

**Subject:** Thresher Closure  
**From:** "DeWit, Arthur W" <arthur.dewit@bp.com>  
**Date:** Sat, 11 Oct 2008 08:40:01 -0500  
**To:** pfmc.comments@noaa.gov

Complete closures are not the only answer.

Punch card: One shark per angler per year. One shark retained per vessel per day.

Other states employ this tactic why can't this be used as a tactic in this State or Federal waters?

Concerned angler,

P.S.

Get those drift gillnets out of the Southern California Bight and problem is solved.

Eliminate them for Pt. Conception to the Mexican border and out a minimum of 75 miles.

**Subject:** HMS Thresher Shark Action

**From:** rich holland <Rich@wonews.com>

**Date:** Thu, 09 Oct 2008 10:32:23 -0700

**To:** pfmc.comments@noaa.gov

I strongly object to a recreational fishing closure of any length. If anything you should close the drift gillnet fishery with its high level of associated catch of mammals, birds and reptiles, not to mention tunas and swordfish, which, though marketable, are better allocated to other fisheries. Before the drift gillnet fishery, threshers were super-abundant throughout the SoCal Bight. Removing the fishery to the outside and putting a time restriction has helped, but the recreational angler deserves a high allocation of the thresher resource. There are many times during the spring months when threshers provide the only offshore opportunity. They are prized eating and the public has shown restraint in the numbers caught. To mandate use of gear to reduce snagging is ridiculous, since snagging is not only legal in salt water, but the threshers use of its tail to stun a bait would result in snagged catches no matter the gear. By the way, I have seen many tail-snagged threshers successfully released.

Rich Holland  
Editor  
Western Outdoors

**Subject:** HMS Thresher Shark Action  
**From:** Joe Exline <jexline1@roadrunner.com>  
**Date:** Wed, 15 Oct 2008 09:20:03 -0700  
**To:** pfmc.comments@noaa.gov  
**CC:** Kit.Dahl@noaa.gov

October 15, 2008

Hello PFMC counsel members my name is Joe Exline. I am secretary of Oceanside Anglers Club a non-profit recreational fishing organization with over 200 members, mostly private boaters, in Oceanside California. Myself and club members are concerned with the proposed changes to thresher shark management and the preliminary preferred alternative.

Oceanside is a prime area for thresher sharks in the spring with Carlsbad canyon, Barn Kelp, and San Onofre they congregate in this area during the spring pupping season. Myself and club members enjoy catching these sharks both for consumption and release.

Last year the Pflieger Institute of Environmental Research (Pier) individuals used our venue to hold a seminar on increasing the survivability of released sharks.

Over seventy of our members showed up very interested in this subject as we promote preserving our fishing resources.

We hold a thresher shark tournament for our club members each year in May in which we only allow each boat to retain one shark.

We give points toward releases for annual awards and the tournament can be won by a released shark with a picture confirming its size.

We have seen the drastic increase in recreational thresher shark fishing and agree that if this increase is sustained some drastic management changes will be warranted however at this time we do not believe the data is sound enough to warrant the preliminary preferred alternative of a closure from February to August. Reviewing the data presented in the September meeting the data used to determine recreational fishing harvest was very marginal at best. In the September 2008 FMC HMST report it described the annual harvest data in metric tons for 2005 through 2007 as follows:

	Large Mess DGN	Commercial Hook and Line	Private Recreational	Charter Recreational	Non HMS gear	Total
2005	155	0.7	55	2.2	11.5	224.4
2006	99	3.4	95	2.4	41.6	241.4
2007	98	3.8	182	3.8	20.8	308.4
Total	352	7.9	332	8.4	73.9	774.2
Average	117.3	2.6	110.7	2.8	24.6	258.1

In this chart the most dramatic increase in take is in private recreational take, from 55 MT to 182 MT.

However looking at the report it mentions these figures came from weights as reported on a fishing website [www.BloodyDecks.com](http://www.BloodyDecks.com) in addition the following survey information was cited from a query on the RecFin (SURFS) database.

Year	A fish Observed catch	PSE	B1 Fish Reported dead	PSE	B2 fish released alive	PSE	Total A+B1	Total A+B1+B2
2005	275	21	30	55	1,141	30	305	1,446
2006	635	33	304	72	620	12	939	1,559
2007	1,544	52	54	31	1,672	50	1,598	3,271

Using the weight of 85 kg (187 lbs) and a 1/3 mortality rate for releases lead to the recreational figures in the first table. However in a supplemental report the figures in the first table were corrected based on an updated commercial information for 2007 and some more realistic weight measurements from Pier and actual CRFS measurements rather than from a fishing website where only large fish are generally reported. The new table data now looks like this:

	Large Mess	Commercial	Recreational	Non HMS	Total
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	DGN	Hook and Line	All Modes	gear	
2005	155	0.7	24	11.5	191.2
2006	99	3.4	30.2	41.6	174.2
2007	163	3.8	75	20.8	262.6
Total	417	7.9	129.2	73.9	628
Average	139	2.6	43.1	24.6	209.3

Modified values shown above is blue recreational weights used were 41.9 kg, 42.3 kg, and 29.7 kg which were more in line with Pier data for the same timeframes.

When you look closer at the data you notice the PSE on the recreational data of 21, 33, then 52 percent in caught fish and 30, 12, 50 in released fish points out the accuracy of the reports is suspect. With these error percentages the 2007 catch could be from 741 to 2,347 and released figures from 836 to 2,508 quite a wide range for basing a closure of the fishing season.

