

April 2007

# THE BILLFISH FOUNDATION

CONSERVATION THROUGH RESEARCH, EDUCATION AND ADVOCACY

2161 E. Commercial Blvd., 2nd Floor • Fort Lauderdale, Florida 33308

177 Riverside Ave., Suite F, #1034 • Newport Beach, California 92663

(954) 938-0150 • (800) 438-8247 • Fax (954) 938-5311 • www.billfish.org



RECEIVED

MAR 19 2007

PFMC

Dr. Donald McIsaac, Executive Director  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220-1384

Dear Dr. McIssac:

I am writing to take the opportunity to express the views of The Billfish Foundation (TBF) on the Council's consideration of a requested exempted fishing permit (EFP) to allow a single vessel to fish with prohibited longline gear in the waters under the jurisdiction of the Pacific Fishery Management Council. TBF has been an active and supportive participant in the development and implementation of the Council's Highly Migratory Species (HMS) Plan. We opposed allowing longline gear into the waters of our Pacific Coast when the Plan was proposed, citing the fact that in addition to the well documented damage the gear inflicts on sea turtles, the status of finfish species primarily expected to be targeted by this gear – swordfish, bluefin tuna, yellowfin tuna and bigeye tuna – was either unknown or, in the view of our scientific staff, approaching an overfished condition. The Council took the appropriate precautionary action and did not allow this gear.

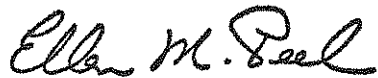
TBF continues to oppose the use of longline gear and we cannot support the EFP request. It is not a request for actual research to look at alternative fishing methods and means. Having been modified and altered a number of times over the last several years, it remains merely a request to conduct exploratory fishing with gear prohibited by the council's HMS Plan. Furthermore, at present two species that have been at one time or another listed as potential target species for this EFP – yellowfin and bigeye tuna – have been classified as overfished. Albacore are, at best, approaching that condition and the Inter-American Tropical Tuna Commission (IATTC) has asked that no new effort be focused on this fishery in the eastern Pacific. We note that the Council is presently working in conjunction with the National Marine Fisheries Service (NMFS) and the IATTC to develop means to reduce fishing mortality on yellowfin and bigeye and cap effort on albacore. Allowing exploratory fishing with longlines seems not to be consistent with good management in this case.

TBF appreciates the fact that the Management Team has devoted time and effort to crafting alternatives for the council's consideration. We certainly support the exclusion

of any EFP permitted longlines from the Southern California Bight where bycatch of striped marlin and conflicts with the well developed recreational fishery would surely have been acute. Again, TBF supports Alternative 1: the status quo non-approval option. However, if the Council deems it necessary to request approval of this EFP we urge you to adopt Alternative 3 and let the gear focus on swordfish. Further, we request that the Council require only non-offset 18/0 or larger circle hooks. Recent research has demonstrated that offsets of greater than a few degrees dramatically increase gut-hooking of finfish. Given this new information, the NMFS has recently required that only non-offset circle hooks be used in Atlantic billfish tournaments. Although the prohibition of use in the southern California Bight may eliminate most potential interactions of the gear with striped marlin, macro scale climate events have been shown to change the distribution of this species, increasing their occurrence northward up the coast. For this reason we believe that the cap on any take of striped marlin included in Alternative 3 would be a necessary condition of any approval and this cap should be set at the level of a single observed mortality.

Thank you for the opportunity to comment and participate in the management of these valuable natural resources. TBF's Chief Scientist, Dr. Russell Nelson, will be at the April Council meeting and available to discuss this issue and answer any questions.

Sincerely yours,

A handwritten signature in cursive script that reads "Ellen M. Peel". The signature is written in black ink and is positioned below the "Sincerely yours," text.

Ellen Peel, LLD  
President

Cc: Dr. Bill Hogarth  
Dr. Robin Allen

STATE CAPITOL  
P.O. BOX 942849  
SACRAMENTO, CA 94249-0006  
(916) 319-2006  
FAX (916) 319-2106

DISTRICT OFFICE  
3501 CIVIC CENTER DRIVE, SUITE 412  
SAN RAFAEL, CA 94903  
(415) 479-4920  
FAX (415) 479-2123

# Assembly California Legislature



**JARED HUFFMAN**  
ASSEMBLYMEMBER, SIXTH DISTRICT

COMMITTEES  
CHAIR, ENVIRONMENTAL  
SAFETY AND TOXIC MATERIALS  
APPROPRIATIONS  
UTILITIES AND COMMERCE  
WATER, PARKS AND WILDLIFE

March 15, 2007

RECEIVED

MAR 20 2007

PFMC

Dr. William Hogarth, Director  
NOAA Fisheries Service  
1315 East West Highway, SSMC3  
Silver Spring, MD 20910

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

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

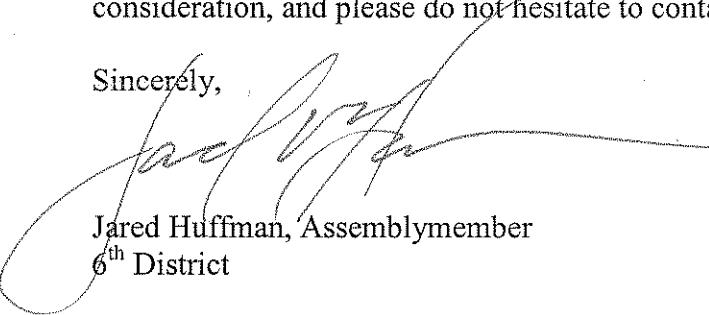
As the state Assemblymember for the 6<sup>th</sup> District in California, my district includes hundreds of miles of coastline. It is my duty to safeguard and protect the natural beauty of the Northern California coastline and the creatures that live there. I'm writing to you today because I'm concerned about the proposed exempted fishing permits (EFP) to expand the swordfish/thresher shark drift-gillnet fishery into current time/area closures and to develop a pelagic swordfish longline fishery within the Exclusive Economic Zone (EEZ). I urge you to deny both EFPs.

There is ample evidence that issuing these EFPs could have a significant impact on the endangered leatherback sea turtle and other marine wildlife. As you know, the California coast has been closed to swordfish pelagic longlining for 30 years and portions of the California and Oregon coastline have been closed to drift-gillnet fishing since 2001 to protect leatherback sea turtles which seasonally inhabit the waters off our coast. The Pacific leatherback sea turtle population has already plummeted from 91,000 in 1980 to currently fewer than 2,300 annual nesting females. If you allow pelagic longline sword fishing and drift-gillnet fishing back into these protected areas, it will place the critically endangered leatherback at greater risk of extinction, and place other protected and endangered marine species at risk.

Before we allow an animal species to be lost forever, I hope you'll continue to enforce the important conservation measures that have been hard-fought and are effective in protecting highly vulnerable species. The existing closures comply with domestic and international conservation mandates and are consistent with the best available scientific information. Both drift-gillnet fishing and longline sword fishing are highly indiscriminate fishing methods that have devastating effects on the marine environment. For this reason, the United Nations banned drift-gillnet fishing on the high seas in 1991, and California has had a ban on swordfish pelagic longlining for 30 years. We should do nothing less than honor these protections.

Please do your part to protect our coastline and deny these EFPs. Thank you for your consideration, and please do not hesitate to contact me with any questions.

