

Note: A large volume of public comment addressed both the Council action on the drift gillnet fishery, Agenda Item J.3, and review of exempted fishing permit application, Agenda Item J.4. Therefore, additional public comment relevant to this agenda item maybe found under Agenda Item J.3.

The following public comment is representative of 12 copies sent to the Council via email:

February 14, 2006

To: Council Members, Pacific Fisheries Management Council
Subject: Longline Exempted Fishing Permit Request

I am a concerned conservationist and angler and would like to take this opportunity to, again, voice my opposition to any attempts to develop a longline fishery off the coasts of California, Oregon and Washington. You have in the past acted prudently to keep this destructive gear out of our Pacific EEZ. Current attempts to open the door to as many as 131 new longline vessels in these waters would be disastrous for HMS stocks, both targeted and taken as bycatch. I support The Billfish Foundation in their opposition to this new source of fishing mortality. Given the current excess of fishing effort and fishing mortality applied to Pacific bigeye, yellowfin and albacore stocks there is no rational reason to even consider expanding existing fisheries. Do not recommend issuance of the proposed EFP for longline gear.

Sincerely,

Art Favre

P. O. Box 82285
Baton Rouge, LA 70884-2285
artf@performance-br.com

Subject: Longline Exempted Fishing Permit Request

From: "Inman's Auto Crash Repair Centre Ltd" <a.inman@inman.demon.co.uk>

Date: Fri, 10 Feb 2006 10:43:18 -0000

To: <pfmc.comments@noaa.gov>

Dear Sirs

I am a concerned conservationist and angler and would like to take this opportunity to, again, voice my opposition to any attempts to develop a longline fishery off the coasts of California, Oregon and Washington. You have in the past acted prudently to keep this destructive gear out of our Pacific EEZ. Current attempts to open the door to as many as 131 new longline vessels in these waters would be disastrous for HMS stocks, both targeted and taken as bycatch. I support The Billfish Foundation in their opposition to this new source of fishing mortality. Given the current excess of fishing effort and fishing mortality applied to Pacific bigeye, yellowfin and albacore stocks there is no rational reason to even consider expanding existing fisheries. Do not recommend issuance of the proposed EFP for longline gear.

Regards

Andrew Inman.

Inman's Auto Crash Repair Centre Ltd.



THE BILLFISH FOUNDATION

CONSERVATION THROUGH RESEARCH, EDUCATION AND ADVOCACY

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February 9, 2006

Mr. Donald K. Hansen, Chair
Pacific Fishery Management Council
7700 NE Ambassador Pl., Suite 200
Portland, OR 97220-1384

Dear Mr. Hansen:

I am taking this opportunity to comment on behalf of The Billfish Foundation on the application for a proposed Exempted Fishing Permit (EFP) that would allow for the use of longline gear in the EEZ under the jurisdiction of the Pacific Fishery Management Council (PFMC) submitted by Ocean Pacific Seafood. It is our understanding that this issue will be considered by the PFMC during your March meeting in Seattle.

TBF believes that it would be inappropriate to approve the requested EFP given the current condition of several stocks and the current context of international management of these fisheries. We note that, even though the application requests an EFP for a single 90 foot longline vessel, the application in question raises the possibility of developing a future longline fishery with a potential of utilizing 71 to 134 vessels.¹ This potential application of latent effort to a new EEZ fishery for tuna species not currently targeted by the existing drift gill net (DGN) fishery is a real cause for concern to existing U.S. recreational and commercial fisheries and all those in our country interested in the conservation of our oceans' valuable resources.

We refer in particular to bigeye, yellowfin and albacore tuna, named as three of the five potential target species in the EFP application. As the Council is aware, all three of these species are currently being exploited at fishing mortality rates above levels estimated to produce average maximum sustainable yield (AMSY)² and all three are subject to management measures intended to constrain effort and fishing mortality under resolutions of the Inter-American Tropical Tuna Commission (IATTC). We strongly believe that any direct expansion of effort or mortality directed at these species is not consistent with the conservation goals established by the PFMC and the IATTC.

¹ Ocean Pacific Seafood Exempted Fishing Permit Application, p. 3; October 6, 2005.

² Fishery Status Report 3, Tunas and Billfishes of the Eastern Pacific in 2004; Inter-American Tropical Tuna Commission, La Jolla, 2005.

