

**Subject: Fwd: Against long-line proposal**

**Date:** Tue, 05 Sep 2000 12:18:16 -0700

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

**To:** daniel.waldeck@noaa.gov

See attached message...PFMC.Comments

SJK

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**Subject: Against long-line proposal**

**Date:** Mon, 4 Sep 2000 02:55:15 -0700 (PDT)

**From:** Travis Lopez <travislopez@yahoo.com>

**To:** senator@feinstein.senate.gov, rhight@dfg.ca.gov, Penny.Dalton@noaa.gov,  
pfmc.comments@noaa.gov

I wanted to express my concern over the proposal to allow long-liners within the 200 mile limit in California Waters.

It is my position that allowing ANY longlining activity within OUR waters will destroy OUR natural resource.

Longlining activities in US waters, in particular, Hawaii, the North Atlantic and the Gulf of Mexico, have resulted in overexploitation of the target species and caused the need for restricting these activities to "save" the resource. The decrease in number, size and regulations restricting the activities of these fisheries. One type of fishing gear is harmful enough, allowing long-lines and gillnets is going too far.

I am a San Diego Native, and college student. I have recently taken up a collection for funding a campaign against the long-liner proposal. I will not idly sit by and allow the destruction of a precious resource. I am counting on your wisdom and competence to proceed within the interest of protecting a natural resource.

Sincerely,

Ms. Travis O. Lopez

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ENVIRONMENTAL DEFENSE  
finding the ways that work



WCS  
WILDLIFE CONSERVATION SOCIETY



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PFMC

September 6, 2000

Chairman Jim Lone  
Pacific Fisheries Management Council  
2130 SW Fifth Ave., Suite 224  
Portland, OR 97201

Dear Chairman Lone:

In light of the recent discussions surrounding the gear types to be covered by the HMS FMP, we wanted to clarify some of our positions regarding the issue. We have been working to help the team in developing performance standards that would apply to all gears in the HMS fishery, both those currently in use in this region and any new gears that may be introduced or invented in the future. We believe that by taking this proactive approach to reducing and avoiding bycatch, the Council can have sustainable populations of highly migratory species for years to come.


A key element for the long-term conservation and management of HMS fisheries is the ability to estimate how much fishing mortality a population can withstand, a process that can be improved by the consideration of information on a stock's biological characteristics. At our request, the scientists on the Plan Team are developing a status index for species caught by the HMS fisheries, including particularly vulnerable species such as sharks. It is our hope that development of such an index will help the Council take proactive management measures and set sustainable catch levels.

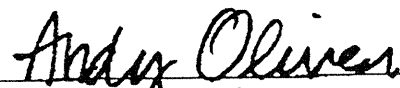
We have also proposed the development and incorporation of performance standards in the FMP to reduce and minimize bycatch in all the HMS fisheries. Performance standards would set objective targets and limits for bycatch across gears. In combination with these performance standards, we propose that the team examine the use of incentives to reward fisheries or individuals that achieve or exceed the targets set forth by the performance standards. Fishermen who demonstrate low bycatch levels or avoid fishing in high bycatch areas could receive higher landing limits. Again, using the information from the vulnerability indices, bycatch quotas could be established on a fishery wide, or vessel by vessel basis. These quotas could decrease over time, as the fishery improves its ability to avoid and minimize unwanted catch. Individual vessel bycatch allowances could be transferable within the fishery to allow fishermen to cover excess catch—once the total allowable bycatch level for a species within the fishery is met, we would propose that the fishery close.

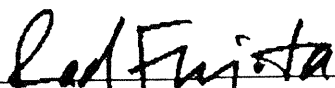
We believe effective monitoring of the fisheries, as well as implementation of performance standards, can best be accomplished through an appropriate observer program. The FMP needs to include statistically significant observer coverage for HMS vessels, recognizing that in some fisheries the coverage should be comprehensive. We also encourage the Council to consider some of the more recent technological innovations in monitoring, such as VMS and on-board cameras. The Team has also considered some small, yet significant, changes which we strongly support, such as requiring VMS on HMS boats and shifting to electronic logbooks. Improved data quality would be a significant contribution to a fishery where many basic questions are still unanswered about the biology and movements of these fish.

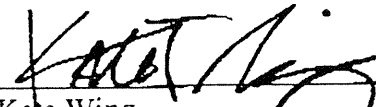
We encourage the Council to direct the Plan Team to examine the use of performance standards and catch incentives, and their effects if combined with more prescriptive measures such as a prohibition on night sets, limited set duration and amounts of gear, or area closures. We urge the Council to use caution now, while these stocks are still healthy, rather than risk jeopardizing their status and necessitating drastic actions later. These highly migratory fish are extremely valuable, and as other fishing grounds around the world are closed more and more fishermen will be looking to the productive areas of the Pacific U.S. Taking the long view in managing these stocks is wise from both an economic and a conservation perspective.

