks close to extinction.

To address this dire threat, in 2001 Federal fisheries managers closed the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure coincides with the leatherback turtle migration, allowing the turtles to safely feed in these waters. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then!

This fishing practice not only endangers turtles, but is destructive to marine mammals, who become entangled in these nets and suffer terribly. I urge you to keep our coastline closed.

Thank you for your consideration.

Sincerely,

--Tracy Ross
Dear Mr. Burner,
As a member of the Monterey Bay Aquarium's Ocean Action Team, it has come to my attention that the Council will be voting about drift gillnet's in the near future. I urge you to keep in place the legislation that has allowed Leatherback turtles to migrate freely since 2001. Since the initial act passed not one Leatherback turtle has been killed on record. Results such as these are crucial to the survival of this important marine species. Please keep the Pacific Leatherback Conservation Area closed for 2006 and make it a commitment to keep it closed for generations to come. Thank you for your time.
Sincerely,
Martina Smutny
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: Duggly9@aol.com
Date: Thu, 2 Nov 2006 14:14:53 EST
To: pfmc.comments@noaa.gov

Please attend my limited comments on sea turtle protection.
It is my understanding that drift gillnets snag and drown sea turtles.
It is my opinion that even one dead sea turtle is much too high a price to pay so that shoppers at the Safeway in Dubuque can have a diversity of choice at the "fresh" seafood counter.
Please maintain or otherwise continue the ban on drift gillnets.
A response to my concern would be appreciated.
Thank you.

Richard Alley
405 N Jefferson
PO Box 368
Converse, IN 46919-0368
765 395-1501
Subject: Agenda Item C.3. Drift Gillnet FMP Comment  
From: laura johnson <lauraafrica@yahoo.com>  
Date: Thu, 2 Nov 2006 23:06:55 -0800 (PST)  
To: pfmc.comments@noaa.gov

Please keep the conservation area closed.

Thanks,  
Laura K Johnson

Get your email and see which of your friends are online - Right on the new Yahoo.com
Far too many species have been lost already, and so many are doomed. When there is an opportunity to save even one we should do everything possible to do it. If closing an area to save the Pacific Leatherback Turtle can be done in the short term, it would seem that this closure should remain in place far into the future.
Pacific leatherback sea turtles have survived on this planet for nearly 100 million years. They have endured ice ages, major volcanic events, meteor impacts, and most every predator in the sea. However, they, and other endangered marine life, cannot survive being caught and drowned in drift gillnets.

Knowing this, in 2001, the National Marine Fisheries Service put into place a three-month drift gillnet closure in a large area off the coast of California that would allow leatherback turtles to safely migrate and feed in U.S. waters, including Monterey Bay. The closure -- the Pacific Leatherback Conservation Area -- has been so effective that no leatherback turtles have been reported drowned in the entire fishery since protections were put in place.

So, why then is the Fisheries Service now considering reopening this area year round to up to 30 drift gillnet vessels?

It's not because the gear has improved. Drift gillnets remain as destructive as they were prior to the 2001 closure. In addition to endangered turtles, dolphins and porpoises, seals and sea lions, and even large whales drown in this fishery. Between 1996 and 2002, more than 50 turtles, 700 seals and sea lions, over 1,000 dolphins and porpoises, and 35 large whales were killed.

These air-breathing animals often die when caught in these huge nets, long enough to loop around a football field six times. In fact, drift gillnets are so harmful to ocean life that they are banned on the high seas and in the waters of several states, including Washington, Georgia and Florida.

The proposal before the Fisheries Service would open up the protected area as long as there are fishery observers on each vessel and caps on the number of leatherbacks and some whale species that can be killed. These controls will help limit the number of leatherback turtles and certain large whales killed.

Unfortunately, with these critically endangered species, the survival of every single one counts. What is more, there will be no caps on the number of other sea turtles, fin whales, gray whales, elephant seals, California sea lions and dolphins killed. Nor will there be any caps on the amount of fish simply discarded, dead and dying, which in this fishery amounts to more than is kept.

It is also not because of economics; the proposed reopening is not expected to provide significant economic benefit. The industry folks argue that the closed area has directly led to the decline in the drift gillnet fishery. But this fishery was waning long before the closure was implemented, with the number of active vessels dropping by half between 1994 and 2000. The Fisheries Service has concluded that the "economic impact of an increase in (drift gillnet) effort is likely to differ little from zero." In other words, there is no predicted economic gain.
from this proposed opening.

The proposed opening therefore makes no sense for either scientific or economic reasons. It also makes no sense for political reasons, as the public has shown overwhelming opposition. Further, it would seem to fly in the face of the recent Governors' Agreement on Ocean Health, where the states of California, Oregon and Washington have explicitly recognized the need for addressing the declining health of our ocean and the need to sustain marine wildlife populations.

In California, we pride ourselves on being progressive in ocean management. If the Fisheries Service approves the opening of the Pacific Leatherback Conservation Area, it will be a hugely irresponsible step backward. Just as we are protecting areas in our state waters through the Marine Life Protection Act, we would be re-opening areas in our federal waters to a wasteful and destructive way of fishing.

The question ought not to be how do we open this area, but rather, how can we catch swordfish, tuna and thresher shark without sacrificing so many other marine creatures? If we don't take the time to find that answer, Pacific leatherback sea turtles may go extinct on our watch.

I want this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed. I would also like to emphasize that this closure should remain in place far into the future -- not just for 2006.
To whom this may concern,
I am a California resident and an avid lover of the environment. I am also a diver, who very often marvels at the beauty of the underwater world. The Pacific Leatherback Turtle has existed on this planet for 100 million years. I admire at it's survival through huge ecological impacts; volcanoes and meteors. Merciless under the pillage of humans however, it's existence will surely wither away. The fate of the Leatherback Turtle has been placed in the hands our conscious race. It would be immoral and unethical to consciously destroy this wondrous animal. Do not let the conservation area be re-opened to drift gill-netting. It is a step backward in our evolution as conscious and wise beings. Please do not let this happen!
Thank you,
Roxanne Robertson

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Subject: Save Leatherback Turtles
From: "Claudia Vieira" <cvgardendesign@gmail.com>
Date: Thu, 2 Nov 2006 18:38:52 -0800
To: <pfmc.comments@noaa.gov>

I am writing to ask you to please continue to protect the Pacific Leatherback Turtle by keeping the Pacific Leatherback Conservation Area closed to drift gillnet fishing. The number of species on our planet is fast shrinking. Please use your power to protect this one, not just now but for the future!

Thank you,
Claudia Vieira
To whom it may concern,

I am an active scuba diver in California and elsewhere. As a physician, biologist and diver I am concerned about the effects of reopening the fisheries off the coast of California and Oregon during the leatherback turtle migration.

The Pacific leatherback turtle population is clearly endangered and may only continue recovery if its migration remains protected. Please do not reopen this fishery during this vital time of the year. It is not adequate to close only for a few years, but to make a commitment to permanent closure during the migration.

Please help preserve this ancient species. Keep the fisheries closed to gill nets during the leatherback turtle migration.

Sincerely

Don Winters, MD
To the Pacific Fishery Management Council:

Attention Federal Fisheries Managers,

I am writing to express my concerns for the preservation of the Leatherback Sea Turtle. I want the Pacific Leatherback Conservation Area off the coasts of California and Oregon to continue to be closed to "drift gillnet fishing" now and permanently for the future. Please protect our ocean and the Leatherback Sea Turtle.

Thank you,
Kathleen Pyle
Rancho Santa Margarita, California
It is very important to me that you do NOT consider opening the Pacific Leatherback Conservation Area to drift gillnets year round.

While I do not like the killing of seals, sealions, whales and dolphins in these nets, I believe that allowing the killing of endangered marine life like the Pacific Leatherback Turtle is unconscionable.

Sincerely,
Mary Ann Finger
Mill Valley, CA
Subject: drift gillnet
From: "Scott Gursky" <sgursky@san.rr.com>
Date: Thu, 2 Nov 2006 16:56:48 -0800
To: <pfmc.comments@noaa.gov>

Dear Federal Fisheries Managers,

Please keep the closure of the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure coincides with the leatherback turtle migration, allowing the turtles to safely feed in these waters. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then!

You can be a Blessing to our planet!
Hello.

I would like to speak Out NOW for Pacific Leatherback Turtles. The Pacific leatherback turtle urgently needs our help to save this struggling species.