The most recent report by the IATTC's stock assessment working group reveals that current levels of fishing mortality for yellowfin tuna are at 120% of the level that would produce AMSY.³ The report concludes that "... it is likely that the stock (biomass) is below the AMSY level." Bigeye tuna fishing mortality rates are at 175% of the level that would produce AMSY and the same report states that consequently total biomass and spawning biomass of the stock are at the lowest levels observed in the time period considered (1975-2005). This assessment report is by no means overly conservative. In fact the authors note that had spawner:recruit relationships been used in the baseline analyses the results would have been more pessimistic.

The same assessment report addressed north Pacific albacore tuna stocks. It concluded that current spawning stock biomass is below the level expected to produce AMSY and that biomass may decline if "... current levels of F persist." The assessment results for these three species are not new or unexpected, but rather have been predicted by previous assessments in recent years.

In response to this scientific advice the IATTC has enacted resolutions dealing with tuna conservation, concluding in 2004 that "... the studies of yellowfin and bigeye tuna presented at this meeting show that both stocks are at a level below that which would produce the average maximum sustainable yield (AMSY)."⁴ Longline quotas are in place for bigeye tuna with the existing U.S. commercial fleet limited to its Pacific catch total from 2001. In fact, the U.S. fleet has been prematurely shut down in the last two years because this cap was reached. Seasonal closures to purse seine fishing for yellowfin and bigeye are also in place.

In the June 2005 meeting the IATTC concluded that the best scientific evidence on North Pacific albacore tuna from the International Scientific Committee for Tuna and Tuna-like Species in the North Pacific Ocean indicates that the species is either fully exploited, or may be experiencing fishing mortality above levels that are sustainable in the long term. The Commission subsequently passed a resolution that calls for:

- 1) The total level of fishing effort for North Pacific albacore tuna in the Eastern Pacific Ocean not be increased beyond current levels, and
- 2) The CPCs shall take necessary measures to ensure that the level of fishing effort by their vessels fishing for North Pacific albacore tuna is not increased.⁵

Allowing for the development of anew albacore fishery in the Pacific EEZ would not be consistent with this measure.

The PFMC has responded to these actions and has asked that the HMSAS begin considering means of complying with the ban on increased albacore effort and, in November, deferred discussion of bigeye tuna conservation measures until the March meeting. Given the current status of bigeye, yellowfin and albacore stocks there is clearly no logical rationale for attempting to develop new sources of effort and fishing mortality through the issuance of an EFP for longline gear in the Pacific EEZ.

³ Ibid.

⁴ IATTC Resolution C-04-09

⁵ IATTC Resolution C-05-02

TBF thanks you all for taking the time to consider our comments and trusts that the council will agree that the current biological condition of these stocks, taken into consideration in the context of existing U.S. fisheries does not warrant a recommendation to issue the requested EFP. TBF has supported the development and implementation of the PFMC's HMS Plan from the beginning and looks forward to continuing a constructive relationship with the Council.

Sincerely yours,



Ellen M. Peel
President

EP:rsn

CC: Bill Hogarth
Rod McKinnis
Bill Fox
David Hogan

Donna Greenberg

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PFMC

February 9, 2006

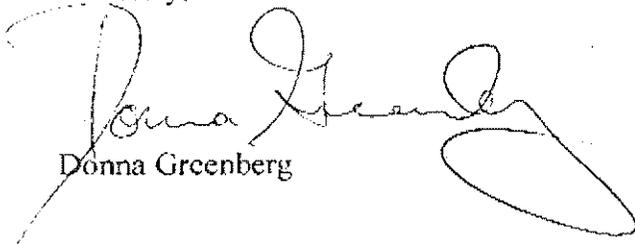
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220-1384
VIA FAX

To: Council Members, Pacific Fisheries Management Council
Subject: Longline Exempted Fishing Permit Request

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Thank you for your consideration to this important matter.

Sincerely,



Donna Greenberg

Subject: Longline exempted fishing permit
From: Cawlegend@aol.com
Date: Mon, 13 Feb 2006 13:35:39 EST
To: pfmc.comments@noaa.gov

Gentlemen

I oppose the issuance of this permit. Do not vote for it.

Craig Whitehead. M.D.

7606 Nacido Ct.

Tampa, FL 33615