Sincerely,



Jared Huffman, Assemblymember  
6<sup>th</sup> District

JH/dmg

**Subject:** [Fwd: Stop the give away] No to Longliners!  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:30:16 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>

---

**Subject:** Stop the give away  
**From:** cd peevey <cdpeevey@cablespeed.com>  
**Date:** Sat, 24 Mar 2007 11:12:29 -0700  
**To:** pfmc.comments@noaa.gov

No to longliners

Why on earth do keep on finding new ways to depelet whats left of fisheres ?

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|---------------------------|--|
| <b>Stop the give away</b> | <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
|---------------------------|--|

**Subject:** [Fwd: Reference Agenda Item J.2 Exempted Fishing Permit (EFP) for Longline Fishing in the West Coast Exclusive Economic Zone in the subject heading of your email.]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Thu, 22 Mar 2007 10:46:06 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

---

**Subject:** Reference Agenda Item J.2 Exempted Fishing Permit (EFP) for Longline Fishing in the West Coast Exclusive Economic Zone in the subject heading of your email.  
**From:** bhallman@ransome.com  
**Date:** Thu, 22 Mar 2007 12:15:38 -0500  
**To:** pfmc.comments@noaa.gov

I have witnessed longlining in the Northeast, Southeast and in central America and in all of my years of fishing I have wondered how a responsible Government could allow such indiscriminate slaughter. Longlining is contrary to our modern environmental concerns and we must set the example by not allowing longlining in the US to encourage the world to conserve and harvest the sea in a well managed manner.  
William H Hallman Delran NJ USA.

Reference Agenda Item J.2 Exempted Fishing Permit (EFP) for Longline Fishing in the West Coast Exclusive Economic Zone in the subject heading of your email.

Content-Ty  
Content-En

**Subject:** [Fwd: Reference Agenda Item J.2 Exempted Fishing Permit (EFP) for Longline Fishing in the West Coast Exclusive Economic Zone]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:32:21 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>

---

**Subject:** Reference Agenda Item J.2 Exempted Fishing Permit (EFP) for Longline Fishing in the West Coast Exclusive Economic Zone  
**From:** Carlos Ramírez <cramirez@evertecinc.com>  
**Date:** Mon, 26 Mar 2007 11:08:25 -0400  
**To:** pfmc.comments@noaa.gov

This is a very bad idea. Longliners should be band from all US territorial waters.

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| Reference Agenda Item J.2 Exempted Fishing Permit (EFP) for Longline Fishing in the West Coast Exclusive Economic Zone |
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| <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
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**Subject:** [Fwd: Reference Agenda Item J.2 Exempted Fishing Permit (EFP) for Longline Fishing in the West Coast Exclusive Economic Zone]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Thu, 22 Mar 2007 11:49:02 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

---

**Subject:** Reference Agenda Item J.2 Exempted Fishing Permit (EFP) for Longline Fishing in the West Coast Exclusive Economic Zone  
**From:** Charles Brasch III <charlesbrasch@braschdillon.com>  
**Date:** Thu, 22 Mar 2007 14:37:24 -0400  
**To:** pfmc.comments@noaa.gov

Dear Sir:

I wrote the same thing concerning longline fishing off the eastern coast. To keep it short:

**PLEASE NO!!**

Please don't add anymore longline fishing anywhere in the country!! Please!! Give the fish a chance.

Charles Brasch III  
Brasch-Dillon & Associates, Inc.  
Phone: 404-249-9633  
Direct Fax: 404-835-0376  
www.braschdillon.com

Reference Agenda Item J.2 Exempted Fishing Permit (EFP) for Longline Fishing in the West Coast Exclusive Economic Zone

**Content-Type:** message/rfc822  
**Content-Encoding:** 7bit

**Subject:** [Fwd: Possible New Longline Permit in Norther Pacific Waters]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:26:36 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

---

**Subject:** Possible New Longline Permit in Norther Pacific Waters  
**From:** John Childs <jchilds9782@msn.com>  
**Date:** Fri, 23 Mar 2007 16:50:35 -0700  
**To:** pfmc.comments@noaa.gov

To Whom It May Concern:

I oppose the possibility of approving a permit for a commercial vessel to use longline gear in the Northern California, Oregon and Washington Offshore waters. The species that are the intended targets are currently considered over fished, and the added take isn't accomplishing anything.

Further, recreational limits are being proposed, but yet the recreational fisherman provide more financial support to the Northwest than any of the commercial fisheries, yet we take less than 1% of the overall harvest.

In my opinion it is faulty logic to consider a new commercial fisheries in our waters.

Thanks for you time,  
John Childs

**Possible New Longline Permit in Norther Pacific Waters**

**Content-Type:** message/rfc822  
**Content-Encoding:** 7bit

**Subject:** [Fwd: Please decline the long line application permit]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:32:01 -0700  
**To:** Mike.Burner@noaa.gov

---

**Subject:** Please decline the long line application permit  
**From:** TERRY ROELKE <KEVINRO4@MSN.COM>  
**Date:** Sun, 25 Mar 2007 18:45:44 -0700  
**To:** pfmc.comments@noaa.gov

I am writing to express my concern and opposition of adding additional fishing pressure off of the Oregon California and Washington coast with the addition of permitting the long line applications filed with your agency.

The thirty mile boundary does not adequately protect native species and species that are showing the beginnings of decline in population. Additionally the areas specifically off the Oregon Coast are limited to the pursuit of sport anglers for Pacific Halibut. One of the premier fishing areas out of Newport known as the Chicken Ranch is out side the thirty mile area.

Granted the Long lines are not targeting bottom fish However do to the limited structure for these fish and the oppurtunity for the sportsman a long line could compromise the access to this area.

I have personally experience negative impacts to access by this method of fishing from Cod Lines. Do to the length and drift these can compromise an entire structure.

Our Halibut are not found at all locations.

Please deny the application and future applications.

Kevin Bennett  
Roseburg, Oregon

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| <b>Please decline the long line application permit</b> | <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
|--|--|

**Subject:** [Fwd: Pacific EFP]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:22:26 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

---

**Subject:** Pacific EFP  
**From:** mountainequip@comcast.net  
**Date:** Fri, 23 Mar 2007 11:10:21 -0700  
**To:** pfmc.comments@noaa.gov

Dr. Donald McIsaac, Executive Director  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220-1384

Dear Dr. McIsaac:

I am writing to take the opportunity to express the views of The Billfish Foundation (TBF) on the Council's consideration of a requested exempted fishing permit (EFP) to allow a single vessel to fish with prohibited longline gear in the waters under the jurisdiction of the Pacific Fishery Management Council. TBF has been an active and supportive participant in the development and implementation of the Council's Highly Migratory Species (HMS) Plan. We opposed allowing longline gear into the waters of our Pacific Coast when the Plan was proposed, citing the fact that in addition to the well documented damage the gear inflicts on sea turtles, the status of finfish species primarily expected to be targeted by this gear – swordfish, bluefin tuna, yellowfin tuna and bigeye tuna – was either unknown or, in the view of our scientific staff, approaching an overfished condition. The Council took the appropriate precautionary action and did not allow this gear.

TBF continues to oppose the use of longline gear and we cannot support the EFP request. It is not a request for actual research to look at alternative fishing methods and means. Having been modified and altered a number of times over the last several years, it remains merely a request to conduct exploratory fishing with gear prohibited by the council's HMS Plan. Furthermore, at present two species that have been at one time or another listed as potential target species for this EFP – yellowfin and bigeye tuna – have been classified as overfished. Albacore are, at best, approaching that condition and the Inter-American Tropical Tuna Commission (IATTC) has asked that no new effort be focused on this fishery in the eastern Pacific. We note that the Council is presently working in conjunction with the National Marine Fisheries Service (NMFS) and the IATTC to develop means to reduce fishing mortality on yellowfin and bigeye and cap effort on albacore. Allowing exploratory fishing with longlines seems not to be consistent with good management in this case.

