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Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

Dear Chair Lowman and Council Members,

I would like to express my thanks and support for the Council's effort to hold the drift gillnet fleet accountable for their entire haul--including bycatch animals--through the use of hard caps and increased monitoring. However, it is disheartening to find that the Council has yet to move forward with its plan, as decided last March, to transition away from drift gillnets to more selective, environmentally friendly types of gear. I make my living as a chef, and fully understand how important the tools of a trade can be. While sharp knives and seasoned pots are ideal, fresh and sustainable ingredients are essential in the arsenal of a chef. Be it ingredients in the kitchen or nets in the water, chefs and fishermen must be prudent in the ways that they pursue their passions.

Whether cooking for my family or cooking for competition judges, I try my best to use foods that are sustainably grown, caught or produced. During my time in San Diego, I had access to some of California's best seafood. Nevertheless, the thought of unsustainable fishing practices can put a bad taste in everyone's mouth. Drift gillnets are notoriously indiscriminate, and threaten non-target species that are not meant to be caught. A diner enjoying a fillet of swordfish would be repulsed to know that her dinner may have cost a sea turtle its life. Therefore, in developing a Purpose and Need Statement for the Drift Gillnet Monitoring and Managing Plan, the Council should focus on reducing bycatch. I also ask that you set hard cap limits at conservative levels and take appropriate action should those limits be reached. While drift gillnet use is still permitted, mandating 100% observer coverage by the start of next fishing season would ensure that fishermen are abiding by regulation, and could provide greater insight into the impact of drift gillnet fishing.

The Magnuson-Stevens Fishing Conservation Management Act requires fishery managers to minimize bycatch as a primary conservation goal in fisheries management. By switching to an alternative type of fishing gear, it is possible to meet the needs of the industry while protecting the whales, turtles, sharks and dolphins that have an equal right to the ocean. By rekindling

your commitment to engender more sustainable fishing practices, the Council can ensure the continued vitality of all dimensions of the Pacific Ocean.

I soon hope to browse the fish market knowing that minimal sacrifices were made. Thank you for your work to reduce bycatch in the fisheries you manage.

Ricardo Heredia
Executive Chef



Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Fwd: HMS

1 message

PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov>

Thu, Feb 26, 2015 at 3:16 PM

To: Kit Dahl - NOAA Affiliate <kit.dahl@noaa.gov>

Cc: Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

----- Forwarded message -----

From: **Chuck Janisse** <cjanisse@vermontel.net>

Date: Thu, Feb 26, 2015 at 10:55 AM

Subject: HMS

To: pfmc.comments@noaa.gov

Cc: Pete Dupuy <LaPazKD@aol.com>

Allow me to fish for swordfish and other pelagics off the west-coast with the pelagic longline gear that is endorsed under the HMS FMP permit and has been issued to me.

I believe that I have been unlawfully denied access to this resource since the HMS FMP was implemented. I'm now convinced that the Council, by issuing a permit that allows for the use of pelagic longline gear and then prohibits its use within the Council's jurisdiction, has systematically subverted Magnuson-Stevens Act regulations in order to prohibit access to HMS in this area to longline fishermen.

In so doing, the Council has deprived thousands of west-coast consumers from access to healthy stocks of local swordfish and other pelagics that could otherwise be harvested with fishing gear that I have demonstrated to have an extremely low bycatch rate. Instead, you have forced these thousands of local seafood consumers to buy imported swordfish thereby encouraging excessive waste of marine resources from foreign fishing without conservation restrictions that U.S. fishermen adhere to.

By what standard does this make sense? Your continued efforts to block the use of highly selective longline gear within your jurisdiction fosters excessive waste of global marine resources in order to restrict access to a healthy stock of swordfish and other pelagics from being harvested by a local fisherman that has a proven record of highly selective fishing with this gear.

Please take the steps necessary to remedy this situation immediately.

Pete Dupuy

—

Thank you for your comments to the Pacific Fishery Management Council. Your comments have been received and will be forwarded to the appropriate staff member for processing.

Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

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Twitter: <http://Twitter.com/PacificCouncil>



Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Fwd: Please Allow Ventura II to fish in local waters

1 message

PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov>

Fri, Feb 27, 2015 at 7:04 AM

To: Kit Dahl - NOAA Affiliate <kit.dahl@noaa.gov>, Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

----- Forwarded message -----

From: **Nate Ross** <emailn8@gmail.com>

Date: Fri, Feb 27, 2015 at 12:52 AM

Subject: Please Allow Ventura II to fish in local waters

To: pfmc.comments@noaa.gov

Hello,

I am a resident of Los Angeles and would love it if Ventura II was allowed to use its proven low-bycatch longline gear technique within west-coast waters.

Please allow them to do so.

A tax paying citizen,

Nate Ross

—

Thank you for your comments to the Pacific Fishery Management Council. Your comments have been received and will be forwarded to the appropriate staff member for processing.

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Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Fwd: fish

1 message

PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov>

Fri, Feb 27, 2015 at 7:04 AM

To: Kit Dahl - NOAA Affiliate <kit.dahl@noaa.gov>, Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

----- Forwarded message -----

From: **John Norton** <cecilpnorton@me.com>

Date: Thu, Feb 26, 2015 at 9:23 PM

Subject: fish

To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

to whom it may concern,
i am writing to support the Ventura Fish Company and the public that they provide Dr. Norton

Sent from my iPad

—
Thank you for your comments to the Pacific Fishery Management Council. Your comments have been received and will be forwarded to the appropriate staff member for processing.

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Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Fwd: Ventura II, inability to fish in local waters

1 message

PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov>

Fri, Feb 27, 2015 at 7:09 AM

To: Kit Dahl - NOAA Affiliate <kit.dahl@noaa.gov>, Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

----- Forwarded message -----

From: **Suzan Henry** <goingcoastal45@gmail.com>

Date: Fri, Feb 27, 2015 at 7:08 AM

Subject: Ventura II, inability to fish in local waters

To: pfmc.comments@noaa.gov

Please tell me what the Council's reasoning is for the following claim? I look forward to your response.

Suzan Henry
Ventura, CA

Help the Ventura II, and Protect your Access to Fresh, High-quality Local Seafood

The Pacific Fishery Management Council prohibits the Ventura II from fishing with its proven low-bycatch longline gear technique for the healthy stocks of local seafood in west-coast waters. They ignore your right to have access to this fresh local seafood that the Ventura II could easily bring to you.

This is not a question of simple mismanagement, the Council has purposefully created this unjust and unfair allocation of a local seafood resource, despite legal requirements to the contrary, in order to satisfy powerful special interests that are not concerned with your rights. Despite the Ventura II's federally documented 98% retained, or released alive, 8-year catch record with its low-bycatch longline gear technique, the Council continues to ignore the Ventura II's constant pleas to be allowed to fish with its proven low-bycatch longline gear technique within west-coast waters. Instead, the Ventura II is forced to travel hundreds of miles offshore in order to bring you this seafood.

If you enjoy continued access to the fresh, high-quality seafood that the Ventura II brings to you, speak up. Use your voice to let the Council know that you expect them to protect your access to local seafood. Tell them to allow the Ventura II to use its proven low-bycatch longline gear technique within west-coast waters. You will be the winners.

Email the Council at pfmc.comments@noaa.gov. Tell them that you are entitled to access to the fresh, high-quality local seafood resources brought to you by Pete Dupuy and the Ventura II, and you expect the Council to protect your interests and rights to this resource by allowing the Ventura II to fish with its proven low-bycatch longline gear technique within west-coast waters.

—

Thank you for your comments to the Pacific Fishery Management Council. Your comments have been received and will be forwarded to the appropriate staff member for processing.

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Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Fwd: Allow Ventura II ship to fish local waters

1 message

PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov>

Fri, Feb 27, 2015 at 7:13 AM

To: Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>, Kit Dahl - NOAA Affiliate <kit.dahl@noaa.gov>

----- Forwarded message -----

From: **Bruce Schultz** <herschultz2015@gmail.com>

Date: Fri, Feb 27, 2015 at 7:12 AM

Subject: Allow Ventura II ship to fish local waters

To: pfmc.comments@noaa.gov

We are entitled to access to the fresh, high-quality local seafood resources brought to us fresh by Pete Dupuy and the Ventura II, and we expect the Council to protect our interests and rights to this resource by allowing the Ventura II to fish with its proven low-bycatch longline gear technique within west-coast waters.

Please do not accede to the demands of special interests in this matter, but let this proven fishing resource have access to the local fresh fish in our local waters.

Bruce & Beatrice Schultz
Malibu, CA

—

Thank you for your comments to the Pacific Fishery Management Council. Your comments have been received and will be forwarded to the appropriate staff member for processing.

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Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Fwd: Ventura II

1 message

PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov>

Fri, Feb 27, 2015 at 7:20 AM

To: Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>, Kit Dahl - NOAA Affiliate <kit.dahl@noaa.gov>

----- Forwarded message -----

From: **Mireille** <mireilleneumann@gmail.com>

Date: Fri, Feb 27, 2015 at 7:14 AM

Subject: Ventura II

To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

We support Pete Dupuy and Ventura II. We need independent fishermen who fish by the law.

Sent from my iPhone

—

Thank you for your comments to the Pacific Fishery Management Council. Your comments have been received and will be forwarded to the appropriate staff member for processing.

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Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Fwd: Access to fresh fish

1 message

PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov>

Fri, Feb 27, 2015 at 11:02 AM

To: Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Cc: Kit Dahl - NOAA Affiliate <kit.dahl@noaa.gov>

----- Forwarded message -----

From: **Sharon Kopito** <skopito@aol.com>

Date: Fri, Feb 27, 2015 at 10:59 AM

Subject: Access to fresh fish

To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

My family is entitled access to the fresh, high-quality local seafood resources brought to us by Pete Dupuy and the Ventura II, and I expect the Council to protect my interests and rights to this resource by allowing the Ventura II to fish with its proven low-bycatch longline gear technique within west-coast waters. Please don't take away our beloved tuna for sushi nite!!! Can't afford to buy it in high end restaurants. Thank you, Sharon Kopito

Sent from my iPhone

—

Thank you for your comments to the Pacific Fishery Management Council. Your comments have been received and will be forwarded to the appropriate staff member for processing.

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Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Fwd: low bycatch line fishing

1 message

PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov>

Mon, Mar 2, 2015 at 2:19 PM

To: Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Cc: Kit Dahl - NOAA Affiliate <kit.dahl@noaa.gov>

----- Forwarded message -----

From: **Margaret Barrett** <maggie.barrett@gmail.com>

Date: Fri, Feb 27, 2015 at 3:34 PM

Subject: low bycatch line fishing

To: pfmc.comments@noaa.gov

I am a resident of Ventura county in California and enjoy fresh fish from the Ventura II. Please do not restrict their use of blow bycatch line fishing.

—

Margaret Barrett

—

Thank you for your comments to the Pacific Fishery Management Council. Your comments have been received and will be forwarded to the appropriate staff member for processing.

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Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Fwd: Ventura II

1 message

PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov>

Mon, Mar 2, 2015 at 2:23 PM

To: Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Cc: Kit Dahl - NOAA Affiliate <kit.dahl@noaa.gov>

----- Forwarded message -----

From: **Ray Kawaguchi** <rayk@4plantas.com>

Date: Sat, Feb 28, 2015 at 10:44 AM

Subject: Ventura II

To: pfmc.comments@noaa.gov

Dear Pacific Fishery Management Council,

We are entitled to access to the fresh, high-quality local seafood resources brought to us by Pete Dupuy and the Ventura II, and we expect the Council to protect our interests and rights to this resource by allowing the Ventura II to fish with its proven low-bycatch longline gear technique within west-coast waters.

Thank you,

Ray & Setsuko Kawaguchi

—

Thank you for your comments to the Pacific Fishery Management Council. Your comments have been received and will be forwarded to the appropriate staff member for processing.

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Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Fwd: Ventura II Fishing Boat access to local fish support request

1 message

PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov>

Mon, Mar 2, 2015 at 2:25 PM

To: Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Cc: Kit Dahl - NOAA Affiliate <kit.dahl@noaa.gov>

----- Forwarded message -----

From: **Kevin RUPP** <kevinrupp@mac.com>

Date: Sun, Mar 1, 2015 at 9:30 AM

Subject: Ventura II Fishing Boat access to local fish support request

To: pfmc.comments@noaa.gov

Cc: Ventura Fish Company <venturafishcompany@gmail.com>

I support local fishermen and want buy and eat locally caught fish.

Why does the council not?

The ban hurts the entire community but especially families of limited means as this ill-conceived ban drives up the cost of quality food. Also forcing fisherman far offshore increases the everyday hazards these men face and is a waste of resources.

A reversal of this ban of local fishing of the west coast ocean should be reversed. Thank, you.

Kevin Rupp

Landman

400 Brevard Ave

Ventura, CA 93003

Mobile [\(805\) 340-0498](tel:8053400498) Primary

Office [\(805\) 644-2990](tel:8056442990) Secondary

Fax [\(855\) 644-2990](tel:8556442990) Tollfree

—

Thank you for your comments to the Pacific Fishery Management Council. Your comments have been received and will be forwarded to the appropriate staff member for processing.

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Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Fwd: Ventura II

1 message

PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov>

Mon, Mar 2, 2015 at 2:25 PM

To: Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Cc: Kit Dahl - NOAA Affiliate <kit.dahl@noaa.gov>

----- Forwarded message -----

From: **TracySusman** <tracysus@aol.com>

Date: Sat, Feb 28, 2015 at 4:32 PM

Subject: Ventura II

To: pfmc.comments@noaa.gov

Please allow the Ventura II to fish the west's coastal waters and not be forced to go miles out to sea to bring us fresh fish.

Sincerely,

Barbara Susman

—

Thank you for your comments to the Pacific Fishery Management Council. Your comments have been received and will be forwarded to the appropriate staff member for processing.

Pacific Fishery Management Council

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Portland, OR 97220

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Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Fwd: The Ventura 2 fishing boat

1 message

PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov>

Mon, Mar 2, 2015 at 2:28 PM

To: Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Cc: Kit Dahl - NOAA Affiliate <kit.dahl@noaa.gov>

----- Forwarded message -----

From: **Stan Wyatt** <bluesdown118@aol.com>

Date: Sun, Mar 1, 2015 at 2:57 PM

Subject: The Ventura 2 fishing boat

To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

We all own the ocean. Let the Ventura two fish closer to home. There are plenty fish out there for all to enjoy for many many years to come. Like Santa Rosa and San Migel islands the two greatest fish preserve's in the Pacific Ocean and being so far out there the fish are doing just fine. But where are all the rules for no fishing anacapa and Santa Cruz islands. These two island should have no restrictions on them simply because Rosa & Migel are the true thriving fish preserve's and no one ever really goes out that far any ways .We are all part of nature like the birds,bee and the flower and trees and fish. Quit making the rules for all of us . I feel it's worse killing a cow or a pig. The ocean is doing just fine and will always take care of its self ! Stan Wyatt a true America who loves to eat fish. More time needs to be spent on closing the nuke plants along the coast so we don't end up like Japan . Now that would be sad.

Sent from my iPhone

—

Thank you for your comments to the Pacific Fishery Management Council. Your comments have been received and will be forwarded to the appropriate staff member for processing.

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Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220
Submitted via: pfmtc.comments@noaa.gov

February 27, 2015

RE: Highly Migratory Species, Drift Gillnets

Dear Ms. Lowman and Council Members:

On behalf of the members and constituents of The Humane Society of the United States (The HSUS), I am writing to reiterate our concern with the management of drift gillnets used to target swordfish in the California Current ecosystem and with the untenable bycatch that results from this fishery. These nets, that are set overnight in the waters off California, target swordfish and thresher sharks, but additionally have a wasteful bycatch of nearly 60 different species of marine life including whales, dolphins, seals, sea lions, sea turtles, sharks, tunas, marlins, and other fishes.

In past comments, The HSUS has urged the Council to develop a plan to transition away from the use of drift gillnets and toward use of alternative technologies that are likely to reduce the bycatch-related mortality of marine mammals and sea turtles in drift gillnets. In the interim, we support imposing caps on the bycatch of protected species entangled by this fishery.

As we have stated in our prior comments submitted for Council meetings in 2014, the total incidental mortality of several marine mammal stocks or species incidentally caught by this and other fisheries exceeds a minimum level of significance set for each species under the Marine Mammal Protection Act (MMPA). Under the MMPA, insignificance is the standard set for the Act's zero mortality rate goal (ZMRG), which has been defined in federal regulations as 10 percent of a species' Potential Biological Removal (PBR) level. [69 Fed. Reg. 43338, July 20, 2004] In particular, the annual average mortality of endangered sperm whales in this fishery appears to exceed not only the species ZMRG but its PBR level as well. The National Marine Fisheries Service's (NMFS) take reduction team has struggled to address the issue of excessive bycatch of marine mammals in this fishery and, at its most recent meeting a year ago, the team merely affirmed emergency measures put in place by NMFS.

While we continue to believe that this fishery should be phased out in favor of other more selective methods of fishing for the target species; in the interim we would like to offer support for a cap on mortality that is based on the ZMRG for each species and, if exceeded, would result in a closure of the fishery until such time as the five-year average of annual mortality had returned to less than 10 percent of the species' PBR. The NMFS must also assure that the level of observer coverage (or other monitoring method) is sufficient to document and enforce caps that are set for individual species.

We believe that there are other more selective means of fishing that would reduce the untenable level of mortality and waste that are a byproduct of the drift gillnet fishery. However, pelagic longlines should not be an alternative, preferred, gear type. This method has been prohibited off the west coast for decades due to unresolved issues of high bycatch. Because The HSUS is appointed by NMFS to serve on other two take reduction teams that were convened under the MMPA to address excessive bycatch of marine mammals in longline fisheries (i.e., the pelagic longline fishery in the Atlantic and one operating from Hawaii), we are well aware that this method of fishing is also not sufficiently selective to resolve the problem of excessive bycatch of protected species.

Until such time as alternative, cleaner, fishing methods can be instated to replace the drift gillnet fishery, annual hard caps should be set which, if reached or exceeded, would result in closing the fishery for the remainder of the year. These caps for each species or stock of marine mammal should be set at levels sufficient to attain the MMPA's mandate for attaining the Act's ZMRG.

As we have in the past, The HSUS urges the Council and NMFS to phase out this fishery so that it will not continue to catch and kill substantial numbers of our nation's ocean wildlife as unwanted bycatch. This drift gillnet swordfish fishery—which, we understand, makes up less than one-half of one percent of the value of California's fisheries—has failed to come up to the bar of sustainable management despite more than 30 years of attempts to address bycatch concerns. Please act expeditiously to instate hard bycatch caps for the 2015-2016 fishing season and to develop a plan to transition away from the use of this wasteful method of fishing.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sharon B. Young".

Sharon B. Young
Marine Issues Field Director
The Humane Society of the U.S.
syoung@humanesociety.org

February 27, 2015

Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

RE: Agenda Item H.4 –Highly Migratory Species, Drift Gillnet Hard Caps

Dear Chair Lowman and Council Members:

Thank you for your hard and important work at the March, June, September and November 2014 Pacific Fishery Management Council (“Council”) meetings to establish a goal of a clean West Coast swordfish fishery and further the development of hard caps and accountability measures to control and reduce bycatch in the drift gillnet swordfish fishery. Drift gillnets are an inherently unselective gear type and we reiterate our request that the Council prohibit this gear in the Highly Migratory Species (HMS) Fishery Management Plan. During any transition period leading up to a prohibition of this gear type, we support 100 percent observer coverage and hard caps that limit and reduce the bycatch of whales, dolphins, seals, sea lions, sea turtles and the many species of fish that are taken, injured and killed by the California-based drift gillnet swordfish fishery.

We are writing now to provide specific comments on the proposed statement of purpose and need, goals and objectives, and alternatives for drift gillnet hard caps, performance objectives and monitoring. In summary, we request the Council take the following actions at its March 2015 meeting:

1. **Adopt a Purpose and Need Statement** that articulates that the purpose of the action is to avoid, limit and reduce bycatch in the West Coast Swordfish Fishery, and establish a clear intent to transition from and ultimately prohibit the use of drift gillnets off the U.S. West Coast.
2. As an interim measure leading up to a prohibition on this gear type, **establish annual hard caps** that limit and reduce the bycatch of endangered sea turtles and whales, plus other marine mammals, as proposed in table 1 of this letter.
3. **Define performance standards** for certain species of discarded finfish and all species of marine mammals not managed with hard caps, as well as an overall discard rate objective. Review these performance standards after each season; and if annual performance standards are not met, conduct a review of the bycatch and recommend additional management measures to achieve conservation targets.
4. **Adopt a fishery monitoring alternative** to maintain the 30% target observer coverage level for the 2015-16 fishing season, immediately remove the unobservable vessel exemption, and achieve 100% monitoring for the 2016-17 fishing season and beyond.

The Council and National Marine Fisheries Service have an ongoing responsibility to minimize and avoid bycatch.¹ As stated in the NOAA National Bycatch Report:

Ensuring the sustainability of marine resources for future generations is the primary mission of the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NMFS). Reducing the unintentional capture, or bycatch, of fish, marine mammals, sea turtles, and seabirds is an essential part of this goal and is required under NMFS' guiding legislation.²

Bycatch is a major unresolved problem in the drift gillnet swordfish fishery. Fishery data collected by onboard observers over the past ten years indicates that the drift gillnet fishery discarded 64% of all animals caught.³ For every swordfish landed – the primary target of this fishery – five other animals are discarded. Observers have recorded at least 62 different species killed in this gear, including rare megamouth sharks, and endangered species like leatherback sea turtles, loggerhead sea turtles and sperm whales. What is more, based on NOAA national bycatch reports and regional marine mammal stock assessments, this drift gillnet fishery kills far more cetaceans than all other U.S. West Coast and Alaska fisheries combined. It is also the only Category I fishery on the U.S. West Coast as defined by the Marine Mammal Protection Act due to frequent interactions with marine mammals.



Figure 1. A gray whale (left, 2013) and short-finned pilot whale (right, 2000) killed by California drift gillnets. An estimated 3 gray whales and 6 short-finned pilot whales were killed in the drift gillnet fishery in the 2013-2014 season. Photos: NOAA.

There are limits on how much an inherently unselective gear type can become selective. The current configuration of drift gillnets (set at depth and being nearly one mile long) results in much greater mortality of the animals caught as bycatch (particularly air-breathers) than with actively tended gears that can be checked more frequently. A mile long 14-inch mesh gillnet placed in a global hotspot of biological diversity of ecologically important and vulnerable wildlife -- the California Current ecosystem -- will inevitably

¹ Magnuson Stevens Fishery Conservation and Management Act, 16 U.S.C. 1853 MSA §303(11)

² National Marine Fisheries Service. 2011. U.S. National Bycatch Report [W. A. Karp, L. L. Desfosse, S. G. Brooke, Editors]. U.S. Dep. Commer., NOAA Tech. Memo. NMFS-F/SPO-117E, 508 p.

³ National Oceanic Atmospheric Administration (NOAA) Observer Program, total discard rate (number of animals) from May 2007 to January 2013.

http://www.westcoast.fisheries.noaa.gov/fisheries/wc_observer_programs/sw_observer_program_info/data_summ_report_sw_observer_fish.html (last accessed 21 March 2014).

catch large quantities of unintended species. It is therefore unlikely that drift gillnets will ever be able to achieve acceptable levels of bycatch. Even if changes to time, area, and configuration can reduce bycatch of certain species, they are likely to increase bycatch of other species. After 35 years of management and experimentation with drift gillnet gear, the fishery has simply failed to minimize bycatch.

The existence of fundamentally different techniques to catch swordfish, both proven (harpoons) and on the near-horizon (deep-set buoy gear) indicates that a prohibition on drift gillnets is ultimately a more cost effective way to minimize bycatch while maintaining a viable swordfish fishery. Energy and resources devoted to a sustainable swordfish fishery are better spent on making the known cleaner gears more economically viable, rather than on the endeavor of making the drift gillnet fishery marginally better. There remains a clear need for a transition plan that includes a prohibition on drift gillnet gear combined with measures to increase the use of selective gear types and the market value of clean, sustainably caught swordfish.

For the actions before you, we have reviewed the Highly Migratory Species Management Team (HMSMT) report on the proposed California drift gillnet fishery management and monitoring plan (Agenda Item H.4.b HMSMT Report March 2015) and offer the following comments.

1. Proposed Purpose and Need Statement, Goals and Objectives.

We request the Council adopt a purpose and need statement that clearly articulates the Council's goal of controlling and reducing bycatch in this fishery as an interim step during a transition to more selective gear types. To achieve a clean and long-term sustainable West Coast swordfish fishery, we expect the Council's objectives are to:

- Establish annual hard caps to control and reduce bycatch in the drift gillnet fishery as an interim measure during the phase out of this gear;
- Maintain conservation areas for endangered leatherback and loggerhead sea turtles so as to avoid the bycatch of these critically imperiled species;
- Move toward 100% observer coverage and/or electronic monitoring during a transition period to clean and selective gears; and
- Promote and ultimately replace drift gillnets with clean gear types that can selectively target swordfish – not drift gillnets or pelagic longlines.

We assert that any optimum yield for swordfish is one that does not take and kill protected marine life and large numbers of non-target fish. This is achievable given that swordfish can be taken with harpoon gear with zero bycatch and there are alternative gears under consideration that so far appear to have dramatically lower bycatch levels. U.S. consumers should not have to buy locally caught seafood that was caught with gear that also killed whales, dolphins and sea lions. The social, economic, and ecological costs to the Nation of the bycatch in this drift gillnet gear are simply too severe to continue their use. For people concerned about a potential transfer effect due to swordfish imports, we note that NMFS has committed to finalize rulemaking on U.S. import standards by 2016, as required by the

Marine Mammal Protection Act,⁴ to ensure that foreign nations wishing to export seafood to the U.S. demonstrate equivalent bycatch protections. We urge the Council to support this effort.

We strongly oppose the HMSMT-recommended objective to “allow access to the Pacific Leatherback Conservation Area (PLCA) with individual vessel and/ or fishery... bycatch... caps” (Goal 3, HMSMT report, page 2). We request that you do not adopt this objective. The PLCA has been working to reduce and avoid the bycatch of endangered leatherback sea turtles. The PLCA is a critical conservation area that protects leatherback foraging hotspots and migratory corridors for Pacific leatherback sea turtles. It would be irresponsible and dangerous to the conservation of these sea turtles to open the PLCA to drift gillnets. As indicated in a presentation by NOAA Protected Resources Division biologist, Jeff Moore, at the February 4-6, 2015 HMSMT meeting, the bycatch of leatherback turtles should not exceed one mortality in every five years off the West Coast if we are to begin to recover this species. Putting such an imperiled species at further risk by reopening the PLCA or even setting a cap at ‘three’ leatherback turtles, would be an affront to the mandates of the Endangered Species Act.

With respect to leatherback sea turtles that nest in Indonesia and forage off the U.S. West Coast, we remind the PPMC of the scientific paper submitted in the March 2013 supplemental briefing book highlighting the ongoing long-term decline of the western leatherback sea turtle population. In a peer-reviewed scientific publication the authors

“found a 29% decline in nesting at Jamursba Medi and a 52% decline at Wernon from 2005 through 2011. We found that the estimated annual number of nests at Jamursba Medi has declined 78.3% over the past 27 years (5.5% annual rate of decline) from 14,522 in 1984 to 1,596 in 2011.”⁵

A recent IUCN Red List assessment of leatherback sea turtles estimates that as few as 2,071 mature adult leatherback sea turtles (males and females) remain in the entire Pacific, and the IUCN predicts a 96 to 99 percent total population decline by 2040 under current conditions.⁶ The Red List Assessment, published in November 2013, names fisheries bycatch as one of the biggest threats to leatherbacks globally, offering further support for reducing the threat of interactions in the California driftnet fishery. As you know, California designated Pacific leatherback sea turtles as the state marine reptile. In 2013 the State of California and others hosted the Pacific Leatherback Sea Turtle Conservation Summit resulting in an international commitment to protect and restore this shared sea turtle population, along with government partners from leatherback nesting beaches in Tambrau, Indonesia, the primary area where U.S. West Coast leatherbacks nest.