The Pacific leatherback turtle, the largest of the sea turtles and a species that predates the dinosaurs, has been in deep trouble over the last many years. For example, over the past 20 years, the population of Pacific leatherbacks has plummeted by 97%. Destructive fishing practices, especially drift gillnets, have pushed Pacific leatherbacks close to extinction.

Thanks to you the Pacific Fishery Management Council addressing this dire threat in 2001 closing the drift gillnet fishery off the coast of California and Oregon for three months of the year. The closure coincides with the leatherback turtle migration, allowing the turtles to safely feed in these waters. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then!

I ask you (as do the many supporters in my community who feel the way I do), the fisheries managers, to please keep this area safe for turtles by keeping the Pacific Leatherback Conservation Area closed to drift gillnet fishing. This would eliminate the devastating consequences for leatherback sea turtles, if this plan was dropped, and gillnetting was allowed again.

Thank you for your time.

Tom Koontz

Get FREE company branded e-mail accounts and business Web site from Microsoft Office Live
http://clk.atdmt.com/MRT/go/mcrssaub0050001411mrt/direct/01/
I work with Ca State Parks as a resource monitor for our endangered Ca Least Terns and threatened Western Snowy Plovers. We have seen a very positive impact on the species thanks to the restrictions the Government has placed on human impact and allowed exclosures for the breeding and nesting of these birds. Due to the success of the restrictions placed on the drift gillnet fishing, I would like to state that I would like to see continued restrictions this coming year. As you are aware the number of leatherback turtles are dangerously close to extinction. This proactive action will play a large part of bringing back this species to a healthy number. The leatherback turtles are able to feed freely during this time of their migration. Thank you for hearing my voice on this critical issue. Let's all work together to perfect this species.

Nina Richert  
Oceano Dunes State Park  
Oceano, Ca
Pacific Fishery Management Council,

Please keep the Pacific Leatherback Conservation Area closed. As humans, the most powerful creatures on earth, it's our responsibility to keep these amazing animals alive. Please keep the drift gillnet fishery off the coast of California and Oregon closed. Please do the right thing.

Thank You,
Matthew Zola
Subject: "Isabella, Zoe" <isabellaz@BrynMawrSchool.org>
From: "Isabella, Zoe" <isabellaz@BrynMawrSchool.org>
Date: Thu, 2 Nov 2006 15:34:27 -0500
To: <pfmc.comments@noaa.gov>

dear Pacific Fishery Management Council,

The Pacific leatherback turtle population has already suffered too much depletion, please encourage their recovery by keeping the coasts clear of gill netting. The absence of gill netting was successful, we cannot afford to reverse that.

Thank you,
To whom it may concern,

I want this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed. Pacific leatherback sea turtles have survived on this planet for nearly 100 million years. They have endured ice ages, major volcanic events, meteor impacts, and most every predator in the sea. However, they, and other endangered marine life, cannot survive being caught and drowned in drift gillnets. The Pacific leatherback turtle, the largest of the sea turtles and a species that predates the dinosaurs, is in deep trouble, the cause, humans. Over the past 20 years, the population of Pacific leatherbacks has plummeted by 97% because of an inefficient and genocidal system of catching swordfish, tuna and thresher shark.

The Pacific Leatherback Conservation Area has been so effective that no leatherback turtles have been reported drowned in the entire fishery since protections were put in place. So, why then is the Fisheries Service now considering reopening this area year round to up to 30 drift gillnet vessels? It's not because the gear has improved:

Drift gillnets remain as destructive as they were prior to the 2001 closure. In addition to endangered turtles, dolphins and porpoises, seals and sea lions, and even large whales drown in this fishery. Between 1996 and 2002, more than 50 turtles, 700 seals and sea lions, over 1,000 dolphins and porpoises, and 35 large whales were killed.

It is also not because of economics:

The proposed reopening is not expected to provide significant economic benefit. The industry argues that the closed area has directly led to the decline in the drift gillnet fishery. But documented truth is that the fishery was waning long before the closure was implemented, with the number of active vessels dropping by half between 1994 and 2000. The Fisheries Service has concluded that the "economic impact of an increase in (drift gillnet) effort is likely to differ little from zero." In other words, there is no predicted economic gain from this proposed opening.

The question ought not to be how do we open this area, but rather, how can we catch swordfish, tuna, and thresher shark without sacrificing so many other marine creatures?

If we don't take the time to find that answer the Pacific leatherback sea turtles may go extinct on our watch. Explain that one to your children.

Regards,

Kristen K. Morris
Canton, Michigan
Kristen.morris@assurant.com
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Thank you.
Please preserve our oceans and keep the wildlife safe for future generations!!

Thank you, Madeline Banach

Madeline Banach, WISC
Commercial Lines Marketing
Associated Financial Group
Employee Benefits. Insurance. HR Solutions.
Office (262) 542-8822 / (800) 837-8822
madeline.banach@associatedfinancialgroup.com

*************************** NOTICE ***************************
Subject: Agenda item C.3
From: "Goldstein, Gersham" <GGOLDSTEIN@stoel.com>
Date: Thu, 2 Nov 2006 11:45:16 -0800
To: <pfmc.comments@noaa.gov>

I understand that at your next meeting you will be discussing the closing of the gillnet season for three months to allow the safe migration of sea turtles. I favor the closing of the gillnet season for this purpose not only for this year but for all future years to allow the migration to continue as it has since 2001.

Gersham Goldstein
gershamtax@comcast.net
80 SW Tanglewood Dr.
Lake Oswego, OR 97035
Subject: Please save the leatherback Turtles
From: "Randa" <randath@earthlink.net>
Date: Fri, 3 Nov 2006 07:02:50 -0800
To: <pfmc.comments@noaa.gov>

Please save the leatherback Turtles.

Randa Thompson
Subject: Agenda Item C. 3. Drift Gillnet FMP Comment.
From: Jayson Olvera <jaysonolvera@yahoo.com>
Date: Fri, 3 Nov 2006 08:48:58 -0800 (PST)
To: pfmc.comments@noaa.gov

Dear Sir or Madam,

I have recently been made aware of scheduled decision to determine whether or not to allow fishing in the Pacific Leatherback Conservation Area. I believed that it is your responsibility to protect the Leatherback turtles and their habitat from the commercial fishing industry. I would go on to say that you should revoke fishing in these waters not only during the migration season, but continuously and indefinitely. Your actions could preserve and protect the Leatherback for future generations. I thank you for your time and await your decision.

Sincerely,

Jayson Olvera

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November 5, 2006

Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Dear Chair, and Members of the Council:

I am writing to express my support in keeping the Pacific Leatherback Conservation Area closed to drift gillnet fishing. Since 2001, the annual three-month closure of this essential habitat for migrating leatherback turtles has effectively saved lives, preventing further loss of these ancient marine reptiles to the hazards of DGN fishing practices. You have given this species a little breathing room in the fight against extinction. Thank you, and bravo!

So I find myself puzzled when I hear that those responsible for helping the leatherback are considering undoing all their own hard work by re-opening the Conservation Area to year-round DGN fishing.

Could it be that DGN fishing isn't as bad as was previously thought? In my (admittedly layman) view, that doesn't seem likely. While I'm sure more and more fisheries have adopted responsible DGN practices such as using smaller, monofilament nets, conscientiously checking for entangled bycatch species, and posting independent observers on board their vessels, there are still unintended casualties like whales, seals, dolphins, sharks, and of course, turtles. And while the numbers of these victims may not seem large in themselves, we aren't dealing with large populations to begin with. Many bycatch species are critically endangered and the loss of any represents a blow to genetic diversity.

The indiscrimination of DGN is what led to the United Nations banning the practice in international waters, a move followed by some of our own states (Washington, Florida) in managing their own waters. Frankly, I am surprised that California doesn't join their ranks. With its richly diverse marine populations, the danger of impacting endangered species is perhaps as great there as anywhere else in the United States.

Could it be that allowing DGN year-round in the Conservation Area will significantly increase the total catch? That may not be the best idea, with the decline in populations of big-money species such as tuna. If this article which appeared in this week's issue of *Science* (http://www.sciencemag.org/cgi/content/short/314/5800/721b) is even remotely on target, it seems to me that we may be forced to close additional areas just to give our target fish species a chance at recovery to harvestable levels.

I realize the difficulty of your job in balancing the interests of commerce, conservation, and the individual lives of fishermen and people like me. I thank you all for your commitment, and
hope you decide to keep the Pacific Leatherback Conservation Area closed during the turtle’s annual migration.