TBF appreciates the fact that the Management Team has devoted time and effort to crafting alternatives for the council's consideration. We certainly support the exclusion of any EFP permitted longlines from the Southern California Bight where bycatch of striped marlin and conflicts with the well developed recreational fishery would surely have been acute. Again, TBF supports Alternative 1: the status quo non-approval option. However, if the Council deems it necessary to request approval of this EFP we urge you to adopt Alternative 3 and let the gear focus on swordfish. Further, we request that the Council require only non-offset 18/0 or larger circle hooks. Recent research has demonstrated that offsets of greater than a few degrees dramatically increase gut-hooking of finfish. Given this new information, the NMFS has recently required that only non-offset circle hooks be used in Atlantic billfish tournaments. Although the prohibition of use in the southern California Bight may eliminate most potential interactions of the gear with striped marlin, macro scale climate events have been shown to change the distribution of this species, increasing their occurrence northward up the coast. For this reason we believe that the cap on any take of striped marlin included in Alternative 3 would be a necessary condition of any approval and this cap should be set at the level of a single observed mortality.

Thank you for the opportunity to comment and participate in the management of these valuable natural resources.

TBF's Chief Scientist, Dr. Russell Nelson, will be at the April Council meeting and available to discuss this issue and answer any questions.

Sincerely yours,

Ellen Peel, LLD  
President

Cc: Dr. Bill Hogarth  
Dr. Robin Allen

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|--------------------|--|
| <b>Pacific EFP</b> | <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
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**Subject:** [Fwd: No long Lines in Our Wates]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:31:19 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>

---

**Subject:** No long Lines in Our Wates  
**From:** stefanie <baddogs3@centurytel.net>  
**Date:** Sun, 25 Mar 2007 06:53:30 -0700  
**To:** pfmc.comments@noaa.gov

Dr. Donald McIsaac, Executive Director

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

Dear Sir,

I am writing to you to express my dismay that anyone would even consider allowing long lining off the west coast. As a sport and taxpayer I have grave concerns about this occurring. For the first time sportsfishers are being told they may have to be limited on albacore as the fish are on the verge of over fishing. If this is the case then why allow more indiscriminate harvests to occur? We all know that long lining incurs high numbers of by catch and will also impact the albacore population. In light of the need to conserve our precious resource please do not allow the long liners fish our waters. You have the ability to do the right thing please remember we are counting on you.

Sincerely,

Mike Richman

|                                   |  |
|-----------------------------------|--|
| <b>No long Lines in Our Wates</b> | <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
|-----------------------------------|--|

**Subject:** [Fwd: Longlining]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:39:23 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>

---

**Subject:** Longlining  
**From:** Kenneth Charles Boman <BomanK@cwu.EDU>  
**Date:** Sat, 24 Mar 2007 17:59:09 -0700  
**To:** pfmc.comments@noaa.gov

Dr. Donald McIsaac, Executive Director

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

Dear Sir,

I am writing to express my grave concerns regarding long-line fishing of the coast of Oregon and Washington. As you well know the numbers of pelagic fish have reached all time lows throughout the world because of commercial over fishing and long-liners have been at the forefront of this exploitation.

Long-line fishing is not selective and as a result countless marine animals/mammals are killed as by-catch. Turtles, birds, sharks, etc all die because of this deadly practice. Thousands of baited hooks in the water of our coast and thousands upon thousands of pounds of dead fish ready to export is not a responsible management policy of our resources. Opening the door to one will only invite more and our oceans can't handle it.

As a sportsman and recreational fisherman I have to deal with shorter seasons, bag limits and gear restrictions all to support the lessening of restrictions on commercial fisherman.. Washington wants to put a limit on Albacore for the first time ever because they contend Albacore stocks are on the verge of over exploitation yet recreational fisherman comprise less than 10% of the take.

I implore you to reject the proposal to allow any increase of commercial pressure or long-line fishing off the coast of Washington and Oregon.

Sincerely,

Ken Boman

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| <b>Longlining</b> | <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
|-------------------|--|

**Subject:** [Fwd: Long-lining off Pacific Coast]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:31:47 -0700  
**To:** Mike.Burner@noaa.gov

---

**Subject:** Long-lining off Pacific Coast  
**From:** charles.e.barnes@comcast.net (Chuck Barnes)  
**Date:** Sun, 25 Mar 2007 18:26:17 +0000  
**To:** pfmc.comments@noaa.gov

Honorable Council Members:

The current idea for a new long-lining fishery effort of any kind off the pacific coast is ridiculous to me. If this is not a bad idea then I give up.  
Seems every time I turn around we have another move directed in the opposite direction for the good of our fish resources.  
Ask the fish if this is the right thing to do for the future we need them to provide.  
I hope we get a better grip, or a grip at all, soon..... on doing the right stuff.  
It seems we always put maximum pressure to maximize risks and harvest when we should be doing precisely the opposite.....  
The fish would give us an 'F-Minus'. We are perfecting doing the wrong things to the best of our ability.  
But I guess that's all we can expect out of mankind.  
That figures.....

Respectfully,  
Chuck Barnes  
1553 164th Ave. N.E. W-5  
Bellevue Wa., 98008

|                                      |  |
|--------------------------------------|--|
| <b>Long-lining off Pacific Coast</b> | <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
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**Subject:** [Fwd: Longlines]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:21:57 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

---

**Subject:** Longlines  
**From:** Matt Bridgewater <matt@gem-products.com>  
**Date:** Fri, 23 Mar 2007 13:16:04 -0400  
**To:** pfmc.comments@noaa.gov

The introduction of longline fishing into any region seriously damages the fishery and hurts the recreational marine business. I urge you to ban this method of fishing.  
MB



**Matthew Bridgewater**  
**President**  
[matt@gemlux.com](mailto:matt@gemlux.com)

140 Industrial Loop  
Orange Park, FL 32073  
800.874.4506 Tel  
904.269.5905 Fax

Visit us at: <http://www.gemlux.com>

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| <b>Longlines</b> | <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
|------------------|--|

**Subject:** [Fwd: Longlines]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:27:42 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>

---

**Subject:** Longlines  
**From:** FISHNG1@aol.com  
**Date:** Sat, 24 Mar 2007 01:56:28 -0400 (EDT)  
**To:** pfmc.comments@noaa.gov

Dr. Donald McIsaac, Executive Director  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220-1384

Dear Dr. McIsaac:

I am writing to take the opportunity to express the views of The Billfish Foundation (TBF) on the Council's consideration of a requested exempted fishing permit (EFP) to allow a single vessel to fish with prohibited longline gear in the waters under the jurisdiction of the Pacific Fishery Management Council. TBF has been an active and supportive participant in the development and implementation of the Council's Highly Migratory Species (HMS) Plan. I oppose allowing longline gear into the waters of our Pacific Coast when the Plan was proposed, citing the fact that in addition to the well documented damage the gear inflicts on sea turtles, the status of finfish species primarily expected to be targeted by this gear – swordfish, bluefin tuna, yellowfin tuna and bigeye tuna – was either unknown or, in the view of scientific staff, approaching an overfished condition.