⁴ Section 101(a)(2) of the MMPA states: “the Secretary of the Treasury shall ban the importation of commercial fish or products from fish which have been caught with commercial fishing technology which results in the incidental kill or incidental serious injury of ocean mammals in excess of United States standards. See: http://www.nmfs.noaa.gov/ia/species/marine_mammals/18_mmpa.html

⁵ Tapilatu, R. F., P. H. Dutton, M. Tiwari, T. Wibbels, H. V. Ferdinandus, W. G. Iwanggin, and B. H. Nugroho. 2013. Long-term decline of the western Pacific leatherback, *Dermochelys coriacea*: a globally important sea turtle population. *Ecosphere* 4(2):25. <http://dx.doi.org/10.1890/ES12-00348.1>.

⁶ Wallace, B.P., Tiwari, M. & Girondot, M. 2013. *Dermochelys coriacea*. In: IUCN 2013. IUCN Red List of Threatened Species. Version 2013.2. <www.iucnredlist.org>. Downloaded on 27 November 2013. <http://www.iucnredlist.org/details/summary/6494/0>

2. Hard Caps

We support annual hard caps for the full list of species for which the Council is currently considering hard caps, with the addition of other species. For endangered leatherback and loggerhead sea turtles, we believe hard caps of 'three' mortalities or serious injuries per year is far too high, and each should be set at 'one'. These are critically endangered species and the science clearly shows the populations that are caught by this fishery are in severe decline.^{7,8} Any annual hard cap based on mortality or serious injury should not exceed one per year for both species, and it may be necessary to have hard caps that shut the fishery down for multiple years if a single animal is killed or seriously injured.

For endangered fin whales, humpback whales and sperm whales set the hard cap at 10% PBR or the expected annual take (ITS, Table 12, 2013 DGN Biological Opinion), whichever is less. The MMPA mandates that commercial fisheries "*reduce incidental mortality and serious injury of marine mammals to insignificant levels approaching a zero mortality and serious injury rate...*"⁹ The total incidental mortality of marine mammals killed by this fishery exceeds a level that the MMPA defines as insignificant. The threshold of insignificance is equated with the MMPA's zero mortality rate goal, which NMFS has interpreted in regulations as 10 percent of a species' PBR.¹⁰

For sperm whales, under the newly proposed PBR of 2.7, 10% of PBR equals 0.27 whales per year. Therefore, hard caps must ensure the 5-year average remains below 0.27 sperm whales per year. This means that there should be a multi-year hard cap for sperm whales such that if a single animal is observed killed or seriously injured, the fishery would close immediately and remain closed for the subsequent three seasons. Specifically, the killing or serious mortality of one sperm whale over a four year period would equate to 0.25 annually, so one take over a four year period is the maximum take that would maintain the bycatch below 10% PBR. Similarly, for humpback whales with a PBR of 11, 10% PBR would be 1.1, so the annual cap should be 1 whale, which would close the fishery for the remainder of the season if reached or exceeded. We note that the current annual mortality and serious injury of humpback whales listed in the most recent stock assessment report (4.4 whales/year) is 40% of PBR (11), so the MMPA's zero rate mortality goal has not been achieved for this species. For fin whales the PBR is 16, so 10% of PBR is 1.6. Therefore, similar to humpback whales, the annual cap for fin whales should be 1 whale, consistent with MMPA standards.

We support the Council's addition at the November meeting of short-finned pilot whales and common bottlenose dolphins to the preliminary preferred alternative, based on the criteria of recent bycatch exceeding 10% of PBR. For short-fin pilot whales, the PBR is 4.6,

⁷ Tapilatu, R. F., P. H. Dutton, M. Tiwari, T. Wibbels, H. V. Ferdinandus, W. G. Iwanggin, and B. H. Nugroho. 2013. Long-term decline of the western Pacific leatherback, *Dermochelys coriacea*: a globally important sea turtle population. *Ecosphere* 4(2):25. <http://dx.doi.org/10.1890/ES12-00348.1> and NMFS 2012. Biological Opinion. Continued operation of the Hawaii-based Shallow-set Longline Swordfish Fishery - under Amendment 18 to the Fishery, at pg. 78. Management Plan for Pelagic Fisheries of the Western Pacific Region.

⁸ 76 Fed. Reg. 58,868 (September 22, 2011) designating and uplisting the North Pacific DPS to 'endangered'

⁹ 16 U.S.C § 1387(b)(1).

¹⁰ 69 Fed. Reg. 43,338 (July 20, 2004).

so 10% of PBR is 0.46. The recent bycatch mortality of 6 whales¹¹ in the 2013-14 season equates to a 5-year average of 1.2/year, which exceeds 10% of PBR (0.46). Therefore, based on the MMPA standard, the cap should be one whale over a three year period with 100% observer coverage, such that if one short-finned pilot whale is killed, the fishery is closed for the remainder of the season and the subsequent two years. We oppose the HMSMT recommendation of setting an annual hard cap of 5 short-finned pilot whales, based on a 'rounded up PBR'. Rounding up PBR, for the sake of having a rounded number, is in disregard of the PBR standard, let alone the MMPA zero rate mortality goal.

For the common bottlenose dolphin (CA, OR, WA offshore), the annual mortality and serious injury of 2.0 dolphins/year is currently 36.4% of the PBR of 5.5 dolphins/year.¹² We request the Council establish a hard cap of one common bottlenose dolphin per two years, such that if one dolphin is killed or seriously injured, the fishery is closed for the remainder of the season and the full subsequent season, based on the mandated MMPA zero mortality rate goal. We oppose the HMSMT recommendation of setting an annual hard cap of 6 common bottlenose dolphins based on a 'rounded up PBR'.

Table 1. Oceana supports the hard caps in Table 1 of this letter as an interim measure leading up to the full prohibition of drift gillnets.

Species/Group	Interactions	Rationale
Fin whale	1/ year	10% PBR
Humpback whale	1/ year	10% PBR
Sperm whale	1 over a 4 year period*	10% PBR
Short-finned pilot whale	1 over a 2 year period*	10% PBR
Common bottlenose dolphin	1 over a 2 year period*	10% PBR
Loggerhead sea turtle	1**	Critical conservation concern
Leatherback sea turtle	1**	Critical conservation concern and continued decline
Olive Ridley sea turtle	1/ year	Annual Incidental Take Statement
Green sea turtle	1/ year	Annual Incidental Take Statement
All dolphins	52/ year	Recent (2007-2013) average estimated annual bycatch mortality
All pinnipeds	45/ year	Recent (2007-2013) average estimated annual bycatch mortality
All other whales	1/ year	Recent (2007-2013) average estimated annual bycatch mortality

* meeting the hard cap would close the fishery for multiple years if exceeded.

** may warrant closing fishery for multiple years if exceeded.

¹¹ The 2014 observed mortality of 2 short-finned pilot whales corresponds to an estimated 6 total mortalities given the observer coverage of 34%. This recent bycatch event was not included in the HMS MT Report 3 from September 2014, but is available in the 2013/2014 observer data summary at: http://www.westcoast.fisheries.noaa.gov/publications/fishery_management/swr_observer_program/drift_gillnet_catch_summaries/observeddgn2013-2014.pdf

¹² HMSMT Report 3 (DGN Hard Caps/Bycatch Reduction), Table 3, September 2014. http://www.pcouncil.org/wp-content/uploads/G4b_HMSMT_Rpt3_DGN_SEPT2014BB.pdf

While we understand the rationale for not setting hard caps for other individual marine mammals species for which recent bycatch is below 10% PBR, the continued overall take of dolphins and pinnipeds at mortality levels close to 100 per year remains a serious concern. In addition to hard caps for endangered turtles, whales and individual marine mammal species whose bycatch is greater than 10% PBR, we reiterate our request that hard caps be established at the group level for all dolphins and all pinnipeds based on recent average annual bycatch mortality. We oppose alternative 2 that would set an annual hard cap for all dolphins at 13,582 and an annual hard cap for all pinnipeds at 4,316. Frankly, this is absurd. It flies in the face of the goal of reducing bycatch and it would violate the Marine Mammal Protection Act. To prevent any increases in marine mammal bycatch, we recommend you start with recent average catches at the maximum.

What is more, as per the challenges raised by NMFS in the time necessary for the agency to make Serious Injury determinations, we request that these proposed hard caps be set based on number of interactions, not Serious Injury/Mortality.

3. Performance Objectives for Finfish

We commend the Council for considering finfish bycatch reduction measures, as bycatch concerns with the DGN fishery reach far beyond simply protected species. A fishery that discards over half the animals it catches is simply a dirty fishery, and clearly is not meeting Magnuson-Stevens Act National Standard 9 to minimize bycatch to the extent practicable. With respect to your alternatives, each serves as an indicator of a separate and important concern with different bycatch aspects: the overall bycatch rate, finfish bycatch and marine mammal bycatch. Furthermore, as currently formulated in the HMSMT report, there is no cost to setting these standards. Therefore, we recommend setting performance standards for each category by adopting Alternatives 1, 3, and 4 as your Final Preferred Alternative.

We support your preliminary preferred alternative (# 4) for annual performance objectives for non-ESA listed marine mammals. In addition, we support alternative 3, performance objectives for select finfish (noting that we originally proposed these as annual hard caps, not performance standards). We also support alternative 1, which sets an overall performance objective for total retained catch (regardless of whether discards are observed dead or alive), calculated as landed catch divided by total catch. However, it should be required that the percent retained increase by 10% each year, where right now, the ten year average is that only 36% is retained (64% discarded). Adopting all three of these alternatives will ensure the Council is periodically reviewing and monitoring bycatch trends in the DGN fishery in a comprehensive, holistic manner.

4. Establish 100% Accountability via Observers/ Electronic Monitoring in 2016

Regarding regulatory requirements for observer coverage, we support the Council's PPA to remove the "unobservable" vessel exemption through regulatory action. Additionally, we reiterate that under a hard cap regime, the hard cap levels must be contingent on the level of required observer coverage to function as intended. However, we are concerned that the Council's September motion of a 100% observer monitoring requirement by 2018/19 represents significant "backpedaling" from the clear commitment the Council made in June to require 100% monitoring in 2016. The June 2014 decision document stated "The

Council's intent is that a requirement be established for 100% accountability via observers and/or EM no later than late summer 2016." However, the PPA refers to the current 30% observer coverage level only increasing to 100% monitoring in 2018. The Council should also clarify how the selected observer coverage level will affect implementation of the hard caps and performance targets (i.e., if the observer coverage is 50%, the caps and performance standards based on observed mortality/serious injury are cut in half or take will be extrapolated up). We also support a requirement that the industry is responsible for paying for observer coverage in excess of the 30% coverage paid for by NMFS.

Conclusion

Moving forward, we encourage the Council to transition "the current drift gillnet fishery to a fishery utilizing a suite of more environmentally and economically sustainable gear types" as per the Council's March 2014 decision document. We know that swordfish can be harvested with low to zero bycatch using existing harpoon and hand-held hook and line gear. In addition, buoy gear seems to be a promising alternative on the near horizon.¹³ In this time of precautionary and ecosystem-based approaches to management, we urge you to phase out and close the drift gillnet fishery and in the meantime, please consider and adopt the hard caps, performance standards and observer coverage requirements as presented in this letter.

Thank you for your time and consideration of these comments.

Sincerely,



Ben Enticknap
Pacific Campaign Manager



Geoffrey G. Shester, Ph.D.
California Campaign Director

¹³ C.A Sepulveda, S. A. Aalbers, and C. Heberer. 2014. Testing Modified Deep-Set Buoy Gear to Minimize Bycatch and Increase Swordfish Selectivity. NOAA Bycatch Reduction Engineering Program 1(27-32). http://www.nmfs.noaa.gov/by_catch/docs/brep_2014_sepulveda.pdf

WYLAND WORLDWIDE

ART • NATURE • COMMUNITY

Feb. 27, 2015

Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

RE: H.4 Drift Gillnet Management and Monitoring Plan Including Final Action on Hard Caps

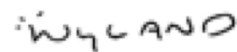
Dear Chair Lowman and Council Members,

As a young artist in the 80's, I thought it my responsibility to connect two worlds--above and below the water--through art. However, I have since realized that reaching into a third dimension is equally as important: the future. The first time I saw gray whales migrating down the California coast, I was captivated by their grace, and struck by the beautiful fragility of their home. From an artist's perspective, the wonders of the natural world have a resounding effect on both an aesthetic and emotional level. The culture, society and economy of Southern California is inextricably tied to the continued health of the Pacific Ocean. Fishermen, conservationists and artists, alike, can attest to the importance of preserving California waters in the interest of future abundance, future appreciation, and future inspiration.

Such a future will certainly be influenced by the Council, but nevertheless, will be largely determined by the hands of a generation that has yet to realize its dreams. There is an inherent injustice in denying a child the opportunity to witness the very same sights that we, our parents, or our grandparents saw. Try as I might to capture the beauty of the ocean through my art, a painting will never be an adequate replacement for reality. It is currently in the Council's capacity to prevent further marine degradation by supporting a transition away from the use of drift gillnets. A wholly unsustainable fishing practice, drift gillnets are known to injure or kill non-target species that were never meant to be caught. For instance, descendents of the migrating whales, that I saw in my youth, are in danger of entanglement as they make their way along the California coast. I therefore urge the Council to develop a Drift Gillnet Monitoring and Managing Plan that sets hard cap limits at conservative levels, mandates 100% observer coverage and encourages fishermen to switch to a more selective type of gear. We can no longer afford to take the ocean and its bounty for granted.

The Magnuson-Stevens Fishing Conservation Management Act requires fishery managers to minimize bycatch as a primary conservation goal in fisheries management. By implementing widespread use of environmentally sustainable fishing practices, the Council will take another step forward toward its ultimate goal of sustainable fisheries management. I sincerely hope that the Council will consider the untapped potential of each grade-school kid who has yet to see his or her first migrating gray whale.

Thank you for your work to reduce bycatch in the fisheries you manage.



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Congress of the United States
Washington, DC 20515

February 27, 2015

Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, #101
Portland, OR 97220
pfmc.comments@noaa.gov

Mr. William W. Stelle, Jr.
Administrator, Northwest Region
National Marine Fisheries Service
7600 Sand Point Way, NE, Bldg 1
Seattle, WA 98115-0070
will.stelle@noaa.gov

Dear Chair Lowman and Administrator Stelle:

We write in support of the Pacific Fishery Management Council's goal, stated in March 2014, to transition the West Coast swordfish fishery from using drift gillnets to more environmentally friendly and economically sustainable gear types. Bycatch in the drift gillnet fishery continues to threaten the health of our ocean, and continues to kill endangered and protected species that are of great national and ecological significance. As part of a comprehensive plan, we support the development and use of more environmentally sustainable gear and enforceable hard caps for bycatch control of protected species, along with monitoring to ensure the limits are successfully implemented.

The Magnuson-Stevens Fishery Conservation and Management Act, the primary law governing marine fisheries management in U.S. federal waters, requires that fisheries managers, to the extent practicable, minimize bycatch, and, to the extent bycatch cannot be avoided, minimize the mortality of such bycatch. The drift gillnet fishery has begun to improve bycatch avoidance by lowering the nets deeper into the water column, using pingers to warn off protected species, and developing new bycatch mitigation fishing techniques. But these efforts do not go far enough. Enforceable bycatch limits are imperative. Further, continued gear innovation and significant advances in fishing techniques are necessary to meet bycatch limits, ensuring a sustainable fishery and protecting marine life.

High bycatch rates undermine the standard we set for ourselves and weaken the United States' reputation as a world leader in sustainable fisheries management. We are aware of other gear that can be used to catch swordfish with low bycatch rates, including existing harpoon gear and experimental buoy gear. In 2012, NOAA entered into a Memorandum of Understanding with Morocco to test the use of selective buoy gear as an alternative gear. We urge the Council and NOAA Fisheries to continue research and development on these and other innovative and sustainable fishing methods for catching swordfish.

We share the goal of a healthy and sustainable swordfish fishery on the U.S. West Coast. It is important for U.S. consumers of swordfish to have sustainable alternatives to internationally-supplied products that lack the environmental safeguards provided by U.S. management. In furtherance of these goals, we urge the Pacific Fishery Management Council and National Marine Fisheries Service to act quickly to develop a comprehensive plan to aggressively address this critical issue.

Thank you for your consideration and attention to this important issue.

Sincerely,

Dan Lane

John

Grace I. Neapolitano

Michael W. Haddon

Milee Thompson

Doris O. Matsui

Jo M. King

Laurel Crystal Allard

Carl Blumman

Zoe Lynn

Jon M. Dermott

Mark DeSalvino

~~no show~~

Alan Lowenthal

Joanna

Adam B. Schiff

Barbara Jee

[illegible]



Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Fwd: Agenda Item H.4 Drift Gillnet Management and Monitoring Plan Including Final Action on Hard Caps

1 message

PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov>

Mon, Mar 2, 2015 at 2:30 PM

To: Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Cc: Kit Dahl - NOAA Affiliate <kit.dahl@noaa.gov>

----- Forwarded message -----

From: **Dan Jacobson** <Djacobson@environmentcalifornia.org>

Date: Mon, Mar 2, 2015 at 1:58 PM

Subject: Agenda Item H.4 Drift Gillnet Management and Monitoring Plan Including Final Action on Hard Caps

To: pfmc.comments@noaa.gov



Ms. Dorothy M. Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

RE: Agenda Item H.4 Drift Gillnet Management and Monitoring Plan Including Final Action on Hard Caps

Dear Chairman Lowman and Council Members:

I write to you on behalf of Environment California, a statewide, citizen-based environmental advocacy organization that seeks to overcome environmental challenges by coupling scientific research with community involvement. Through a variety of different media outlets, we try our best to raise awareness about important environmental issues and provide a platform from which everyday people can voice their opinions. The California legislature is prone to the influence of powerful interests, and we believe that independent research, tough-minded advocacy and spirited grassroots action are the best ways to ensure environmental protection.

Among California's many natural treasures, its marine ecosystem is truly a wonder to behold. California waters, rich with biodiversity, provide a host of ecosystem services that should not be taken for granted. We applaud the Council's progressiveness in sustainable fisheries management, but are concerned about a recent retrogression. Environment California urges the Council to reinstate its plan to phase out the practice of drift gillnet fishing, in favor of more environmentally sustainable methods. Drift gillnets are notoriously indiscriminate, and cannot be utilized without posing grave danger to non-target species, including whales, dolphins and sea turtles. The ability of fishermen to catch fish need not infringe upon the ability of protected species to freely navigate the ocean. Just as Environment California gives a voice to the people, the Council has an opportunity to give a voice to the marine community. In developing a Drift Gillnet Monitoring and Managing Plan, we ask the Council to set hard caps at conservative levels, mandate 100% observer coverage and encourage fishermen to switch to more selective types of gear. In its decision to reduce bycatch, the Council will be able to reconcile the economic needs of fishermen with the existential rights of non-target species.

The Magnuson-Stevens Fishing Conservation Management Act requires fishery managers to minimize bycatch as a primary conservation goal in fisheries management. By phasing out the use of drift gillnets, and reducing the amount of bycatch, the Council can ensure that California's marine ecosystem remains lively and resilient. All California residents--whether finned or footed--benefit from a healthy Pacific Ocean, and we appreciate the Council's help in creating a better home.

Thank you for your work to reduce bycatch in the fisheries you manage. We pledge continued support for the Council and look forward to future cooperation.

Daniel Jacobson
Dan Jacobson
State Director
Dan Jacobson
State Director
Environment California
1314 H street suite 100a
Sacramento, CA. 95814
Djacobson@environmentcalifornia.org

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Thank you for your comments to the Pacific Fishery Management Council. Your comments have been received and will be forwarded to the appropriate staff member for processing.

Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220
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Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

RE: H.4 Drift Gillnet Management and Monitoring Plan Including Final Action on Hard Caps

Dear Chair Lowman and Council Members,

I am writing to you on behalf of the Laguna Niguel Billfish Club, a Southern California fishing club that supports the passions of recreational fishermen. The LNBC was founded in 1978 with the primary intent to participate in the Hawaiian International Billfish Tournament, but has since expanded its goals to supporting the sport of Gamefishing and conservation. We proudly support the research and conservation efforts of the International Game Fish Association, the Billfish Foundation and Wild Oceans. As exciting as the pursuit of billfish can be, we also understand the importance of sustainable fishing practices to ensure the continuation of a cherished pastime.

The LNBC applauds the Council for its progressive work toward environmentally minded fisheries management. However, we are concerned about the Council's recent retreat from a decision to transition away from the use of drift gillnets, in favor of a more selective type of gear. As a fisherman, I can attest to the significance of using the correct kind of gear, and the practical and ethical ramifications of such choices. Because drift gillnets are inherently indiscriminate, the threat they pose to non-target species is unjustifiable in the realm of sustainable fishing practices. Most fishermen are neither interested, nor intend, to catch whales or dolphins, but the continued use of drift gillnets will undoubtedly create accidental and unnecessary casualties. The LNBC encourages the Council to complete its Drift Gillnet Monitoring and Managing Plan by setting hard cap limits at conservative levels, taking appropriate measures should those limits be reached, and mandating 100% observer coverage. Phasing out the use of drift gillnets can help reduce the average amount of bycatch, thereby keeping other marine animals in the water where they belong.

The Magnuson-Stevens Fishing Conservation Management Act requires fishery managers to minimize bycatch as a primary conservation goal in fisheries management. By switching to an alternative type of fishing gear, it is possible to meet the needs of the industry while protecting the whales, turtles, sharks and dolphins that have an equal right to the ocean. We hope the Council will consider our comments and take steps to keep Southern California waters pristine and abundant.

Thank you for your working to reduce bycatch in the fisheries you manage. We appreciate your consideration of all fishermen and "fish," alike.

Robert Chavers
President - LNBC



March 2, 2015

Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
70 NE Ambassador Place, Suite 101
Portland, OR 97220

via email: pfmtc.comments@noaa.gov

**Re: Agenda Item H.4 – Highly Migratory Species, Drift Gillnet
Management and Monitoring Plan Including Final Action on Hard Caps**

Dear Chair Lowman and Council Members:

Wild Oceans represents conservation-minded fishermen who seek to conserve the ocean's top predators – the big billfish, swordfish, tunas and sharks – while preserving healthy ocean food webs and critical habitats.

The evidence is overwhelming that drift nets do not conform to these goals. They are an extremely wasteful method of fishing, incapable of limiting what they catch to the targeted species. Such senseless squandering of precious ocean resources is much too high a price to pay to permit their continued use. The council's decade-long experiment with Pacific Leatherback Conservation Area closures has demonstrated not only that we can minimize the capture and killing of protected species by limiting the use of drift nets, but that curtailing their use is the only way to protect our ocean diversity from the indiscriminate entanglement and killing associated with this gear.

For these reasons, we support the development of a California Drift Gillnet Fishery Management and Monitoring Plan (Plan) as an interim step in a transition from drift nets to cleaner, actively-tended gear that reduces bycatch and brings more target fish to market. During this

transition, the council should manage this fishery with hard caps on all vulnerable species and require 100 percent at-sea monitoring.

In order to develop and implement management measures for the California drift net fishery to further reduce 1) bycatch below current levels, and 2) incidental take of ESA-listed species and other marine mammals, we suggest the council consider the following comments and recommendations:

1. **Modify the Plan's Purpose and Need statement as follows:** "The purpose of the proposed action is to further reduce bycatch, including **but not limited to** incidental take of ESA-listed species and other marine mammals, in the DGN fishery below levels permitted by applicable law **and below levels recently observed in the DGN Fishery.**" The public objects to harmful fishing practices. Allowing the status quo to continue would not only ignore the public's repeated and continued call for the council to end the use of drift nets in the Pacific, but would contradict the council's duty under National Standard 9 to reduce bycatch.
2. **Implement hard caps that reduce the bycatch of selected threatened and endangered species from current levels.** Annual hard caps should be based on the interactions between the drift net fishery and protected species and should trigger a closure for the remainder of the fishing year when a cap is reached. The council should set these caps at levels below those currently observed in the drift net fishery. According to the HMSMT Report, "[a] small improvement in bycatch performance is seen between the No Action and Preliminary Preferred Alternative [Alternative 4]... Therefore, this is the only alternative consistent with the council's goal of reducing bycatch in the DGN fishery." Because only one alternative achieves the council's stated goal, the council should offer additional hard cap alternatives that further reduce the bycatch of selected threatened and endangered species in order to give the public a full range of reasonable alternatives rather than a simple either/or.
3. **Include a suite of performance standards for finfish bycatch.** Drift net bycatch discussions tend to focus on avoiding turtle and marine mammal interactions, and noting the high risks and uncertainties involved, acceptable "takes" of these protected species. These discussions ignore the need to reduce finfish bycatch, too. In the end, even if the council could manage the fishery to avoid interaction with and mortality of marine mammals and sea turtles – a highly doubtful proposition - it likely would not decrease the bycatch of fish – thousands of non-target sharks, hundreds of billfish and many other species - which account for well over half the entire catch in drift nets.

Performance objectives get to the heart of the bycatch issue. They address the sharks, tuna, marlin and other fish that make up of the preponderance of a drift net haul. The overall rate of bycatch - fish which are harvested in the drift net fishery, but which are not sold or kept for personal use – averages above 60 percent of total catch, placing this fishery in the top 20 percent of the highest bycatch fisheries in the world. The animals caught and discarded by drift nets have an economic value to recreational fishermen, coastal tourism, and ecosystem services that has not been accounted for.

We support the adoption of performance objectives Alternatives 3, 4 and 1 as a group. Together, these three alternatives trigger review if there is an overall increase in bycatch or a bycatch spike in a protected or ecologically-sensitive species. Performance objectives will provide the council with a means of annually assessing the fishery performance in relation to its objectives to determine what, if any, additional management measures are needed to minimize bycatch. A suite of performance objectives can give a more accurate assessment of drift net bycatch and can track if and how the fishery responds to hard caps and other management measures and how these responses affect the amount and composition of bycatch.

Alternative 1 seeks to track percentage of retained catch to animals caught. This statistic alone does not adequately measure the impact of drift net bycatch on the California Current Ecosystem. For example, overall bycatch could decrease if the fishery found a new market for a currently unmarketable species, such as mola mola, but at the same time increase the bycatch of important recreational and ecological species such as marlin or shark. If the council adopted Alternative 1 alone, such a change in the fishery would not trigger council review. Alternative 3, performance objectives for selected bycatch species, and Alternative 4, performance objectives for non-ESA listed marine mammals, will establish clear bycatch thresholds and will trigger council review if and when bycatch of a selected species spikes.

4. **Adopt 100% monitoring.** Of course, a management plan based on hard caps or performance standards depends on adequate monitoring. The only way to truly understand the depth and breadth of bycatch, including rare events, in the drift net fishery is to require 100% monitoring. Once electronic monitoring proves effective in the drift net fleet, we could support the council's Preliminary Preferred Alternative – 30 percent at-sea observer coverage coupled with industry-funded electronic monitoring. However, until the effectiveness of electronic monitoring is proven, we recommend 100% at-sea observer coverage of drift net trips, with the increased observer costs paid by the fishery, not the taxpayer.

Ultimately, managing large-scale, indiscriminate gears like drift nets is extremely complicated and costly, from an economic as well as an environmental standpoint. Trying to conserve and protect swordfish, marlin, sharks, tunas, dolphin-fish, turtles, marine mammals and seabirds – targeting some, trying to avoid others – is the fisheries management equivalent of playing *Wack-a-Mole*. The species taken as bycatch in drift nets vary in their conditions from abundant to endangered and everything in between, with very different management goals and regulations needed for each.

The HMSMT report points out that “[a] choice between alternatives will involve tradeoffs between potentially lower bycatch levels and a risk of lost production, revenues, and profitability,” reinforcing the conclusion that the future belongs to more environmentally-sustainable alternative gears. For years now, *Wild Oceans* has been promoting a transition away from drift nets and multi-mile pelagic longlines – gears that fish passively and kill indiscriminately – to safer, more selective fishing methods for swordfish, tuna and other commercial species, methods that are available now and which should be an integral part of the Council’s transition plan away from drift nets.