Quellyn L Snead
To Whom This Concerns:

I would ask that you NOT reopen the Pacific Leatherback Conservation Area! In our modern ERA of so much human damage that is bestowed upon our Earth and its life forms, it appears that even "relatively small" decisions can have far-reaching effects.

Please, please, please continue the closure policy that was adopted in 2001.

Thank you,

Brent DeWitt
San Diego, CA
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "Diane Drewke" <drewke@comcast.net>
Date: Sun, 5 Nov 2006 06:48:51 -0800
To: <pfmc.comments@noaa.gov>

I am vehemently against opening the Pacific Leatherback Conservation Area up to drift gillnet fishing. This area must remain closed to continue to help protect the Pacific Leatherback Turtle. Keeping the drift gillnet fishing out has been a tremendous help to the turtle and should be continued at all costs. I would like to see this a more permanent decision not one that is revisited every year. It seems we should leave it in place for at least the next 5 years before revisiting this yet again.

Sincerely,
Diane Drewke
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: JimJam Bonks <suphax0r52@yahoo.com>
Date: Sun, 5 Nov 2006 04:50:57 -0800 (PST)
To: pfromc.comments@noaa.gov
CC: oceanaction2@mbayaq.org

Please do not end the ban on drift gillnet fishing. If you were to lift the ban there would be no economic benefits. The only thing that would happen as a result would be the deaths of several critically endangered animals such as Pacific leatherback turtles. Even if you were to place caps on the number of endangered sea life killed by drift gillnets, such fishing practices would still do significant damage to turtle stocks. As a concerned resident of the California coast, I beg you to continue the ban on drift gillnet fishing.

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Subject: Agenda Item C.3. Drift Gillnet FMP Comment  
From: Ljpearsall@aol.com  
Date: Sat, 4 Nov 2006 21:39:17 EST  
To: pfmc.comments@noaa.gov  
CC: bill.hogarth@noaa.gov

Dear Pacific Fishery Management Council members:

I am writing to you in support of a permanent ban on drift gillnet fishing in the Pacific Leatherback Conservation Area. The area must remain safe for turtles by keeping the area closed, not just for 2006, but far into the future. Responsible management of the dwindling population of leatherback turtles must include a ban on drift gillnet fishing. In addition, there should be habitat restoration, nest protection, and marine pollution and debris management. Such action will benefit other populations of marine mammals as well. We rely upon NOAA for stewardship of our oceans, this ban is extremely important.

This area is a national treasure, and the pacific leatherback turtle is a national resource. Thank you for protecting this important resource for future generations.

Sincerely,

Lorraine J. Pearsall

7708 Takoma Ave, Takoma Park, Maryland  20912
Subject: Agenda Item C.3. Drift  
From: mountains@redshift.com  
Date: Sat, 4 Nov 2006 16:26:09 -0800 (PST)  
To: pfmc.comments@noaa.gov

We are all on the Earth to live in unison. Humans took step in 2001 to address the threat to the Pacific Leatherback Turtle by closing the drift gillnet gishery off the coast of California and Oregon during their migration. It has been effective, so much so that not one turtle has been caught in the fishery. Why is it now under consideration for fisheries managers to allow drift gillnet fishing again – with potentially devastating consequences for leatherback sea turtles?

Please prevent this from happening, please help preserve the future of this species for future generations of all beings.

Thank you,

K. Hills  
Salinas CA
Dear Pacific Fishery Management Council,

I am a student at Cherokee High School, currently taking A.P. Biology. I am very concerned about Pacific leatherback turtles. I sincerely hope that the drift gillnet fishery off the coast of California and Oregon remains closed this year and every year in the future. Keeping the Pacific Leatherback Conservation Area closed has prevented a countless number of needless deaths. Destructive fishing practices, particularly drift gillnets, could potentially cause the extinction of this already threatened species. Thank you.

Sincerely,
Melanie McMann
I am writing to urge you to close the Pacific Leatherback Conservation off the coast of California and Oregon to drift gillnet fishing not only in 2006, but for at least a decade in order to preserve our Pacific Leatherback turtles.

Since research has shown that ocean sealife is under such stress already, everything you do to maintain the ecosystem is crucially important.

Thank you,

Pat Shelton,
San Rafael, CA
Dear Sirs:

I am writing this in support of a permanent ban on drift gillnet fishing in the Pacific Leatherback Conservation Area. To date, this program has been eminently successful in preventing mortality of Pacific leatherbacks. These highly endangered turtles may face total extinction within 10 years. The Pacific population was once believed to be the world’s largest, but has crashed within recent years. Factors responsible for the population crash likely include exploitation for eggs and meat by humans and incidental take in numerous commercial fisheries, particularly by fishers employing drift gillnets. The management of this dwindling population must include severe limitations on drift gillnet fishing in addition to habitat restoration, nest protection, and marine pollution and debris management. In addition to the beneficial effects of banning drift gillnets with respect to leatherbacks, a positive effect will be found on populations of marine mammals that are similarly impacted by this fishing method. As the date approaches for your annual decision regarding the closing of the conservation area this year, I recommend that you enforce the closure both this year and permanently into the future.

Paul C. Chrostowski, Ph.D., QEP, FRSH
CPF Associates, Inc.
7708 Takoma Avenue
Takoma Park, MD 20912
P: 301-585-8062
F: 301-585-2117
C: 240-678-8250
Greetings from Monterey-

I am writing on behalf of the beautiful Pacific leatherback sea turtle, which is nearing extinction due to us humans.

Please continue with your great efforts to save these creatures from such a fate. Isn't life tough enough- for us humans too?? When we can actually DO something about it, why don't we?

It seems there's no reasonable excuse to once again allow the "drift gillnet" type fishing practice in California. As the Monterey Herald article so perfectly stated,

"The proposed opening therefore makes no sense for either scientific or economic reasons. It also makes no sense for political reasons, as the public has shown overwhelming opposition. Further, it would seem to fly in the face of the recent Governors' Agreement on Ocean Health, where the states of California, Oregon and Washington have explicitly recognized the need for addressing the declining health of our ocean and the need to sustain marine wildlife populations."

Although, personally, there are not enough hours in my life to actively support these necessary things, I am concerned, and pray daily for responsible ocean management for the sake of our planet, those animals, my children and their children.

I hope my words will help in some small way to dissuade our government from taking a huge, destructive step backward that will ultimately affect us all...

Thank you for listening,
~Suzanne Emery
Subject: Agenda Item C.3. Drift Gillnet FMP Comment  
From: Lisa Dworkin <lisa.dworkin@mindspring.com>  
Date: Sat, 4 Nov 2006 14:06:39 -0600  
To: pfmc.comments@noaa.gov

Dear members of the council,

I'm writing to urge you to keep the Pacific Leatherback Conservation Area closed so that this area remains safe for turtles. The Pacific leatherback turtle is in deep trouble because over the past 20 years the population of Pacific leatherbacks has plummeted by 97%. Destructive fishing practices, especially drift gillnets, have pushed Pacific leatherbacks close to extinction. The 2001 closure of the drift gillnet fishery coincides with the leatherback turtle migration, allowing the turtles to safely feed in these waters. The closure has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then! (Statistics courtesy of the Monterey Bay Aquarium) Please continue this closure in the interest of the turtles.

Thank you for your attention to this matter.

Sincerely,

Lisa Dworkin
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "Kenneth Rohrs" <hkrooster@gmail.com>
Date: Sat, 4 Nov 2006 21:41:16 +0800
To: pfmc.comments@noaa.gov, jim.lecky@noaa.gov, bill.hogarth@noaa.gov

Dear Sir and/or Madam,

In 1977 I watched leatherback turtles lay their eggs on the beach at Rantau Abang, West Malaysia. It was a primeval experience, watching those 6-8 foot turtles doing something that had occurred continuously since the beginning of time. Some of those turtles were tagged and found to swim across vast ocean expanses. Today there are no more leatherback turtles laying eggs on those expansive beaches in west Malaysia.

The few gill net fishermen's economic catches do not match the priceless loss of time immemorial species such as the leatherback. Mankind needs to find sustainable ways to harvest the ocean and still maintain an ecological balance.

Please show forward thinking planning and leadership and not re-open the California coast to large gill netting trawler fishing. Give the oceans a rest to recover, at least until we can figure out how to manage them sustainably for generations to come.

I do vote and will vote in Tuesday's election in California.