Steve Ng  
Concerned citizen  
7816 61st Ave NW  
Gig Harbor, Wa 98335  
[FishNg1@aol.com](mailto:FishNg1@aol.com)

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|                  |                                     |
|------------------|-------------------------------------|
| <b>Longlines</b> | <b>Content-Type:</b> message/rfc822 |
|                  | <b>Content-Encoding:</b> 7bit       |

**Subject:** [Fwd: longliners]

**From:** PFMC Comments <pfmc.comments@noaa.gov>

**Date:** Mon, 26 Mar 2007 08:26:11 -0700

**To:** Mike Burner <Mike.Burner@noaa.gov>

**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

---

**Subject:** longliners

**From:** DALE JULIE MARLOW <DAJURYNI\_8@msn.com>

**Date:** Fri, 23 Mar 2007 16:04:18 -0700

**To:** pfmc.comments@noaa.gov

we have enough problems with the gill nets we don't need any more thieves of the river or ocean?

|                   |                                     |
|-------------------|-------------------------------------|
| <b>longliners</b> | <b>Content-Type:</b> message/rfc822 |
|                   | <b>Content-Encoding:</b> 7bit       |

**Subject:** [Fwd: Long-liners off the Washington State Coast]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:39:51 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>

---

**Subject:** Long-liners off the Washington State Coast  
**From:** Jeff Alexander <gonzomon@peoplepc.com>  
**Date:** Sat, 24 Mar 2007 19:12:58 -0800  
**To:** pfmc.comments@noaa.gov

I am writing to express my grave concerns regarding long-line fishing of the coast of Oregon and Washington. As you well know, the numbers of pelagic fish have reached all time lows throughout the world because of commercial over fishing and long-liners have been at the forefront of this exploitation.

Long-line fishing is not selective and as a result countless marine animals/mammals are killed as by-catch. Turtles, birds, sharks, etc... all die because of this deadly practice. Thousands of baited hooks in the water off our coast and thousands upon thousands of pounds of dead fish ready to export is not a responsible management policy of our resources. Opening the door to one will only invite more and our oceans can't handle it.

As a sportsman and recreational fisherman I have to deal with shorter seasons, bag limits and gear restrictions all to support the lessening of restrictions on commercial fisherman.. Washington wants to put a limit on Albacore for the first time ever because they contend Albacore stocks are on the verge of over exploitation yet recreational fisherman comprise less than 10% of the take.

I implore you to reject the proposal to allow any increase of commercial pressure or long-line fishing off the coast of Washington and Oregon.

Sincerely,

Jeff Alexander

408 N. 13th St.

Selah, WA 98942

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| <b>Long-liners off the Washington State Coast</b> |
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| <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
|--|

**Subject:** [Fwd: Longline Permit]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:28:21 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>

---

**Subject:** Longline Permit  
**From:** Jeff Bott <jbott@genesishouse.com>  
**Date:** Sat, 24 Mar 2007 07:47:23 -0700  
**To:** pfmc.comments@noaa.gov

To Whom It May Concern,

I'm writing to express my opposition to the proposed EFP to allow longline fishing for several species of tuna and swordfish in our Pacific Coastal waters.

I believe these fish are already being overfished. Charts and studies show their numbers in decline. So if anything we need to be moving to more conservative management rather than putting more pressure on their numbers.

Thank You,  
Jeff Bott  
5514 70th DR SE  
Snohomish, WA 98290

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|------------------------|--|
| <b>Longline Permit</b> | <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
|------------------------|--|

**Subject:** [Fwd: Longline off Oregon and Washington]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:27:26 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>

---

**Subject:** Longline off Oregon and Washington  
**From:** mikelw@comcast.net  
**Date:** Sat, 24 Mar 2007 04:40:29 +0000  
**To:** pfmc.comments@noaa.gov

I can't believe this would even be an option to be considered.  
It is claimed this maybe a fisheries that is already over fished.  
And yet it might be thought as being something to be considered?\  
Please don't let this happen at any price. This is our home you are selling.  
don't let this happen.  
I will not vote for anyone with this kind of thought pattern.Thank you and I do VOTE.  
Mike Weber.

**Longline off Oregon and Washington**

**Content-Type:** message/rfc822

**Content-Encoding:** 7bit

**Subject:** [Fwd: Longline Gear]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:32:41 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>

---

**Subject:** Longline Gear  
**From:** "Bob...Kim Giles" <bk\_giles98205@yahoo.com>  
**Date:** Sat, 24 Mar 2007 23:40:11 -0700 (PDT)  
**To:** pfmc.comments@noaa.gov

Please do not allow longline gear to be used in the coastal waters of the northwest, for the sake of our fisheries, for the sake of my fishing rights, and for the sake of my children's and children's children's right to fish our waters. Please do the right thing!

Bob Giles  
11832 28th Street SE  
Everett, WA 98205

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[Food fight?](#) Enjoy some healthy debate  
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|                      |                                     |
|----------------------|-------------------------------------|
| <b>Longline Gear</b> | <b>Content-Type:</b> message/rfc822 |
|                      | <b>Content-Encoding:</b> 7bit       |

**Subject:** [Fwd: Longline fishing]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:26:50 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>

---

**Subject:** Longline fishing  
**From:** Sharon Schrenk <sschrenk@centurytel.net>  
**Date:** Fri, 23 Mar 2007 17:32:55 -0700  
**To:** pfmc.comments@noaa.gov

I agree with The Billfish Foundation therefore I ask the Council to please NOT allow Longline fishing along the Northern California, Oregon and Washington Coasts.

Thank-you for your careful consideration of this matter.

Sincerely,

Sharon A. Schrenk

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No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.5.446 / Virus Database: 268.18.17/730 - Release Date: 3/22/2007 7:44 AM

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|-------------------------|--|
| <b>Longline fishing</b> | <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
|-------------------------|--|

**Subject:** [Fwd: Longline approval]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:19:40 -0700  
**To:** Mike burner <Mike.Burner@noaa.gov>, Kit Dahl <Kit.Dahl@noaa.gov>

---

**Subject:** Longline approval  
**From:** Dickrep@aol.com  
**Date:** Thu, 22 Mar 2007 20:06:59 -0400 (EDT)  
**To:** pfmc.comments@noaa.gov

Dear Sirs, please do not approve the use of long lines for even a single vessel in the Pacific area. I've read about this subject thoroughly and have seen the visible evidence of both the destruction of the dorado recreational fishing in the Sea of Cortez as well as the danger of longlines for recreational and other vessels. In addition, the marlin fishery off the Pacific Coast has declined dramatically in the recent decade and we need to support "sustainable fishing" only.

Richard A. Replogle, Tucson, AZ.

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|--------------------------|-------------------------------------|
| <b>Longline approval</b> | <b>Content-Type:</b> message/rfc822 |
|                          | <b>Content-Encoding:</b> 7bit       |

**Subject:** [Fwd: Long liners]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:31:33 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>

---

**Subject:** Long liners  
**From:** "Anderson,Ronald G." <ANDERSRG@airproducts.com>  
**Date:** Sun, 25 Mar 2007 13:13:54 -0400  
**To:** pfmc.comments@noaa.gov

To All,

Please, Don't let the Longliners in our Water. It's not going to do anything but further impact our fisheries declining population, resulting in lower numbers, hurting everybody concerned.