Best fishing practices call for small-scale, high-yield, locally supplied fisheries, using the latest technological developments in sustainable fishing. It is part of a progressive shift away from so-called modern, “efficient” methods of fishing that are wasteful and ultimately unmanageable. We look forward to working with the council to make this vision a reality.

Sincerely,

A handwritten signature in black ink, appearing to read "Theresa Labriola". The signature is fluid and cursive, with a large initial "T" and a stylized "L".

Theresa Labriola
West Coast Fisheries Project Director



3964 Harney St. San Diego, Ca 92110 619.295.3272 Fax 619.295.0727
301 Mission Ave. Oceanside, Ca 92054 760.967.1820

www.HarneySushi.com

Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

RE: RE: Agenda Item H.4 Drift Gillnet Management and Monitoring Plan
Including Final Action on Hard Caps

Dear Chair Lowman and Council Members,

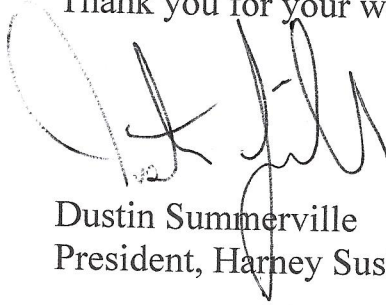
I write to you on behalf of Harney Sushi, an award-winning sushi bar in San Diego. At both of our locations, the chefs and staff at Harney Sushi are dedicated to providing customers with a unique fine dining experience, complete with music for their mouths and sushi for their soul. We are very fortunate to have access to some of the best seafood in Southern California, and pride ourselves in using only the freshest ingredients. We are committed ourselves to serving sustainable seafood options and adhere to strict guidelines established by NOAA, the Monterey Bay Aquarium and the Marine Stewardship Council. Just as we treat our ingredients with respect, we try to treat their origins--land or sea--with the same reverence.

As the Council may know, sushi is one of the hallmarks of Japanese cuisine. Seafood is incredibly important to the history and culture of Japan, and for centuries, has been significant as basic sustenance and culinary inspiration. Fortunately, sushi is now more ubiquitous than ever, albeit at a certain cost. Widespread enjoyment of sushi is only possible in conjunction with sustainable fishing practices. Drift gillnet fishing is not such a practice. The indiscriminate nature of drift gillnets poses mortal danger to non-target species, like whales, dolphins and sea turtles. Our customers would be appalled to know that their sushi roll could have cost a dolphin its life. We encourage the Council to complete its development of a Drift Gillnet Monitoring and Managing Plan, through which it would set hard cap limits to conservative levels and mandate 100% observer coverage. Transitioning

away from drift gillnets to a more selective, environmentally sustainable type of gear would reduce levels of bycatch and prevent unnecessary casualties.

The Magnuson-Stevens Fishing Conservation Management Act requires fishery managers to minimize bycatch as a primary conservation goal in fisheries management. By phasing out the use of drift gillnets, the Council can ensure that our ocean resources are not wasted or taken for granted. The principles of Japanese cuisine are inherently connected to the multiplicity and changeability of nature. We hope that the Council will take progressive action toward reconciling the best interests of the world's people with the world's oceans.

Thank you for your work to reduce bycatch in the fisheries that you manage.

A handwritten signature in black ink, appearing to read 'Dustin Summerville', is written over the printed name and title.

Dustin Summerville
President, Harney Sushi Inc.

United States Senate

WASHINGTON, DC 20510

March 2, 2015

Ms. Dorothy M. Lowman
Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, #101
Portland, OR 97220

Mr. William W. Stelle, Jr.
Administrator, West Coast Region
National Marine Fisheries Service
7600 Sand Point Way, NE, Building 1
Seattle, WA 98115

Dear Chair Lowman and Administrator Stelle:

We are writing to you in support of the Pacific Fishery Management Council's goal, stated in March 2014, to transition the West Coast swordfish fishery from using drift gillnets to more environmentally sustainable fishing gears. We are greatly concerned that bycatch in the drift gillnet fishery continues to kill endangered and protected species that are of great national and ecological significance. Consequently, we urge you to develop a comprehensive plan to transition this fishery to more environmentally sustainable fishing gears that includes the use of enforceable limits to reduce bycatch in this fishery and 100 percent monitoring until the transition has occurred.

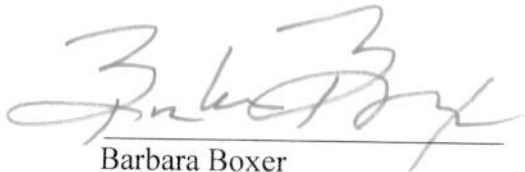
The Magnuson-Stevens Fishery Conservation and Management Act, the primary law governing marine fisheries management in U.S. federal waters, requires that fisheries managers, to the extent practicable, minimize bycatch, and, to the extent bycatch cannot be avoided, minimize the mortality of such bycatch. According to NOAA's National Bycatch Report, the West Coast drift gillnet fishery kills more cetaceans than all other West Coast and Alaska fisheries combined. One estimate indicates that as many as 100 dolphins, whales, seals, and sea lions on average are killed each year as a result of this fishery. In addition, drift gillnet discards include turtles, ecologically important shark species and valuable recreational fish such as marlin. While efforts have been made to reduce the level of bycatch in the West Coast swordfish fishery, including the use of pingers to deter marine mammals and depth restrictions for nets, more must still be done.

We are aware of other gears that can be used to catch swordfish with significantly lower bycatch rates, including existing harpoon gear and experimental buoy gear. In 2012, NOAA entered into a Memorandum of Understanding with Morocco to test the use of selective buoy gear as an alternative gear. We strongly encourage the Pacific Fishery Management Council and the National Marine Fisheries Service to continue this important research and the development of these and other innovative and sustainable fishing methods for catching swordfish.

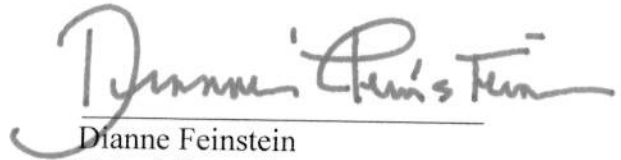
Ultimately, we support a healthy and sustainable West Coast swordfish fishery that can supply the U.S. market. To this end, we support your goal to transition the West Coast swordfish fishery to fishing gears that are more environmentally sustainable and urge you to act quickly to develop a comprehensive plan that includes enforceable limits on bycatch and additional

monitoring during the transition. Please keep us informed of your progress and timeline toward achieving this goal. Thank you for your consideration of this important issue.

Sincerely,

A stylized, cursive handwritten signature of Barbara Boxer in dark ink.

Barbara Boxer
United States Senator

A cursive handwritten signature of Dianne Feinstein in dark ink.

Dianne Feinstein
United States Senator

A cursive handwritten signature of Ron Wyden in dark ink.

Ron Wyden
United States Senator



AMERICAN CETACEAN SOCIETY

Ms. Dorothy M. Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

RE: H.4 Drift Gillnet Management and Monitoring Plan Including Final Action on Hard Caps

Dear Chairman Lowman and Council Members:

I write to you as a member of the American Cetacean Society, a nonprofit organization whose mission is to protect whales, dolphins, porpoises, and their habitats through public education, research grants, and conservation actions. The Los Angeles chapter of ACS is heavily involved in the ongoing Gray Whale Census and Behavior program, and has become increasingly concerned about the threat that drift gill nets pose to the safety of migrating gray whales. By this time of year, most gray whales have made the migration down toward the warmer waters of Baja California to breed and give birth to young. Many calves are born over the course of the southern migration, and are vulnerable to the threat of unsustainable fishing gear. As the baby whales travel north with their mothers from the protected lagoons of Baja California to their summer feeding grounds in the arctic, they are again susceptible to being caught and drowned in fishing gear set along the west coast.

As members of the Whale Entanglement Team, we are extremely disheartened to receive the 10th confirmation of a large whale in distress off the California coast so far this year. In 2014, there were 17 reports of entangled whales. Reports are only a percentage of what the actual count can be.

The central mission of the American Cetacean Society is conservation, which involves acknowledging and protecting marine mammals' inherent right to exist. Although some fishermen may consider their boats a "home away from home," the ocean is the one and *only* home of whales, porpoises and dolphins. The use of indiscriminate fishing gear, like drift gillnets, impedes upon the ability of such marine mammals to navigate California waters without risk of injury or death. Drift gillnets are notorious for accruing bycatch, which is a grave misfortune that should not be dismissed as an "unavoidable" externality of fishing. By encouraging fishermen to transition away from drift gillnets to more selective, environmentally

sustainable types of gear, the Council can ensure that unnecessary casualties are avoided. We hope to motivate the Council to set bycatch limits to conservative levels, strictly enforce hard caps and increase observer coverage to 100%, in order for policy implementation to be fully effective. We believe that it is possible for humans to enjoy and benefit from marine ecosystems, while keeping conservation and sustainability in mind.

The Magnuson-Stevens Fishing Conservation Management Act requires fishery managers to minimize bycatch as a primary conservation goal in fisheries management. By phasing out the use of drift gillnets, and reducing the amount of bycatch, the Council can ensure that cetacean populations continue to flourish in California waters. To be able to “show, not tell” future generations about the majesty of the gray whale is a goal that the Council can help the American Cetacean Society achieve.

Thank you for your work to reduce bycatch in the fisheries that you manage. We look forward to working alongside the Council in preserving the biodiversity of our oceans.

Respectfully yours,

A handwritten signature in black ink, reading "Diane Glim". The signature is written in a cursive, flowing style.

Diane Glim American Cetacean Society Immediate Past President
PO Box 1931
San Pedro, CA 90733

Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NO Ambassador Place, Suite 101
Portland OR, 97220

RE: H.4 Drift Gillnet Mangement and Monitoring Plan Including Final Action on Hard Caps

Dear Chair Lowman and Council Members,

I write to you today as a marine biologist, NMFS observer, progressive conservationist, and a human being. I thank you for your progressive efforts towards creating and managing sustainable fisheries that support not only our dependence on the ocean, but the long term environmental and economic sustainability that is our responsibility. However, I write to you out of concern of environmentally detrimental fishing practices that are still being used in Southern California waters. We not only have a responsibility to maintain our fisheries for our own economic gain but it is our job to ensure that we can have healthy fish stocks for future generations in a healthy and balanced ecosystem. I understand what it means to work closely with fishermen, policy makers, and corporations to achieve the ultimate balance between the give and take that comes with sustainable fisheries.

Not only do we need fishermen to be held accountable, but we need any corporations that they fish for to understand the importance of sustainable fisheries practices to insure long term profits for the environment and for them. I have seen fishermen, when fishing is slow or the fish are small and immature, grow upset that their quota is too high and the corporations push to gain more despite knowing this is happening. It starts with the fishermen actively keeping track of what is brought onboard and the government policy makers having an accurate representation of what is actually happening in this fishery without influence of purely profit driven companies. By enforcing hard caps and going from a partial coverage fishery to 100% observer coverage, it gives a more complete picture of just how bad the bycatch is. I understand it is not intentional for fishermen to target bycatch species, but drift gillnets are too indiscriminate. Endangered species, marine mammals, and sharks are just some of the animals trapped unintentionally. These animals are already threatened, slow to reproduce, and facing issues globally without the United States, which should be a trendsetter on the international front, catching these animals as bycatch.

As a former NMFS fisheries Observer, I have worked closely with fishermen to ensure that everyone is doing their part to make sure fish are available next year and years to come. No fishermen wants their fishery to collapse or close because bycatch is simply too high. Why then, do we continue to allow the use of indiscriminate drift gillnets when there are better ways possible and available? No fishery is perfect, but if we work together we can make it better. It isn't just a request; it is our responsibility as ambassadors for the marine environment. We can not have a divide between fishermen, policy makers, corporations, and government representatives (observers). It is high time

we come together to begin managing our fisheries so they are not just beneficial to us but beneficial on a global scale. We can set the trend not just on the Pacific coast of the United States, but for our country, that we will work to achieve sustainable fisheries for all to benefit from.

Therefore, I entreat the council to execute its motion to create Drift Gillnet Monitoring and Managing plan that sets hard cap limits at conservative levels, mandates 100% observer coverage and encourages fishermen to switch to a more environmentally sustainable type of fishing gear. Our oceans are an irreplaceable source of enjoyment, fascination, inspiration and economic bounty. Please don't forget the ecological importance, charisma, and beauty of the animals being caught as target fish and as bycatch with the drift gillnets. We must protect that and show the rest of the United States and the world that sustainability and minimal bycatch is possible when we all choose to work together.

The Magnuson-Stevens Fishing Conservation Management Act *requires* fishery managers to minimize bycatch as a primary conservation goal in fisheries management. By switching to an alternative type of fishing gear, it is possible to meet the needs of the fishing industry while protecting other marine mammals that have an equal right to the ocean. The NMFS observer data collected thus far shows that bycatch levels remain unacceptably high. The incidental take of shark and marine mammals is something that should be taken seriously as their keystone roles in the ecosystem are revealed more. I encourage you to increase the observer coverage to 100% to have more data available for analysis. I hope the Council's decision will soon enable observers to report more numbers, whether they are favorable or not, so we can effectively adapt to manage this fishery properly. I hope the council chooses to keep non-target species in the water where they belong and do so by enforcing stricter regulations and investigating alternative fishing methods that are more discriminate.

Thank you for your work to reduce bycatch in the fisheries you manage and for taking responsibility to do all that is necessary to effectively manage the fishery now and years to come.

Lila Ruth Jones
Marine Biologist
Progressive Conservationist
Human Being



Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

Dear Chair Lowman and Council Members,

I write to you on behalf of Pacific Environment, a non-profit organization dedicated to protecting the living environment of the Pacific Rim. Pacific Environment has multiple areas of focus and is active in various regions, including California, where our main initiatives revolve around energy policy and the ocean. Seeing that the California coast features four prominent marine sanctuaries, the state has much space, and many animals, to proudly protect. Pacific Environment is particularly concerned with the threat of human impact upon whales, dolphins, and other marine wildlife, as is the current issue with drift gillnet fishing.

Among the foundational principles of Pacific Environment, promoting best practices and increasing accountability are two of the most important. We are encouraged by the Council's efforts to implement hard caps and increase monitoring of drift gillnet fleets, but are also disconcerted to find that the Council has lost some momentum. Last March, the Council committed to facilitating a transition from the use of drift gillnets to more selective types of gear. We would like to stress how imperative it is to realize this goal. Because drift gillnets are notoriously nonselective, they pose a threat to all non-target species that swim through the area. The whales and dolphins that Pacific Environment works to protect have an equal, if not greater, right than fishermen to freely roam the waters of the Pacific. Therefore, in developing a Purpose and Need Statement for the Drift Gillnet Monitoring and Managing Plan, the Council should focus on reducing bycatch. We also ask that the Council set hard cap limits at conservative levels and take appropriate action should those limits be reached. While drift gillnet use is still permitted, mandating 100% observer coverage by the start of next fishing season would ensure that fishermen are abiding by regulation, and could provide greater insight into the impact of drift gillnet fishing.

The Magnuson-Stevens Fishing Conservation Management Act requires fishery managers to minimize bycatch as a primary conservation goal in fisheries management. By phasing out the use of drift gillnets, and reducing the amount of bycatch, the Council can continue to build upon the precedence of sustainable fishing practices. We ask for the Council's help in generating regional, and one day global, change toward environmental stewardship and conservation.

Sincerely,

Domenique Zuber
Development Manager

369 Pine Street, Suite 518 ▪ San Francisco, CA 94104

Ph: 415.399.8850 ▪ Fax: 415.399.8860 ▪ www.pacificenvironment.org

Oceanside Senior Anglers

February 26, 2015

Dorothy Lowman, Chair
Kit Dahl, HMS
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220

Subject: Drift Gillnet Management Plan

Oceanside Senior Anglers, Inc. is a 501 (c) (7) Fishing Club located in Oceanside, California. Our club is comprised of over 400 members who primarily fish the Eastern Pacific, from Alaska down to Cabo San Lucas.

Our club is writing this letter to let you know we collectively believe it is time to hold the commercial drift gillnet operations to a higher standard of accountability. The issue is not with the commercial fisherman, but the indiscriminate killing nature of the drift gill nets. We are also concerned that the PFMC may support opening up licenses for long lines off the coast of Southern California.

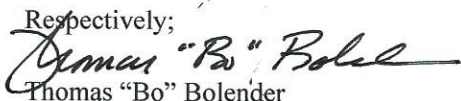
The numbers of fish and mammals killed by both drift gill nets and longlines is not really known. Proposed monitoring of each commercial license seems like a step in the right direction. The technology exists today to document what is actually being ensnared in the nets. Funding should exist to also have a physical presence on a portion of the commercial fleet. Every time our local San Diego news shows a whale ensnared in a net or wrapped in nylon rope, it reflects on the stewards of the ocean who are supposed to regulate and control the use of gillnets and long lines.

The latest numbers posted in Western Outdoor News (Feb 27, 2015) indicate 20 drift gill fishing boats netted over 800,000 lbs. of sword fish in the Sept 2014 to Jan 2015 season. I won't go into the details of the "By Catch" listed in the article but it seems to our members, if the "By Catch" was observed on a limited basis, what is the true total of whales, dolphins and sea lions and other non-target fish killed in the nets?

It's time for PFMC to take a stand. Fund the technology and physical inspection of the drift gill net operations along the west coast. Fund the science to come up with an alternative technology to capture sword fish and make sure the alternative method is not long lines. Many of our members can tell you how devastating long lines are off the coast of Baja Mexico. They are a menace to everything that swims and use of long lines off the coast of Southern California should not be allowed.

Our stance is clear. Protect and enhance the experience of ocean fishing. Through proper management ensure the natural resources are available for our children and grandchildren. We entrust professionals like you to represent the interest of the recreational fishing community. Please press for improved monitoring of the drift gill net fleet and do not allow long lines off the coast of SoCal.

Respectively;



Thomas "Bo" Bolender
Vice President and Conservation Director
Oceanside Senior Anglers

February 27, 2015

Dorothy Lowman, Chair

Kit Dahl, HMS

Pacific Fishery Management Council

7700 NE Ambassador Place, Suite 101

Portland, OR 97220

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MAR 2 2015

PFMC

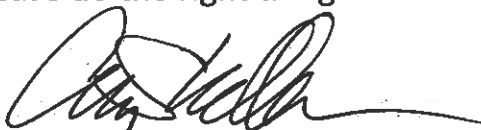
RE: Drift Gillnet Management Plan

Our fisheries are a hugely important resource and must be managed prudently for the benefit of all concerned, for now and into the future. You are the professional managers that we, as recreational fishermen, look to for enlightened guidance and thoughtful policies.

Drift gillnets, longlines and other antiquated/obsolete commercial fishing gear have no place in the world of prudent fisheries management. All of this unattended gear produces bycatch, which is 100% waste and therefore totally unacceptable.

As a 68 year old native Californian who has actively pursued salt water fishing for 64 of those years, I strongly and passionately request that you protect our fisheries by banning all longline and drift gillnet gear from our waters. We can't control what the "other guys" do to their resources, but we are responsible for protecting ours here at home.

Please do the right thing.

A handwritten signature in black ink, appearing to read "Craig S. Walker", with a long horizontal flourish extending to the right.

Craig S. Walker

RECEIVED

February 25, 2015

FEB 2 2015

Dorothy Lowman, Chair
Pacific Fishery Management Council
1100 NE Ambassador Place, #101
Portland, Oregon 97220

PFMC

Re: Agenda Item H.5: Drift Gillnet Management Plan including Hard Caps FPA

Dear Chair Lowman and Council Members:

As members of the sport angling community, we write in support of the Council's recent actions to clean up the drift gillnet fishery for swordfish in California and provide the following recommendations. Specifically, we believe the Council should hold the drift gillnet fleet accountable through use of hard caps and 100 percent monitoring while transitioning the fishery to actively tended and more selective gear types and deny any application to open a longline fishery.

The drift gillnet fishery catches several species marine life that are ultimately thrown overboard including recreationally important species like striped marlin. Drift gillnets are inherently nonselective and will have unintended interactions even with increased monitoring and management. Therefore, we encourage the Council to move away from drift gillnets and transition the fishery to more selective and actively tended gear types like harpoon and buoy gear.

We also write to express our concern with the Council considering the authorization of a longline fishery both outside and inside our Exclusive Economic Zone. Longlines are simply another indiscriminate form of fishing and are not the solution to the drift gillnet problem. Resources should not be focused on developing a new swordfish fishery that uses outdated and wasteful methods. Instead, the Council and NMFS should focus their resources on transitioning to more selective and actively tended fishing gears.

As long as the drift gillnet fishery exists, we ask the Council to hold the fleet accountable. We support the Council's implementation of hard caps on protected and vulnerable species and 100 percent monitoring to ensure those hard caps are adequately enforced. Because the catch of some species is a rare event, the Council will not have a clear picture of how many animals are caught in the drift gillnet fishery and cannot enforce hard caps on protected species until every fishing trip is observed. We support the use of electronic monitoring, but only if it is proven to be as effective as onboard observers. Until electronic monitoring is available, the Council should impose 100 percent observer coverage.

Thank you for your consideration of these comments. As resource users, we look forward to working together toward sustainable management of our fisheries.

Sincerely,



8034 Genesta Ave
Van Nuys, CA 91406



Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Fwd: Drift Gillnets

1 message

PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov>

Tue, Mar 3, 2015 at 7:43 AM

To: Chuck Tracy - NOAA Affiliate <chuck.tracy@noaa.gov>

Cc: Kit Dahl - NOAA Affiliate <kit.dahl@noaa.gov>

----- Forwarded message -----

From: **Melissa Galiati** <flyingfish512@gmail.com>

Date: Mon, Mar 2, 2015 at 11:13 PM

Subject: Drift Gillnets

To: pfmc.comments@noaa.gov

As a marine biologist and naturalist in Monterey, CA (and previously in San Diego, CA) I am a steward for the ocean and all its creatures. I am in support of finding alternative methods for fishing swordfish and stopping the dangerous use of drift gillnets. Let's put an end to bycatch and dirty fishing practices. Let's be a voice for the whales, dolphins, sea lions, turtles, and fish whose lives are at risk from drift gillnets and help save them all! Thank you to Geoff Shester for inspiring and educating us all on this matter!

Sincerely,

Melissa Galiati

Monterey Bay Whale Watch - biologist

Monterey Bay Aquarium - aviculture volunteer

American Cetacean Society Monterey Bay Chapter - program director

[619-855-0055](tel:619-855-0055)

—

Thank you for your comments to the Pacific Fishery Management Council. Your comments have been received and will be forwarded to the appropriate staff member for processing.

Pacific Fishery Management Council

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Portland, OR 97220

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March 2, 2015

Dorothy Lowman, Chair

Pacific Fishery Management Council

7700 NE Ambassador Place, Suite 101

Portland, OR 97220

William Stelle, Regional Administrator

NOAA Fisheries, West Coast Region

760 Sand Point Way NE

Seattle, WA 98115

RE: Comments on Council Agenda Item H.4 Drift Gillnet Management and Monitoring Plan
Including Final Action on Hard Caps

Dear Council Members,

Turtle Island Restoration Network urges the Pacific Fisheries Management Council to take measures to immediately eliminate the use of drift gill net gear in California. This gear has a nearly forty year track record of failure to reduce the catch and bycatch of threatened species and has proven to be a net drag on the U.S. economy. While hard caps may be of

use during the transition period, they are not an adequate substitute for protected areas and closures of an inalterably indiscriminate fishery.

Please also find attach our letter of support from Sylvia Earle and 215 other scientists from around the world calling for the end of the use of drift gill nets in California.

This drift gill net (DGN) fishery is among the top 20% of high bycatch fisheries in the world.¹² While the drift gill net fishery accounts for under 0.5% of the earnings of the California fishing industry, it is responsible for 87% of all killings of whales and dolphins on the west coast and Alaska. Fully 21% of the animals caught by this fishery from 2004-2013 are listed as threatened species by the International Union for the Conservation of Nature (IUCN). In addition, the DGN is disproportionately responsible for the catch of U.S. listed federal endangered species.

Regulatory efforts to eliminate or markedly reduce bycatch from this fishery have repeatedly failed or created new problems in the process of addressing new ones. Five years after legalization of the gear in 1982, California Department of Fish and Game adopted closures to protect pinnipeds, including a 12-mile exclusion along the coast. In 1986, additional closures were implemented to protect gray whales. In 1990, additional closures were required out of concerns regarding shark catch. (In 2001, Washington State closed its fishery outright out of concerns of overfishing of thresher sharks.) In 1997, nets were required to be lowered 36 feet to address further concerns. In 2001, the Pacific Leatherback Conservation Area was implemented because of excessive catch of sea turtles. Despite this series of attempts to make the fishery sustainable it remains stubbornly among the dirtiest fisheries in the world.

¹ Kelleher, K. (2005) Discards in the world's marine fisheries. An update. *FAO Fisheries Technical Paper. No. 470*. Rome, FAO. 2005. 131p, Table 6. See also Lewison, R., L. Crowder, B. Wallace, J. Moore, T. Cox, R. Zydelsis, S. McDonald, A. DiMatteo, D. Dunn, C. Kot, R. Bjorkland, S. Kelez, C. Soykan, K. Stewart, M. Sims, A. Boustany, A. Read, P. Haplin, W. Nichols, C. Safina. (2014) Global patterns of marine mammal seabird, and sea turtle bycatch reveal taxa-specific and cumulative megafauna hotspots. *PNAS* 111:5271-5276, doi:10.1073/pnas.1318960111.

² Observer data from 2013-14 indicates a discard ratio of 1811 discards to 1875 landings, for a discard ratio of 0.97, which would place it at number 13 globally if broken out as a distinct fishery compared to a league table of the world's highest bycatch fisheries in an 1994 report. See, Table 7b, FAO (1994) *A Global Assessment of Fisheries Bycatch and Discards*, Alverson, D.L.; Freeberg, M.H.; Pope, J.G.; Murawski, S.A., *FAO Fisheries Technical Paper. No. 339*. Rome, FAO. 1994. 233p.

Drift gill nets are banned on the high seas, by statute in Washington, by constitutional amendment in Florida, have been abandoned by Oregon, and Mexico is considering bans off Baja California. The Food and Agriculture Organization has characterized large-scale pelagic drift nets generally as an inherently “inadequate practice” and destructive.³ The impacts of this fishery have not resulted from inadequate incentives to fishermen to clean up their practices or from scientific gaps, but because there is no way to use a net the size of the Golden Gate bridge without massive and unacceptable environmental impacts.

In light of these facts, we also make the following recommendations to the Council:

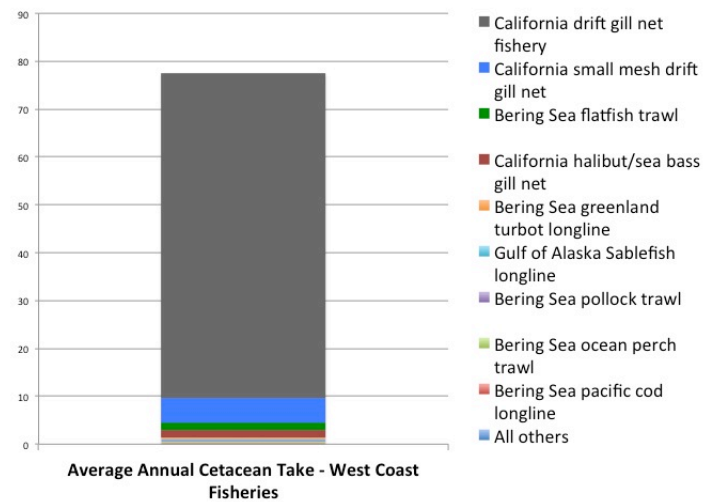
First, we urge the Council to take on goals that comport with both the principles of environmental sustainability and legal requirements. Therefore, we urge the Council to amend Goal 1 to read “Reduce marine mammal take to levels approaching zero, to reduce take of all other protected, threatened and declining species to zero, and to reduce take of all other species to sustainable levels.” Given the realities that many depleted species will become endangered without rigorous management, this goal should acknowledge that many species affected by the drift gill net fishery are depleted, listed as “vulnerable” by the IUCN, or are protected by international treaty, but not yet listed by NOAA Fisheries under the U.S. Endangered Species Act. Absent serious efforts, it will only be a matter of time before they are.