Sincerely,
Ken Rohrs

--
Karen and Ken Rohrs-HKRooster@gmail.com
"How you understand something usually depends upon your point of reference."
Dear Fisheries Service,

Please renew the 3 month drift gillnet closure in the Pacific Leatherback Conservation Area. As the only sea turtle likely to be seen at our latitude, the leatherback is a very special inhabitant of our waters. The alarming reduction in population of such a unique creature surely warrants some serious conservation measures. I cannot understand why the 3 month closure, which seems to be effective in eliminating turtle deaths, would be re-considered. With so many other pressures on sea turtles worldwide, the US should set an example, and provide serious protection on a permanent basis.

Bruce Erickson,
Santa Rosa, California
Subject: Agenda Item C.3. Drift Gillnet FMP Comment  
From: "" <gltmscribe@netscape.com>  
Date: Fri, 3 Nov 2006 20:41:08 -0800  
To: <pfmc.comments@noaa.gov>

---

To: pfmc.comments@noaa.gov  
Subject: Agenda Item C.3. Drift Gillnet FMP Comment  

Dear Pacific Fishery Management Council,

It has been brought to my attention that you are proposing to allow year round drift gillnet fishing in the Pacific Leatherback Conservation area off the California and Oregon coasts. I wish to express my opposition.

I am aware that the proposal requires fishery observers on each vessel and caps on the number of leatherbacks and some whale species that can be killed. While I recognize that these controls will help limit the number of leatherback turtles and certain large whales killed, having just one killed is unnecessary. This is an endangered species!

Beyond the endangered leatherback turtle, there is no protection or limit on the number of other species killed (sea lions, dolphins, elephant seals, fin whales, gray whales, other sea turtles, etc.) I understand the fisheries service concluded there would be no economic impact as a result of year round drift gillnet fishing.

So - if the only result of this change would be unnecessary deaths of endangered sea turtles (that will lead to the species ultimate extinction) and other fish, why is such a proposal being considered?  

This area needs to remain safe for turtles (and other sealife), by keeping the Pacific Leatherback Conservation area closed for the three month period while the turtles migrate and feed. Additionally, this approved closure should extend well beyond the year 2006. This closure should be in place for MANY years to come. Such a decision keeps supports California's commitment to healthy progressive ocean management. We protect our state waters, shouldn't we protect our federal waters and sealife as well?

Thank you for listening,

Sincerely,
Gail McNamara

---

Netscape. Just the Net You Need.
Subject: SAVE THE TURTLES  
From: totopspin3@crestcomtech.com  
Date: Fri, 3 Nov 2006 22:29:16 -0500  
To: pfmc.comments@noaa.gov

Dear Pacific Fishery Management Council,

My name is Tim Olsen. I am a high school student and I am currently taking Advanced Placement Biology. As a part of the curriculum, our class learned about the endangered species of the world, and the reasons why they are endangered. Two of the major causes of extinction in organisms are habitat intrusion and destruction, and the second is poaching or hunting. My concern at the present moment is for the Pacific Leatherback Turtles. This turtle is the largest of all the sea turtles and has lived on this planet 13 times longer than humans, dating back to the dinosaurs 65 million years ago. Due to destructive fishing practices in using drift gill nets, the population of this turtle has dropped 97%. Could you imagine if 97% of the human race was killed by a cause that could be prevented? These turtles, migrating to California and Oregon for three months of the year have been protected by the Federal fisheries managers since 2001 by outlawing the use of these drift gill nets. The turtles have since been able to feed safely in these waters and a trapped turtle has not turned up since! However, now you are preparing to waive this outlaw? With this action, the population of the turtle will most definitely face extreme drops in population and possibly extinction. As a result, I am asking for your help. Please, by all means, continue to keep this area safe for the turtles by keeping the Pacific Leatherback Conservation Area closed. Let this turtle continue to make a come back, so we do not lose one of the oldest turtles, please protect the Pacific Leatherback Sea Turtle.

A concerned citizen and AP Biology student,

Timothy Olsen
Subject: Agenda Item C.3. Drift Gillnet FMP Comment  
From: "Kristin Teed" <kristin.teed@comcast.net>  
Date: Fri, 3 Nov 2006 16:07:56 -0800  
To: <pfmc.comments@noaa.gov>  

Dear Pacific Fishery Management Council,

It has been brought to my attention that you are proposing to allow year round drift gillnet fishing in the Pacific Leatherback Conservation area off the California and Oregon coasts. I am writing to oppose this proposal.

I am aware that the proposal requires fishery observers on each vessel and caps on the number of leatherbacks and some whale species that can be killed. While I recognize that these controls will help limit the number of leatherback turtles and certain large whales killed, having just one killed is one TOO MANY. This is an endangered species we're talking about! And beyond the endangered leatherback turtle, there is no protection or limit on the number of other species killed (sea lions, dolphins, elephant seals, fin whales, gray whales, other sea turtles, etc.) Additionally, the fisheries service has concluded that there would be no economic impact as a result of year round drift gillnet fishing.

So - if the only result of this change would be unnecessary deaths of endangered sea turtles (that will lead to the species ultimate extinction) and other fish, why would you consider such a proposal?

I want this area to remain safe for turtles (and all sealift), by keeping the Pacific Leatherback Conservation area closed for the three month period while the turtles migrate and feed. Additionally, this approved closure should extend well beyond the year 2006. This closure should be in place for MANY years to come. I believe this decision keeps in line with California's commitment to progressive ocean management. We protect our state waters, shouldn't we protect our federal waters and sealift as well?

Thank you for your time,

Signed,
Kristin Teed
Subject: Sea Turtle Alert
From: María Guadalupe García Rojas <linda_chez@hotmail.com>
Date: Fri, 03 Nov 2006 16:52:16 -0600
To: pfmc.comments@noaa.gov
BCC:

I want that you keep the Conservation Area closed (California and Oregon) to remain safe for turtles by keeping the Pacific Leatherback, Thanks alot.

BM. María Guadalupe García-Rojas.

Más vale parecer un idiota con la boca cerrada, que abrir la boca y disipar toda duda (anónimo)

Prodigy/MSN Hotmail Plus. Más espacio, más funcional Haz clic aquí
PLEASE keep the the Pacific Leatherback Conservation Area!!!!!!!!!!!!!!!!!!!!!!!!!!!!

Rose Linck
Ladies and Gentlemen:

I am concerned about the future of the Leatherback Turtle. I urge you to keep the waters off the coasts of California and Oregon safe for marine life. Please make the right choice by keeping drift gillnets out of the waters. Your decision not only affects the lives of marine animals but the lives of us, our children and future generations.

Please, keep the ocean waters free of drift gillnets.

Sincerely,
Michelle Powell
Edmond, Oklahoma
Subject: Agenda Item C.3. Drift Gillnet FMP Comment  
From: Alison Barratt <abarratt@seafoodchoices.org>  
Date: Tue, 7 Nov 2006 10:00:52 +0000  
To: pfmc.comments@noaa.gov  
CC: bill.hogarth@noaa.gov  

Dear Pacific Fishery Management Council,

I was dismayed to hear that you are considering re-opening the drift gillnet fishery during the Pacific leatherback migration period. This closure has been a monumental success, with not a single turtle caught in this fishery during the last 3 years.

The Pacific leatherback faces so many threats in its bid to cling to survival on our planet. Many of those threats are outside our sphere of influence - loss of nesting beaches, threats from distant water longline fleets, pollution etc. However, here is a straightforward measure, with a successful outcome, which does not negatively impact the fishery or any other stakeholder.

With no perceived benefit to this change, why would we further wish to threaten the existence of one of the most ancient species to roam our planet? The loss of every single leatherback turtle is immense, when this species is so severely endangered, that it could be extinct within 2 or 3 generations.

I urge you to reconsider and give these animals a chance for continued survival.

Kind regards,

Ali Barratt
Dear Sir/Madam:

Please continue to protect the leatherback sea turtle by continuing the ban on drift gillnet fishing. Leatherbacks are the largest and most northerly species of sea turtles, and if they are lost - so is an amazing piece of the environment.

Thank you for choosing the future over dollars,

Sarah-Mae Nelson
2823 Lantz Ave.
San Jose, Ca 95124
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "denise balesteri" <queenmessina@hotmail.com>
Date: Mon, 06 Nov 2006 22:45:35 -0700
To: pfmc.comments@noaa.gov
BCC:

Dear Sirs,
The conservation of the Leatherback Sea Turtle is a necessity in the preservation of nature as we know it. To let this species be heartlessly slaughtered for the selfish wants of mankind is unforgivable. We have a responsibility to this planet and every living creature on it as the dominant sentient inhabitants. Please continue to keep the Pacific Leatherback Conservation Area closed, not just for 2006, but as far in to the future as possible. Thank you for your time, it is much appreciated.