Thank You, Ronald G. Anderson

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| <b>Long liners</b> | <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
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**Subject:** [Fwd: Long liners in the Pacific Ocean]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:27:15 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>

---

**Subject:** Long liners in the Pacific Ocean  
**From:** Robin Kaup <nlrrefrigeration@yahoo.com>  
**Date:** Fri, 23 Mar 2007 19:06:09 -0700 (PDT)  
**To:** pfmc.comments@noaa.gov

At a time when the palegic species are declining off of the Pacific coast, I think that it would be irresponsible to provide a permit to deplete these species beyond the level they are now. If they are talking about cut backs on the amount of harvest of these species why would you even think about isueing a vessle a license to begin overharvesting these fish.

Please protect our fish populations by not issueing the permit.

Thanks  
Robin Kaup  
Silverton Oregon  
Home Port, New Port Oregon  
[NLRrefrigeration@yahoo.com](mailto:nlrrefrigeration@yahoo.com)

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| <b>Long liners in the Pacific Ocean</b> | <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
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**Subject:** [Fwd: long line]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:22:51 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

---

**Subject:** long line  
**From:** Marlin Gohn <gohnm@microdental.com>  
**Date:** Fri, 23 Mar 2007 11:57:38 -0700  
**To:** pfmc.comments@noaa.gov

As a pacific coast fisherman that does fish for albacore in our northern California waters I do not think that we should have long lines in our waters at all, for to many years we have aloud our waters to be over fished it's time to stop.  
Thank You Marlin Gohn

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| <b>long line</b> | <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
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**Subject:** [Fwd: LONG LINE FISHERY (proposed)]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:27:03 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>

---

**Subject:** LONG LINE FISHERY (proposed)  
**From:** Fennerty <roadsend@seasurf.net>  
**Date:** Fri, 23 Mar 2007 17:06:34 -0800  
**To:** pfmc.comments@noaa.gov

I do not support additional commercial fishing pressure off the Pacific Coast. Too many of these species are at or near the point of being overfished.

Gus Fennerty  
Astoria, OR

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| <b>LONG LINE FISHERY (proposed)</b> | <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
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**Subject:** [Fwd: Keep Longliners out]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:29:30 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>

---

**Subject:** Keep Longliners out  
**From:** kenny boman <chukar14@yahoo.com>  
**Date:** Sat, 24 Mar 2007 10:01:41 -0700 (PDT)  
**To:** pfmc.comments@noaa.gov

We opposed allowing longline gear into the waters of our Pacific Coast when the Plan was proposed, citing the fact that in addition to the well documented damage the gear inflicts on sea turtles, the status of finfish species primarily expected to be targeted by this gear - swordfish, bluefin tuna, yellowfin tuna and bigeye tuna - was either unknown or, in the view of our scientific staff, approaching an overfished condition. There is no need to open up our waters to this type of fishery. This will only result in increasing the rate of over harvest for the above species.

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| <b>Keep Longliners out</b> | <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
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**Subject:** [Fwd: J.2 Exempted Fishing Permit (EFP) for Longline Fishing in the West Coast Exclusive Economic Zone]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:23:37 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

---

**Subject:** J.2 Exempted Fishing Permit (EFP) for Longline Fishing in the West Coast Exclusive Economic Zone  
**From:** Raymond Zamora <RZamora@BSFLLP.com>  
**Date:** Fri, 23 Mar 2007 15:36:24 -0400  
**To:** pfmc.comments@noaa.gov

I oppose the Exempted Fishing Permit for long line fishing in the West coast.

**Raymond Zamora, CP**  
Certified Paralegal  
**Boies, Schiller & Flexner LLP**  
305.357.8465 Office  
305.357.8567 Fax  
<http://www.bsfllp.com>

\*\*\*\*\*  
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| <b>J.2 Exempted Fishing Permit (EFP) for Longline Fishing in the West Coast Exclusive Economic Zone</b> | <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
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**Subject:** [Fwd: Fwd: long lining]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:24:48 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

---

**Subject:** Fwd: long lining  
**From:** michael preston <pceco@comcast.net>  
**Date:** Fri, 23 Mar 2007 13:26:15 -0700  
**To:** pfmc.comments@noaa.gov

THIS THE SAME MESSAGE I SENT IN REGARDS TO THE FEASCO IN HAWAII LAST DECEMBER . MESSAGE HASN'T CHANGED , NEVER WILL , GET IT !  
SORRY THE PICTURE IS UPSIDE DOWN JUST PICK UP YOUR COMPUTER AND TURN IT OVER . EVER WONDER WHAT WE HUMANS LOOK LIKE TO A FISH WHEN HE JUMPS UPSIDE-DOWN ?

Begin forwarded message:

From: michael preston <pceco@comcast.net>  
Date: December 16, 2006 3:01:27 PM PST  
To: [info.wpcouncil@noaa.gov](mailto:info.wpcouncil@noaa.gov)  
Subject: Fwd: long lining

THIS BIG BOY WAS RELEASED AND WILL LIVE TO FIGHT AGAIN , AND AGAIN , AND AGAIN, AND AGAIN. EVERY TIME HE DOES SOMEBODY GETS A PAYCHECK !  
IT WOULD BE A CRIME FOR HER TO END UP AS ''BY-CATCH'' AND WASTED !

Begin forwarded message:

From: michael preston <pceco@comcast.net>  
Date: December 16, 2006 2:46:30 PM PST  
To: [info.wpcouncil@noaa.gov](mailto:info.wpcouncil@noaa.gov)  
Subject: long lining

CAN'T THE FISH HAVE A LITTLE PART OF THE VAST OCEAN ? THE POPULATION OF THE PLANET IS 6.5 BILLION SOULS . WITH TODAYS TECHNOLOGY WE SHOULD NOT CALL IT FISHING WE SHOULD CALL IT HARVESTING , WE CAN AND WILL CATCH THEM ALL TO TRY AND FEED THE PLANET WITH A DEPLETABLE RESOURCE . THE ONLY REASON THERE IS ANY MARLIN LEFT ON THE PLANET IS BECAUSE THEY TASTE LIKE DUNG AND THE ORIENTALS DONT LIKE THEM. I AM A OLD GUY WHO HAS FISHED ALL OVER THE PLANET FOR BILL FISH , I WITNESSED FIRSTHAND WHAT HAPPENED TO THE FISHERY IN THE SEA OF CORTEZ YEARS AGO WHEN IT WAS LONG LINED , IT WAS DECIMATED OVERNIGHT AND EVEN TO THIS DAY HAS NOT RECOVERED . I WOULD SAY THE AUSIES GOT IT RIGHT , I FISH THERE A LOT AND NEW ZEALAND ALSO . PROTECT THE RESOURCE AND IT WILL LAST FOREVER IS THEIR PHILOSOPHY AND IT LEAVES PLENTY OF ROOM FOR THE COMMERCIAL GUYS. IT WOULD BE WISE TO LISTEN VERY CAREFULLY TO THE HAWAIIAN'S . THIS IS A POLITICAL FIGHT BETWEEN GOOD SENSE AND SHORT TERM CORPORATE PROFITS . A FISHERY AREA THIS SMALL CAN BE FISHED OUT LONG LINING IN A VERY SHORT PERIOD OF TIME AND MAY NOT EVER RECOVER.THE ''BY-CATCH'' WILL KILL THE SPORT-FISHING INDUSTRY . IT WILL TRASH THE LOCAL ECONOMY FOREVER ALSO.