The draft goal 1 language does not comport with the statutory mandate of the Marine Mammal Protection Act, section 118 which states “it shall be the immediate goal that the incidental mortality or serious injury of marine mammals occurring in the course of commercial fishing operations be reduced to insignificant levels approaching a zero mortality and serious injury rate...”⁴ Clearly, this provision mandates that the goal of west coast fisheries, including this fishery, to reduce marine mammal take to “insignificant levels approaching zero.” Any goal not approaching zero facially conflicts with this Congressional mandate.

³ Food and Agriculture Organization, World inventory of fisheries. Destructive fishing practices. Issues Fact Sheets. Text by S.M. Garcia. In: *FAO Fisheries and Aquaculture Department* [online]. Rome. Updated 27 May 2005. [Cited 28 January 2015].

⁴ 16 U.S.C. § 1387

Given the exceptional difficulty of ensuring that take of all marine mammals by this indiscriminate fishery remains under 10% of PBR, this language virtually requires that the Council end the use of drift gill nets. For example, under population estimates from all but one recent study and a



growth rate taken from the scientific literature rather than a “default cetacean” rate, 10% of PBR of the sperm whale may be less than 0.1 individual per year, requiring that the take of a single whale to close the fishery for a decade. From the perspective of the west coast fishing industry as a whole, this one very small fishery (0.5% of fishing revenues in California) accounts for a disproportionately excessive level of marine mammal take from the fisheries under the PFMCC’s oversight. Today, the Council could reduce overall take of whales and dolphins from the fisheries it manages by a staggering 87% at a stroke simply by eliminating one gear type from one small fishery: the California drift gill net fishery. The current proposal instead fails to establish limits that would progressively reduce allowable take, and so does not “reduce[] [mortality] to insignificant levels approaching a zero mortality and serious injury rate....”

Second, we recommend that hard caps only be employed during the period of transitioning out the use of drift gill nets and not as an adequate substitute for eliminating their use. Hard caps absolutely require 100% observer coverage and are notoriously difficult to enforce, since hitting caps invariably provokes proposals to raise caps or delays in closures, which in turn necessitate expensive and slow legal action by the public while fisheries continue to harm protected species. Furthermore, accurate numerical caps rely on a detailed understanding of the demography and ecology of each of the species for which hard caps are crafted. Insofar as such estimates are subject to error because of the paucity of underlying data or errors in modeling assumptions, relying on caps runs a marked risk that caps may be inadvertently set too high to be compatible with recovery.

Third, given the highly degraded state of the world's oceans, we urge the Council to strengthen Goal 2 to reduce bycatch to levels that will not further deplete *any* species and put them in immediate danger of extinction. Since 2004, this fishery has caught and killed some 15 species of fish that are listed as threatened or vulnerable by the IUCN. Although the speed and territorial limitations of the U.S. administrative state have not kept pace with biological realities, performance measures must aim to prevent declines to the point that species become federally listed. Thus, performance objectives must go beyond data collection and trigger effective regulatory action adequate to meet this goal. While additional research may be beneficial, forty years of global experience with drift gill nets is unequivocal that the gear is too destructive to have a place in modern fisheries.

Fourth, we strongly and unequivocally oppose any expansion of fishing in the Pacific Leatherback Conservation Area (PLCA). Creation of the PLCA has been one of the few regulatory successes in the history of the DGN, and the Pacific leatherback cannot tolerate a return to the excessive levels of take associated with fishing in this critical area. The best scientific evidence shows clearly that leatherback populations are still declining and cannot support additional mortality. On current trends, the leatherback may be extinct by 2030, absent serious efforts to reverse current practices.⁵⁶⁷ Population analyses have demonstrated as early as the 1990s that increases in adult mortality beyond 1% of background levels cannot be sustained.⁸

In the decade prior to implementation of the PLCA, the drift gill net fishery killed some 112 Pacific leatherback turtles, and caught and released many more, but implementation of the PLCA reduced leatherback kills by the drift gill net fishery by over 90% (Table 1). Today, between 2004 and 2014, an average of 1.2 leatherbacks per year are caught and released in drift gillnets off of the California coast. There is absolutely no evidence or credible

⁵ Lewison, R., S.A. Freeman, L. Crowder (2004) Quantifying the effects of fisheries on threatened species: the impact of pelagic longlines on loggerhead and leatherback sea turtles. *Ecology Letters* 7: 221-231.

⁶ Tapilatu, R. F., P. H. Dutton, M. Tiwari, T. Wibbels, H. V. Ferdinandus, W. G. Iwanggin, and B. H. Nugroho. 2013. Long-term decline of the western Pacific leatherback, *Dermochelys coriacea*: a globally important sea turtle population. *Ecosphere* 4(2):25. <http://dx.doi.org/10.1890/ES12-00348.1>.

⁷ Spotila, J. R., R. D. Reina, A. C. Steyermark, P. T. Plotkin, and F. V. Paladino. 2000. Pacific leatherback turtles face extinction. *Nature* 405:529–530.

⁸ Spotila, J. R., A. E. Dunham, A. J. Leslie, A. C. Steyermark, P. T. Plotkin, and F. V. Paladino. 1996. Worldwide population decline of *Dermochelys coriacea*: Are leatherback turtles going extinct? *Chelonian Conservation and Biology* 2:209–222.

argument to be made that the nature of drift gill net gear has changed in any substantive way that would mean a return to the PLCA would cause anything other than a spike in leatherback turtle takes. Since the creation of the PLCA has been one of the few modest successes of management of this fishery, the PLCA must unequivocally remain closed to

Table 1. Turtle Bycatch in the California Driftnet Fishery before and since the creation of the Pacific Leatherback Conservation Area (PLCA). Data compiled from Shore 2013.

Species	Estimated Deaths Before PLCA 1990-2000 (15% Avg. Observer Coverage)	Estimated Deaths After PLCA 2001-2010 (20% Avg. Observer Coverage)
Leatherback Turtle	112	6
Loggerhead Turtle	25	3
Turtle Unidentified	15	*
Green Turtle	7	

drift gill net fishing.

By a similar token, there is similarly no reasoned justification for removing jurisdiction of this fishery from state authorities as this fishery is based solely within the state of California and management deeply implicates state interests to protect its wildlife and economy.

Fifth, the purpose and need statement is unnecessarily restrictive with respect to gear type and illegally constrains considerations of alternatives. By restricting the purpose to limiting bycatch *in the DGN fishery*, the Council forecloses limiting bycatch by the far more prudent and proven method of eliminating high bycatch DGN gear in favor of lower bycatch gear,

such as harpoons, or alternative experimental gear. Also, as noted, the DGN fishing community engages in a wide range of other fisheries, such as Dungeness crab, albacore troll, or seabass, demonstrating a wide range of alternative approaches to maintaining an economically viable community. The full range of alternative approaches must include less destructive approaches, and the purpose must be broader to focus on reducing bycatch in the *swordfish fishery*, rather than limiting consideration to a single gear.

Sixth, as discussed above, hard caps are difficult to implement and prone to error. However, should caps be used as a management tool, we urge the council to account for the error variance in any estimate by requiring the fishery be closed when the 95% confidence interval of the catch estimate overlaps with the cap. With any estimate based on partial coverage the actual bycatch by the fishery may be higher or lower than an estimate extrapolated from partial observer coverage. If fishing is allowed to continue until the estimate reaches the cap, there is approximately a 50% probability that the fishery will have actually exceeded the cap. By instead relying on the 95% confidence interval of the estimate, the Council would have a reasonable confidence that the cap has not in reality been exceeded.

Seventh, implementation of the caps must occur within a few weeks of the take in order to be effective at reducing the risk of bycatch. Given prior experience with implementing hard caps in other fisheries and the urgency of reducing bycatch, there is no principled reason for delay. As noted, closing the fishery actually takes a month and half to implement, almost a third of the effective fishing season, during which time bycatch will continue. Furthermore, maintaining a credible cap regime requires 100% observer coverage, which must begin no later than the 2016-17 season.

Eighth, hard caps, if any, must account from cumulative mortality and the likelihood of scientific error. To be biologically grounded, caps must include bycatch from all fisheries and experimental permits, since there is no scientific basis for not including all anthropogenic mortality from all cumulative sources. Efforts to exclude bycatch from EFP vessels will effectively increase the total take allowed by the PFM, placing the protected populations at greater risk. In addition, hard caps must be low enough to mitigate error in scientific estimates of population growth rates and PBR. For example, we note that the

proposed increase of sperm whale PBR from 1.5 to 2.7 in the 2014 SAR is based in part on a single scientific paper using an entirely new approach that the authors admit produce unstable estimates. In addition, the SAR uses a default cetacean population growth rate of 2%, despite longstanding evidence in the scientific literature that sperm whale populations grow at 1% a year, but no more than 1.5% per year.⁹ Thus, a more realistic PBR is actually under 1. As mentioned above, the science and regulations would require a hard cap of under approximate 0.1 per year, requiring closures of up to a decade until the annual average meets the cap. The logistical difficulties this poses for management points up that this fishery cannot be practically managed sustainably and should be simply closed. Since the consequences of this kind of overestimate can be catastrophic, we urge the Council to adopt caps that reflect the zero mortality rate goal of PBR. Furthermore, where a species is in decline (for example leatherback sea turtles or common thresher sharks, which the DGN fishery decimated in the 1980s and is barely recovering today), there is no positive growth rate at all to support a positive PBR, meaning any take is in excess of actual biological replacement. Although awkward, again this logical conclusion is purely driven by the fact that, in fact, this fishery is not sustainable and is targeting declining species.

Ninth, the drift gill net fishery is a net drain on the U.S. economy, because its inherent nature as a high bycatch fishery necessarily incurs substantial regulatory costs that outweigh the profits from the fishery. Under the simulations of the economic impacts to the fishery under all hard caps, the net profits under the absolutely most favorable scenario amounts to net profits of \$263,065. However, this amount is dwarfed by the \$775,000 budget for the NOAA's southwest observer program, let alone any increase to reach 100% observer coverage. In the analysis of observer costs, that the average profit for a DGN fishing set is currently approximately \$700, while the cost of the observer program alone is "slightly higher than \$700" indicating that the fishery is not profitable, absent a taxpayer subsidy to ensure regulatory compliance. This does not begin to include litigation costs, costs of biologists to develop analyses, grants and salaries of academic and independent scientists to evaluate the impacts of the fishery, the costs of regulators to develop policy alternatives, and other agency administrative costs. In effect, the U.S.

⁹ Whitehead, H.. 2002. Estimates of current global population and historical trajectories for sperm whales. *Marine Ecol. Prog. Series.* 242:295-304.

taxpayer would be far better off economically if we were simply to pay the drift gill net fleet to sit in port, even *before* consideration of the ecological impacts. Given that this fleet contributes so disproportionately to take of marine mammals and other threatened species, in maintaining the DGN fishery, the PFMC is asking the U.S. taxpayers to pay indirectly to have our endangered marine mammals, sea turtles, sharks, and other fish killed.

Tenth, we generally support the concept of performance metrics, but to be of value, they must adequately reflect biological impacts, must trigger regulatory corrections when they are not met, and must be technically defensible. Currently, the performance objectives, especially the preferred alternative, are lacking in several critical aspects. First, these metrics have no management consequences, which limits their utility in addressing harmful ecological impacts. Second, all species that are in approaching imminent danger of extinction must have performance metrics so as to prevent further depletion. The preferred alternative sets no standards whatsoever for finfish, many of which are listed as near threatened, vulnerable or endangered by the IUCN, while the common thresher shark and Bigeye thresher shark are protected under the Convention for the Conservation of Migratory Species. Performance standards must set higher standards for those species that have seen sharp declines and may be too depleted to fulfill key ecological functions (e.g., ecosystems may be particularly sensitive to depletion of apex predators such as sharks.¹⁰) Third, **Alternative 1** should be retained as an overall performance metrics, since alternative one more accurately reflects the impacts of excessive catch where discards released alive cannot be assumed to survive. In addition, the approach of alternative 3 to focus on total impacts to particular species in lieu of actual hard caps places a proper emphasis on the magnitude of impacts in ways obscured by ratios. Finally, the preferred alternative is neither grounded in a measure of the wastefulness of the fishery, nor in any assessment of actual biological impacts, but rather seems to codify past practices without particular incentive to improve.

Several improvements and lessons are to be found in the discussion of relative performance of the DGN fishery. First, as noted, the suite of imperiled species is broader

¹⁰ Myers RA, Baum JK, Shepherd TD, Powers SP, Peterson CH. 2007. Cascading effects of the loss of apex predatory sharks from a coastal ocean. *Science* 315,1846–1850.

than the limited set protected under U.S. law and full ecosystem impacts must be considered. Second, the key metrics of harvest and economic data are essentially missing for both the harpoon fishery and buoy gear (since economic data are admittedly anomalous.). Since these gears are critical alternatives, this analysis provides little clarity on this key point. Similarly, data from the California longline fishery is based on a single vessel and so lacks statistical validity. Still, it is instructive that the longline fisheries perform essentially as badly as the DGN and so do not represent a viable alternative gear.

Essentially, gear that has such disproportionately high environmental impacts for the return should simply not be used. To place the DGN fishery in the context of the industry as a whole, according to the report, the DGN fishery lands \$14,755 worth of fish for every whale or dolphin killed¹¹. If every fishery were as destructive as the DGN, the entire \$245 million California fishing industry would kill in excess of 16,600 cetaceans a year.

Conversely, if the DGN were to match the average performance of other California fisheries, the DGN fishery would kill one cetacean roughly every 38 years. Clearly, the DGN, and similarly longline gear, grossly underperform other methods of obtaining seafood.

Finally, we categorically oppose issuing Exempted Fishing Permit approvals to any gear that has been demonstrated to have exceptionally high bycatch. As noted in the HMSMT report, the experience from the Hawaiian longline fishery demonstrates that longlines are a similarly destructive and indiscriminate gear. Longlines merely replicate the issues that render drift gill nets unacceptable. As noted above, sea turtle interactions are but one of many management considerations and high bycatch gear must also address interactions with cetaceans, depleted shark species, birds and other fish species. Second, as stated above, we categorically oppose the testing of gear within the PLCA. This area has been demonstrated to have a high potential for turtle interactions, and the population of the Leatherback turtle is sufficiently depleted that it cannot be put at risk for the sake of an experiment. Only if a gear is demonstrated to effectively reduce bycatch of other species outside the area can it responsibly be deployed within the PLCA. Finally, it is imperative that any experimental gear bycatch be counted toward hard caps for the swordfish fishery.

¹¹ NOAA Observer data show an average of 67 cetaceans taken annually from 2004-2013.

Otherwise, such EFPs merely become a back door to increase the hard cap by dividing the fishery into smaller groups. Such an outcome is biologically unacceptable.

On the whole, the economic and ecological arguments for eliminating the use of drift gill net gear immediately or through a rapid transition plan are compelling. Forty years of efforts to clean up the DGN fishery have failed to produce an acceptable fishery, so it is time to transition to either alternative gear.

Most respectfully submitted,

A handwritten signature in blue ink, appearing to read 'D. Karpa', with a stylized flourish at the end.

Doug Karpa

Legal Program Director

Turtle Island Restoration Network

9255 Sir Francis Drake Blvd.

Olema, CA



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The Honorable Anthony Rendon
Chair of Assembly Committee on Water, Parks, and Wildlife
State Capitol, Room 2136
Sacramento, CA 95814

William Sydeman, Ph.D.
President
wsydeman@faralloninstitute.org

14 March 2014

Dear Chair Rendon:

We are writing to express our support of AB 2019 (Fong and Levine) which establishes a ban on the use of drift gillnets to catch swordfish and thresher sharks off California. Because non-target species are taken by drift gillnets, this fishing gear is destructive and must be eliminated.

The National Marine Fisheries Service has documented that 63% of all individual fish and other animals caught in these mile-long drift nets are discarded; this is, these animals are killed (drowned while caught in nets) and then thrown dead back into the ocean. Detailed long-term observations show that this indiscriminate killing includes over 100 individual marine mammals as well as thousands of sharks and other unwanted fish each year. Threatened and endangered species that die in drift gillnets include sea turtles, dolphins, sea lions, seals, and even large whales. Importantly, drift gillnets kill iconic game fish (e.g. marlin) that are not retained by the fishers, affecting recreational fisheries in the State. Iconic seabirds such as albatrosses are also killed. This high level of "bycatch" (i.e., catch of non-target fish and indiscriminate killing of iconic marine birds and mammals) has been shown to negatively impact these populations, and is in violation of numerous laws including the Endangered Species Act, Marine Mammal Protection Act, and Migratory Bird Treaty Act to name a few.

California has a solid history of eliminating destructive fishing gear. In the mid 1980s coastal set gillnets, similar to drift gillnets, but set (anchored) to the bottom, were banned after tens of thousands of murre (a seabird) and hundreds of coastal mammals such as harbor porpoise, were killed driving their populations down. After nearly 30 years, these populations have only partially recovered. Now, banning drift gillnets is the right thing to do.

AB 2019 allows for the continued catch of swordfish and thresher sharks for food with hand-held hook and lines and harpoons by currently-active fishers. Thus, this bill will not affect jobs, but rather only targets and eliminates the fishing gear that kills species that are not targeted by the fishery. Reducing the mortality of these key predators will serve to enhance the recovery of California's marine ecosystems and maintain them in as natural a state as possible for the benefits of society in perpetuity.

Sincerely,

William J. Sydeman, Ph.D.
President, Farallon Institute

cc: Assembly Committee on Water, Parks, and Wildlife
The Honorable Paul Fong
The Honorable Mark Stone
The Honorable Marc Levine
The Honorable Das Williams





Sent via Email

March 2, 2015

Dorothy Lowman, Chair Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

William Stelle, Regional Administrator
NOAA Fisheries, West Coast Region
760 Sand Point Way NE
Seattle, WA 98115
pfmc.comments@noaa.gov

RE: Agenda Item H.4: Drift Gillnet Management and Monitoring Plan

Dear Chair Lowman, Council Members, and Administrator Stelle,

Thank you for the opportunity to comment on behalf of the Center for Biological Diversity (“Center”) on Agenda Item H.4, the Drift Gillnet Management and Monitoring Plan. The Center’s primary concern is that the Pacific Fishery Management Council’s (“Council”) preferred proposed alternative unnecessarily and unlawfully delays measures to improve monitoring of the California drift gillnet fishery. The implementation deadline for better monitoring – such as 100% monitoring and removal of the unobservable vessel exemption – must be May 1, 2015, as required by the terms and conditions of the National Marine Fisheries Service’s (“NMFS”) biological opinion.

As background, NMFS reinitiated consultation on the continued management of the drift gillnet fishery as a result of the prohibited take of two endangered sperm whales in 2010. NMFS concluded that the revised level of incidental take would not likely result in jeopardy with the implementation of reasonable and prudent measures, which were to be implemented by terms and conditions. Monitoring the drift gillnet fishery was the first reasonable and prudent measure. To implement that measure, NMFS included six terms and conditions in the biological opinion. The last of these required that NMFS evaluate the “usefulness and feasibility” of additional actions to ensure adequate monitoring by December 31, 2014, and “initiate implementation” of those measures, in consultation with the Council as necessary, by May 1, 2015.¹

¹ National Marine Fisheries Service, Biological Opinion on the continued management of the drift gillnet fishery under the Fishery Management Plan for U.S. West Coast Fisheries for Highly Migratory Species at 129 (May 2, 2013). The biological opinion states at 128-29:

IF. NMFS will evaluate the usefulness and feasibility of implementing additional measures or actions, such as electronic monitoring of fishing effort or instituting alternative observer platforms, to ensure the DGN

Meeting the requirements of the biological opinion's terms and conditions is essential for the fishery to comply with the Endangered Species Act. NMFS's biological opinion must include an incidental take statement ("ITS") which specifies the impact of any incidental taking, provides reasonable and prudent measures necessary to minimize such impacts, and sets forth terms and conditions that must be followed. 16 U.S.C. § 1536(b)(4). Separately, section 7(o) establishes that if the terms and conditions of the ITS are followed, "any taking" that occurs pursuant to the action is not considered a "prohibited taking." 16 U.S.C. § 1536(o)(2). Consequently, the ITS acts as a liability shield for otherwise prohibited take. Without compliance with the terms and conditions (i.e. assessing and implementing improved monitoring measures by May 1, 2015), the Endangered Species Act prohibits the fishery's incidental take of endangered species.

The Council should confirm that NMFS is meeting its obligations to keep the California drift gillnet fishery in compliance with all terms and conditions of the biological opinion. In the past two months, the Center has informally asked several times for NMFS's assessment that the biological opinion required to be complete by December 31, 2014, but NMFS's responses have been vague and did not show compliance with the terms and conditions. Because the Council is considering a monitoring plan at the March 2015 meeting, such an assessment would greatly inform Council members and the public as to usefulness and feasibility of measures. We urge the Council to make public NMFS's assessment that complies with the biological opinion.

Thank you for consideration of these comments.

Sincerely,



Catherine W. Kilduff, M.S., J.D.
Staff Attorney
Center for Biological Diversity
ckilduff@biologicaldiversity.org

fishery is accurately monitored and compliant with the existing regulatory requirements implemented to minimize the incidental take of ESA-listed species identified in the proposed action. This assessment should focus on improved coverage of fishing effort that might otherwise be unobserved or unobservable under the current fishery observer program. This assessment shall be completed by December 31, 2014, in coordination with the PFMC, if necessary, and any additional NMFS guidance on implementation of electronic monitoring programs that may be issued by the NMFS Office of Policy prior to completion of this assessment. SFD will confer with PRD on the results of this assessment and shall initiate implementation of any useful and feasible measures identified by this assessment in consultation with the PFMC and any additional national NMFS guidance, as necessary, by May 1, 2015.

March 2, 2015

Dorothy Lowman, Chair
Pacific Fishery Management Council
1100 NE Ambassador Place, #101
Portland, Oregon 97220

RE: Agenda Item H.4 - Drift Gillnet Management Plan including Hard Caps FPA

Dear Chair Lowman and Council Members:

We write in regards to the future management of the drift gillnet (DGN) fishery. At its March meeting, the Pacific Fishery Management Council (Council) has the opportunity to begin transitioning the DGN fishery to a more sustainable West Coast swordfish fishery. To this end, we request the Council take the following actions:

1. craft a Purpose and Need Statement for the DGN Monitoring and Management Plan (Plan) with goals and objectives that include a transition away from DGN gear;
2. use authority under the Magnuson-Stevens Fishery Conservation and Management Act (MSA) to set hard caps at conservative levels; and
3. adopt a Final Preferred Alternative (FPA) that implements annual hard caps on high-priority protected species, establishes performance objectives on other bycatch species, and requires 100 percent observer coverage.

We support a healthy and sustainable swordfish fishery off the West Coast that can meet domestic consumer demand without the environmental damage caused by the DGN fishery. By taking the above actions, the Council can move toward that goal.

Craft a Purpose and Need Statement that includes a transition away from DGN gear

In crafting a Purpose and Need Statement for the DGN Monitoring and Management Plan and identifying goals and objectives, the Council should focus on transitioning away from DGN gear. At the November Council meeting there was a significant amount of discussion on the intent of the Council in regards to the future management of the DGN fishery. There are differing opinions among Council members on how to move forward, but discussion on the Council floor

clarified that the Plan could still include a transition away from DGN gear.¹ We support the Council's stated goal to reduce bycatch in the DGN fishery. However, given the indiscriminate nature of DGN gear, a transition to more selective and actively tended gear types is necessary to significantly reduce bycatch and bycatch mortality to truly achieve a sustainable West Coast swordfish fishery.

The public's support for such a transition is abundantly clear. Over the past year alone, thousands of people and dozens of organizations and businesses have contacted the Council urging a shift away from DGN gear. As stewards of a public resource, the Council should heed the call from the public and move toward a fishery that consumers can be proud to support because it more environmentally friendly. In crafting the Purpose and Need Statement for the Plan, the Council should include the objective of transitioning to alternative gears that are more selective and better meet the requirement of the Magnuson-Stevens Fishery Conservation and Management Act (MSA) to minimize bycatch to the extent practicable and minimize the mortality of the bycatch that cannot be avoided.

Use authority under the MSA to set hard caps at conservative levels

The Council has the discretion under the MSA to set hard caps lower than Incidental Take Statement (ITS) numbers or Potential Biological Removal (PBR) levels. Existing management under the Marine Mammal Protection Act (MMPA) and the Endangered Species Act (ESA) does not incorporate the Council's mandate to reduce bycatch in the fisheries it manages under the MSA. As recognized in the November Council motion, hard caps "are intended to avoid potential conflicts with the MMPA and the ESA, but are not intended as an attempt to manage the populations of these animals through the MSA."² Therefore, the Council does not need to reconcile hard caps with numbers used to manage marine mammal and endangered species populations.

Neither PBR nor ITS numbers take into account the Council's bycatch reduction goals. PBR is the level at which a species can no longer maintain its Optimum Sustainable Population (OSP).³

¹ [Council Meeting Deliberations, November 18, 2014](#) - Mr. Myer: "I was hoping we could transition the DGN fishery and I think that can be within a management plan to transition and with the language you have there that if the management plan decides or has options or ways to transition through there, I think I'm okay with this, I did not necessarily want to see the transition taken out of this – is it possible that it could still be wrapped up in a management plan?"

Mr. Crabbe: "the intent is to leave all options on the table"

² Motion by Culver/Lincoln, November 18, 2014.

³ OSP is defined, with respect to any population stock, as the number of animals which will result in the maximum productivity of the population or the species, keeping in mind the carrying capacity of the habitat and the health of the ecosystem of which they form a constituent element. 16 U.S.C. §1362(3)(9).

Under the MMPA, maintaining bycatch levels below PBR is not the ultimate goal; the goal is to reduce bycatch to 10% of PBR (the Zero Mortality Rate Goal). To date, the DGN fishery has not achieved this goal and the Take Reduction Team has not developed a plan to reach this goal as required by the MMPA. Similarly, jeopardy is the point at which an activity threatens the continued existence of a species. Species listed under the ESA are in danger of extinction and every effort should be made to avoid take. Congress recognized the existence value of these species in promulgating the ESA stating that “species of fish, wildlife, and plants are of esthetic, ecological, educational, historical, recreational, and scientific value to the Nation and its people.”⁴ Therefore, the Council has legitimate justification for acting under MSA authority to better meet its goals for bycatch reduction and protection of the marine ecosystem.

As recognized by NMFS, “[b]ycatch should be examined in the context of biological, ecological, economic, and social impacts to provide a comprehensive evaluation of its overall significance.”⁵ The MSA gives Councils discretionary authority to enact measures to “conserve target and non-target species and habitats, considering the variety of ecological factors affecting fishery populations.”⁶ In setting hard caps on protected species in the DGN fishery under MSA authority, the Council should take into account social and environmental concerns and reduce hard caps to conservative levels, allowing for a large buffer between ITS numbers and PBR levels.

Adopt a FPA including hard caps, performance objectives, and 100 percent observer coverage

Pew supports many elements of the Council’s Preliminary Preferred Alternative (PPA) including the implementation of hard caps on high-priority protected species and the establishment of performance objectives on other bycatch species. By adopting hard caps and performance objectives for the DGN fishery, the Council can limit the impact of the DGN fishery while transitioning to more environmentally sustainable gear types.

Although we support the intent behind the PPA, we request the following changes before the Council adopts its FPA. The Council should 1) base hard caps on takes instead of serious injury and mortality, 2) require 100 percent observer coverage, 3) reiterate that hard caps should be calculated on an annual basis, 4) base performance objectives on a reduction from average bycatch levels, 5) adopt performance objectives on finfish, and 6) identify the management response should the fishery exceed a performance objective. The rationale behind these recommendations is detailed below.

⁴ 16 U.S.C. §1531(a)(3).

⁵⁵ [National Bycatch Report First Edition Update](#), 2014, p.4.

⁶ 16 U.S.C. § 1853(b)(12).