Denise Balesteri
Subject: Agenda Item C.3 Drift Gillnet FMP Comment  
From: Nadine Smith <allennadine@comcast.net>  
Date: Mon, 6 Nov 2006 20:48:11 -0800  
To: pfmc.comments@noaa.gov

Dear Pacific Fishery Management Council,

I am requesting that you continue the 3 months closure of drift gill net fishing in order to protect the Pacific Leatherback Turtles and other marine mammals as you have in the past few years.

It seems like such a small time frame each year, to prohibit this type of fishing, in order to help these animals to remain safe. It is the least that we can do for another species.

Sincerely,
Nadine Smith
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: Gayle and Jim Cunningham <gjcunning@comcast.net>
Date: Mon, 06 Nov 2006 19:40:14 -0800
To: pfmc.comments@noaa.gov

Please ensure that the 3 month period we currently have for gillnet fishing along the California and Oregon coast line is kept in place. I believe it is making a difference in the population of Leatherback Sea Turtles. I would love to see the population of this breed be something that is not dwindling because of poor management by commercial fish companies. If we don't put legislation in place now, there is nothing stopping these companies from hurting these animals during their migration period.

Gayle Cunningham
I urge you to continue the closure of the drift gillnet fishery off the coast of California and Oregon during the leatherback turtle migration. I want this area to remain safe for turtles by keeping the Pacific Leatherback Conservation Area closed. This closure should be permanent.
Hello. My name is Patrick Cunningham and I am in 7th grade. My favorite animal is the leatherback sea turtle. When I grow up I want to be a marine biologist. When ever we go to any sort of aquarium I always see if there is a sea turtle exhibit. Knowing that they are now becoming more threatened devastates me. Although I too am a fish and shrimp lover, I would never eat a fish again if I knew it would help the well being of the leatherbacks[and other species]. Wouldn't you stop or try to stop the killing of your favorite animal if you could? This animal will go extinct because of their small numbers, but wouldn't you want to keep an animal on the planet as long as possible? I know I would. More and more animals are becoming extinct because of humans. Once a human wants something they go after it no matter what. We destroy and demolish all in our path. Have you seen the movie _Hoot_? If you have you know what I mean. The same thing is happening to the turtles. We are making it so that the turtle can't reproduce, and we are doing this to get food too. Why can't you put a fine male fence around the area you fish in and search for anything you don't wish to catch and throw [not literally] the animal to the other side of the fence. You could even put hooks on the top of the fencing and pick it up with your boat. Of course you would need some muscle and maybe a crane, but you would save many species. It would save you in the long run too, you would get a lot fewer fines. Please change your minds and stop gill fishing for a 3 months.

From *the biggest turtle fan in the entire United States*,
Patrick Cunningham
Hello. My name is Patrick Cunningham and I am in 7th grade. My favorite animal is the leatherback sea turtle. When I grow up I want to be a marine biologist. When ever we go to any sort of aquarium I always see if there is a sea turtle exhibit. Knowing that they are now becoming more threatened devastates me. Although I too am a fish and shrimp lover, I would never eat a fish again if I knew it would help the well being of the leatherbacks[and other species]. Wouldn't you stop or try to stop the killing of your favorite animal if you could? This animal will go extinct because of their small numbers, but wouldn't you want to keep an animal on the planet as long as possible? I know I would. More and more animals are becoming extinct because of humans. Once a human wants something they go after it no matter what. We destroy and demolish all in our path. Have you seen the movie _Hoot_? If you have you know what I mean. The same thing is happening to the turtles. We are making it so that the turtle can't reproduce, and we are doing this to get food too. Why can't you put a fine male fence around the area you fish in and search for anything you don't wish to catch and throw [not literally] the animal to the other side of the fence. You could even put hooks on the top of the fencing and pick it up with your boat. Of course you would need some muscle and maybe a crane, but you would save many species. It would save you in the long run too, you would get a lot fewer fines. Please change your minds and stop gill fishing for a 3 months. From *the biggest turtle fan in the entire United States*,
Patrick Cunningham
I am sending this e-mail to you in opposition of allowing gillnet fishing to take place off of our California coastline. The damage that is done to all marine life is appalling and should not be allowed.

Mary von Tolksdorf
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: Jeffrey <jjackman@daileyads.com>
Date: Mon, 06 Nov 2006 16:17:03 -0800
To: pfmc.comments@noaa.gov

Pacific Fishery Management Council
To Whom It may Concern:

I am righting this letter to urge to continue the annual ban of Drift Gillnet Fishing off the coasts of California and Oregon. This policy that has been in place since 2001 has helped to eliminate the senseless death of the Pacific Leatherback turtle. It is necessary to continue these types conservations to preserve the wildlife within our oceans. Without proper management and conservation we run the risk of not only depleting the overall supplies of the intended fish species but, also, as collateral damage, risk the reduction of already threaten species of dolphins, whales, and other air breathing animals. Being that the three month ban of Drift Gillnet Fishing has proved to be successful in limited the environmental impact of this practice it only seems natural to allow this ban to continue as long as the Leatherback Turtle and other ocean species remain endangered.

It is important for each of us to do our part to aid in the conservation and prolonging of our natural resources. It is under this ideal that I urge to continue the the annual ban on Drift Gillnet Fishing to allow the Leatherback Turtles and other species to nest and feed freely during this time of year.

Sincerely
Jeffrey Jackman
Dear Pacific Fishery Management Council,

Please keep the current three month ban on drift gillnet fishing in the Pacific Leatherback Conservation Area intact. It is a very intelligent way of protecting the Pacific Leatherback Turtle. Please consider making the ban more permanent (renew it automatically each year) until the Pacific Leatherback population is again healthy. The Pacific Leatherback Turtle deserves our continued help in making their comeback.

The current three month ban on gillnet fishing is extremely successful at protecting the Pacific Leatherback, please don't change it. The ban also helps the ecosystem in the Pacific Leatherback Conservation Area recover each year from the devastating effect that gillnet fishing (the marine equivalent of strip mining) has on the area.

Thank You,

Greg Korelich
Santa Rosa, California
To whom it may concern,

I would like to express my support for the continued protection of the leatherback turtles from gillnet fishing during their migration period. It has proven to have helped the population growth of the turtles and should be continued.

I am also concerned about gillnet fishing in the Channel Islands National Marine Sanctuary during the summer feeding period of the migrating Humpback Whales. We observed them feeding right next to where the nets were, and it is concern they could be entangled in them.

Sincerely,

Deborah Aspenleiter
Subject: Pacific Leatherback Turtles
From: "Scott, Juliet" <Juliet.Scott@Avnet.com>
Date: Mon, 6 Nov 2006 10:47:26 -0700
To: <pfmc.comments@noaa.gov>

To Whom It May Concern:

I want the Pacific ocean to remain safe for Pacific Leatherback Turtles by keeping the Pacific Leatherback Conservation Area closed. Every year the Pacific Fishery Management Council decides whether or not to continue closing this area so please emphasize that this closure should remain in place far into the future -- not just for 2006.

Thank you,

Juliet Scott
Customer Support Representative
Avnet Technology Solutions
Phone: 877-967-3664 ext 6113
Fax: (480) 794-9640
Email: juliet.scott@avnet.com
"Dedicated to Your Success"
Subject: Pacific Leatherback Conservation Area
From: "Werner Wernicke" <Werner.Wernicke@viwapa.vi>
Date: Mon, 6 Nov 2006 12:47:19 -0400
To: <pfmc.comments@noaa.gov>

TO: Pacific Fishery Management Council

I urge you to keep closed the Pacific Leatherback Conservation Area into the indefinite future, and do not allow drift net gillnets. The destruction of marine life associated with gillnets is immoral and should not be allowed.

Werner Wernicke

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Hi! Please continue to keep the Pacific Leatherback Conservation Area closed to drift gillnets to prevent injury and death to the turtles and other marine life, in 2006 and onwards! Thank you,

Katie
Subject: Agenda Item C.3 Drift Gillnet FMP Comment
From: Sharyn Kovac <beachbumkovac@yahoo.com>
Date: Tue, 7 Nov 2006 06:52:00 -0800 (PST)
To: pfmc.comments@noaa.gov

I was shocked and sickened to hear of the proposal to allow drift net fishing of the coast of California and Oregon to continue. With the population of Pacific Leatherback turtles down 97% over the past 20 years, you must be completely crazy!! Drift net fishing should be banned all year and everywhere. Please save our turtles!!!