ANOTHER FISHERY I HAVE SEEN DESTROYED FIRST HAND IS THE COAST OF CALIFORNIA WHERE I LIVE . OF COURSE ITS ALL THE FAULT OF THE SPORT FISHERMAN IF YOU LISTEN TO THE POLITICIANS WHO HAVE BEEN BANKROLLED BY BIG BUSINESS .

IF OUR POLITICIANS ALLOW THIS TO HAPPEN THEY ARE ONLY HELPING THE FORIGN FISHING COMPANY'S , NOT US U. S. TAXPAYERS. THANK YOU FOR THIS OPPORTUNITY TO BE HEARD ALL THE BEST ''MARLIN MIKE'' PRESTON

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| <b>Fwd: long lining</b> | <b>Content-Type:</b> message/rfc822 |
|                         | <b>Content-Encoding:</b> 7bit       |

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| <b>Scan0008_0008.jpg</b> | <b>Content-Type:</b> image/jpeg |
|                          | <b>Content-Encoding:</b> base64 |

**Subject:** [Fwd: EPF - Longline - I Do Not Support Approval]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:29:49 -0700  
**To:** Mike burner <Mike.Burner@noaa.gov>

---

**Subject:** EPF - Longline - I Do Not Support Approval  
**From:** Trish and Jim Davis <jimtrish247@yahoo.com>  
**Date:** Sat, 24 Mar 2007 10:50:30 -0700 (PDT)  
**To:** pfmc.comments@noaa.gov

Dear Dr Mclsaac:

I support the enclosed letter 100%. Longlines in any form are destructive and not selective and contribute to decline of our stocks. Please consider my input and follow-up when a decision has been made.

James B Davis  
27203 7th PL S  
DesMoines, WA 98198  
253-946-0181

Dr. Donald Mclsaac, Executive Director  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220-1384

Dear Dr. Mclssac:

I am writing to take the opportunity to express the views of The Billfish Foundation (TBF) on the Council's consideration of a requested exempted fishing permit (EFP) to allow a single vessel to fish with prohibited longline gear in the waters under the jurisdiction of the Pacific Fishery Management Council. TBF has been an active and supportive participant in the development and implementation of the Council's Highly Migratory Species (HMS) Plan. We opposed allowing longline gear into the waters of our Pacific Coast when the Plan was proposed, citing the fact that in addition to the well documented damage the gear inflicts on sea turtles, the status of finfish species primarily expected to be targeted by this gear – swordfish, bluefin tuna, yellowfin tuna and bigeye tuna – was either unknown or, in the view of our scientific staff, approaching an overfished condition. The Council took the appropriate precautionary action and did not allow this gear.

TBF continues to oppose the use of longline gear and we cannot support the EFP request. It is not a request for actual research to look at alternative fishing methods and means. Having been modified and altered a number of times over the last several years, it remains merely a request to conduct exploratory fishing with gear prohibited by the council's HMS Plan. Furthermore, at present two species that have been at one time or another listed as potential target species for this EFP – yellowfin and bigeye tuna – have been classified as overfished. Albacore are, at best, approaching that condition and the Inter-American Tropical Tuna Commission (IATTC) has asked that no new effort be focused on this fishery in the eastern Pacific. We note that the Council is presently working in conjunction with the National Marine Fisheries Service (NMFS) and the IATTC to develop means to reduce fishing mortality on yellowfin and bigeye and cap effort on albacore. Allowing exploratory fishing with longlines seems not to be consistent with good management in this case.

TBF appreciates the fact that the Management Team has devoted time and effort to crafting alternatives for the council's consideration. We certainly support the exclusion of any EFP permitted longlines from the Southern California Bight where bycatch of striped marlin and conflicts with the well developed recreational fishery would

surely have been acute. Again, TBF supports Alternative 1: the status quo non-approval option. However, if the Council deems it necessary to request approval of this EFP we urge you to adopt Alternative 3 and let the gear focus on swordfish. Further, we request that the Council require only non-offset 18/0 or larger circle hooks. Recent research has demonstrated that offsets of greater than a few degrees dramatically increase gut-hooking of finfish. Given this new information, the NMFS has recently required that only non-offset circle hooks be used in Atlantic billfish tournaments. Although the prohibition of use in the southern California Bight may eliminate most potential interactions of the gear with striped marlin, macro scale climate events have been shown to change the distribution of this species, increasing their occurrence northward up the coast. For this reason we believe that the cap on any take of striped marlin included in Alternative 3 would be a necessary condition of any approval and this cap should be set at the level of a single observed mortality.

Thank you for the opportunity to comment and participate in the management of these valuable natural resources. TBF's Chief Scientist, Dr. Russell Nelson, will be at the April Council meeting and available to discuss this issue and answer any questions.

Sincerely yours,

Ellen Peel, LLD  
President

Cc: Dr. Bill Hogarth  
Dr. Robin Allen

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| <b>EPF - Longline - I Do Not Support Approval</b> |
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| <b>Content-Type:</b> message/rfc822 |
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| <b>Content-Encoding:</b> 7bit |
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**Subject:** [Fwd: April 6 Meeting on Longliner]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:29:08 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>

---

**Subject:** April 6 Meeting on Longliner  
**From:** jack <jackp63@comcast.net>  
**Date:** Sat, 24 Mar 2007 08:54:25 -0800  
**To:** pfmc.comments@noaa.gov

Dear Sir or Madam: On April 6, there will be a meeting to decide whether to allow a longliner to operate in the California/Washington area to take tuna, marlin etc. Please do not allow this to happen. There is already too much commercial pressure on these species off our coast and other areas where they roam. There should no longline fishing or more commercial pressure. There are recreational needs to satisfy. Thank you. Jack Polance

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| <b>April 6 Meeting on Longliner</b> | <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
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**Subject:** [Fwd: Agenda ItemJ.2 Exempted Fishing Permit (EFP) for Longline Fishing in the West Co]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:23:13 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

---

**Subject:** Agenda ItemJ.2 Exempted Fishing Permit (EFP) for Longline Fishing in the West Co  
**From:** CAYMAR@aol.com  
**Date:** Fri, 23 Mar 2007 15:10:49 -0400 (EDT)  
**To:** pfmc.comments@noaa.gov  
**CC:** Jennifer\_Thompson@billfish.org

Gentlemen:

Are you out of your minds?! How can you possibly consider the introduction of longlines on our West Coast after the havoc, according to your own studies, that these indiscriminate killing machines have caused on the East Coast. This is beyond belief! I sincerely hope that sanity returns and that the Council votes to continue the deserved and necessary ban on longlines.

Sincerely,  
David L. Heine  
570 Ivanhoe Plaza  
Orlando, FL 32084

\*\*\*\*\*

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| <b>Agenda ItemJ.2 Exempted Fishing Permit (EFP) for Longline Fishing in the West Co</b> | <b>Content-Type:</b> message/rfc822<br><b>Content-Encoding:</b> 7bit |
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**Subject:** [Fwd: Agenda Item J.2 Exempted Fishing Permit (EFP) for Longline Fishing in the West Coast Exclusive Economic Zone]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:20:20 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>  
**CC:** Kit Dahl <Kit.Dahl@noaa.gov>

---

**Subject:** Agenda Item J.2 Exempted Fishing Permit (EFP) for Longline Fishing in the West Coast Exclusive Economic Zone  
**From:** Bill Bennett <bbennett@mglaw.com>  
**Date:** Thu, 22 Mar 2007 16:28:57 -0800  
**To:** pfmc.comments@noaa.gov

Dear NOAA,

I have lived 50 years in Southern California, and been witness to the destruction of the local salt water fishery. With proposals to increase or provide exempted permits for long line fleets, you will only add to the demise of pelagic game fish and sharks in our waters. I urge you to consider the demise of sport fishing as not only an industry but as a tradition here from Zane Grey to present. By exterminating all game fish by long lines, you kill not only a real commercial industry for sport fishing, but the favorite past time of many thousands in our region.

