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June 3, 2005

(REVISED COPY)

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Attention: DONALD K. HANSEN
Chairman

JUN - 3 2005

Re : PUBLIC COMMENT

PFMC

I am writing this letter on behalf of the West Coast Long liners. It is evident the use of circle hooks mackerel bait has had a very positive effect on the turtle takes in the Hawaii and East Coast long line fisheries.

For this reason, I think our state fisheries should be allowed to proceed immediately, using the same technologies applied in Hawaii and East Coast, with 100% observer coverage.

The fleet is under tremendous financial pressure, now that we can finally say that there is some sort of fishing technique which is effective in reducing turtle takes. Let's use common sense and let our west coast fishermen earn a living. They have suffered enough during this whole process.

I recommend an emergency opening initiating in August 2005. This would allow the fishermen an opportunity to get back on track with their lines and their finances. There is no need for set vouchers because we are only dealing with 20 boats.

LILLO AUGELLO
President
Western Fish Co.

Arthur de Wit
520-103 Stoneham Ct.
Long Beach, Ca 90805

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JUN - 7 2005

Pacific Fisheries Management Council

PFMC

Dear Council Member:

It is my sincere hope that the establishment of a limited entry program for the West Coast high seas longline fishery does not include permittance of these vessels to fish within the 200 mile EEZ.

I was a commercial harpoon fisherman between 1982 and 1990. I witnessed firsthand the demise of the Southern California harpoon industry while the Drift Gillnet fishery flourished. Of course, the Drift Gillnetters fished themselves right out of the Southern California Bight (the area between Pt. Conception and the Mexican border) and were forced to venture further north and offshore to remain productive. Meanwhile the harpoon swordfish fishery within the Bight became virtually non-existent throughout the 1990's. Not only did the harpoon industry suffer, the recreational opportunities for marlin, shark, albacore and other pelagic species declined to almost non-existent status during those years. Only recently we have seen a glimmer of a comeback. In the past 3 years, the handful of harpoon fisherman that are left have seen a small improvement in their fishery. The past 5-6 years have seen an annual arrival of albacore in our waters that were completely missing for nearly 10 years prior. We have seen a significant increase in the numbers of juvenile mako sharks. This area is considered a nursery for this species. Just the past two years we have seen a small return of thresher sharks, which have been conspicuously absent in significant numbers from this area for at least 15 years.

I believe the exclusion of High Seas Longlines within the EEZ and the restriction of the High Seas Drift Gillnet fishery in recent years to eliminate sea turtle bycatch is directly correlated to the health of the harpoon swordfish fishery and subsequently the entire ecosystem within the Southern California Bight. I am aware the use of gillnets are still seasonally permitted within the Bight. However, the lack of volume of fish has not made it economically viable for the larger vessels to fish this area. There is still some negative impact from the few vessels that do fish this area but it is nowhere near the pressure the area felt back in the early 80's to mid 90's. Undoubtedly, this would change rapidly should the area see an unusual influx of swordfish. Obviously, more vessels would move into the area and the Southern California Bight would sustain significant damage. **Even with the current state of regulations the Southern California Bight remains at significant risk.**

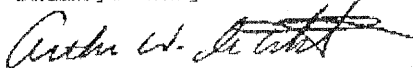
The harpoon industry is an excellent bellwether regarding the health of the swordfish fishery. You will see a pattern repeated three times before in the North Atlantic, Chilean and Eastern Pacific fisheries. As more longlines and drift gillnets (gillnets primarily in our local area) were introduced into these areas, catch rates by the harpoon industry were the first to fall. Eventually both the North Atlantic and the Chilean fisheries crashed. I feel the only thing that kept the Eastern Pacific fishery from falling further than it did were the exclusion of longlines and the restrictions on drift gillnets noted above. Conversely, the harpoon industry is also the last to recover. The recent increase in success by our local harpoon fisherman is a very encouraging sign of the fisheries health. However, you must keep in mind the size of the fleet is a mere fraction of what it was throughout the harpoon fisheries' history.

Both longlines and drift gillnets are highly effective methods of take. This is not to be confused with efficient. They both, as I am sure you are aware, have extremely high rates of bycatch making them very inefficient. Through research I have personally conducted, bycatch rates are 60% to as high as 400% relative to the target species. These are not numbers made up from thin air. There is more than enough documentation to substantiate these numbers so I will not bog this letter down with references. I realize longlines are considered slightly more selective than drift gillnets by varying hook size, type, depth, location and bait used. Yet it is undeniable that no matter all these precautions taken by the operator the bycatch rate remains unreasonably high. There is no question a 100-vessel harpoon fleet would have virtually no by catch whereas the same cannot be said for even one longline vessel.

The reason I have continually referred to the Southern California Bight is due to the fact that this is one of the most unique areas in the world and deserves special protection. The physical topography of the coastline gives us significantly better weather on average than similar latitudes. The deflection of the Humboldt Current traveling southward along our coast and subsequently "wrapping" around and flowing northward along the southern California coast brings us significantly warmer water than would occur in similar latitudes without this topography. As a result we see an influx of pelagic species annually that would not otherwise occur.

The crash of the North Atlantic and the Chilean swordfish fisheries are well documented and without a doubt the result of the extensive use of Longlines and Gillnets. I believe even a limited entry of longline vessels within the EEZ would have a significant negative impact on the health of the ecosystem in the Southern California Bight. **I urge the PPMC in their management of Highly Migratory Species to not permit a longline fishery within the 200-mile EEZ.**

Thank you for your consideration.


Arthur de Wit