Sharyn Kovac
Pawleys Island
South Carolina
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: Alina <alinamk@gmail.com>
Date: Tue, 7 Nov 2006 09:34:49 -0800
To: pfmc.comments@noaa.gov

I want this area to remain safe for turtles. Please keep the Pacific Leatherback Conservation Area closed.
--
Alina
Drift Gillnet Fishing has been proven in to be destructive to many species of ocean animals. The practice should be permanently abolished.

😊 Rose
Subject: Agenda Item C.3. Drift Gillnet FMP Comment  
From: Alina <alinamk@gmail.com>  
Date: Tue, 7 Nov 2006 09:34:49 -0800  
To: pfmc.comments@noaa.gov

I want this area to remain safe for turtles. Please keep the Pacific Leatherback Conservation Area closed.
--
Alina
Hello Members of the Pacific Fishery Management Council,

I am sending this email to oppose the reopening of the drift gillnet fishery off the coast of California and Oregon during the Pacific Leatherback migration period. Destructive fishing practices, especially drift gillnets, have pushed Pacific leatherbacks close to extinction. The closure, which was put into place by NMFS in 2001, has been so effective that not a single leatherback turtle has been recorded caught in the fishery since then! Drift gillnets remain as destructive as they were prior to the 2001 closure. Unfortunately, with these critically endangered species, the survival of every single one counts. The proposed reopening is not expected to provide significant economic benefit. The proposed opening therefore makes no sense for either scientific or economic reasons. It also makes no sense for political reasons, as the public has shown overwhelming opposition. Further, it would seem to fly in the face of the recent Governors’ Agreement on Ocean Health, where the states of California, Oregon and Washington have explicitly recognized the need for addressing the declining health of our ocean and the need to sustain marine wildlife populations.

Please keep the Pacific Leatherback Conservation Area closed!

