



April 08, 2008

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

Dear Dr McIsaac:

I am writing on behalf of World Wildlife Fund (WWF) to support Mr. Pete Dupuy's application for an Experimental Fishing Permit (EFP) to conduct a longline fishery in Council waters.

The current ban on longline fishing in California and PFMC waters is similar to the situation that existed in Hawaiian waters a number of years ago. Because of interactions with sea turtles and their declining populations, the swordfish longlining industry was closed in 2001. By working together, the industry, the Western Pacific Fisheries Management Council and NOAA, were able to adopt measures that enabled the longline fisheries to be reopened. These measures included set limits, mandatory observers, a cap on turtle interactions, the use of circle hooks, and selective use of bait species. Since these measures were adopted turtle interactions and mortality have been dramatically reduced. Leatherback mortalities have averaged less than one per year between 2004-2007, and the potential is there to reduce this to zero with the application of consistently improving techniques.

As outlined in his EFP application and in further discussions, Mr. Dupuy has assured WWF that he plans to operate under similar restrictions to those implemented in Hawaii, as well as undertaking trials of gear sets and gear modifications to further reduce possible bycatch of non-target species. Approval of this EFP would provide further means of testing gear improvements, with funding already being appropriated by NOAA Southwest Fisheries Center to support this EFP. This would be used to place observers on board, create an experimental design, and perform data analysis. This is a move towards bringing consistency among the Hawaiian and West Coast fleets in this fishery.

The Hawaiian example has shown that a longline fishery can be substantially improved with gear and management modifications, rather than simply being shut down. The initiative in Hawaii is an important component of a larger international effort to eliminate the threat of longline fishing to sea turtles. WWF believes that the U.S. fishery needs to lead by example. Improvements adopted and refined in the Hawaii fishery can be instrumental in transforming other fleets. Given the trajectory of Pacific leatherbacks and

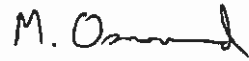
World Wildlife Fund

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loggerheads, it is essential that we reduce bycatch not only in the U.S. fleet, but in all fishing fleets in the Pacific. International fishery management bodies have recognized this need and called on all fleets to improve fishing gear and techniques to reduce turtle bycatch. The problem is one of international dimension.

Thank you for the opportunity to comment on this application.

Yours sincerely

A handwritten signature in black ink, appearing to read "M. Osmond". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mike Osmond
Snr Program Officer
Fisheries Program
World Wildlife Fund