Sincerely,

William B. Bennett  
NHYC Anglers Fleet  
Newport Beach, CA

Agenda Item J.2 Exempted Fishing Permit (EFP) for Longline Fishing in the West Coast Exclusive Economic Zone

**Content-Type:** message/rfc822  
**Content-Encoding:** 7bit

**Subject:** [Fwd: (no subject) Longlines]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:28:04 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>

---

**Subject:** (no subject)  
**From:** CMMSaved@aol.com  
**Date:** Sat, 24 Mar 2007 09:18:08 -0400 (EDT)  
**To:** pfmc.comments@noaa.gov

sirs  
i am against the proposal to allow long line fishing even if it is a single vessel  
thank you for your consideration  
sincerely  
craig m morgan, md

---

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|                     |                                     |
|---------------------|-------------------------------------|
| <b>(no subject)</b> | <b>Content-Type:</b> message/rfc822 |
|                     | <b>Content-Encoding:</b> 7bit       |

**Subject:** [Fwd: I oppose allowing longlining off the Oregon / Washington coasts]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Mon, 26 Mar 2007 08:28:39 -0700  
**To:** Mike Burner <Mike.Burner@noaa.gov>

---

**Subject:** I oppose allowing longlining off the Oregon / Washington coasts  
**From:** Dean Ferguson <ciferguson37733@charter.net>  
**Date:** Sat, 24 Mar 2007 07:56:17 -0800  
**To:** pfmc.comments@noaa.gov

To: Dr. Donald Mclsaac, Executive Director  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220-1384

From: Dean Ferguson  
37733 Highway 30  
Astoria, OR 97103

Dear Dr. Mclsaac:

I would like to express my opposition to allowing any longline fishing off the Oregon and Washington coasts. The current focus continues to be rebuilding fish stocks and reduction in limits both from the sport and commercial side. Currently, Oregon has a 25 Albacore per person limit, and the discussion is how to reduce that to 10 to avoid over-fishing, even though sport fishing of Albacore is but a tiny fraction of the total catch. It does not make much sense, in my opinion, to allow a non-selective fishery to target the same fish we are being told are currently over-fished.

Please take my opinion into consideration on this matter.

Sincerely,

Dean Ferguson

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| <b>I oppose allowing longlining off the Oregon / Washington coasts</b> |
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Dear Dr. McIssac:

I am writing to take the opportunity to express the views of The Billfish Foundation (TBF) on the Council's consideration of a requested exempted fishing permit (EFP) to allow a single vessel to fish with prohibited longline gear in the waters under the jurisdiction of the Pacific Fishery Management Council. TBF has been an active and supportive participant in the development and implementation of the Council's Highly Migratory Species (HMS) Plan. We opposed allowing longline gear into the waters of our Pacific Coast when the Plan was proposed, citing the fact that in addition to the well documented damage the gear inflicts on sea turtles, the status of finfish species primarily expected to be targeted by this gear – swordfish, bluefin tuna, yellowfin tuna and bigeye tuna – was either unknown or, in the view of our scientific staff, approaching an overfished condition. The Council took the appropriate precautionary action and did not allow this gear.

TBF continues to oppose the use of longline gear and we cannot support the EFP request. It is not a request for actual research to look at alternative fishing methods and means. Having been modified and altered a number of times over the last several years, it remains merely a request to conduct exploratory fishing with gear prohibited by the council's HMS Plan. Furthermore, at present two species that have been at one time or another listed as potential target species for this EFP – yellowfin and bigeye tuna – have been classified as overfished. Albacore are, at best, approaching that condition and the Inter-American Tropical Tuna Commission (IATTC) has asked that no new effort be focused on this fishery in the eastern Pacific. We note that the Council is presently working in conjunction with the National Marine Fisheries Service (NMFS) and the IATTC to develop means to reduce fishing mortality on yellowfin and bigeye and cap effort on albacore. Allowing exploratory fishing with longlines seems not to be consistent with good management in this case.

TBF appreciates the fact that the Management Team has devoted time and effort to crafting alternatives for the council's consideration. We certainly support the exclusion of any EFP permitted longlines from the Southern California Bight where bycatch of striped marlin and conflicts with the well developed recreational fishery would surely have been acute. Again, TBF supports Alternative 1: the status quo non-approval option. However, if the Council deems it necessary to request approval of this EFP we urge you to adopt Alternative 3 and let the gear focus on swordfish. Further, we request that the Council require only non-offset 18/0 or larger circle hooks. Recent research has demonstrated that offsets of greater than a few degrees dramatically increase gut-hooking of finfish. Given this new information, the NMFS has recently required that only non-offset circle hooks be used in Atlantic billfish tournaments. Although the prohibition of use in the southern California Bight may eliminate most potential interactions of the gear with striped marlin, macro scale climate events have been shown to change the distribution of this species, increasing their occurrence northward up the coast. For this reason we believe that the cap on any take of striped marlin included in Alternative 3 would be a necessary condition of any approval and this cap should be set at the level of a single observed mortality.

Thank you for the opportunity to comment and participate in the management of these valuable natural resources. TBF's Chief Scientist, Dr. Russell Nelson, will be at the April Council meeting and available to discuss this issue and answer any questions.

Sincerely yours,

Allen Dean Mulanax  
Portland Oregon  
almulanax@comcast.net

**Subject:** long line fishing

**From:** "Foco, Trebor" <Trebor.Foco@TycoHealthcare.com>

**Date:** Mon, 26 Mar 2007 13:11:44 -0400

**To:** pfmc.comments@noaa.gov

Dr. Donald McIsaac, Executive Director  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220-1384

Dear Dr. McIsaac:

I am not much for words so please take this short email as a protest to the long line proposal off the west coast of Washington and Oregon. It seems funny that this would even be considered in this day in age of trying to prevent over-fishing.

Please do not allow this to happen in our waters as we would all like to see fish stocks continue to increase.

Thank you,

Treb

*Trebor C. Foco*  
*Valleylab Co.*

*360-624-3844 new cell*  
*trebor.foco@tycohealthcare.com*

**Subject:** EFP for an experimental pelagic longline fishery  
**From:** "Scharber, Jim W" <jim.scharber@bankofamerica.com>  
**Date:** Tue, 27 Mar 2007 14:29:18 -0500  
**To:** pfmc.comments@noaa.gov

I oppose the EFP for an experimental pelagic longline fishery in West Coast federal waters.

James W. Scharber

7323 Griffin Rd.

Brooksville, Fl 34601

**Subject:** Agenda Item J.2 Comment

**From:** Walt Blendermann <salmonmann@hotmail.com>

**Date:** Mon, 26 Mar 2007 18:53:45 -0700

**To:** pfmc.comments@noaa.gov

Dr. Donald McIsaac, Executive Director  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, Oregon 97220-1334

Subject: Agenda Item J.2: Extended Fishing Permit (EFP) for Long Line Fishing in the West Coast EEZ

After careful detailed review of the Draft Environmental Assessment for the Subject EFP, I support the issuance of an EFP with Alternate 3. The timely acquisition of needed data in a controlled minimum ecosystem risk environment, that can further the goals of sustainable fishery development is reasonable and prudent.