Sincerely,
Stephanie Danner

~~~~~~~~~~~~~~~~~~~~~~~~~
Stephanie Danner
Seafood Watch Fishery Research Analyst
Center for the Future of the Oceans
Monterey Bay Aquarium
99 Pacific Street
Suite 100A
Monterey, CA 93940
p: (831) 647-6861
f: (831) 647-6870
sdanner@mbayaq.org

www.seafoodwatch.org
Dear Pacific Fishery Management Council,

I am writing you to inform you of my feelings on the conservation of the Pacific Leatherback Turtles. It is in my deepest wishes that you will reconsider your preparation to allow drift gillnet fishing again. This summer I took part in a great deal of lectures that really stressed the horrors that humans can do to marine animals and I believe now, more than ever, that something must be done to save these endangered ocean-loving species and you can help. I recognize your generous actions by banning the drift gillnet fishery for a period of three months each year; however, I can't help but be disappointed in your plans to put an end to these efforts. Look at how successful it has been. Not a SINGLE Pacific Leatherback Turtle was caught since it was put into effect. Please, allow the Pacific Leatherback Conservation Area to remain a safe environment for turtles. You truly will be making a difference. Thank you for your time.

Sincerely,
Marissa Perrone

Check Out the new free AIM(R) Mail -- 2 GB of storage and industry-leading spam and email virus protection.
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: Janzebra@aol.com
Date: Tue, 7 Nov 2006 16:12:13 EST
To: pfmc.comments@noaa.gov

Please keep the Pacific Leatherback Conservation Area closed

I want to voice my opinion that I would like you to keep the Pacific Leatherback Conservation Area closed and safe for turtles. This closure should remain in place far into the future -- not just for 2006.
Thank you.
Janet Epperson
Please don’t allow drift gillnet fishing again in the Pacific Leatherback Conservation Area! The closure of this area has had tremendous results over the past five years, it would be a shame to endanger Pacific Leatherback turtles by reopening this area to drift gillnet fishing. Please continue to protect these beautiful animals. They’ve been around longer than we have!

Jim Westbrook
It’s important to me to protect ocean wildlife. You have it in your means to do so.

With the successful closure of the California and Oregon coast to the drift gill net fishery in 2001, not a single leatherback turtle mortality has been recorded. I am writing to encourage you to please keep this area safe for turtles by keeping the Pacific Leatherback Conservation Area closed – permanently.

In so many cases, a working compromise between wildlife and destructive fishing practices doesn’t exist. **In this case, it does.** Let’s not take a step backwards. Please move today to permanently close the Pacific Leatherback Conservation Area to drift gill net fishers.

Sheila Bowman
Seafood Watch Outreach Manager
(831) 647-6871
SBowman@mbayaq.org
www.seafoodwatch.org

2006 is our “Year of Exploring”! Find out what’s happening this month at www.montereybayaquarium.org
Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: Suzanne Snygg <suzannesnygg@yahoo.com>
Date: Tue, 7 Nov 2006 12:02:25 -0800 (PST)
To: pfmc.comments@noaa.gov

Dear Staff:

I understand that the Pacific Fishery Management Council is reviewing the possibility of opening drift gillnet fishing off the coasts of California and Oregon for a full 12 months rather than 9. Given the current predictions that the fish population will collapse by 2048 I rather wish that no drift gillnet fishing took place. However, the reason for my particular concern today is in defense of the Pacific Leatherback turtle which migrates through the region during those 3 months that drift gillnet fishing is prohibited. We've seen the population of this species drop 97% in the past 20 years, however I've read that since this practice of closing drift gillnet fishing for 3 months, we haven't lost a single turtle. That is great news, and I ask that you please, please continue this practice of keeping the region closed for the 3 months during the turtles migration.

Thank you for your time and consideration

Suzanne Snygg
7505 Hihn Road
Ben Lomond, CA
95005
Subject: Turtles
From: "Linarez, Karen" <Karen.Linarez@wellpoint.com>
Date: Tue, 7 Nov 2006 14:31:36 -0800
To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

Please keep the Pacific Leatherback Conservation Area closed. This should not come up every year as they are not going to recover in a year’s time.
Please give the turtles a chance to complete their migration. The closure has been working and should become policy. Their population has been decimated by 95%.
Thanks
Karen Linarez
Carm., Ca

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Subject: Agenda Item C.3. Drift Gillnet FMP Comment
From: "Laura Marshall" <lmarshall@stanfordalumni.org>
Date: Tue, 07 Nov 2006 16:47:23 -0800
To: <pfmc.comments@noaa.gov>

Dear Council,

Please continue to keep the Pacific Leatherback Conservation Area closed to drift gillnet fishing. Not only for this year, but for many many years to come. This is very important to preserve our natural resources and allow populations to continue to recover.

Thank-you,
Laura Marshall
Environmental Engineer and Marine Mammal Center volunteer
Dear Pacific Fishery Management Council,

Our planet is being destroyed at every corner of the globe. With thousands of species driven to extinction every year this is no time to relax regulations.

The ban on drift gillnets should remain!! If we can’t even protect a few turtles, what species is next? Humans. That’s right. Take a stand for the turtles and biodiversity on our only planet.

Sincerely,

Dan Tudor

Tudor Wines
Winemaker/Owner
P.O. Box 830
Pacific Grove, CA 93950
831-224-2116 mobile
831-885-0147 fax
dantudor@tudorwines.com
www.tudorwines.com

--
No virus found in this outgoing message.
Checked by AVG Free Edition.
Version: 7.1.409 / Virus Database: 268.13.18/506 - Release Date: 10/30/2006

--
No virus found in this incoming message
Checked by AVG Free Edition.
Version: 7.1.409 / Virus Database: 268.13.18/506 - Release Date: 10/30/2006
To: Pacific Fishery Management Council

From: Deborah Goldstein, Turtle Lover and Ocean Conservationist

RE: Agenda Item C.3. Drift Gillnet FMP Comment

Fax: 503-820-2299

Please save the Pacific Leatherback turtle!!!

Don’t reopen the Pacific Leatherback Conservation Area to drift gillnet fishing. There is no real benefit....just damage to our oceans!
for leatherbacks of the central American region and southern Mexico on their southward post-nesting migration toward South America. Turtles that have been satellite-tracked head toward the Galapagos Islands where they taper into higher concentrations, perhaps in a feeding migration, before dispersing again towards South American waters (Morreale et al., 1996). The clustering of many individuals along this migratory corridor greatly increases the vulnerability of eastern Pacific leatherback turtles to incidental capture in longline fisheries, especially because of the prevalence of shallow-set fishing practices off Mexico and Central America.

Neither the industry sources interviewed nor published sources of information can provide a precise accounting of Hawaii swordfish replacement by country of product origin. After swordfish-style longlining was prohibited in Hawaii, about 20 vessels relocated to the eastern Pacific (NMFS, undated), where they continued to target swordfish and make incidental catches of sea turtles at approximately the same rate as in the Hawaii swordfish-style longline fishery (i.e., 1.7 sea turtle takes per 10,000 hooks from Caretta, 2003).

Sea turtle take rates in U.S. swordfish longline fishing west and east of 150° E latitude are compared by Caretta (2003). The area east of 150 W is the region most utilized by vessels landing in California, although there is overlap with the historic Hawaii-based swordfish vessels. At both per-set and per-1000-hooks levels sea turtle take rates are higher east of 150° W (1.8 takes/10,000 hooks) than in the historic Hawaii swordfish fishery (1.7 takes/10,000 hooks), although the differences are not statistically significant (Caretta, 2003).

Except for California, the other most likely replacement sources of swordfish all have higher associated sea turtle BPUE (Table 21). Thus, it is highly likely that the NMFS-ordered regulations that were in effect from mid-2001 through March 2004 had the indirect effect of increasing sea turtle takes associated with Hawaii swordfish replacement fisheries, rather than achieving the stated objective of reducing sea turtle takes overall.

Table 21. Comparison of the number of sea turtle takes per 100 mt of fresh swordfish from Hawaii and imported swordfish that replaced Hawaii swordfish after the 2001 fishery closure.

<table>
<thead>
<tr>
<th>Area and Longline fishery</th>
<th>Sea turtle takes/100 mt fresh swordfish catch¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>Eastern tropical Pacific offshore of nesting beaches (e.g., Costa Rica, Mexico)</td>
<td>4310</td>
</tr>
<tr>
<td>Eastern tropical Pacific offshore (e.g., Costa Rica, Panama)</td>
<td>1480</td>
</tr>
<tr>
<td>South Africa</td>
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<td>Historic Hawaii Shallow-set swordfish-style</td>
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¹ Calculated from Tables 9, 10 and 11.

7.2 Compare Bycatch Impacts Associated with Pelagic Fish Sources

C/B and B/C ratios have the potential to enable marketers and consumers to compare some of the environmental consequences that they are endorsing when they purchase seafood
Transfer function estimation of trade leakages generated by court rulings in the Hawai‘i longline fishery

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Pacific Institute for Research and Evaluation, Calverton, MD, USA
E-mail: csarmiento@pire.org

Under the Endangered Species Act (ESA) mandate to protect turtle stocks from incidental contact, the Emergency Interim Rule of August 2000 prohibited Hawai‘i permit holders from targeting swordfish in the area from the Equator to 28°N and between 173°E and 137°W. As a result of this interim rule, landings of swordfish in Hawai‘i decreased 93% in 2001. This paper implements a transfer function analysis to measure trade leakages generated by this ruling. This case study for the Hawai‘i fishery measures the limitations of the ESA when enforcement has jurisdiction on some producers, but not others.

I. Introduction

In February 1999, the Center of Marine Conservation (CMC) and the Turtle Island Restoration Network challenged in court the NOAA Fisheries’ (NMFS) determination that the Hawai‘i longline fishery was not likely to jeopardize the existence of leatherback, loggerhead, olive ridley, hawksbill, or green turtle stocks. The court ruled on 23 November 1999 in favour of the CMC, and established in accordance with the Endangered Species Act (ESA) that ‘within 30 days of the order that NMFS close the area north of 20°N between 150°W and 168°W to Hawai‘i longline permit holders’ (Western Pacific Pelagic Fisheries EIS, pp. 1–6). Several amendments have followed the original court order of 1999 to better enforce protection of turtles under the guidelines of the ESA, which prioritizes protection of endangered species over socio-economic impacts of regulation.

Effects of the CMC challenge and subsequent court orders to the Hawai‘i fishery were, nonetheless, minimal until the Emergency Interim Rule of August 2000 that became effective on 15 March 2001. This ruling extended fishing restrictions to the East and West of the 1999 closure area, and prohibited Hawai‘i permit holders targeting swordfish in the area from the Equator to 28°N and between 173°E and 137°W. As a result of this interim rule, landings of swordfish in Hawai‘i decreased 93% in 2001. In essence, regulatory action to enforce the ESA ended the swordfish sector in Hawai‘i, and most recent biological opinions now focus on the Hawai‘i tuna sector.

The outcome of the Emergency Interim Rule, however, may not have had the full intended effect of reducing turtle interaction if fleets from other regions, which are not subject to the area closure restrictions imposed on the Hawai‘i fleet, substituted Hawai‘i swordfish production with their own production. Intuitively, restricting access to some fishers, but not all, on a valuable resource may induce a transfer effect or trade leakage (Barrett, 2003) with fishers not restricted by the regulation entering into a market and taking up the slack left by the regulated vessels.

This paper tests whether major swordfish producers in the Pacific Rim have taken up the production previously executed by vessels with Hawai‘i permits as a result of the Emergency Interim Rule and, second, a transfer function (Enders, 1995) is used
Pacific Islands Study Confirms Effectiveness of Measures that Address Sea Turtle Bycatch in the Longline Fishery

The results of a study recently announced by the Western Pacific Fishery Management Council confirm that new regulations requiring a specific type of fishing hook and bait in the Hawaii-based longline fishery resulted in significant reductions in the capture rates of threatened and endangered sea turtles. Capture rates of leatherback and loggerhead turtles declined by 82% and 90%, respectively, while the catch rate for the primary target species (swordfish) increased by 16%. Catch rates for other species, such as tunas, mahimahi, opah and wahoo declined. The technical report is now available online.

For more information, please read the Council's announcement.
Table 4-7. West Coast commercial landings of albacore, other tunas, swordfish, and sharks, 1981-2005.

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Dear Mr. Hansen, Dr. McIsaac and Members of the Council:

