

Eye Consultants
of Huntington, Inc.

Craig M. Morgan, MD

May 15, 2006

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PFMC

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

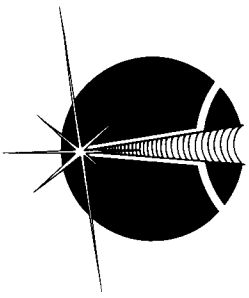
Dear Mr. Hansen:

I am taking this opportunity to comment on 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.

I believe 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.

I 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). I 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.

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.



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I thank you all for taking the time to consider my comments and trust 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.

Sincerely,

Craig M. Morgan, M.D.

CMM/ej