First, to facilitate enforcement, hard caps should be based on takes, not serious injuries and mortalities. This is particularly important given the lack of information regarding post-release mortality. It also eliminates the need for the Science Review Group to determine in season whether an interaction resulted in mortality or rose to the level of a serious injury because every interaction will be counted toward a hard cap. Because the hard caps proposed in the PPA are based on anticipated takes,⁷ it follows that any take would count toward the hard cap.

Second, the Council should require 100 percent observer coverage starting in the 2015-2016 fishing season. Any level of observer coverage under 100 percent requires fishery managers to extrapolate observed interactions to account for assumed interactions that were not observed. This extrapolative method may not reflect actual take in the fishery and can result in an unintended management response. As acknowledged by the HMSMT:

*The feasibility of a hard cap management system depends on monitoring fishing in real time. Protected species takes in the DGN fishery are rare events, so reliably estimating takes with an acceptable level of accuracy and precision is difficult without a high level of monitoring.*⁸

By requiring all DGN trips be observed, the Council will have an exact accounting of all catch and bycatch in the fishery.

Third, the Council should reaffirm that hard caps are to be calculated on an annual basis. The ability of the fleet to reduce bycatch should be assessed annually and compared to the performance of alternative gear. This will allow the Council to hold members of the fleet accountable and encourage fishery participants to reduce bycatch and invest in alternative gears. In the November motion, the Council reiterated in their directions to the HMSMT that “annual hard cap numbers for the PPA are based on the Council’s objective to reduce bycatch.”⁹ Simply because PBR is determined on a 5 year average does not mean that caps must also be based on a 5-year plan. A 5-year cap is not responsive to bycatch events and will not allow bycatch estimation and reduction in real time. Annual caps allow managers to assess the fishery’s impacts from season to season and determine what action may be required.

Fourth, the Council should adopt performance objectives on finfish and include an overall discard rate target as indicated in the PPA.¹⁰ The DGN fishery discards 64% of the finfish it catches.¹¹ This is an unacceptable level of bycatch under any standard. As a first layer of

⁷ Wolford/Crabbe Motion, Sept. 2014 (basing hard caps on the ITS numbers).

⁸ [Agenda Item G.4.b, HMSMT Report 3, Sept. 2014](#), p.1.

⁹ Motion by Culver/Lincoln, Nov. 18, 2014 (*emphasis added*).

¹⁰ Motion by Wolford/Crabbe, Sept. 15, 2014 (establishing finfish performance objectives with blue shark = 143; common mola = 68; marlins = 28).

¹¹ [Agenda Item H.4.b, HMSMT Report, March 2015](#), Table 10, p.15.

protection, the Council should set performance objectives on species of fish known to be caught in high numbers in the DGN fishery including blue sharks and mola mola as well as rare and vulnerable species of fish such as megamouth sharks, hammerhead sharks, and marlins. The Council should further address finfish bycatch by establishing an overall discard rate. In setting an overall discard rate, the Council should include all discards, not only mortalities. Although some species are discarded alive, the Council's primary goal is to reduce bycatch in its fisheries, not only bycatch mortality. This is particularly important due to the limited information on post release mortality. Performance objectives on specific fish species and an overall discard rate will help address bycatch issues in the DGN fishery.

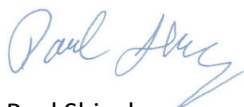
Fifth, the Council should base performance objectives on a reduction from average bycatch levels, not a 10-year maximum. If the Council's goal is to reduce bycatch in the DGN fishery from current levels, it makes little sense to base performance objectives on a maximum year of bycatch. Doing so could allow for higher bycatch levels in future years than have occurred recently and would not necessarily meet the Council's mandate to reduce bycatch in the fisheries it manages. By basing performance objectives on a reduction from average bycatch levels, the Council will better meet the goal of reducing bycatch in the DGN fishery.

Finally, the Council needs to identify a meaningful management response if the fishery exceeds a performance objective. This should include a structure and process for timely review of bycatch data and define levels at which particular management response would be warranted including closure of the fishery.

Conclusion

At the March meeting, the Council should consider what is gained by the ongoing operation of the DGN fishery. As long as DGN gear is used off our coast, there will be unacceptable levels of bycatch. To address this, the Council must develop a plan for transitioning the DGN fishery to more selective and environmentally sustainable gear types and move toward a fishery that the West Coast can be proud to support.

Sincerely,



Paul Shively
Manager, U.S. Oceans, Pacific
The Pew Charitable Trusts
pshively@pewtrusts.org



Tara Brock
Senior Associate, U.S. Oceans, Pacific
The Pew Charitable Trusts
tbrock@pewtrusts.org



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Portland, Oregon 97201
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March 2, 2015

Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 N.E. Ambassador Place, Suite 101
Portland, OR 97220-1384

RE: Agenda Item H.4 Drift Gillnet Management and Monitoring Plan Including Final Action on Hard Caps

Dear Chair Lowman,

The Pew Charitable Trusts has collected 19,925 comments encouraging the Council to set enforceable limits on the catch of vulnerable and endangered species while fishermen make the transition to less-wasteful fishing methods. Please include the attached petition as an electronic submission on the web site for the supplemental briefing book.

The petition itself is included along with the names and cities of individual signers that were gathered after Feb. 9.

Dear Chair Lowman and Council Members:

At your March meeting, the Council will make important decisions on how to manage the West Coast swordfish fishery. I encourage the council to move this fishery away from drift gillnets to more sustainable methods of fishing. In the meantime, the council should adopt enforceable limits on the catch of vulnerable and endangered species to protect the ocean ecosystem while fishermen make the transition to less-wasteful fishing methods. Vessels using drift gillnets are outlawed on the high seas and in the Mediterranean Sea and are no longer allowed to land their catch in Oregon and Washington.

Animals unintentionally caught in drift gillnets are an important part of the ocean ecosystem and are of great national significance. They provide aesthetic and recreational value and enhance the economies of coastal communities through whale watching tours, dive trips, and other tourism activities. It is simply not acceptable to indefinitely permit the killing of dolphins and other marine life by the drift gillnet fishery. The Council should protect these species by ensuring that fishing is conducted in the least harmful way.

At your upcoming meeting, I encourage you to set enforceable limits on the killing of nontarget marine life and increase monitoring of drift gillnets. However, I do not believe this is a long-term solution. Every year that is spent making incremental changes to the drift gillnet fishery will delay the necessary transition to cleaner and more sustainable fishing methods.

Thank you for your work to protect our marine ecosystem.

FIRST LAST	CITY	ST	COMMENT
SUZANNE A'BECKET	Cupertino	CA	
JUNE ABNER	San Diego	CA	
WILLY AENLLE	Altadena	CA	
EDWIN AIKEN	Sunnyvale	CA	
CHARLES ALEXANDER	Rialto	CA	
NATALIE ALEXANDER	Irvine	CA	
VINIT ALLEN	Hidden Valley Lake	CA	
DONNA ALLEYNE-CHIN	Montara	CA	
CHERIE ALTEVERS	Lincoln	CA	
DAVE ANDERSON	Berkeley	CA	
J ANGELL	Rescue	CA	
LAUREN APPLING	Penn Valley	CA	
ANTHONY ARN	West Hollywood	CA	
DEBRA ATLAS	REDDING	CA	
EMMA AUSMAN	Toluca Lake	CA	
MABEL AYOTTE	Santa ana	CA	
M B	San Clemente	CA	
JILL B.	San Francisco	CA	
N. B.	Oakland	CA	
CHRISTINA BABST	W Hollywood	CA	
LOIS BACON	Freedom	CA	
ANGIE BAHRIS	Santa Monica	CA	
PAUL BECHTEL	Redlands	CA	

FIRST LAST	CITY	ST	COMMENT
DIRK BEVING	Los Angeles	CA	
BLAZE BHENCE	Cypress	CA	
HELEN BIERLICH	Los Angeles	CA	
NICOLE D. BILOTTI	San Francisco	CA	
CAROL BLANEY	Redlands	CA	
DANIEL BLUM	Gilroy	CA	As a California native, a lifelong diver and boater this is an issue that is close to my heart. The unlimited killing of non target species in drift gillnets has got to STOP!
RONALD BOGIN	El Cerrito	CA	
DIANE BOLMAN	Novato	CA	
BRIAN BOORTZ	Los Gatos	CA	
ANNETTE BORK	Irvine	CA	
MARTY BOSTIC	Los Angeles	CA	Our oceans and the animals it holds are in deep trouble and much of that has to do with this confounded nets!
MARTY BOSTIC	Los Angeles	CA	Our oceans and the animals it holds are in deep trouble and much of that has to do with this confounded nets!
VIC BOSTOCK	Altadena	CA	
JEN BRADFORD	Spring Valley	CA	It's time to put an end to drift nets and millions of accidental murders

KEVIN BRANSTETTER	Applegate	CA	
BONNIE BRECKENRIDGE	San Diego	CA	We MUST stop wasting our natural resources! If we, the supposedly smartest species, do not use our smarts to see that we need to use natural resources wisely and in a sustainable manner, we will be in big trouble very soon.
JASON BROCK	Los Angeles	CA	
CT BROSS	Walnut Creek	CA	
VERA BROWN	Redwood City	CA	
JOE BUHOWSKY	San Ramon	CA	
DEBORAH BURCKHARDT	San Rafael	CA	
DEBORAH BURCKHARDT	San Rafael	CA	
LEANNE BURNS	Stockton	CA	
K BUSHNELL	palo alto	CA	
MARIA BUSTAMANTE	Albany	CA	
RONALD CALVISI	Toluca Lake	CA	
NORMA CAMPBELL	CAMPBELL	CA	Entirely too much damage to sea creatures by gillnets, must be regulated more strictly with higher penalties and possible jail time.
DUDLEY AND CANDACE CAMPBELL	Valley Glen	CA	

M. CANTER	Tiburon	CA	
MARK CAPPETTA	Rancho Mirage	CA	
NICOLE CAPUTO	arcata	CA	
JUNKO CARD	Exeter	CA	
JUNKO CARD	Exeter	CA	
GERALDINE CARD-DERR	Exeter	CA	
CAMILLE CARDINALE	Los Angeles	CA	
JERED CARGMAN	Banning	CA	
VICTOR CARMICHAEL	Pacifica	CA	
MARTHA CARRINGTON	Santa Cruz	CA	
ROBERT CASSINELLI	Sacramento	CA	
JAMIE CASTANEDA	Sierra Madre	CA	
WILLIAM CASTLE	Loomis	CA	
GAIL CASWELL	San Francisco	CA	
KIM CHAMBERLAIN	Fortuna	CA	
SUSAN CHAPMAN	Los Angeles	CA	
STACIE CHARLEBOIS	SEASTOPOL	CA	
FELICIA CHASE	Encino	CA	
ALLAN CHEN	Alameda	CA	
KATRINA CHILD	san francisco	CA	
ROBERT CHIRPIN	Northridge	CA	
MIKE CLIPKA	LATHROP	CA	
PORTLAND COATES	San Francisco	CA	
MITCH COHEN	Berkeley	CA	

BARBARA COHN	Carlsbad	CA	
RUTH COLE	Imperial Beach	CA	
JOE COLGAN	San Lorenzo	CA	
AMY COLLA	Los Angeles	CA	
EMERALD COLON	Chula Vista	CA	
JOHN CONTOS		CA	
CRAIG COOK	Santa Rosa	CA	
GEOFFREY COOK	Berkeley	CA	
MARGARET COPI	Oakland	CA	
ANNA COTTLE	Santa Clarita	CA	
CINDY CRAWFORD	Woodland Hills	CA	
KURT CRUGER	Long Beach	CA	
KERMIT CUFF	Mountain View	CA	
SHERRELL CUNEO	Los Angeles	CA	
REV D	Richmond	CA	
CAROLE DADURKA	San Clemente,	CA	The drift gill net fishery is a cruel waste of our precious ocean creatures. Please stop it.
NAMITA DALAL	los altos	CA	
RHEA DAMON	Calabasas	CA	Archaic gillnets are death traps to innocent ocean animals. Ban them!
SANDIP DASGUPTA	Pasadena	CA	
LYNNE DAVIES	San Francisco	CA	
CLARK DAVIS	Los Osos	CA	

CAROLYN DE MIRJIAN	Valley Glen	CA	
KELLY DEL VALLE	Woodland Hills	CA	Let's stop the damage and repair our marine environments for the next generations to come.
MARGARET DEMOTT	Sacramento	CA	
CATHE DIETRICH	Berkeley	CA	
LAURA DIVENERE	Los Angeles	CA	
NIKKI DOYLE	Oakland	CA	
SAMUEL DURKIN	Fairfield	CA	
JOHN ECKLUND	Newbury Park	CA	
JOHN EDMAN	Sunnyvale	CA	
CAROLE EHRHARDT	Pebble Beach	CA	We need to ban gill nets as there is too much by catch which dies and is lost to the sea.
STEVE EKLUND	Salinas	CA	
MARGUERITE ELIASSON	Ramona	CA	
NANCY ELLESTAD	el cajon	CA	
DOUGLAS ESTES	San Francisco	CA	
DOMINICK FALZONE	Los Angeles	CA	
ALICE J. FELIX	Walnut Creek	CA	Clean up the Calif. Drift Gillnet Fishery! It's time for more selective and safer gear! The vulnerable animals need to be protected from those drift gillnets!!!
DEBORAH FILIPELLI, PH.D.	The Sea Ranch	CA	

VERONIKA FIMBRES	San Francisco	CA	
MARK J. FIORE	San Francisco	CA	
MARGARET FISH	Boonville	CA	
TED FISHMAN	San Jose	CA	
TODD FISK	San Diego	CA	
REGINA FLORES	Lake Elsinore	CA	
DEBRA FLOYD	Coronado	CA	
KIM FORREST	Los Banos	CA	
HAL FORSEN	San Clemente	CA	As a life long waterman I find the continued use of drift gillnets an abomination.
ELIZABETH FOWLER	Richmond	CA	
FOREST FRASIEUR	Benicia	CA	
CARY FRAZEE	Eureka	CA	Our fisheries depend on good management practices & should not be killing whales etc in drift nets!
NANCY FREEDLAND	Big Bear City	CA	
ISABEL FREEMAN	Topanga	CA	
ROBERT BOBBY FROMER	Palmdale	CA	
KRISTINA FUKUDA-SCHMID	Culver City	CA	
SHERRILL FUTRELL	Davis	CA	How many more have to die before we put a stop to it?
ELEN G	Napa	CA	OUR oceans need protecting, NOT greedy corporations that would overfish the Oceans so NONE

			of us has anything to eat. Gillnets should be banned!
C G	SD	CA	
MAL GAFFNEY	Lompoc	CA	
TOM GALLAGHER	Burlingame	CA	
JEFFERY GARCIA	Mendocino	CA	
DEISHA GARCIA	San Jose	CA	
STEPHANIE GARCIA	hanford	CA	
JAMILA GARRECHT	Petaluma	CA	
GINA GATTO	Castro Valley	CA	
LISA GEE	La Crescenta	CA	
GEMMA GELUZ	Fairfield	CA	
MIJA GENTES	Saratoga	CA	
JOANN GERFEN	Santa Maria	CA	
DR DAVID GILBERTSON	Santa Barbara	CA	
CHRIS GILLIS	Oakland	CA	
PHILIP GLASER	Laguna Niguel	CA	Before irrr-reversible damage occurs to our coastal waters
DIANE GLIM	Pacific Grove	CA	Too many marine animals are inadvertently killed while targeting swordfish.
JANICE GLOE	Oakland	CA	
ROBERT GONDELL	Woodacre	CA	
ANTOINETTE GONZALES	Glendora	CA	
B GONZALES	Caruthers	CA	
DARA GORELICK	VAN NUYS	CA	

ERIC GOTTLIEB	Menlo Park, CA	CA	
DOUGLAS GOWER	San Francisco	CA	
BARBARA GRAHAM	san diego	CA	If we don't make an effort now, we won't leave much for future generations. That affects everyone equally. Here you go, grandchild. I left you a dead planet and empty seas. Some legacy, huh?
CARYN GRAVES	Berkeley	CA	
BERT GREENBEG	San Jose	CA	
BARBARA GREENWOOD	Walnut Creek	CA	
ERICA GRIFFIN	San Francisco	CA	
ERICA GRIFFIN	San Francisco	CA	
ABRAHAM H	La Puente	CA	
INNA HABELSKI	Castro Valley	CA	
SARAH HALL	Burbank	CA	We need to protect our wildlife more carefully now than ever before. Our own survival depends on theirs. We let species go extinct at our own peril. In protecting marine life from drift gillnets, we are protecting our own.
PAMELA HAMILTON	sacramento	CA	
MARCELLA HAMMOND	Spring Valley	CA	
HEATHER HANLY	Oakland	CA	

BARBARA HARDWICK	Redondo Beach	CA	
BARBARA HARPE	Lomita	CA	
REBECCA HARPER	Los Angeles	CA	
JOHN HARRIS	Bay Point	CA	
JOE HARVEY	Arnold	CA	
GERALD HASLAM	Penngrove	CA	
SUSAN HATHAWAY	Pico Rivera	CA	
CHRISTINE HAYES	Upland	CA	
TIM HAYES	San Diego	CA	
YURIKO HAZLETT	Oxnard	CA	Drift gill nets kill indiscriminately. They should be banned.
KRIS HEAD	Garden Grove	CA	
NANCY HECK	Santa Maria	CA	
MARK HEIN	Topanga	CA	
BRIDGETT HEINLY	San Diego	CA	
DAKOTA HENNESSEY	Los Angeles	CA	
BILL HERMAN	Oceanside	CA	
ROBERT HICKS	Long Beach	CA	
CHARLES HOCHBERG	Philo	CA	
CHRISTY HOGAN	San francisco	CA	
CATHY HOLDEN	Sacramento	CA	
MR. SIDNEY J.P. HOLLISTER	San Francisco	CA	
CLARE HOOSON	Belmont	CA	
SUZANNE HORSBURG H	Laverne	CA	

JAMES HUBBARD	Los Angeles	CA	
NATALIE HUBBARD	Folsom	CA	
KATHRYN HUGHES	SN16 OJH	CA	
SIAVASH HUMAN	Santa Monica	CA	
JOAN HUNNICUTT	Citrus Heights	CA	Gillnets are nothing but a wasteful process in re fishing.
PAUL HUNRICHS	Santee	CA	
JANINE HURD-GLENN	La Mesa	CA	
MIRIAM L IOSUPOVICI	IMPERIAL BEACH	CA	With increasing awareness of the fragility of the oceans, action is necessary now. Have courage.
LAEL JACKSON	Oceanside	CA	
MARSHA JARVIS	Pinole	CA	
MARILYN JASPER	Loomis	CA	
ANITA JENNINGS	Cloverdale	CA	gill nets are a disaster for our fisheries. Indiscriminate killing machines. should have been controlled long ago. No leeway. Get rid of them.
VIRGINIA JENSEN	Los Osos	CA	A young humpback whale washed ashore On the beach of Montana de Oro California State Park. There were visible signs of its tail being caught is a line of some kind. The tragedy stays with me.
DARYNNE JESSLER	Valley Village	CA	

JOYCE JOHNSON	Burbank	CA	
SYLVIA JONES	Los Angeles	CA	We cannot afford to treat the ocean recklessly or sea life irresponsibly any more.
JAN KAMPA	Soquel	CA	
ANDREA KAUFMAN	Guerneville	CA	
NANCY KELLY	Oakland	CA	
JANET KENNINGTON	Los Angeles	CA	
CHARLENE KERCHEVALL	Oceanside	CA	How Long Has This Horrific Demise Been Going On For This Epidemic To Finally Warrant Our Attention ??? Sea Lions, Sea Otters and Seals Are DYING Because Of Lack Of Food ... Drift Gillnets Must Be Removed ... Please Acknowledge Sustainability Of All Species Are Mandatory For A Thriving Ecosystem For All....
AMRIT KHALSA	Redondo beach	CA	
DR. MHA ATMA S. KHALSA	Los Angeles	CA	
THOMAS KIECKHEFER	Watsonville	CA	
NEAL KING	Oakland	CA	
JAMES KIRKS	Chico	CA	
SARAN KIRSCHBAUM	Los Angeles	CA	Way over due!!!
JOSEPH KLEIN	Benicia	CA	
DIANA KLICHE	long beach	CA	

KARL KOESSEL	Blue Lake	CA	
REBECCA KOO	San Jose	CA	
JOSHUA KRASNOFF	Oak View	CA	
K KRUPINSKI	Los Angeles	CA	
DAN KUKLO	Berkeley	CA	
SUSAN KURCZ-EASOM	Pittsburg	CA	
CELIA KUTCHER	Capistrano Beach	CA	
SHERI KUTICKA	Concord	CA	
SHARON LACY	Sebastopol	CA	
CORINNE LAMBDEN	Alameda	CA	
JULIET LAMONT	Berkeley	CA	
MARYANN LANEW	San Clemente	CA	
CATHERINE LANZL	Encinitas	CA	
LARRY LAPUYADE	San Anselmo	CA	
WILLIAM LAWSON	calimesa	CA	
DALE LE FEVRE	Fort Bragg	CA	
SANDY LEVINE	Pasadena	CA	
O LEWIS	Los Angeles	CA	
PATRICK LEWIS	Emeryville	CA	
OLIVIA LIM	Davis	CA	
STEPHANIE LINAM	Benicia	CA	
KJ LINAREZ	Carmichael	CA	
JUDITH LITTLE	Arcata	CA	
ELAINE LIVESEY-FASSEL	Los Angeles	CA	This is an important issue and I

			wholeheartedly support limits of these wretched killers/gill nets.
PEGGY LOE	Magalia	CA	
CAROL LONG	Santa Cruz	CA	
NICOLE LOPEZ-HAGAN	Pacifica	CA	
CATHERINE LOUDIS	San Anselmo	CA	
JACKLYN LOUGHBOM	manhattan beach	CA	Please do the right thing...so much depends on your right choice.
LORRAINE LOWRY	Sacramento	CA	
ERIN LYNCH	Los Angeles	CA	
W LYNCH	Los Angeles	CA	Please stop destroying sea life with gillnets.
TERE LYNDON	Oakland	CA	
RHONDA LYNN	Sacramento	CA	It's time to stop acting like humans are the only species on Earth that matters. Changes MUST be made to put an end to the senseless deaths of so many animals in our seas.
ELIZABETH M DAROVIC	montrey	CA	
SUSANNE MADDEN	Playa del Rey	CA	
JANET MAKER	Los Angeles	CA	
GLORIA LINDA MALDONADO	Redwood City	CA	
KAREN MALLEY	Anaheim	CA	
MARSHA MALONE	Chino	CA	

LORRETTA MARCEL	San Francisco	CA	
MARTIN MARCUS	San Diego	CA	
VIRGINIA MARIPOSA	Santa Barbara	CA	
GENNEVA MASCHLER	Oak View	CA	
SHIRLEY MASSENZO	Lakewood	CA	
TIM MAURER	Anaheim	CA	
CASEE MAXFIELD	Los Angeles	CA	
PERSEPHON E MAYWALD	Orinda	CA	
HOLLY MCDUFFIE	Los Angeles	CA	
JANET MCLAUGHLIN	Rancho Santa Fe	CA	
ROHANA MCLAUGHLIN	San Anselmo	CA	
MICHAEL MCMAHAN	Huntington Beach	CA	
O MEDZIHRADSKY	S. Lake Tahoe	CA	
KEN MEERSAND	Shell Beach	CA	
APRYL MEFFORD-HEMAUER	Santa Monica	CA	
ROSE MARIE MENARD	Orange	CA	
RICHARD MERCER	San Rafael	CA	A former commercial fisherman - no more large drift gill nets
DEBORA MICHEL	Laguna Hills	CA	
A MILLER	Santa Monica	CA	
BOB MILLER	Santa Rosa	CA	

STEVEN MILLER	Lakeside	CA	
DIANNE MILLER	San Diego	CA	
LEE MILLER	Stockton	CA	
ROSALIND MILLIKEN	Indio	CA	
KENT MINAULT	Sherman Oaks	CA	
DESIREE MITCHELL	San Francisco	CA	
ANTHONY MONTAPERT	Ventura	CA	
RAY MORRIS	Bakersfield	CA	
MARK MULDER	San Jose	CA	
KRIS MULLER	Berkeley	CA	
ROB MYERS	Anaheim	CA	
ROBERTA E. NEWMAN	Mill Valley	CA	
CRYS NGUYEN	Albany	CA	
GINNY NICHOLS	Los Gatos	CA	
RANDI NIELSEN	Richmond	CA	
CHRISTINA NILLO	W Hollywood	CA	
KATHERINE NOLAN	Cupertino	CA	
JAMES NOORDYK	San Diego	CA	
MARIA NOWICKI	San Francisco	CA	
KEVIN O'BRIEN	Laguna Beach	CA	
CATHLEEN O'CONNELL	Boulder Creek	CA	
ELIZABETH OLIVER	San Diego	CA	
POLLY O'MALLEY	Los Angeles	CA	

FRANCES ONESTI	Lawndale	CA	
GERALD ORCHOLSKI	Pasadena	CA	It is imperative to get rid of drift gillnets for the benefit of the ocean ecosystem.
KAREN ORNELAS	San Pedro	CA	Please stop these walls of death now and forever!!!
STEPHEN ORSARY	Corte Madera	CA	
LIONEL ORTIZ	Bayside	CA	
JULIE OSTOICH	Sacramento	CA	
E P	talmage	CA	
GRACE PADELFORD	Los Angeles	CA	
FRANCIS PALMER	Saramento	CA	
NOEL PARK	Rancho Palos Verdes	CA	
LAURA PARKS	Bonny Doon	CA	www.respectbumpersticker.com
MICHELE PASCOE	Rocklin	CA	it's past time to take this issue on. The destruction is no longer tolerable, we are systematically destroying our precious oceans, and all of its life, so essential to our lives too.
JOHN PASQUA	Escondido	CA	BAN ALL GILLNET FISHERY NOW.
ART PATEY	Vallejo	CA	
CAROL PATTON	Kensington	CA	Gill nets destroy - reduce waste from drift gillnets.
JAMES PATTON	Los Altos	CA	
SUZANNE PEÑA	Fullerton	CA	
JULIET PEARSON	Grass Valley	CA	

DAN PERDIOS	Palm Springs	CA	
CAROLYN PETTIS	Santa Clarita	CA	
JIM PHILLIPS	Sonoma	CA	Enforce the laws banning drift gillnets.
REGINA PHILLIPS	Winnetka	CA	
ALICE POLESKY	San Francisco	CA	
JEANNIE POLLAK	Oxnard	CA	
JERI POLLOCK	Altadena	CA	
JACKIE POMIES	San Francisco	CA	
SUSAN POWERS	San Francisco	CA	
KAMAL PRASAD	Santa Rosa	CA	
ALLAN PRIVAL	Santa Monica	CA	
RICHARD PUAOI	Novato	CA	
STEVE PURVIS	Santa Monica	CA	
I R	San Francisco	CA	
I R	San Francisco	CA	
ANNETTE RAIBLE	Petaluma	CA	
PAUL RAMOS	Santa Ynez	CA	
RUDY RAMP	Arcata	CA	
CYNTHIA RATLIFF	Santa Cruz	CA	This is an important matter that has far reaching effects. Please act swiftly to ban drift gill nets.
KAREN RATZLAFF	Santa Rosa	CA	
JOSEPH RAZO	Camarillo	CA	
PATRICIA RE	Penngrove	CA	

MARK REBACK	Los Angeles	CA	
ROBERT REED	Lake Elsinore	CA	
ROBIN REINHART	San Diego	CA	Don't waste another moment!
ANN RENNACKER	Fort Bragg	CA	No more indiscriminate bycatch with gillnets.
KRISTEN RENTON	Valencia	CA	
SANDRA REYNOLDS	Windsor	CA	
MICHAEL C. FORD AND RICHARD B. MARKS	Watsonville	CA	
LYNETTE RIDDER	Concord	CA	
LINDA RIEBEL	Lafayette	CA	
DALE RIEHART	San Francisco	CA	
MICHAEL RIFKIND	Santa Cruz	CA	I won't be purchasing ANY fish until such time as fisheries are managed with respect for the lives and sustainability of the water-environment and all of its residents.
BARBARA ROBBIN	Studio City	CA	
LES ROBERTS	fresno	CA	
GAIL ROBERTS	Tecate	CA	
RICHARD ROBINSON	Fresno	CA	
PRISCILLA ROCCO	Costa Mesa	CA	
CANDACE ROCHA	Los Angeles	CA	
SHARON RODRIGUES	Fremont	CA	

KATHLEEN ROGERS	Paramount	CA	
PATRICIA ROGERS	Concord	CA	
MARY ROJESKI	Santa Monica	CA	THIS KILLS TOO MANY CREATURES PLEASE BE HUMANE AND STOP THIS!!!
DIANE ROONEY	El Cerrito	CA	
BARBARA ROOT	Merced	CA	
JESSIE ROOT	Oceanside	CA	
GREG ROSAS	Castro Valley	CA	
GLENN ROSS	Eureka	CA	I am too angry to comment.
SYLVIA RUIZ	Los Angeles	CA	
KATHERINE RYKOWSKI	Desert Hot Springs	CA	
C S	sdiego	CA	
NINA SAGHEB	San Diego	CA	
DON SAITO	SAN JOSE	CA	Unnecessarily killing the diversity of life in our oceans is suicide for our own species. Stop doing it!
RALPH SANCHEZ	Capitola	CA	
D SANTONE	Pleasant Hill	CA	
JULIE SASAOKA	Concord	CA	
LINDA SAVAGELIN DASAVAGE	San leandro	CA	
DONATELLA SCABINI	El Cerrito	CA	
JEANNE SCHUSTER	West Covina	CA	
DENA SCHWIMMER	Los Angeles	CA	

DEANNA SEAGRAVES	Corralitos	CA	
CHRIS SEATON	Santa Barbara	CA	
FRANK SEEWESTER	Fairfield	CA	
ELLEN SEGAL	Palm Springs	CA	
CHRISTINE SEPULVEDA	Anaheim	CA	
BETH SHAFER	Huntington Beach	CA	
GERALD SHAIA	Sun Valley	CA	
SUSAN SHAPIRA	San Rafael	CA	
GABRIEL SHEETS	Merced	CA	
WAYNE SHERIDAN	San Francisco	CA	
MARGUERITE SHUSTER	Sierra Madre	CA	
SHEILA SILAN	Somerset	CA	
ULY SILKEY	Oakland	CA	No human should have the right to pain animals
MARC SILVERMAN	Los Angeles	CA	
WILLARD SIMMS	Woodland Hills	CA	Drift gillnets are barbaric and don't belong in the 21st century.
SCOTT SINCLAIR	San Rafael	CA	
JULIE SLATER-GIGLIOLI	West Hollywood	CA	
JUDY SMARIO-JOHNSON	Hayward	CA	Please think of all the animals you could save and smile and feel good because you were a part of history because you protected instead of killed marine life!