The Pacific Leatherback sea turtle is an ancient giant on the verge of extinction. These amazing creatures have survived on our planet for nearly 100 million years. Yet their time here could come to an end because of destructive human practices. In the last two decades alone, Pacific leatherback sea turtle populations have declined by 80% or more mainly due to drowning in commercial fishing gear and destruction of nesting sites. Here in the Pacific we can do something about the fishing mortalities.

Knowing this, the agency in charge of protecting leatherbacks, the National Marine Fisheries Service (NMFS), established a Pacific Leatherback Conservation Area off the Oregon and California coasts in 2001 to give leatherbacks a safe place to feed and migrate without threat of drowning in drift gillnets. This time and area closure is working – no Pacific leatherbacks have been reported caught in the fishery since this three month annual closure has been implemented.

Now the Fisheries Service may soon give in to calls by drift gillnetters to re-open the closed area during the times leatherbacks are feeding and migrating along our coasts.

I support the continued closure of the Pacific Leatherback Conservation Area to drift gillnets. The record is clear. The closure works. It would be irresponsible for the agency charged with stewardship of our natural resources to risk worsening the plight of a species already struggling to survive. Indeed, expansion of a fishery with a multitude of bycatch problems – including other species of turtles, dolphins and porpoise, seals and sea lions, large whales, and discards of greater quantity than landed catch – seems inappropriate given the recent West Coast Governors' Agreement on Ocean Health.

As you consider the Drift Gillnet Exempted Fishing Permit for 2007 and beyond, please remember the critically endangered Pacific leatherback sea turtle may be within 30 years of extinction. It would be irresponsible to dissolve the conservation measures currently in place to protect them.

We, the undersigned, believe time is running out to save these amazing creatures.
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November 8, 2006

Chairman Donald Hansen
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220

Re: DGN and LL EFP’s

Dear Don,

**FISH asks the Council to support the DGN EFP for 2007 under the same terms and conditions previously established.**

First and foremost, FISH thanks the Council family and NMFS Southwest Region staff for all of the work that has been done in order to conduct the 2006 DGN EFP. Unfortunately, procedural issues have delayed the issuance of a required MMPA 101(a)(5)(E) permit by NMFS Headquarters, which in turn has delayed approval and issuance of the DGN EFP by NMFS Southwest Region. There is no point in issuing the DGN EFP for 2006 at this late date. However, since NEPA and ESA procedural requirements are complete, and when the MMPA 101(a)(5)(E) permit is issued, FISH asks the Council to support the DGN EFP for 2007 under the same terms and conditions as established for 2006.

FISH understands that there is no future for a fishery that cannot operate within conservation limits established under federal law. In meeting these conservation limits, FISH strives to ensure that DGN fishery impacts are judged according to the best available scientific information and procedures. FISH believes that the leatherback sea turtle take rate estimations contained in the 2000 Biological Opinion—which form the sole justification for the establishment of the time/area closure—do not represent the best available scientific information and procedures. Specifically, the regulation enacted in 1997 requiring the top of driftnets to be a minimum distance of 36 feet below the sea surface—allowing a space for surface swimming marine mammals to pass over—also
reduces sea turtle interactions. Such a reduction is cited in the 1997 Biological Opinion and is supported by available data: The observed take rate for leatherbacks from 1998 to 2004, the time during which the minimum net depth regulation was in effect, is .0015 per set. The take rate for the period 1990 to 1997, when the minimum net depth requirement was not in effect, is .088 per set. The observed leatherback take rate before the minimum net depth requirement was enacted is 5.9 times greater than after this regulation was implemented. The fact that there have been no observed leatherback takes in a four-year period since implementation of the time/area closure when the 2000 Biological Opinion estimated that 8 takes would have occurred suggests that the time/area closure implemented in 2001 was overly restrictive. Hence, FISH proposed the DGN EFP to test the accuracy of the estimated leatherback take rate contained in the 2000 Biological Opinion, which resulted in the regulatory establishment of the time/area closure.

In keeping with its intent to ensure that the DGN fishery is judged according to the best available scientific information and procedures, FISH originally proposed utilizing EFP procedures to test the estimated leatherback take rates contained in the 2000 Biological Opinion because, by utilizing EFP procedures, strict controls to ensure compliance with conservation limits established by federal law—such as hard caps on leatherback takes—could be established and easily enforced. The Council took such controls a step further when it approved the DGN EFP for 2006 to include limiting DGN effort to 300 sets, and setting hard caps on endangered humpback, and sperm whales, as well as the short-finned pilot whale.

In sum, the Council and NMFS correctly supported the DGN EFP which will eventually produce sufficient data to provide a statistically significant answer to the question of whether or not the 36-foot minimum net depth regulation reduces sea turtle entanglement, and give the Council and NMFS a more robust scientific basis to structure the appropriate protective measures.

As seems to be their pattern, several so-called conservation groups have purposefully mischaracterized the Council and NMFS’s support for the DGN EFP. Press releases from groups such as Turtle Island Restoration Network call the time/area closure the “Pacific Leatherback Conservation Area,” to make it look like the time/area closure is something akin to a permanently established wildlife sanctuary. In this way, the Council and NMFS’s support for the DGN EFP is made to seem like an abuse of wildlife protection measures. Unfortunately, neither the general public nor the media is sophisticated enough to understand the regulatory processes at issue and see the intended subterfuge of this ploy. Fortunately, the Council and NMFS are sophisticated enough to see this subterfuge, and give it the weight it deserves.

FISH asks the Council to join the World Wildlife Fund in supporting the 2007 LL EFP.

The second EFP, submitted by Pete Dupuy, and supported by FISH, will test whether or not pelagic longline is an economically viable substitute for DGN gear for the harvest of swordfish within the west coast EEZ. There is little question that, relative to
finfish bycatch or marine mammal and sea turtle interactions, longline is a cleaner gear than DGN. The question is whether longline swordfish harvest levels are economically sufficient as a substitute for DGN gear. This EFP allows limited effort from a single vessel, 100% observer coverage, utilizing gear configuration, seabird protections, and sea turtle protections adopted by the Hawaii longline fishery. FISH believes that this EFP will answer the economic viability question and may give the Pacific Council and NMFS another management option to consider for reducing DGN fishery resource impacts. The World Wildlife Fund, in a February 2006 letter to the Pacific Council in support of the longline EFP, states: “Approval of this EFP would provide further means of testing gear improvements, with funding already appropriated by NOAA Southwest Fisheries Center to support this EFP.”

On behalf of DGN fishermen, FISH thanks you again for your hard work and dedication to HMS fishery management issues. The Council’s decision to use the EFP processes to investigate resource protection methods and alternatives for the DGN fishery is consistent with current law as well as with NMFS policy and practice. FISH looks forward to a successful outcome from this work.

Respectfully,

Chuck Janisse, for FISH, on behalf of DGN fishermen.
Pacific Fishery Management Council
& National Marine Fisheries Service
Drift Gillnet and Longline EFPs

Ben Enticknap. November 14, 2006
<table>
<thead>
<tr>
<th>Species</th>
<th>Estimated Mortality</th>
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<tbody>
<tr>
<td>Dall’s porpoise</td>
<td>44</td>
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<tr>
<td>Pacific whitesided dolphin</td>
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<tr>
<td>Risso’s dolphin</td>
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<td>Common dolphin (shortbeaked)</td>
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<td>Common dolphin (longbeaked)</td>
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<td>Fin whale</td>
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<td>Northern elephant seal</td>
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<tr>
<td>Leatherback turtle</td>
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<tr>
<td>Loggerhead turtle</td>
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<tr>
<td>Northern fulmar</td>
<td>13</td>
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<td>Unidentified bird</td>
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### Catch of marine mammals in “pingered” nets

<table>
<thead>
<tr>
<th>Animal Type</th>
<th>Count</th>
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<tbody>
<tr>
<td>Dolphin, short-beaked common</td>
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<tr>
<td>Dolphin, long-beaked common</td>
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<tr>
<td>Dolphin, northern right whale</td>
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<tr>
<td>Dolphin, Pacific white-sided</td>
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<tr>
<td>Dolphin, Risso's</td>
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<tr>
<td>Dalls Porpoise</td>
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<tr>
<td>Sea lion, California</td>
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<tr>
<td>Seal, Northern Elephant</td>
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<tr>
<td>Whale, Fin</td>
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<td>Whale, Gray</td>
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<tr>
<td>Whale, Humpback</td>
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<tr>
<td>Whale, Minke</td>
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<tr>
<td>Whale, short-finned pilot</td>
<td>1</td>
</tr>
<tr>
<td>Whale, Sperm</td>
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PFMC/ NMFS March 2006. DGN EA, at 135

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<th></th>
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<tbody>
<tr>
<td>Swordfish</td>
<td>309</td>
<td>8</td>
<td>561</td>
<td>48</td>
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<tr>
<td>Striped Marlin</td>
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<td>Albacore Tuna</td>
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<td>Skipjack Tuna</td>
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<td>Common Mola</td>
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<tr>
<td>Pacific Bonito</td>
<td>46</td>
<td>37</td>
<td>263</td>
<td>209</td>
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PFMC HMS SAFE, at 120-121.
300 sets North of Point Conception:

- 900 swordfish
  - 1,884 mola
  - 1,989 blue shark
  - 2,422 albacore
  - 438 bluefin tuna
  - 727 skipjack tuna
  - 144 shortfin mako shark
“We don’t need to study this problem to learn how much bycatch there is. We already know the Leatherbacks are declining fast, so the goal is no dead Leatherbacks.” Martín Hall, IATTC

- Quoted in, C. Safina, *Voyage of the Turtle*
“Specifically the goal of the EFP is to:

- Demonstrate the existing DGN regulations requiring the top of the net to be a minimum distance of 36 feet below the surface reduces the incidental take of leatherback sea turtles to an anticipated level.” – EFP applicant, September 11, 2005

Between 1991 and 1999:

- 17 observed leatherback takes with 36’ extender lines.
- 6 observed takes with nets using extender lines less than 36’.
California/ Oregon drift gillnet time/ area closure
August 15-Nov 15 each year since 2001

Locations of 3,369 observed sets in the drift gillnet fishery, 1996-2002

Locations of observed cetacean kills in the drift gillnet fishery

Locations of observed common dolphin kills in the drift gillnet fishery

Locations of observed pinniped kills in the drift gillnet fishery

Locations of observed Leatherback takes in the drift gillnet fishery

Agenda Item J.3.a

<table>
<thead>
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<tbody>
<tr>
<td></td>
<td>Caught</td>
<td>Dead</td>
</tr>
<tr>
<td>Short-beaked common dolphin</td>
<td>19</td>
<td>19</td>
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<tr>
<td>Grey Whale</td>
<td>0</td>
<td>0</td>
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<tr>
<td>Humpback Whale</td>
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<td>0</td>
</tr>
<tr>
<td>California Sea Lion</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>N. right whale dolphin</td>
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<td>1</td>
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<tr>
<td>Risso’s dolphin</td>
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<tr>
<td>Short-finned pilot whale</td>
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<td>Unidentified whale</td>
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<td>N. Fulmar</td>
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<td>Cassin’s Auklet</td>
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PFMC HMS SAFE, at 120-121.