Thank you for your consideration,

  
Liz Lauck *KW*  
Wildlife Conservation Society

  
Andy Oliver *KW*  
World Wildlife Fund

  
Rod Fujita *KW*  
Environmental Defense

  
Kate Wing  
Natural Resources Defense Council

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PFMC

Dear Sir:

I am a life long sport fisherman. I am deeply concerned about any proposal to allow longline fishing in our waters on any basis whatsoever.

I can not see any benefits to anyone, except longliners, from such a proposal.

However, it is very easy to picture a negative impact on sport fishing from longlining.

I urge you to support and protect sport fishing and the interests of millions of sport fishermen and future generations of fishermen by keeping all longlining out of all of our waters.

The quality and possibly the very continued existence of sport fishing is in your hands.

Sincerely,

*Charles J. Ruth*  
*6538 Basalto St.*  
*Carlsbad, Ca. 92009*

As of 9/6/00, we have received 5 copies of this letter from different individuals.



Dear Chairman Lone.


I'm a member of the Recreational Fishing Alliance (RFA) and I'm extremely concerned that the Pacific Fishery Management Council is considering a proposal to replace driftnets with drift longlines in the Pacific.

The science surrounding this gear is clear – marine mammal interaction is inevitable, as is by-catch of juvenile and unmarketable species, including endangered sea turtles, pilot whales, marlin and sea birds. To introduce this fishing practice to the waters of the West Coast would be reckless

The U.S. Senate and the House of Representatives have both recognized longlines for the "dirty" gear they are – and are addressing the reduction of this gear through the legislative process. Drift longlines and drift gill nets have no place in sustainable and historical fisheries.

I urge you to remove driftnets from the water – but do not replace them with an unsustainable longline industry.

Sincerely,

 **Dr. George M. Paddison**  
3920 Regent Rd. \_\_\_\_\_  
Durham, NC 27707-5312 \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Signature

  
**I FISH I VOTE**

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Between 8/28/00 and 9/6/00, we received this card from an additional 1,267 individuals. Original cards are on file at the PFMC office.



5046 Edinger Avenue  
Huntington Beach, CA 92649  
714 840 0227 TEL  
714 840 3146 FAX

September 8, 2000

Jim Lone, Chairman  
Pacific Fishery Management Council  
2130 SW Fifth Avenue, Suite 224  
Portland, OR

RE: Highly Migratory Species Plan Progress Report. Agenda Item H1

Dear Council Members:

United Anglers of Southern California ("UASC") is the largest organization representing recreational anglers for marine conservation on the Pacific Coast. A large number of our members participate in the various highly migratory species fisheries. We represent anglers from many communities that fish for various mixtures of billfish, tuna, tuna-like species pelagic sharks, and other pelagic species.

UASC believes:


1. The HMS fishery management plan (FMP) should use an ecological system-wide approach. The FMP should include all inter-related pelagic species, including prey species, that occur in the Pacific Coast EEZ in order to provide managers with an effective scope of authority to properly manage the resource. Likewise, the FMP should include all gear types that fish pelagic or pelagic-related populations of species occurring in the Pacific Coast EEZ and realistic comparable socio-economic models created to ensure the use of resource is maximized for the States over the long term.
2. Until such time the FMP uses a complete economic and ecosystem approach the plan should not allow for increases in effort. Utilization of a precautionary approach in the establishment or expansion of fisheries will help avoid the pitfalls recently experienced by this council in the management of groundfish.
3. Creation of the longline fishery submitted in the Janisse/Dupuy proposal would represent an increase in effort.
4. The FMP should include measures to mitigate conflicts between commercial and recreational gear fishing for tuna, tuna-like species, and pelagic sharks. The FMP should contain provisions to continue gear-conflict mitigation currently implemented by the States for billfish.



5. Many of the pelagic fisheries within the Pacific Coast EEZ are fully utilized. The FMP should contain provisions designed to increase and/or protect local availability of pelagic species for recreational use. Recreational gear is the least effective gear in the water; however, it represents both an exceptionally high economic utilization of the resource, and is of great social importance to the State of California.
6. The State of California has taken a position on pelagic longlines. The California Fish and Game Code prohibit use of pelagic longlines inside the US 200-mile EEZ by all fishers under the authority of California. UASC has noted no change in the position of the State regarding this issue, a fact confirmed recently by correspondence from the office of the Director of the California Department of Fish and Game responding to concerns expressed to that office by some of our members.
7. No interest in a longline fishery within the Pacific Coast 200-mile EEZ, either as a new fishery or as a replacement for drift gillnets, has been expressed by any group of U.S. fishers, longline or drift gillnet, not currently operating under the authority of the State of California. The focus of the FMP should be in providing additional resources and enforcement capabilities to the States.

UASC is completely dedicated to recognized principles and goals of marine conservation. UASC strongly supports sound scientific management of our fisheries in order to maximize their economic and social values to the State; while, at the same time, providing protections for the ecosystem and its biodiversity to ensure the long term viability of the marine resource.

Sincerely,



Tom Raftican  
President, UASC

Cc: Don McIsaac  
Rebecca Lent  
Svein Fougner  
Dale Squires  
Steve Crooke  
Larry Six  
Penny Dalton