CHRISTOPHER SMITH	San Diego	CA	
JULIE SMITH	Los Osos	CA	
BRET SMITH	Santa Cruz	CA	
EDWINA SMITH	San Francisco	CA	
MIKE SOUZA	San Diego	CA	
DONITA SPARKS	Los Angeles	CA	Clean up our oceans now!
SHIRLEY SPENCER	Petaluma	CA	
GAYLE SPENCER	Menlo Park	CA	Stop these wasteful deaths.
KAREN SPIEGEL	Burbank	CA	
LESLIE SPOON	Los Osos	CA	
JERE SPRINGER	Glendora	CA	
DAWN STANDLEY	Santa Maria	CA	
CARRIE STATON	Santa Cruz	CA	
JOHN STEPONAITIS	San Francisco	CA	
CHRISTINE STEWART	Escondido	CA	
RON STOCK	Paso Robles	CA	
PETER STONE	Rancho Santa Fe	CA	
MIKA STONEHAWK	Tustin	CA	
TIFFANY STORY	Summerland	CA	
MARISA STRANGE	Long Beach	CA	
GERALD STRATMAN	Glen Ellen	CA	
ANTHONY STRATTON	Elk Grove	CA	
JEWELS STRATTON	san francisco	CA	Please protect ocean life.
MARJORIE STREETER	Alameda	CA	

SANDY STUHAAN	Ridgecrest	CA	
STEVE SUGARMAN	Malibu	CA	
EDWARD SULLIVAN	San Francisco	CA	
MICHAEL SULLIVAN	San Diego	CA	
AMBER COVERDALE SUMRALL	Soquel	CA	
KENNETH TABACHNICK	West Hills	CA	
BARBARA TACKER	Camarillo	CA	
J. HOLLEY TAYLOR	Penn Valley	CA	
TANNY TAYLOR	santa barbara	CA	
ELEANOR THOMAS	Livermore	CA	
BONNIE THOMPSON	Los Osos	CA	
LAWRENCE THOMPSON	Livermore	CA	
MIRANDA TODD	redondo beach	CA	
PELA TOMASELLO	Santa Cruz	CA	
MICHAEL TOMCZYSZYN	San Francisco	CA	
ANDY TOMSKY	san marcos	CA	
MICHAEL TOOBERT	Grass Valley	CA	
TATIANA TORRES	Los Angeles	CA	
JENNIFER TOTH	Santa Clarita	CA	
MARY TULLOCK	Rohnert Park	CA	
JOY TURLO	Redondo Beach	CA	

SAMUEL TWOBears	Windsor	CA	Please ban drift gillnets off the coast of California as they injure and kill too many unintended species of marine life.
ERIKA VADOPALAS	Moss Beach	CA	
ROBIN VANTASSELL	San Rafael	CA	
SHERRY VATTER	Los Angeles	CA	
AYESHA VAVREK	Berkeley	CA	
ANNE VERALDI	San Francisco	CA	
ENRICO VERGA	seal beach	CA	
PAUL VESPER	Berkeley	CA	
BARBARA VIKEN	San Francisco	CA	
JOE AND MARY VOLPE	Ventura	CA	
KAY VON TRESS	Menlo Park	CA	
DEBORAH WALDEN	Diamond Bar	CA	
VICTORIA WALLACE	Dulzura	CA	
VIOLET WALLACH	Santa Monica	CA	
LEW WARDEN	Big Bear City	CA	There must be a better way to fish without sweeping up all life forms in a net. I am willing to pay more for my fish meals to pay your increased costs. Lets do it right, not on the cheap.
DEE WARENYCIA	Roseville	CA	

JASON WARSHAWSKY	SAN JOSE	CA	
MICHAEL WATSON	Sonoma	CA	
FRAN WATSON	Spring Valley	CA	
JOAN WEINER	San Anselmo	CA	
NONA WEINER	San Jose	CA	
GARY WEINSTEIN	North Hollywood	CA	
RUSSELL WEISZ	Santa Cruz	CA	
SCOTT WELDON	Encinitas	CA	Drift Gillnets kill indiscriminantly and need to be outlawed. Swardfishing should be selective. Thank you.
LINDA WHETSTINE	Poway	CA	
CHUCK WIELAND	San Ramon	CA	
VICTORIA WIERIG	San Diego	CA	
WANDIS WILCOX	aptos	CA	
CAROL WILD	Oakland	CA	
ROB WILKERSON	San Diego	CA	
DANIEL WILKINSON	Long Beach	CA	
JENNIFER WILL	Morgan Hill	CA	
ANGIE WILLIAMS	Wishon	CA	
ANGIE WILLIAMS	Wishon	CA	
JOSH WILLIS	San Diego	CA	
PATRICIA WILSON	Spreckels	CA	
ARLENE WILTBERGER	San Carlos	CA	

KEN WINDRUM	Los Angeles	CA	
BETTY WINHOLTZ	morro bay	CA	
JOIE WINNICK	Sherman Oaks	CA	
WENDY WITTL	Santa Barbara Ca	CA	
MARC WOERSCHING	Valley Village	CA	
LEORA WORTHINGTON	Salinas	CA	
MADELINE WRIGHT	Los Angeles	CA	
SHEILA WYSE	Sherman Oaks	CA	
SHIRLEY YUEN	san francisco	CA	
KATIE ZUKOSKI	Chico	CA	
BLAINE ACKLEY	Hillsboro	OR	
HARRIET ADAMS	Eugene	OR	
HECTOR R. AMARO	Salem	OR	
BARBARA ARLEN	Corvallis	OR	
SUSANNA ASKINS	Portland	OR	
BRUCE BAUER	Medford	OR	
WILLIAM BODDEN	Redmond	OR	
PATTY BONNEY	Portland	OR	
CASSANDRA BROWNING	Salem	OR	
KATHLEEN CASSON	Portland	OR	
MARCI CLARK	Long Creek	OR	
MARY CODY	Ashland	OR	
BRAYDEN CRISWELL	Lincoln City	OR	

R S D	Dexter	OR	
OCEANAH D'AMORE	Talent	OR	
D. DELOFF	ALoha	OR	
HARRIS DUBIN	eugene	OR	
BEN EARLE	Portland	OR	
PAULA EPPLER	Milwaukie	OR	
RANDALL ESPERAS	Bend	OR	
MELANIE FEDER	Philomath	OR	
CHERYL FISHER	Milwaukie	OR	
LAURA FLEMING	Eagle Point	OR	
MATT FREEDMAN	Eugene	OR	
GARY GILARDI	Hood River	OR	
MONICA GILMAN	estacada	OR	
MICHAEL GOTMER	Eugene	OR	
VALERIE GUINAN	Bend	OR	
DODY H	Jacksonville	OR	
SARAH HAFFER	Portland	OR	

CLAUDIA HALL	Beaverton	OR	<p>The greatness of a nation & its moral progress can be judged by the way its animals are treated. Mahatma Gandhi our world was beautiful, animals thrived, the air was clear, the water clean. Then, man discovered the continent. Since that time, we have placed our environment in jeopardy. We have fouled the air & dirtied the waters. We have caused the extinction of species, in the air, on the land, & in the sea! People who refer to inhumane treatment of people or animals as they act like animals. Is a lie! If people acted like animals, animal cruelty would not exist! Porpoise, & other sea life (life!!!) Trapped by gillnets is cruelty & murder. Do not allow the greed of a few, to cost the lives of many, any longer!!! It is, finally, time for all ocean life to be recognized as special beautiful beings, worthy of our respect, & seen as valued lives!!! Science</p>
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			has proved mammals as porpoise, dolphins & whales (all oxygen breathers), have feelings for each other & mourn their injured & dead! Now is the time for acting! Now is the time to use your administration & halt gillnets! You are the ministry of fisheries & coastal affairs! It is your job, your responsibility, your honor to protect threatened & endangered life, all sea life!! You have the opportunity to save many innocent lives from gillnets. The ocean lives are swimming in their yard, their ocean! We humans are the intruders! Envision our ocean lives; swim, play, love, & breathe safely, in their habitat, their yard, their ocean! Now turn that vision to reality! Thank you, for reading my plea.
HELEN HAYS	Oregon City	OR	
BRUCE HELLEMN	Portland	OR	
DAVID HERMANN	Portland	OR	

JAY HUMPHREY	Estacada	OR	
D. WIESE JONES	Portland	OR	Please stop this cruel practice.
SANDRA JOOS	Portland	OR	
MARGARET KEENE	White City	OR	
DIANA Keku	Lincoln City	OR	
CHRISTINE KLEIMAN	Ashland	OR	
BASEY KLOPP	Bend	OR	
ROGER KOFLER	Portland	OR	In today's over stressed oceans, er can not afford waste, but that is exactly what happens when drift gillnets are used.
WILLIAM LEE KOHLER	Eugene	OR	This should never happen to the innocents not intended as the catch!
VIRGINIA LANDGREEN	Eugene	OR	
TAMMIE LAWSON	Colton	OR	Get rid of those stupid gull nets all they do is kill
SHARON LEDBETTER	klamath falls	OR	We really need to care for the ocean animals we have left, and this is just one way we can do this.
DIANE LUCK	Portland	OR	Drift nets should not be used as they destroy marine life.
HEATHER MARSH	Lake Oswego	OR	
ERIN MARSHALL	Portland	OR	Gill Netting is INEXCUSABLE anymore EVER!
SETSUKE MARUKI-FOX	Grants Pass	OR	

MICHELE MCFERRAN	Lake Oswego	OR	
H MILLARD	Salem	OR	
IRENE MILLS	Portland	OR	Gillnets are an abomination.
PATRICIA MISNER	cannon beach	OR	
DANIEL MORROW	Ashland	OR	
CHRISTIE NELSON	Grants pass	OR	
STEPHEN ODER	Corvallis	OR	
MARTHA PEREZ	Portland	OR	
DEE POTTER	Bend	OR	It may be time to ban the drift gillnets!
CHERIE REEVES-RUTLEDGE	CENTRAL POINT	OR	
BERKLEE ROBINS	Lake Oswego	OR	
ERIC ROSS	Sweet Home	OR	
JULIA RUSSELL	Portland	OR	
ROBERT AND DOLORES SCHEELEN	Medford	OR	
LINDA SCHWARTZ	Cannon Beach	OR	
STEVE SHEEHY	Klamath Falls	OR	
AUDREY SHEPARD	Springfield	OR	
MARY LOU SOSCIA	Portland	OR	I have the tragedy of gill net by catch. Lots of animals die for absolutely no reason.
WADE STODDARD	Portland	OR	
LINDA K SWIFT	Keno	OR	

JOHN TANGNEY	Happy Valley	OR	
DAVID TAYLOR	Corvallis	OR	
APRIL THEOD	Milwaukie	OR	
LAUREN THOMPSON	Oregon City	OR	
A. TODD	Eugene	OR	
JAMES TYREE II	Portland	OR	
NATALIE VAN LEEKWIJCK	Beaverton	OR	
SATYA VAYU	Portland	OR	
SUSAN WECHSLER	Corvallis	OR	
MARIA WHITE	Beaverton	OR	
LOIS WHITE	Grants Pass	OR	
JEFFREY WHITE	Forest Grove	OR	
GARY ALBRIGHT	Snohomish	WA	Please, a better way can be found than drift gillnets.
CAROL ANDERBERG	Langley	WA	We need to do everything possible to prevent innocent animals from being killed or harmed and die slowly. safety before greed and lack of humanity will destroy species and cause them to be extinct.
ANGELA ANDERSON	Snohomish	WA	
BECKY ANDERSON	Bellingham	WA	
NORMAN BAKER	Sequim	WA	
BRIAN BALTIM	Seattle	WA	
ROBERT BAMFORD	Seattle	WA	

WESLEY BANKS	Vancouver	WA	
LYNNE BANNERMAN	Seattle	WA	
NICK BARCOTT	Lynnwood	WA	
ALBERT BECHTEL	Seattle	WA	Sea life should not have to perish because of the California Gillnet Fishery and we must do something to see that they don't.
SCOTT BISHOP	Olympia	WA	
ANNA BLAEK	Seattle	WA	
JOHN BREMER	Bellingham	WA	
AMELIA BROWER	Seattle	WA	
ROBERT BROWN	Fircrest	WA	It should be easy to throw back what it not wanted in a gill net. Make sure this is done.
TINA BROWN	Anacortes	WA	
JAMIE CAYA	Vancouver	WA	
SCOTT CECILE	Everett	WA	
PHILIP CHANEN	Seattle	WA	
PATRICK CONN	Kent	WA	Don't be political; be smart. Use good ol' common sense. If you do, the decision to eliminate all gill-net fishing will be an easy one.
ALLISON COX	Vashon	WA	Should read let's reduce death from gill nets!
LIA CRAVEN	Tacoma	WA	
BETH DANNHARDT	Zillah	WA	

KEVIN DARCY	Bellingham	WA	
RUTH DARDEN	Seattle	WA	
JACQUELINE DAVIS	Ellensburg	WA	
ELIZABETH DAWSON	Port Hadlock	WA	
RENEE DEMARTIN	Seattle	WA	The oceans need all the help they can get. Drift nets are horrific.
PENNY DERLETH	Deer Park	WA	
DON DICKEN	Ellensburg	WA	
DONNA DIDUCH	Seattle	WA	
ELLEN DORFMAN	Olympia	WA	must stop these drift nets!
ELEANOR DOWSON	Mill Creek	WA	
TIM DURNELL	Rice	WA	
CAROLYN EDEN	Bainbridge Island	WA	
GLENN EKLUND	Oak Harbor	WA	
CHAD EVANS	Seattle	WA	
G F	Port Angeles	WA	
GILL FAHRENWALD	Olympia	WA	
LARRY FRANKS	Issaquah	WA	
NANCY FRIDAY	Kenmore	WA	
STEPHEN FRIEDRICK	Steilacoom	WA	
HAL GLIDDEN	Bellingham	WA	
WILLIAM GOFORTH	University Place	WA	All gillnets should be banned.. You need to have the ability to selective fish, just like sport fishing.
JOYCE GRAJCZYK	Kent	WA	

RAND GUTHRIE	Snohomish	WA	
VALLI HALE	Lakewood	WA	
HEATHER HALL	Seattle	WA	
NANCY HANSEN	Newcastle	WA	
STEVE HANSEN	Bellingham	WA	
DONNA HANSON	Pullman	WA	
JO HARVEY	Pacific	WA	
AMY HEYNEMAN	Bainbridge Island	WA	
ROBERT HILGENBERG	Everett	WA	Stop the unnecessary marine slaughter.
MICHAEL HILL	Elbe	WA	there has to be a better way to catch fish...
BRANT HUBBARD	camas	WA	it's not sustainable- act now
GAYLE JANZEN	Seattle	WA	Drift nets kill everything in their wake including endangered whales and sea turtles. Isn't it long past time to really move towards banning these deadly nets off the coast of CA. Just coming up with recommendations for alternatives is doing nothing to save all the animals that are currently being needlessly killed. Will something be done before the endangered animals being caught have had their numbers reduced to the point of extinction

			and therefore, too late to save them? The time to act is NOW!
CLAYTON JONES	Shoreline	WA	
DOROTHY JORDAN	Lynden	WA	
KATHY KESTELL	Spokane	WA	
RANDY KILMER	Seattle	WA	
WM LAESTADIUS	Mercer island	WA	
BARBARA LAUDAN	Lynden	WA	Let's stop being inconsiderate, selfish and arrogant. Stop the use of drift gillnets. The world cannot afford to lose any more wildlife and disrupt the chain of life.
JULIE LAWELL	Seattle	WA	
PATRICIA A LENZEN.	Vancouver	WA	
DELPHI LOCEY	Seattle	WA	
KANDACE LOEWEN	Seattle	WA	
ERNIE LOREEN	Point Roberts	WA	
SAMMY LOW	Stanwood	WA	
K LYLE	Gig harbor	WA	
MICHAEL LYMAN	COLVILLE	WA	
KATHLEEN MALLEY	Tacoma	WA	
CAROLYN MARSHALL	Mercer Island	WA	
AI MCCARTHY	Redmond	WA	
REBECCA MCDONOUGH	Eastsound	WA	

DONALD MCKELVY	Mount Vernon	WA	
JANICE MCLAUGHLIN	Bellingham	WA	Please consider banning drift gill net's altogether
BRENDA MICHAELS	Issaquah	WA	
MADELAINE MOIR	sequim	WA	
DAVID NELSON	Ritzville	WA	
KATHERINE NELSON	Kent	WA	
JANET NOREM	Lake Forest Park	WA	
JULIE O'DONNELL	seattle	WA	
MICHAEL O'NEILL	Tacoma	WA	
LYNNE OULMAN	Bellingham	WA	
PEGGY PAGE	Stanwood	WA	
ADINA PARSLEY	Stanwood	WA	
HIROKO PATTERSON	Silverdale	WA	
JOHNB PEARCE SR	Seattle	WA	
J R	orting	WA	
KELLY RAGSDALE	longview	WA	
MARK REDMOND	Seattle	WA	
JAMES ROBERTS	Palouse	WA	
RICK ROMITO	Bellingham	WA	
BARBARA ROSENKOTTER	Deer Harbor	WA	
ELENA RUMIANTSEVA	Seattle	WA	
ZANDRA SAEZ	Spokane	WA	This is why I no longer eat fish.
RON AND MARYA SANTI	medina	WA	Do the right thing no matter the efforts of the indiscriminate kill lobby.

CRAIG SAVAGE	Shoreline	WA	
BARB SCAVEZZE	Olympia	WA	
DARLENE SCHANFALD	Sequim	WA	
TAEN SCHERER	Seattle	WA	Thank you, the health of our oceans depends on this type of legislation.
DAN SCHNEIDER	Seattle	WA	
RONLYN SCHWARTZ	Langley	WA	
JOHN SEEBURGER	lakewood	WA	
LESLIE SMITH	Bellingham	WA	
DONNA SNOW	Olympia	WA	
SCOTT SPECIES	Seattle	WA	I never cared much for Gillnets. After countless lost lives of bycatch, tossed overboard, it's time to BAN drift Gillnets. I wish it had been banned years and years ago. And no, I don't eat fish.
CYNTHIA ST VINCENT	Malaga	WA	
DAN STABEL	Aberdeen	WA	I have lived most of my life on the west coast, fish the ocean
JACK STANSFIELD	Stanwood	WA	
LOZZ STARSEED	Seattle	WA	
GERALD STEEL	Olympia	WA	
CAROL STEVENS	Lynnwood	WA	
DONNA STONECIPHER	Seattle	WA	

LINDA SWAN	Snohomish	WA	
DEBBIE THORN	Kirkland	WA	
ALICE TOBIAS	Seattle	WA	
DAKOTA VOGEL	Elbe,	WA	
DIANE WEINSTEIN	Issaquah	WA	
MARIE WEIS	Fox Island	WA	
JAN WEISEL	Woodinville	WA	
NANCY WHITE	Spokane Valley	WA	
KAREN WIBLE	Vancouver	WA	
SCOTT WIDDAS	Silverdale	WA	
EMILY WILLOUGHBY	Tukwila	WA	
KATHLEEN WOLFE	Gig Harbor	WA	Please do the right thing for all.
K. YOUMANS	Roslyn	WA	
PAUL ZURFLUH	University Place	WA	NETs should have ID tags on them to trace back to careless industry members and to serve notice to potential repeat offenders the responsibility is with them to properly monitor their NET investment.
BARB CRUMPACKER	Coeur D Alene	ID	
GLORIA D.	Cataldo	ID	
GLORIA D.	Cataldo	ID	
KENNETH FISHER	Kellogg	ID	
STEPHEN HACKNEY	Grangeville	ID	
JIM MAY	Boise	ID	

GUSTAF SARKKINEN	moscow	ID	
LIZA A	Clermont	FL	
EMORY AARON	CO/Springs	CO	
OLGA ABELLA	Robinson	IL	
GORAN ABRAMIC	Valpovo	AL	
ELIZABETH ABRANTES	CAMBRIDGE	Ontario	
CARINA ACUNA	Sahuarita	AZ	
MR. & MRS E.R. ADAMS	Dexter	MI	Humanity needs to truly Wake Up; to Grow Up and Become Consciously Responsible for the other lifeforms we share this Beautiful Planet, with Her Beautiful and Bountiful Oceans with... It is necessary to truly take care of the lifeforms that are so abundant within the Oceans, at least for now... indiscriminate fishing truly needs to change! NOW
LISA ADAMS	New orleans	LA	
KIM ADAMS	Columbus	NC	
EVELYN ADAMS	McKinney	TX	
TOM ADAMSKI	Oxford	CT	How can this waste have been allowed to even begin?
DORIS ADEBANJO	Chester Springs	PA	
DEBORAH AHLERS	Windsor	CO	
HEIDI AHLSTRAND	owatonna	MN	get rid of drift gillnets now.

MICHELLE ALDRIDGE	Charlotte	NC	Protect our Oceans and all life within!
MELANIE ALEXANDER	Stanfordville	NY	
CHARLES ALEXANDER	Lutherville	MD	There is way too much waste, and killing of endangered species, with the use of drift gillnets.
RICHARD ALLEN	Miami	FL	
KELLY ALLISON	Berlin	MD	
LUCY ALMEIDA	Bloomfield	NJ	
MARGARET ALPERT	Kensington	MD	
CARA AMMON	Chicago	IL	
JULIA AMSLER	Clarion	PA	
STEPHEN ANDERSON	Deerfield	IL	
BRUCE ANDERSON	ROLLING MEADOWS	IL	
DOROTHY ANDERSON	North Weymouth	MA	
CHRISTEEN ANDERSON	Crestview	FL	
LILLIAN ANDERSON	Sun City	AZ	
WILLIAM ANDERSON	Philadelphia	PA	
SUSAN ANDERSON	Boston	MA	
VAUGHN ANDERSON	St. Petersburg	FL	The professionals know best
RANDY ANDERSON-ORR	Harvey	LA	
MARGARET ANDREWS	Charlottesville	VA	Drift gillnets kill the next generation of marine life. They

			need to be regulated to be replaced by less destructive fishing means.
RITA ANDREWS	Great Yarmouth		
DONALD ANGELL	Battle Creek	MI	
MARJORIE ANGELO	Bunnell	FL	
KATHLEEN ANGOTTI	Boonsboro	MD	
BARBARA APPELBAUM	New York	NY	Our oceans are at terrible risk - which puts us all at risk.
JANET APTAKER	New York	NY	
SANDRA ARAPOUDIS	rhodos	AL	
SISSY ARON	New Milford	CT	
NINA ARONOFF	Jamaica Plain	MA	
DIANA ARTEMIS	Falls Church	VA	IT IS IMPERATIVE TO TAKE ACTION.
RICHARD ARTHUR	Phoenix	AZ	
ELIZABETH ASHBY	New York	NY	
NANCY ATKINSON	Incline Village	NV	Gill nets are cruel and wasteful. Either clean up your act or you will no longer have fish to cull. They are barbaric and shameful.
DAVID ATWOOD	Chicago	IL	
KAYE AURIGEMMA	WESTCHESTER	IL	
MARIA AVALOS	BS AIRES		
ANNEMARIE AVANTI	Phoenix	AZ	
V B	Knoxville	TN	
PAAT B	Lisle	IL	

SUSAN BABBITT	Philadelph ia	PA	
REB BABCOCK	Buena Vista	CO	
JOSEPH BACH	Kimberly	WI	
JILL BADYRKA	Stratford	CT	
SIDNE BAGLINI	Malvern	PA	
MARY ANN BAIER	Dearborn	MI	
WANDA BALLENTINE	Saint Paul	MN	
BRANDON BALLINGER	Wil.	NC	
SHARON BALZANO	Wheat Ridge	CO	
AURORA MARGARETA BARABANCEA	Bucharest	Rom ania	
AVA BARIANA	Philadelph ia	PA	
DAVID BARNETT	Chicago	IL	
ALWYN BARR	Lubbock	TX	
LINN BARRETT	Greeley	CO	No more Gillnets!
WILLIAM BARRETT	Boulder	CO	
MANUEL BARRIOS	Lima	Lima	
MAE BASYE	Fuquay Varina	NC	Ban gillnets NOW!
MATTHEW BAUCCO	Bloomingt on	IN	
SARAH BAUMAN	Lincoln	NE	
MONIKA BAUMANN	ABC	Berli n	
MELVIN BAUTISTA	Phoenix	AZ	
SUSAN BAXTER	new york	NY	
ELISABETH BECHMANN	St. Palten	WI	

DEBORAH BECK	Peekskill	NY	
KAROLYN BEEBE	Madison	WI	
BARBARA BEIERL	Nashua	NH	
FRANK BELCASTRO	Dubuque	IA	
BOBBY BELKNAP	Frankfort	MI	
BONNIE BELLIN	Palm Coast	FL	
PAULO HENRIQUE BENITEZ	Dourados		
KERI BENNETT	Valley Stream	NY	
JOHN BENSCHOTE R	Phoenix	AZ	
BLAKE BENTLEY	Roanoke	VA	
NESTOR BERAZATEG UI	Maipa		
HENRY BERKOWITZ	Sabinsville	PA	
DAVID BERKSHIRE	Houston	TX	
RUTHIE BERNAERT	Honokaa	HI	
DAVID BERNSTEIN	Tallahasse e	FL	
ROBERT BERRY	Marion	MA	
ROSE BERTRAND	Madison	WI	I am a scientist, a long time facts and figures person. I know that we must be much more careful in the way we treat our oceans. They are critical to keeping our planet healthy.
RUTH BESCRIPT	Tucson	AZ	