I also feel that the determination of economic viability and ecosystem impact data will require multiple seasons for the single fishing vessel system. I would recommend a 2 or 3 season permit for a single vessel.

Sincerely,  
(signed)  
Mr. Walter H. Blendermann  
120 Windsong Lane  
Sequim, WA 98382

*Advocates for Wild, Healthy Oceans*

RECEIVED

MAR 27 2007

PFMC

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The Ocean   
Conservancy

March 27, 2007

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

RE: Agenda Item J.2 – Exempted Fishing Permit for Longline Fishing in the West Coast  
Exclusive Economic Zone

Dear Mr. McIsaac and the Council:

On behalf of The Ocean Conservancy and our more than 170,000 members and activists nationwide, we are writing to oppose 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 exclusive economic zone (EEZ) for all pelagic longlining, and to the high seas beyond the EEZ for west coast-based shallow-set pelagic longlining. The proposal before the Pacific Fishery Management Council ("Council") would permit an "exempted" longline fishery within the U.S. EEZ off the coast of California. The reintroduction of pelagic longlining off the U.S. west coast poses a significant threat to vulnerable finfish populations as well as endangered and protected species including marine mammals, seabirds and Pacific loggerhead and leatherback populations. We do not believe there is sufficient evidence to justify allowing a renewed longline fishery and urge the Council and the National Marine Fisheries Service (NMFS) to reject the EFP application and identify the draft environmental assessment's (EA's) no action alternative (Alternative 1) as its preferred alternative.

**The EFP threatens endangered sea turtle populations.**

Sea turtles throughout the Pacific are hovering on the brink of extinction due in large part to incidental mortality associated with fishing operations. 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

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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.

In November 1999, concerned about the high level of sea turtle mortality associated with longlining, The Ocean Conservancy (previously known as the "Center for Marine Conservation") won an injunction restricting longline fishing under the Hawaii FMP. The injunction was an effort to reduce leatherback sea turtle mortality from shallow-set longlining targeting swordfish in the Hawaiian Islands.<sup>1</sup> NMFS subsequently issued a Biological Opinion pursuant to Section 7 of the Endangered Species Act (ESA) on the Hawaii FMP. The agency concluded that continued operation of the fishery would jeopardize the existence of leatherback, loggerhead, and green sea turtles, and amended the FMP to close the Hawaii-based shallow-set longline fishery. It was allowed to re-open again 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. In March 2006, the annual hard cap on take of loggerheads was reached after the fishery operated for less than three months.<sup>2</sup> In 2004, NMFS imposed a moratorium on pelagic longline fishing east of 150 degrees West longitude 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.

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 allow the capture of turtles by a California based fishery – EFP or otherwise – when the Hawaii fishery was closed for exactly this reason only one year ago. The Hawaii and California based fleets fish in the same manner, often in the same area, and catch the same turtles.<sup>3</sup> 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.

What's more, the Council must consider the combined impact of the proposed longlining EFP along with the currently pending drift gill-net EFP. While NMFS has not yet approved the drift gillnet EFP, authorization of both EFPs for the 2007 fishing season will increase fishing effort and the risk to protected and endangered species. We strongly urge the Council to select the no action alternative, however should the Council approve the EFP, it should ensure that it includes stringent conservation measures (such as those identified in Alternative 3) that will minimize the impact of the fishery on loggerhead and leatherback sea turtles.

<sup>1</sup> *Center for Marine Conservation, et al., v. National Marine Fisheries Service, et al.*, (Civ. No. 99-00152 DAE)(D. Hawaii)

<sup>2</sup> 71 Fed. Reg. 14824 (March 24, 2006)

<sup>3</sup> 69 Fed. Reg. 11540, 11543 (March 11, 2004) (preamble to final rule closing Pacific longline fishery east of 150 degrees West long.)

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### **The longline EFP threatens vulnerable finfish populations.**

In addition to potential negative interactions between shallow-set longline gear and endangered sea turtle populations, we are concerned about the impact of increased fishing effort on select finfish species. While the EFP application proposes to allow a single vessel to target swordfish with shallow-set longline gear in west coast EEZ, other more vulnerable highly migratory species may be targeted or caught incidentally. The draft EA identifies several non-target species of tuna including bigeye, yellowfin, skipjack bluefin and albacore which are likely to be caught with shallow-set longlines.<sup>4</sup> Of the five major non-target species, three (yellowfin, bigeye and albacore) have been classified as overfished or experiencing overfishing.

Both the IATTC and U.S. stock assessment scientists have identified Pacific bigeye and yellowfin tuna populations as being overfished and subject to overfishing.<sup>5</sup> The IATTC has put forth a resolution which states that "bigeye stocks are below the level that would produce the average maximum sustainable yield (AMSY)" and directs member nations to implement a seasonal closure for commercial purse seine and longline vessels targeting bigeye (and yellowfin) tuna.<sup>6</sup> Likewise, the IATTC and WCPFC adopted resolutions in 2005 identifying North Pacific albacore populations as experiencing overfishing and requiring member nations to cap current levels of effort.<sup>7</sup> The first Stock Assessment and Fishery Evaluation (SAFE) Report for the U.S. West Coast HMS FMP echoed this conclusion and warned that "[t]he current fishing mortality rate is high...and may be cause for concern regarding the current stock status of North Pacific albacore."<sup>8</sup> While shallow-set longlining does not target albacore, bigeye and yellowfin specifically, they are classified as a major non-target species likely to be captured incidentally. In light of the vulnerable status of these tuna populations, expanding capacity, increasing fishing effort and reintroducing longlining off the U.S. West Coast is not consistent with international directives, domestic regulations, the best available science and the principles of precautionary management.

### **The EFP is not designed to achieve its intended purpose.**

For the reasons expressed above, The Ocean Conservancy does not support the proposed longline EFP. In addition, we are concerned that the EFP is not reasonably designed to meet its stated objective. The purpose of the proposed EFP is "to gather information on the economic viability and environmental effects, including potential protected species and non-target finfish interactions, of fishing in the West Coast EEZ targeting swordfish in a data poor fishery."<sup>9</sup> The EFP however would authorize only one vessel to fish for one year. One vessel fishing for one season will not yield statistically significant results that will allow NMFS to reasonably determine whether re-establishing a shallow-set longline fishery off the West Coast is a viable

<sup>4</sup> Draft Longline Exempted Fishing Permit Environmental Assessment, March 2007, p.42.

<sup>5</sup> 2005 HMS Stock Assessment and Fishery Evaluation Report, Table 5-1, p. 111.

<sup>6</sup> Resolution C-06-02, IATTC, June 2006

<sup>7</sup> PROP IATTC-73-C1, June 2005

<sup>8</sup> 2005 HMS Stock Assessment and Fishery Evaluation Report, Section 5.3.1, page 106.

<sup>9</sup> Draft Longline Exempted Fishing Permit Environmental Assessment, March 2007, p.2.

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option. Given our other concerns with the EFP, we are not recommending that the Council authorize more vessels to participate in the EFP to remedy this design flaw, however we do request that the Council and NMFS weigh the ecological risks against the anticipated value of this EFP.

To the extent that Pacific Council is interested in transitioning away from destructive gillnet 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 and select the "no action" alternative.

Sincerely,



Meghan Jeans  
Pacific Fish Conservation Manager  
The Ocean Conservancy