Even using an average weight between the heavy fisherman estimate of 85 kg and the CRFS estimate of 29.7 kg (57 kg) and these catch values you get the following data for recreational catch

Low Catch weight	High Catch weight	Low Release 1/3 mortality	High Release 1/3 mortality	Low Catch + Release	High Catch + Release
42.2	133.7	15.9	47.7	58.1	181.4

Taking the worst case scenario of a heavy weigh estimate and highest percent error of 181.4 and adding the commercial and charter values for the worst year of 2007 you get 369 MT. This is the only way a decision of closure could be recommended due to exceeding the harvest guideline of 340 MT. The real scenario however is likely far less than the current harvest guideline and more in line with the 262.6 mentioned in the revised table from the supplemental report..

Looking at the data from the reports it is clear to see the data is not robust enough to be considered viable and is questioned even in the reports as a basis for closure of the fishery. This preferred alternative will have the most economic impact on recreational fishing by eliminating the average fisherman from participating in either harvest or release of this species.

That is in direct conflict with national standard 8 of the Magnuson-Stevens Act which stresses "...minimize adverse economic impacts on such communities"

Since I am also a respected member of BloodyDecks I asked the fishing community to participate in a poll on the alternatives proposed for this fishery. In my poll I allowed four choices and the results are as follows:

Action	Number of votes	Percent of votes
Closure from February 1 to August 14	43	26.54
Punch card with annual limits	84	51.85
Bag, Boat, possession limit changes	47	29.01
Gear restrictions	21	12.96

It is clear to see the fishing community would favor by almost a 2 to 1 margin some kind of reporting system or annual limit, or changes in the boat/individual possession limits as an alternative rather than closure. Even most in favor of a closure mentioned a shorter closure period. In addition my communication with PFMC members led me to believe that closure was only adopted as the preferred alternative because it was the easiest to enforce, not the best solution for the fishery.

In closing it is the opinion of me and OAC club members that closure of the fishery would not only be in conflict with national standard 8 of Magnuson-Stevens Act which states:

"(8) Conservation and management measures shall, consistent with the conservation requirements of this Act

(including the prevention of overfishing and rebuilding of overfished stocks), take into account the importance of fishery resources to fishing communities in order to (A) provide for the sustained participation of such communities, and (B) to the extent practicable, minimize adverse economic impacts on such communities.”

It also does not follow standard 2 of the act which states “(2) Conservation and management measures shall be based upon the best scientific information available” as the scientific evidence is faulty and does not indicate exceeding the annual harvest guideline for the species. In addition closure would not allow for the collection of more dependable/reliable data to be attained which is vital in the protection of the species. With this we suggest more public education is required and another alternative except closure be considered by the council in the November meeting,

Please feel free to contact me with any questions/concerns on my comments included in this document either by responding via email to [jexline1@roadrunner.com](mailto:jexline1@roadrunner.com) or calling me at 760.271.4178.

Thank you

Joe Exline

**Subject:** [Fwd: HMS Thresher Shark Action]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Wed, 15 Oct 2008 14:15:45 -0700  
**To:** Kit Dahl <Kit.Dahl@noaa.gov>

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**Subject:** HMS Thresher Shark Action  
**From:** Rick Windbigler <fallrent@tfb.com>  
**Date:** Wed, 15 Oct 2008 12:23:15 -0700  
**To:** pfmc.comments@noaa.gov

Hello PFMC Counsel Members. My name is Rick Windbigler and I am a private fisherman based out of Oceanside. I heard that you are currently contemplating closing down Thresher fishing for most part of the year. I do not agree with closing down any fishery. I fish marlin in all of the tournaments based out of Catalina and fish for them for recreation on my boat Rickdicolous. Thanks to conservation efforts, limits on take and education of marlin anglers the marlin stock, in my opinion, is as good as it ever has been and maybe better. I believe if the counsel does a good job with setting bag limits and education on the proper way to release threshers and the importance of releasing the shark our thresher fishery will be around for my kids to enjoy. To just close it down so no one can fish these great sharks would be a shame and not allow my kids to enjoy the sport as I do. I hope you reconsider your options on thresher shark fishing in this area.

Respectfully  
Rick Windbigler  
235 West college st  
Fallbrook Ca. 92028  
760-801-1665  
[fallrent@tfb.com](mailto:fallrent@tfb.com)

<b>HMS Thresher Shark Action.eml</b>	<b>Content-Type:</b> message/rfc822
	<b>Content-Encoding:</b> 7bit

**Subject:** [Fwd: HMS Thresher Shark Action]  
**From:** PFMC Comments <pfmc.comments@noaa.gov>  
**Date:** Thu, 16 Oct 2008 08:09:06 -0700  
**To:** Kit Dahl <Kit.Dahl@noaa.gov>

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**Subject:** HMS Thresher Shark Action  
**From:** Mike & Karen Kaneen <kkaneen@socal.rr.com>  
**Date:** Wed, 15 Oct 2008 18:17:38 -0700  
**To:** pfmc.comments@noaa.gov

I am opposed to the drastic action of closing the thresher season Feb to Aug. This is the prime spring early summer fishing time when there is little else of size to fish for. A daily limit, yes a boat limit, yes, an annual limit, ok. I don't believe there is any scientific evidence that the Thresher is being overfished by sport fishermen. I have heard that fishermen have not been self policing, I disagree, Myself, I take one and only one [if any at all] and my friends do likewise. I know some of the people at the weigh stations and they tell me it is seldom that anyone comes in with more than one. These are large fish and no one needs more than one a season, unlike the more common small Makos. I also do not believe there are any thresher "kill" tournaments held. Lets try some less radical solutions than a complete closure during the prime and really only season. Thank You Michael Robert Kaneen

<b>HMS Thresher Shark Action.eml</b>	<b>Content-Type:</b> message/rfc822
	<b>Content-Encoding:</b> 7bit