J BEVERLY	Urbana	IL	
ROBERT BEVERLY	Orange	TX	
BETTINA BICKEL	Glendale	AZ	
EDWARD BIELAUS	Rockville	MD	
SUSAN BIGGS	columbia city	IN	This protection should have been implemented on day one.How irresponsible to the world.
MICHAEL BILECKI	Ronkonko ma	NY	
MARGARET BISH	birmingham	AL	Stop this cruel practice!
LINDA BISHOP	Overland Park	KS	
MELISSA BISHOP	Deposit	NY	
HANNAH BLAKEMAN	Myrtle Beach	SC	
SHELLY BLANK	Rapid City	SD	
SUSAN BLOUNT	Laurel	MD	
LOUISE ROSE BLUME	Clermont	GA	
JANE BOARDMAN DOYLE			
GEORGE BOGGS	Elkview	WV	
WILLIAM J BOLEN	Brick	NJ	
LEE BONINI-KOCH	Warwick	MD	
VIRGINIE BONNIER	Miami	FL	
RICHARD BOOTH	Grosse Ile	MI	
SARA BOOTH	Daphne	AL	
EDITH BORIE	New Paltz	NY	
GAVIN BORNHOLTZ	Grand Blanc	MI	

BRAD BORNSTEIN	Wilmette	IL	
BETTINA BOWERS	Nashville	TN	
KEN BOX	Austin	TX	
HANNES BRACHMAN N	Manchen	Bava ria	
RYAN BRADLEY	Greenbelt	MD	
RHONDA BRADLEY	Crossville	TN	
KATIE BRADY	Carson City	NV	
GEORGIA BRAITHWAITE	Cottonwo od	AZ	
VICKY BRANDT	New York	NY	
ANN BRENNAN	Blauvelt	NY	
KAREN BRENNHOFE R	sartell	MN	
ANNA BREWER	Fountain	MI	
JOHN BREWER	Marietta	OH	
JOSEPH BRIGANDI	Blackwoo d	NJ	
RENEE BRINKER	O'Fallon	MO	
MARY BRISTOW	Brentwoo d	TN	
PAMELA BROCIOSUS	New York	NY	Drift gillnets do not descriminate as to what they catch. Please protect our marine life, this seems like a simple way to move to a more sustainable future.
ALAN BROMBORS KY	Silver Spring	MD	
MARK BROOKER	Chicago	IL	

TRACY BROPHY	Garland	TX	
WENDY BROPHY		NJ	
TOM BROWN	Lakewood	NJ	
KATHERINE BROWN	New York	NY	
KEVIN BROWN	Clarksville	IN	
JOSEPH H. BROWN	Hammond	LA	
VALERIE BROWN	crownsville	MD	
CHARLES BRUMLEVE	Manhattan	KS	Gillnets need to be stop due to the indiscriminate killing of sea animals.
CURZIO BRUNI	Assisi	CT	
JAMES BRUNTON	Tampa	FL	
DEBBIE BRUSH	Castle Rock	CO	
JUDY BUCHSBAUM	Philadelphia	PA	
MICHELLE BUERGER	Madison	WI	
SCOTT BURGER	Richmond	VA	
MAUREEN BURKE	Palm Beach Gardens	FL	
BRUCE BURNS	Austin	TX	
JOY BURNS	Osawatomie	KS	
KAREN BURROUGHS	Orlando	FL	It's time to stop by catch killing our declining sea life!!
GRACE BURSON	Plymouth	NH	
MATTHEW BURTON	Cincinnati	OH	
JEANNE BUSACCO	Durham	NC	

CHANTAL BUSLOT	Hasselt	AL	
EDWARD BUTLER	New York	NY	
GRETCHEN BYRNE	Albuquerque	NM	Too many species are being caught and wasted in drift gillnets. This must be stopped.
L C	Milford	CT	
CAROL CURTIS	Majuro	UT	
TIFFANY CALDWELL	Amory	MS	
JANET CAMERON	Calgary	AL	
ROBERT CAMPBELL	Clearwater	FL	
THERESA M. CAMPBELL	Madison Heights	MI	
HILARY CAPSTICK	Tallahassee	FL	
RENEE CAPUTO	west chicago	IL	
MARCELLA CARAVAGLIOS	Messina	IT	
CHRIS CARBONE	Camden	NJ	
ROBERT CAREW	Coral Springs	FL	
PAT CARLISLE	Norfolk	VA	
CHERON CARLSON	Arlington	VA	
CHRISTY CAROSELLA	Ozone Park	NY	Please protect these animals.
MARY CARRICK	Washington	DC	
MAURICIO CARVAJAL	Santiago		
LYNN CASCIO	Huntington	NY	
NANCY M. CASWELL	Clinton	MA	
MELISSA CATHCART	Minneapolis	MN	
JOHN CAVALIERE	Warwick	RI	You can do better!!!

ANGELA CELLI-JONES	Jax	FL	
DAVID CENCULA	Sparks	NV	
ALEXANDER CHAPMAN	Boulder	CO	
KATHY CHASE	Shelton	CT	
PATRICIA CHELMECKI	Elburn	IL	
ELENA CHERNYSHE VA	Brooklyn	NY	
SUSAN CICERO	Alta	WY	
MORGAN CLARK	South Orange	NJ	
MARTINA CLARK	Westampt on	NJ	
AFFOLTER CLAUDINE	Basel		
ILEANA CLAVIJO	Wilmington	NC	I am a retired marine biologist and know well the destructive power of drift gill nets. Please ban them.
JILL CLEVELAND	Delavan	WI	
SANDRA COBB	Moreland Hills	OH	
LAURI COFFMAN	Cedar Falls	IA	Be a HERO, not a ZERO
JOHN COHEN	northamp ton	MA	
RICHARD COLEMAN	New Paltz	NY	
SOPHIA COLEMAN	Brandon	FL	
JOSEFAPIED AD COLOM	Barcelona		
STEVEN COMBES	Gainesvill e	FL	STOP THE GLUTTONY!!
MARY CONARD	North charleston	SC	
DEB CONGDON	galesville	WI	BE humane-and remember there is another generation behind

			the one that is there now.
CRAIG CONN	Pittsburgh	PA	
LIZA CONNELLY	Brookline	MA	Thank you for taking a moment to read about this important issue. I greatly appreciate your time and attention to this matter.
JOSEPH CONNOLLY	Newingto n	CT	
IRENE CONNOLLY	BROOKLY N	NC	
JOE CONNORS	New York	NY	
LAURIE CONROY	Wellesley Hills	MA	
NICHOLAS CONTE	Matawan	NJ	
VIKA COOK	Darwin	Nort hern Territ ory	
ERNEST COOPER	Indianapol is	IN	
DAVID COPP	Fort Myers	FL	
JC CORCORAN	Santa Fe	NM	Go Vegan!
SHEFFIELD COREY	Saunderst own	RI	
SUZANNE CORKIN	Cambridg e	MA	Please act responsibly before it's too late.
BERT CORLEY	hanahan	SC	
MARIANNE CORONA	Middlefiel d	CT	
M. CECILIA CORREIA	Elizabeth	NJ	
SEAN CORRIGAN	Trinity Beach	Quee nsland	
MARK COSGRIFF	Lakewood	OH	
LYNN COSTA	Warwick	RI	
CHARLES COURANT	Belfast	MA	

BETSY COUSINS-COLEMAN	leonia	NJ	
GABRIELA CRACIUNAS	Cluj-Napoca		
CAROL CRAMER	Troy	MI	
MARCELLA CRANE	Phoenix	AZ	
BRUCE CRATTY	Denver	CO	
JESSICA CRESSEVEUR	New Albany	IN	
WILLIAM CROSBY	Erie	PA	
LAWRENCE CROWLEY	Louisville	CO	
DREW CUCUZZA	New Haven	CT	
CRISTINA CUESTA	Torrent		
JASMINA CUK	Solna	Bremen	
JENNIFER CUNNINGHAM	Aurora	IL	
RUTH CURIALE	Fair Haven	NJ	
STEVE CURRIER	OLD LYME	CT	
MARIE CURTIS	Oakhurst	NJ	
JANELL CURTIS	Crestview	FL	
SHERI CUTRIGHT	St Augustine	FL	PLEASE STOP GILL-NET FISHING!
JOANNA CUTTING-BRADY	DRACUT	MA	
LIZ D.	Morris Plains	NJ	
G ALLEN DAILY	Wauwatosa	WI	
JOHN DALLA	Las Vegas	NV	
S. DANIELS	Bradenton	FL	
K DANOWSKI	Pittsburgh	PA	
CARRIE DARLING	Phoenix	AZ	

BETH DARLINGTON	Poughkeepsie	NY	
FRAN DAVERSA	Great Falls	VA	
BILL DAVIDOV	Atlanta	GA	
SARAH DAVIS	Raleigh	NC	
RICHENDA DAVISON	Wilmington	DE	
KATHY DAY	Richmond	VA	
ROBERT DE BECK	Cromwell	IN	
FRANCO DE NICOLA	Pittsford	NY	
ALMIDES DE SÃi	San Paulo	SP	
BERENICE GUEDES DE SÃi	SÃo Paulo	SP	
BERNADETE DE SÃi	SÃo Paulo		
KRISTOPHER DEAPEN	Laveen	AZ	
STARK DEBRA	Santa Fe,	NM	
KAREN DECKEL	Buzzards Bay	MA	NO MORE GILLNETS! Save our future!
BARBARA DECOURSEY	Milwaukee	WI	Without a change in use of destructive fishing methods, we will seriously diminish our marine food sources.
THERESA H DEERY	St Pete Beach	FL	
OLIVER DEEX	Longmeadow	MA	
DAVIDE DEFAVARI	Palermo	Italy	
LAURA DEHAVEN	Atlanta	GA	
SHERI DELAINE	Eau Claire	WI	Gillnets are a lazy, irresponsible way to fish. Indiscriminately killing

			anything that gets into the nets while fishing for one type of fish (or even two or three) causes unnecessary cruelty, violence and suffering. It's a callous and stupid human that would practice this form of so-called fishing.
PRISCILLA DELANEY	Wynnewood	PA	
MICHAEL DELOYE	Boynton Beach	FL	
PATRICIA DELUCA	Nokomis	FL	
JACKIE DEMARAIS	Granbury	TX	
CHRISTI DEMARK	Hoboken	NJ	
LEE DENGLER	jacksonville	FL	please consider this matter. thank you.
AL DEROY	Pittsburgh	PA	
CAROL DEWEES	Pottstown	PA	
DONALD DI RUSSO	Hyde Park	MA	
MARIA DIAZ ACILLONA	Bilbao	Spain	
GLORIA DIGGLE	Fort White	FL	
PAMELA DILIBERTO	Pittsboro	NC	
CHRISTI DILLON	Mooreville	NC	
MERCEDES DIMAIO	Tampa	FL	please ban drift gillnets-thanks
RONALD DISTEFANO	Wilmington	DE	
JAMES DIXON	Terra Alta	WV	
ROBERT DLOUGHY	Pearl River	NY	
TRANG DOAN	Englewood	CO	

RENATA DOBRYN	Montauk	NY	
REV. ELIZABETH DODD	Boca Raton	FL	
GARRY M. DOLL	Williamsport	PA	We're in the midst of the fifth great extinction event. It might be nice if we didn't TRY to kill everything!!!
MARK DONALDSON	Melbourne	FL	
ADAM D'ONOFRIO	North Dinwiddie	VA	
SUE D'ONOFRIO	Keysville	VA	
LISHA DOUCET	Wellington	CO	
DIANNE DOUGLAS	Phoenix	AZ	
DEIRDRE DOWNEY	Fairbanks	AK	
SUZANNE DOYLE	milford	CT	
JUERGEN DR. PINKOW	Mahlhausen	Baden-Wuerttemberg	
BETH DREWELOW	Evansdale	IA	
BONNIE DUMAN	Deerfield	IL	
KATHY DURRUM	Aurora	CO	Managers to clean up the california drift gillnet fishery! Stop killing my sea friends!
STEPHEN DUTSCHKE	Louisville	KY	
TRACEY EAKIN	McMurray	PA	
SUSAN EARLE	cambridge	MA	
ANN EASTABROOKS	Andrews	NC	

STEPHEN EDINGER	safety harbor	FL	
JACQUELINE EDMUNDSON	New Orleans	LA	It is ridiculous that the gillnet fishery is allowed to kill so many non-target species.
ERIC EDWARDS	West Chicago	IL	
PAT EISERER	Millersville	PA	
CHRISTINE ELLIOTT	Maugansville	MD	
LYNN ELLIOTT	Durham	NC	
DAVID ELWELL	Washington	DC	
LISE EMOND	Pasadena	MD	
GEORGE ERCEG	Natrona Heights	PA	
PHYLLIS ERWIN	Guilford	VT	
DIANE ETHRIDGE	Conroe	TX	
PAMELA EVANS	Kemp	TX	
KINNEY EVITT	Odessa	TX	
TORY EWING	Omaha	NE	
ANDREA F.	Beach Park	IL	
LEIGH FABBRI	Plano	TX	
K FABIANE	Schenectady	NY	
LAUREL FACEY	Millers Falls	MA	
JUDY FAIRLESS	Warren	NJ	
KIM FALCONE	Wakefield	RI	
JIM FARY	Silver Spring	MD	
WENDY FAST	Dansville	NY	A sustainable ocean and marine population is essential to our survival.
YVONNE FAST	Aalborg	NJ	

ANITA FAULKNER	Carrollton	TX	
CAROLE FERAY	St Paul	MN	
ED FIEDLER	Austin	TX	
CRAIG FIGTREE	chicago	IL	
SCOTT FINAMORE	Citrus springs	FL	
BRIAN FINK	Philadelphia	PA	
QUENTIN FISCHER	Roanoke	VA	
KRISTIN FISCHER	South Windsor	CT	
LAWRENCE FISCHMAN	Yarmouth	ME	
DIANA FISHER	niceville	FL	
CHARLES FITHIAN	Dover	DE	
WILLIAM FLEMING	Virginia Beach	VA	
SALLY FLOOD	Indianapolis	IN	
TOM FONDA	State College	PA	
DOREEN FORBES	London,	Ontario	
AMY FORD	Windham	MA	
JANET FORMAN	new york	NY	
WENDY FORSTER	Newcastle upon Tyne	AL	
LUCI FOWLER	New Port Richey	FL	
IRENA FRANCHI	Sunny Isle Beach	FL	
HENRY FRANK	Philadelphia	PA	Banning drift gillnets is the RIGHT thing to do.
SONJA FRANZ	Baltimore	MD	
JULES FRAYTET	Charlotte	NC	
SHELLEY FRAZIER	Durham	NC	
ROSEMARY FRENCH	Reno	NV	

VALERIE FRIEDMAN	Orlando	FL	The amount of bycatch is disgusting. there is no excuse for it.
JUDITH FRIEND	Fort Collins	CO	
DINA FRIGO	chicago	IL	
JEREMY FROST	Southport	CT	Our oceans are in decline in so many ways. We need to do what we can wherever possible and this is one of those areas!
CLARISSA FROST	Saco	MA	
LAURA FURMAN	Ringoes	NJ	
ROB FURSICH	hartsdale	NY	
KATRINA G	Pensacola	FL	
CANDACE GABRIEL	Chicago	IL	
JENNIFER GAEGLER	Kensington	MD	
BRIAN GAGNON	Franklin	MA	
NICHOLAS GALANTE	Tavares	FL	
SARAH GALLAGHER	New York	NY	It's 2015. Time to get in step with much of the rest of the world!
NICOLE GAMBINO	Staten Island	NY	
SUSAN GARCIA	Phoenix	AZ	
A. GARDNER	Mount Airy	NC	
WILLIAM GARDNER	Central Lake	MI	
JAN GAREN	Swansea	NY	
JG GAREY	New York	NY	Let's vote for sustainability!
NINA GARFINKEL	Woodmere	NY	
LYDIA GARVEY	Clinton	OK	
RICHARD GAST	Constable	NY	

ALBERT GAUNA	Trinidad	CO	
M.JEAN GAVIN	Phila.	PA	
ERIC GEBHARD	Chandler	AZ	
RITA GENTRY	Santa Fe	NM	
CONSTANCE GEORGE	New York	NY	
LINDA GERTIG	Bellevue	NE	
MARIO GIANNONE	florence	Italy	
KEN GIBB	Zephyr Cove	NV	
THEO GIESY	Norfolk	VA	
J DAVID GILLANDERS	State University	AR	Stop the unnecessary drowning of whales, dolphins, and sea turtles form the use of floating gill nets.
ABIGAIL GINDELE	Portsmouth	NH	
DEKE GLIEM	Dawson	IA	
MARCIA GODICH	Trafford	PA	
ANDREW GOLD	Santa Fe	NM	
EDWARD GOLDBERG	Jackson Heights	NY	
JEAN GOLDMAN	Miami Beach	FL	
LISA GOLDMAN	Thornton	IN	
FRANK GONZALES JR.	Plymouth	MI	
JACKIE GOODMAN	Austin	TX	
MARGARET GOODMAN	Glen Mills	PA	Waste is a sin.
JUDITH GORDON	Evans	GA	
BEVERLEE GOYNES	Ridgefield	CT	
HOPE GRABLE	Bourbonnais	IL	The human race needs to start

			respecting the Earth's eco-systems and learn to live in concert with the Earth rather than raging against it at any cost. There is no Planet B.
JEANNE GRAFFIN	Madison	WI	
PAMYLLE GREINKE	Peconic	NY	
CAROLYNN GRIFFITH	Honolulu	HI	
JULIE GRIFFITH	St Charles	IL	
MELANIE GRIFFITH	Cedar Falls	IA	Sustainable fishing benefits everyone.
RUTH GRIFFITHS	Llanfyllin	UK	These destructive nets should be banned. Learn your lesson now . Greed will destroy stocks & leave us with nothing!
STACY GROSSMAN	Bexley	OH	
WARREN GROSSMAN	Ventnor City	NJ	This is your business. Please do all you can to rid the oceans of the plastic horror that is left behind. You owe it to the future of this planet.
EARL GROVE	East Canton	OH	
SHEL GROVE	Washington	DC	
MARK GRZEGORZEWSKI	Tampa	FL	
MERRY GUBEN	Worton	MD	
JODI GUENTHER	missoula	MT	
H. GUH	Dallas	TX	

AUBREY GUILBAULT	Grand Blanc	MI	
GREG GUMINA	Birmingham	MI	It's true, alot of innocent species get caught up in these gill nets and we need to find a safer way to trawl out fish without harming other animals of the sea.
TERRY GUNNING	Madison	WI	
SUSAN GUNTHER	Beacon	NY	
ELISABETH GUSS	ny	NY	
DUANE GUSTAFSON	Cook	MN	
MARCY GUSTAFSON	Chicago	IL	Please stand up for reason and nature.
MARILYN H	Rochester	NY	This tragic fishing method needs to stop now!
JON HAGER	Riverton	UT	
MARK HALLETT	Bloomington	IN	
MARCIA HALLIGAN	Viroqua	WI	
MICHAEL HAMBURGER	Collingswood	NJ	
SARAH HAMILTON	Canastota	NY	
PENNY HAMMACK	NORTH RICHLAND HILLS	TX	
RICHARD HAN	Ann Arbor	MI	
JOAN HANSEN	Lone Rock	WI	
JIM HANSON	Orlando	FL	
TYLER HARRINGTON	Schuyler Falls	NY	

CATHERINE HARRISON	Minnetonka	MN	
JEANE HARRISON	Des Moines	IA	
DENNIS HARTENSTINE	Birdsboro	PA	
CAROLE HARTLWB	Lake Helen	FL	
ANDREW HARWIN	New York	NY	
MICHAEL HASKELL	Scarborough	ME	
JOHN HAUCK	Boston	MA	
KATHY HAVERKAMP	Geneva	NY	
EDDIE HAVOC	Glen Cove	NY	
PAUL HAWKINS	Brevard	NC	
CHRIS HAZYNSKI	Bordentown	NJ	
LINDA HEAGY	Arlington	TX	
B HEARN	Asheville	NC	I urge you to take action to clean up the CA drift gillnet fishery
LEN HEARNE	Columbia	MO	
GAIL HEATH	Wilmington	DE	
SUSAN HEFFERNON	Nashville	TN	This is DIS-GUSTING, & WRONG. It needs to STOP.
GERNOT HEINRICHSDORFF	Colorado Springs	CO	
JEANNE HELD-WARMKESEL	North Wales	PA	
SUZANNE HELLER-CULVER	Brooklyn	NY	
CARL HENNE	Fredericksburg	VA	

BIRTHE HENRIKSEN	Soeby		
CLAUDIO HENRIQUES	New York	NY	
DEVIN HENRY	Alfred	NY	
ERIC HENSGEN	Tampa	FL	
ERIC HENSGEN	Tampa	FL	
NANCY HERLINGER	Katy	TX	
JOHN HESS	Roslindale	MA	
KAREN HEWELT	Chesterfield	MI	gill nets don't discriminate
ANNE-MARIE HEWITT	Bromsgrove	NY	
LISA HEY	WINSTED	CT	
GILLIAM HICKS	Madison	MS	
VALERIE HILDEBRAND	Parma	OH	
GINGER HILL	Lyman	SC	
LISA HILLESLAND	Longmont	CO	
ALEXANDER HILLMAN	Westminster	CO	
NORMAN HINES	Simsbury	CT	
CAROL HINKELMAN	Rochester	NY	
WILLIE HINZE	Winston Salem	NC	
KATHY HOLLAND MEDANIC	jamaica plain	MA	Driftnets need to be banned the world over! We cannot make it any harder for ocean life to survive than we have already!
WILLIAM HOLLINGSHEAD	Tucson	AZ	
SARA HOLMES	Chester	CT	
MARK HOLMGREN	St Petersburg	FL	We must restore the natural world for abundance =

			survival.
SUE HOLTZ	Boulder	CO	Drift nets kill!!!
DOROTHY HOLTZMAN	Lakewood	NJ	
KENNETH HONIG	Scarsdale	NY	We can do a much better job conserving marine fisheries that will benefit wildlife, fishermen, and consumers.
LOIS HOOT	Washingt on	NC	
B HORNE	b	MD	
BOBBIE HOWARD	Scottsdale	AZ	
DAN HUBBARD	Rochester	NH	
MONIKA HUBER	Vienna		
TARA HUBER	Rockville	MD	
ROBIN HUDSON	Tarpon Springs	FL	
MR & MRS RICHARD N HUFF	Fort Wayne	IN	
LINDA HUNT	NORTH EAST	MD	
STEPHANIE HUNTINGTON	Denver	CO	
HAYDN HUNTLEY	Makawao	HI	
MARIA IANC	Zaragoza	NV	
MICHAEL ILTIS	Madison	WI	
SHERWOOD INDERLIED JR	CLAYTON	NJ	
SUSAN INMAN	Elk Rapids	MI	
SHARON INTILLI	Warwick	NY	We humans are so terribly unaware of all the ways we are not only destroying the delicate ecological balance of our oceans, we are blissfully ignorant

			how in the long term ALL of that affects each of us and our own survival. WE NEED TO TAKE ALL OF THIS VERY SERIOUSLY.
TERESA IOVINO	Memphis	TN	
INGRID ISAKSEN	Hvalstad	SD	
MARTHA IZZO	Evergreen	CO	
QUIDA JACOBS	Miami Beach	FL	
MARTHA JAEGER	St. Louis	MO	
JENNIFER JAINER	Jonesboro	MA	
ROBERT AND DONNA JANUSKO	Bethlehe m	PA	
ELIZABETH JAVINSKY	Minneapo lis	MN	
GARY JEFFERS	Liberty Township	OH	Whenever I think of gillnets I also think of the term burn, rape, pillage as well as scorched earth. Need I say more?
JAMES JEFFREY	Virginia Beach	VA	
HARRIET JERNQUIST	Millburn	NJ	
ANKA JHANGIANI	Reston	VA	
BENJAMIN JOANNOU JR	Pinecrest	FL	
SUSAN JOBE	Afton	MN	
WINIFRED JOHANSON	New Providenc e	NJ	Drift gillnets destroy so much sea life . It should be phased out and replaced with more sustainable methods .

ERICA JOHANSON	Hopewell	NJ	
DESIREE JOHNSON	middleboro	MA	
MARY JOHNSON	Mount Kisco	NY	
PATRICE JOHNSON	Lubbock	TX	
RHONDA JOHNSON	Aylett	VA	
CAROL JOHNSON	Winfield	IL	
RUTH JOHNSTON	Hales Corners	WI	
ARLENE JONES	Philadelphia	PA	
INGRID JONES	Moberly	MO	
MARY JONES-GIAMPALO	New Lisbon	WI	
MELISSA JUDGE	Tampa	FL	
LESLIE JUST	West seneca	NY	
C K	Lake Geneva	WI	
LINDA KACSER	Rockville	MD	It's heartbreaking and unnecessarily wasteful.. We can manage better, and live better.
SUSAN KALAN	Orange	VA	
PAUL KALKA	Conshohocken	PA	
JANET KALMAN	Boca Raton	FL	
DAVID KATZ	Westminster	CO	
KAREN KAWSZAN	Spring	TX	
FREDERICK KAZMAN	Pittsburgh	PA	
JOHN KEISER	New York	NY	
PETER J. KEISER	Manlius	NY	

ROBERT KELLER	Parsippany	NJ	
MARLENE KELLER	Berlin	Berlin	
BARBARA KELLY	Youngstown	OH	
CATHLEEN KELLY	Calverton	NY	
THOMAS KELLY	Flemington	NJ	
JOEL KELLY	montrose	MN	
D KENNEDY	runcorn		
KATE KENNER	Jamaica Plain	MA	Waste is right-waste of lives of marine animals who are not even being sought. Gillnets are inefficient and unethical with millions of animals dying for the purpose of catching only specified fish. It is time to say good bye to gill nets and find a more practical and sustainable method of fishing.
JULIE KENNIE	West Dennis	MA	
DEBBIE KENYON	Apex	NC	
KATHLEEN KESKE	Brooklyn	NY	
JK KIBLER	Ghent	NY	
RAMSAY KIEFFER	Milford	DE	
CAROLYN KIEL	Port Orange	FL	
HENRY KIMBELL	Sparks	NV	
KAREN KINDEL	Canton	OH	
MARILYN KING	Smithville	WV	
JANIS KINSLOW	Aston	PA	

H KIRK	inverness		
MICHAEL KIRKBY	Toronto	Ontario	
PAMELA KJONO	Grand Forks	NC	
CARL KLEIN	Buffalo	NY	
LAURA KLEIN	Bronx	NY	This action to clean up the Drift Gillnet mess is long overdue.
LEONA KLERER	Stamford	CT	Gillnets should be outlawed as they catch unwanted animals!
STEVEN KLINE	Baltimore	MD	Please save our fishery from this barbaric practice
PETE KLOSTERMAN	New York	NY	
ANGELA KNABLE	Flanders	NJ	
BOBBIE KNIGHT	Denver	CO	
DAVID KNIGHT	Winter Haven	FL	
TED KNIGHT	Milwaukee	WI	
DONNA KNIPP	New York	NY	
IVETTE KNOL	Cape Coral	FL	
JOANN KOCH	Lebanon	CT	
EDDIE KONCZAL	Monroe Township	NJ	As someone concerned about marine life, I urge you to speed the transition away from drift gillnets in favor of a less destructive method of fishing.
HERBERT KORN	Lexington	MA	
NINA KORNSTEIN	Framingham	MA	
DON KOSAK	Menomonie Falls	WI	
DAWN KOSEC	Austintown	OH	

STEVEN KOSTIS	New York	NY	
THOMAS KOVEN	Hampton	NJ	
FRED KOZAK	Marstons Mills	MA	
DANIEL KOZMINSKI	Solon	OH	
DIANE KRASSENSTEIN	Philadelphia	PA	
MARION KRAUS	Heidenheim	Baden-Wuerttemberg	
DOUG KRAUSE	Fargo	NC	
SUSAN KRAUSE	Saint James	NY	
KAREN KRAVCOV MALCOLM	Scottsdale	AZ	
BRUCE KRAWISZ	Marshfield	WI	
HEIDI KROUSKUP	Glendale	AZ	
JAMES A. KRUMM	WILLOW GROVE	PA	THEY MUST COMPLY ! VERY CRUEL !
M C KUBIAK	Bloomington	IL	Remember that America once had abundant buffalo herds?
SANDY KUCINSKI	Toledo	OH	
HOLLY KUKKONEN	Iowa City	IA	
JANET KUNCL	Collinsville	IL	
KEN KURTZ	Phoenix	AZ	
V L	oviedo	FL	
CLAUDIA LA PAGLIA	GENOVA		
PEGGY LA POINT	Denton	TX	
DALE LACOGNATA	Indianapolis	IN	
LAURIE LAGOE	Alexandria	VA	It is time to re-examine our

			unfettered capitalistic global economic system. Let us make life simple for humans and more humane for animals.
DAVID LAND	Silver Spring	MD	
DOUG LANDAU	St Petersburg	FL	
JUDY LANDRESS	Corpus Christi	TX	
ERIC LANE	Denver	CO	
KENNETH LANG	Washington	DC	
LYNN LANG	Randolph	MA	Please let's stop the use of gill nets
SHARRON LAPLANTE MD	tolland	CT	
DRENA LAPOINTE	Scottsdale	AZ	
KENNETH LAPOINTE	Ottawa	Ontario	
MICHELE LARGMAN	Hackettstown	NJ	
MARY LARSON	Omaha	NE	
JENNIFER LASLEY	Alexandria	VA	
FRED LAVY	Harrisonburg	VA	
RHONDA LAWFORD	South Wilmington	IL	
KATHLEEN LAWLESS	Harleysville	PA	
MICHAEL LAWRENCE	Harrison City	PA	
LYN LEEUW	Marianna	FL	
SUSAN LEFLER	Austin	TX	
LORETTA LEHMAN	Duncannon	PA	
JOHN LEINEN	Stillwater	MN	
RONALD LEMMERT	Peekskill	NY	

MATEA LEON	Virginia Beach	VA	
JOHN A. LEONE	Margate	FL	
RAYMOND LESZCZAK	Barnegat	NJ	
EILEEN LEVIN	Minnetonka	MN	This kind of waste is unacceptable and unsustainable. act now before it is too late
ROSEANNE LEVY		CT	
WENDY LI	Brooklyn	NY	
DOMINIC LIBBY	Milton	NH	
PENELOPE LICHTENECKER	River Forest	IL	
JOHN LIGHT	Arlington	VA	
SARAH LILLEY	Brooklyn	NY	
SUSAN LINDEN	Palm Bay	FL	
DUDLEY LINDSLEY	Leonardtown	MD	
AMY LINDSTROM	Lansing	MI	
KIM LINES	Ft Lauderdale	FL	This is a no brainer. We can no longer afford to indiscriminately waste ocean resources.
ORLANDO LINHARES	São Paulo	SP	
ROBERT LINZMEIER	Palatine	IL	
PHIL LIPARI	Colonia	NJ	
DEBORAH LIPMAN	Providence	RI	
WILBUR LITTLE	Denver	CO	
MICHAEL LITTLE	Durham	NC	
JULIE LITTLEFIELD	Mioresville	NC	Please help
S LOGAN	Miami	FL	

T LOGAN	Austin	TX	why hasn't this already happened??
NICOLE LOH	Singapore	WI	
MARGARET LOHR	commerce city	CO	
LOIS LOMMEL	North Chesterfield	VA	
JIM LONG	Accokeek	MD	
MARGARET LOOMIS	Silver Spring	MD	
ROCIO LOPEZ	Miami	FL	
YAHAIIRA LOPEZ	Miami Gardens	FL	
PHILIP LOUIE	Woodhaven	NY	
LINDSLEY LOVE	Pittsburgh	PA	
NANCY LOWELL	Tampa	FL	Please get rid of these horrifying traps for unintended victims. It is such a waste, and it seems to be a great part of the fish stock depletions.
LYN LOWRY	Longmont	CO	
HEIDI LUDWICK	Papillion	NE	
WALT LUERKEN	Seekonk	MA	
ANNA LUKASZEWICZ	Blasdell	NY	
FRED LUKE	Honolulu	HI	
DORIS LUTHER	Hollis	MA	
STEVE LYONS	Rockford	IL	
JAN LYONS-FAIRBANKS	Branchville	NJ	Gill nets kill too many innocent sea creatures.
DENISE LYTLE	Fords	NJ	
BILL MACARTNEY	Reno	NV	

KRISTYN MACPHAIL	Littleton	CO	
MAX MAGBEE	Baton Rouge	LA	
EUGENIA MAGILL	Arlington	VA	
LILLY MAHANEY	Leland	MI	Please do the right thing.
KATHLEEN MAHER	Ocean	NJ	
HOLLY F. MALARNEY	Chelsea	MA	Drift gillnets are a brutal, wasteful way of fishing and must be either stopped or must utilize a system that is conducive to a healthy, sustaining ocean.
PEGGY MALNATI	Farmington Hills	MI	This is a sloppy and destructive fishing practice that is doing terrible harm to vulnerable populations in the ocean.
SHARON MANICOM	Dallas	TX	
LOUISE MANN	South Chesterfield	VA	
BJOERN MANNSFELD	Denver	CO	
MARIO MARALDO	Harrison twp.	MI	
VAL MARJORICA STLE	Inverness	FL	
REBECCA MARSHALL	Gainesville	TX	
NATHALIE MARTEL	calgary	Alber ta	
CRAIG MARTIN	New Stanton	PA	
JEFF MARTIN	Heiskell	TN	
TINA MARTIN	Rochester	NY	
ROSI MARTIN	Chesapeake	VA	
R MARTIRE	New York	NY	

CAROLYN MASSEY	Quincy	IL	
MARC MASTO	Boardman	OH	
FRANCIS MASTRI	West Haven	CT	
THELMA MATLIN	Reno,	NV	Think of the future. We must conserve the food for then.
GEORGIA MATTINGLY	Longmont	CO	
MYOKA MAUGEAIS	Ottawa	Ontario	
MARGITH MAUGHAN	Salt Lake City	UT	
HARRY MAUNEY	Washington	NC	
JERRY MAWHORTER	Royal Oak	MI	
LISA MAZZOLA	Tampa	FL	
IAN MCCALLAN	Cardwell	Queensland	Marine animals are not a resource for us to plunder. The lessons of the destruction of the cod fisheries in the Atlantic during the last century have still not been learnt and we continue to eat our way through the oceans animals. Profit before conservation is a dangerous mantra preached by all who continue to vastly overexploit and ignore our responsibilities as the prime hunters on the planet.
TONI MCCALLEY	Hamilton	NY	
SHIRLEY MCCARTHY	Branford	CT	senseless killing of so many species

BRANDI MCCAULEY	Des Moines	IA	
HARRIET MCCLEARY	Minneapolis	MN	
ANDY MCCOLLUM	Mount Vernon	IA	Please address this bycatch problem.
ROBERT MCCONNELL	Arlington	MA	
JANA MCCORMICK	San Antonio	TX	Please protect our oceans, ban nets altogether.
JAN MCCREARY	Silver City	NM	Stop killing our sea life in drift gillnets!!!
MAUREEN MCCULLOUGH	New Hope	MN	
SYDNEY MCDERMOTT	Marana	AZ	
CATHARINE MCEACHERN	Saint Paul	MN	
RICHARD MCKEE	Longmont	CO	
COLLEEN MCKENNA	Brunswick	ME	
RENAE MCKEON	Kearney	NE	Drift Gillnets are nothing more than floating coffins in the sea. Everything in their path is caught and dies a slow, horrible death. They should be banned forever from all oceans!!
LINDA MCKILLIP	Erial	NJ	
ANNIE MCMAHON	Clarkdale	AZ	
ANN MCMULLEN	Sandy	UT	
CATHERINE MCNAMARA	Orlando	FL	
AMANDA MCNEILL	Cortez	CO	No more of this wasteful practice! Wiping out thousands of

			members of marine species is not in OUR best interests either!
MARIAN MEINEN	New York	NY	
GWENN MELTZER	Woodlyn	PA	
JEANNINE MENDROLA	Broomall	PA	
LYNN MERLE	Vineland	NJ	
JOHN MESERVE	PEMBROKE	MA	
SUSAN MESSERSCHMITT	Biddeford	ME	
WHITNEY METZ	Mannington	WV	
TANYA MEYER	Emporium	PA	
COLONEL MEYER	North Port	FL	
ETHAN MIDDLEBROOKS	Sunnyside	NY	
DORI MILES	Crown Point	NY	
SHANNON MILHAUPT	Denver	CO	
JACK MILLER	Middleburg	PA	
CRICKETT MILLER	Saint Louis	MO	
MICHAEL MILLER JR	Phila	PA	
DANIEL MINK	Harrisburg	PA	
THOMAS MISKOVSKY	Ann Arbor	MI	
JUDE MISURELLI	Hockessin	DE	
GINA MONDAZZE	Hollywood	FL	
ROBERT MOODY	Tallapoosa	GA	
LINDA MOONEY	Flagstaff	AZ	
PAULINE MOORE	Houston	TX	

NANCY MOORE	Madison	WI	
TOM MOORE	Boulder	CO	there is no excuse for using these generalized killing techniques!
SHARON MORA	whittier	NC	
LIANA MORAN	Glendale	AZ	
PHYL MORELLO	White Pine	TN	
PHYL MORELLO	White Pine	TN	Protect our oceanlife from gilnets'
DENNIS MORLEY	Old Bridge	NJ	
MICHELLE MORRIS	Euless	TX	
FLORENCE MORRIS		NY	
KATHLEEN MORRIS	Columbus	OH	
WENDY MORRIS	Phoenix	AZ	
DEIRDRE MORRIS	Medford	MA	Please clean up the California gillnet industry. Thanks.
GLORIA MORRISON	Pecos	TX	
EARL MORSE	Waterford	MA	
PAUL MOSS	White Bear Lake	MN	
NICHOLAS MOSUNIC	pocono pines	PA	
NANCY MUELLER	Chapel Hill	NC	
MARIANNE MUKAI	Delhi	NY	
ENZO MULAS	florence	Italy	
CARRIE MULLEN	orangeburg	NY	
D MURACO	needham	MA	
DYLAN MURPHY	Columbia	SC	

DYAN MUSE	Bridge City	TX	
MONIQUE MUSIALOWSKI	Clinton Twp	MI	
PIA MUSTONEN	Tampere	Finland	
CORNNE MUSY	St-Legier	Switzerland	
LINDA MYERS	Petersburg	PA	
JESSICA NATHAN	Southlake	TX	
TONY NAUBER	Kranichfeld	Thuringia	
GREG NAVARRO	Philadelphia	PA	
BILL NAVE	Winthrop	MA	
PATRICIA NAZZARO	Union	KY	
DEBBIE NEIMARK	Chicago	IL	
DEBBIE NEIMARK	Chicago	IL	
STEVEN NELSON	Crystal Lake	IL	
THOMAS NELSON	Lansdowne	PA	
GEORGE NESTE	High Point	NC	
KATE NEUSCHAEFER	Breckenridge	CO	
JACQUELINE NEWMAN	Greenville	KY	
JACOMINA NEWMAN-OSMON	Scottsdale	AZ	
ALAN J NISHMAN	Haydenville	MA	
CLAIRE NIVOLA	Newton Highlands	MA	
MICHAEL NORDEN	Defiance	PA	
MELISSA NORMAN	Gainesville	FL	

CRISTINA NOVELO	Veracruz		
OHN NOWLIN	Scottsdale	AZ	
KAREN O'BRIEN	Westmont	IL	
EVELYN OCH	Pittsburgh	PA	
ELLEN OCONNOR	Arlington	VA	
JEN ODOM	Lighthouse Point	FL	
CARL OERKE JR	River Edge	NJ	
LARRY OLIVIER	Chattanooga	TN	
COREY E. OLSEN	Delafield	WI	
CYNTHIA OPDERBECK	Storrs	CT	Please, we need to demonstrate our commitment to humane and responsible practices, as in the need to protect marine life from drift gillnets!
LJ ORSZULAK	Chicopee	MA	
ALEX OSHIRO	Honolulu	HI	We need to responsibly manage our ocean resources so that we may all share it.
KELSEY OTTEN	Fairfield	CT	
CHRIS OTTOSEN	shell lake	WI	
BOB OTTOSEN	shell lake	WI	
MARCIA OUELLETTE	Lafayette	IN	
DELORES OWEN	Colorado Springs	CO	
S OWENS	Memphis	TN	
CEM OZKOK	crownsville	MD	
SUSAN PACE	PRESTON	MS	

KRIS PAGENKOPF	Gainesville	FL	
MICHELLE PALMAS	Poughkeepsie	NY	
RALPH PALMER	Brattleboro	VT	
DAVID PARKER	Las Vegas	NV	
COREY PARKER	schaumburg	IL	
G PARKER	Peoria	IL	
STEWART PARKS	MYRTLE BEACH	SC	Please ban. There is enough slaughtering of whales and dolphins. Do we have to add another species? There has to be more thought put into protecting ocean life.
MICHAEL PARSONS	Aguilar	CO	
PAT PASCUAL	Patterson	NY	
RANDALL PASKE	Kansas City	MO	
ELKE PASSARGE	Colonia	NJ	
DALE PATRICK	Des Moines	IA	
K L PAUL	Trevoise	PA	
DANIELLE PAYNE	Ft Wayne	IN	
GRACE PAYNE	Austin	TX	
JIM PECH	Madison	WI	
SUSAN PELAKH	Cocoa Beach	FL	
JOSH PELLEG	Omer		
DONNA PEMBERTON	Cocoa	FL	
CARLA PEREIRA	Union	NJ	
V.E. PERKINS	Franktown	CO	It's a sign that we're a species too stupid to

			survive that we are still using gillnets. The oceans must be protected and the creatures in them.
JOEL PERKINS	Denton	TX	
RICHARD PERKOWSKI	Bluff	UT	
DEBORAH PERRERO	Potomac Falls	VA	
LINDA PETERSON	Indian Trail	NC	
KYLE PETERSON	Sterling Heights	MI	
ROBIN PETERSON	Jacksonville	FL	
NEZKA PFEIFER	Scranton	PA	
DAMON PHILLIPS	Alexandria	VA	
DONALD PHILLIPS	Yorktown	VA	
JOE PHILLIPS	Colfax	NC	
JOSEPH PHILLIPS	Kernersville	NC	
RICHARD PHILLIPS	Neenah	WI	
EWA PIASECKA	Warsaw	Poland	
KIMBERLY PICAZO	Las Vegas	NV	
ANNETTE PIENIAZEK	Houston	TX	
EVELIO PINA	San Juan	PR	
JOHN PINEZICH	Longmont	CO	
CHARLOTTE PISONI	St. Louis	MO	
LINDA PISTOLESI	Spring Valley	NY	
GEMMA PLANAS	barcelona		
FRANKLIN PLATIZKY	Denton	TX	
ELSIE POPE	Memphis	TN	His is the right

			thing to do. Now is the right time to do it. PLEASE. THANK YOU.
ELSIE POPE	Memphis	TN	
CARLO POPOLIZIO	Estell Manor	NJ	Be respectful of marine life.
ROBIN POPPE	Barnum	MN	
JUDI POULSON	Fairmont	MN	
MÂ JOSA PRADA	Barcelona	Spain	
MARY PRICE	Cleveland	OK	
MEREDITH PRIESTLEY	Bedford	NY	
SARAH PROPST	Newport News	VA	Gillnets kill many sea animals that are discarded. Protect important sea life from unnecessary death.
LESLIE PROUTY	West Hyannisport	MA	What a horrible fate for these beautiful creatures!!
PATRICIA PRUITT	Oak Park	IL	
NICHOLAS PRYCHODKO	Bridgehampton	NY	
RO PU	Brooklyn	NY	Stoop gill nets
LAURIE PUCA	New City	NY	
MARIA PUGLIESE	Florence	AZ	
PHOEBE PURCELL	London		
SUSAN/ROBERT PUSCHECK	Ypsilanti	MI	It is unacceptable to harm iconic and endangered species to catch a luxury seafood item such as swordfish. We want dolphin-safe swordfish.
MICHAEL QUILLIN	parma heights	OH	

BARRY RABICHOW	Oak Park	IL	
RASA RACEVICIUTE	Atlanta	GA	
ROBERT RACINE	Mesa	AZ	
ELIZABETH RAINOLDI		MA	
A LYNN RAISER	Saint Johns	FL	
JOANN RAMOS	Iselin	NJ	Fish do not spontaneously appear. Take better care of the ocean's inhabitants.
CONNIE RAPER	Durham	NC	
LANETTE RAPP	Leesburg	FL	
JANE READING	Phoenix	AZ	
CATHY REAM	Clinton	MT	
LENORE REEVES	Mokena	IL	
MARNEE REILLY	Kinderhook	NY	
THOMAS RENNINGER	Newark	DE	
MR. & MRS. BRUCE REVESZ	Cedar Grove	NJ	
OSCAR REVILLA	San Sebastian de los Reyes	NC	
DOLORES REYNOLDS	Grand Junction	MI	
MICHAEL RIBORDY	Wellington	KS	
DEBORAH RICHARDS	Burns	WY	
GAYLE RICHARDSON	grove city	OH	
ELISABETH RICHTER	Wiener Neustadt	VA	
RON RICHTER	Bethlehem	PA	

CAROLYN RICKETTS	Edgewater	MD	
CAROLYN RIDDLE	Austin	TX	
DARA RIDER	San Tan Valley	AZ	
PATRICIA RISSO	Middleburg	PA	
SERGIO RIVERA	Chicago	IL	
NANCY ROBERTS-MONEIR	Gulfport	MS	
KENNETH ROBERTSON	Kansas City	MO	
JACK ROBINS	Iowa City	IA	
JANET ROBINSON	Boca Raton	FL	
DAMETA ROBINSON	Wisconsin Rapids	WI	
JACQUELINE ROBINSON	Powder Springs	GA	
NELLY RUTH ROBLES REY	Bogota		
LOR RODRIGUEZ	Garland	TX	
STEVEN RODRIGUEZ	Cedar Creek	TX	
DENNIS ROGERS	Hubbardston	MA	
ROSALYN ROHLOFF	Golden	CO	
JOHN ROIG	Boca Raton	FL	
JOHN ROKAS	Eastpointe	MI	
JELICA ROLAND	Buzet		
KEVIN ROLFES	Austin	TX	
DEBORAH ROLLINGS	Colorado Springs	CO	
DENISE ROMESBURG	Phoenix	AZ	
MICHAEL ROSA	West Hartford	CT	

KATHRYN ROSE	Denver	CO	
TIM ROSE	Lighthouse Point	FL	
MELENE ROSE	Ridgefield	CT	Thank you for doing your best to save our oceans.
HELENE ROSEN	Ivyland	PA	
JON ROSENBLATT	piscataway	NJ	Drift and drag gillnets are disrupting the environment and endangering several species - Please ban their use
STEWART ROSENKRANTZ	Pompano Beach	FL	
MIKE ROSSA	carteret	NJ	
PATRICIA ROSSI	Levittown	PA	
DAVID ROTH	ARLINGTON	VA	
KAREN RUBINO	Huntington Station	NY	
JULIANN RULE	Avon	MN	
GALE RULLMANN	Youngsville	NC	
MARGARET RUNFORS	Årebro		
LINDA RUSSELL	Tauranga		
ANNIE RYAN	boston	MA	
ROBIN RYSAVY	Lake Winnebago	MO	
A S	Chicago	IL	
M S	hamburg	NY	
CAROLINE SÄVILLA	Champs-sur-marne	NY	
R SAFRON	North Ridgeville	OH	
MARINA SAGARDUA	brighton	MA	
NICK SALERNO	Glenview	IL	

FREDDY SALL	miami beach	FL	
MAX SALT	Woonsocket	RI	
CRISTINA SANCHEZ	Glendale	AZ	
LEIGH SANDS	Denton	MD	
MARC SANTORA	Takoma Park	MD	
ROBERT SARGENT	Salem	NH	
LEIGH SAUNDERS	Hastings		
CRISTINE SAUNDERS	Ocala	FL	This letter says it all on Why you should no longer use gillnets! Be respectful of our oceans bounty.
REBECCA SAVAGE	Boulder	CO	
JANIS SAWYER	Santa Rosa Beach	FL	
TIMOTHY SCHACHT	Grosse Pointe Park	MI	
SUE SCHAMMER	Ulm	Baden-Warttemberg	
AUGUST SCHEER	Ardsley	NY	
PIERRE SCHLEMEL	Old Bethpage	NY	
SYBIL SCHLESINGER	Natick	MA	We must stop drift gill nets now.
EVA SCHMELZER	Duesseldorf	North Rhine-Westphalia	
MICHAEL SCHMIDT	Reading	MA	

LINDA SCHMIDT	Gibsonia	PA	
MICHAEL SCHMOTZER	York	PA	
MARIA SCHNEIDER	Munich	Bavaria	
RANDOLPH SCHOEDLER	Milwaukee	WI	
EILEEN SCHOLL	Charlotte	NC	
RANDY SCHRADER	Orlando	FL	
AMY SCHUMACHER	Beavercreek	OH	
JOYCE SCHWARTZ	Altamonte Springs	FL	
SIBYLLE SCHWARZ	Eagle River	AK	
KRAIG AND VALERIE SCHWEISS	Sterling	IL	
PAOLA SCODELLARI	Roma		
DAVE SEARLES	Brodhead	WI	
TED SEBASTIAN	Surprise	AZ	I am a military certified Underwater Search and Rescue Diver in California. I've seen the carnage these nets leave behind. It's an awful example of our disrespect of our oceans and home.
JOSHUA SEFF	McKinney	TX	
GREG SELLS	Austin	TX	
TONI SEMPLE	Livingston	MT	We no longer can pretend these nets are not doing great damage, especially to apex predators without whom we have no balance and humans will die.

JIM SENNETT	Lewistown	MT	
RAGEN SERRA	Denver	CO	
MICHELLE SEWALD	Denver	CO	
MICHAEL SEXTON	bolivar	NY	
MIKE SEYFRIED	Boulder City	NV	
PEPA SGD	fdsv	FL	
PRISCILLA SHADE	Boston	MA	We have to stop destroying indiscriminately!
GEORGIA SHANKEL	Chicago	IL	
JANICE SHANNON	tampa	FL	
DONALD SHAW	St Petersburg	FL	
JOE SHAW	Quakertown	PA	
JAMES SHELTON	Richmond	VA	I have visited the pacific coast twice for birding and wildlife watching. I buy pacific seafood each week as long as it is sustainable. I support taking measures to end the problems with drift nets.
JUDITH SHEMATEK	Seaford	VA	
BRET SHER	Vernon Hills	IL	
NICHOLAS SHERMAN	Burlington	VT	
NICHOLAS SHERMAN	Schriever	LA	
BOYCE SHERWIN	Malone	NY	
KATE SHERWOOD	Long Beach	NY	
ARON SHEVIS	Brooklyn	NY	
NINA SHIRINA	Moscow	KY	

JACOB SHIRMER	New York	NY	
ADRIAN SHIVA	Trincity	NC	
DANIEL SHIVELY	Greensburg	PA	
AVIVA SHLISELBERG	Rego Park	NY	
H. DENNIS SHUMAKER	Marietta	PA	
CHRISTIAAN SIANO	Austin	TX	
OMAR SIDDIQUE	Ellicott City	MD	
CHANDRA SIGMUND	Austin	TX	
HELENA SILVA	lisboa		
LINDA SIMONDS	Oklahoma City	OK	there is NO excuse for this. needs to be stopped now.
BEVERLY SIMONE	West Nyack	NY	
MILLICENT SIMS	Montclair	NJ	
CYDNEY SIRI	Cimarron	CO	Soon we will have no fish to eat from our oceans and everything will be toxic and the balance of our oceans will be gone forever. Please help in any way you can to stop our losses.
STEVE SIVLEY	Austin	TX	
JULIE SKELTON	Belleville	MI	
LAURENCE SKIRVIN	Villa Rica	GA	
DAVID SKRYJA	Waukesha	WI	
ADAM SLOAN	Denver	CO	
CYNTHIA SMALL	Golden	CO	
MARI SMET	Woodhaven	NY	

DONALD SMITH	Capitan	NM	
BRIAN SMITH	Ellington	CT	
JANELL SMITH	NEW DOUGLAS	IL	
KIMBERLEY SMITH	sedalia	MO	
DIANA SMITH	Arlington	VA	
V SMITH	Lansdale	PA	
STEVE SMITH	Washingt on	DC	
BRADLEY SMITH	Cape Coral	FL	
MARY ANN SMITH	Fort Washingt on	PA	Thank you for considering my views.
ELEANOR SMITHWICK	Atlanta	GA	
COPLEY SMOAK	Bonita Springs	FL	This is long overdue.
HENRY SMOKE	Columbus	NC	
CAROLE SMUDIN	Bridgewater	MA	My kids want you to clean it up !!!!
SANDY SOBANSKI	New York	NY	Get rid of these horrible nets now!
ALLA SOBEL	Hoboken	NJ	
M SOLOMON II	harrisburg	PA	
MARCY SOMENEK	deer park	IL	
EILEEN SONNENBERG	Brewster	MA	
TRISTAN SOPHIA	Absarokee	MT	
SALLY SORENSEN	Westerly	RI	
JAMES SORRELLS	Groveland	FL	
PATRICIA SOTEROPOULOS	Chatham	NJ	
BRUCE SOWDEN	Casselberry	FL	

THEODORE SPACHIDAKIS	PIRAEUS	AL	
DEBORAH SPENCER	Billerica	MA	
KAREN SPRADLIN	Jacksonville	AL	
ANTONIA STAD	Amsterdam		
JOANNA STALKER	Margate	FL	
DENNIS STANSELL	Suches	GA	
ANETTE STAUSKE	Davidsonville	MD	
JOE STEBBINS	Seven Mile Beach	AZ	
MATT STEDMAN	Montauk	NY	get rid of this antiquated technique, we can do better!
KLAUS STEINBRECHER	Angel Fire	NM	
JIM STEITZ	Gatlinburg	TN	Gillnets are shrouds of death that evacuate the oceans of life. They do not constitute a means of fishing as most people would recognize the term. Swallowing a vast realm of the pelagic ecosystem within inescapable netting and drowning countless intelligent, sentient creatures, whose only crime is swimming amidst lucrative swordfish and thresher sharks, is morally profane

			and offensive to our dignity. You must terminate the use of gillnets in American-governed waters entirely, as a heinous usurpation of our common oceanic treasure by a commercial clique.
DOROTHEA STEPHAN	Winzer	Bavaria	
GAIL STEWART-ILES, PH.D.	Rockledge	FL	
JEAN STIDHAM	LAS VEGAS	NV	
GINA STIFF	Williamsburg	VA	
SARAH STIMELY	Fort Collins	CO	
E STO	passaic	NJ	
LAUREN STONE	Northfield	MA	It is time to clean up or make serious changes re: the ca. Drift gillnet fishery. To many marine life are indiscriminately being caught.
LISA STONE	Houston	TX	
MARGERIE STONE	Shelocta	PA	
PEPITA STONE	London		
RICHARD STROWD	Chapel Hill	NC	
THOMAS STRUHSAKER	Durham	NC	
STEVE STURGILL	Louisville	KY	
MORAIMA SUAREZ	Brooklyn	NY	
ADITI SUNDARAJAN	Mckinney	TX	

PETER SUPERSANO	Reno	NV	
RICH SURDYK	Pittsburgh	PA	
BRIAN K. SUTTON	Louisville	KY	
ROBERT&MARY SWAIN	Grand Rapids	MI	PROTECT,CONSERVE and PRESERVE OUR OCEANS ON THIS RARE AND PRECIOUS PLANET
MARK SWEENEY	Ellicott City	MD	
SUE SWISS	hopatcong	NJ	
BARBARA SWYDEN	Rio Rancho	NM	
MARINA TACHLINSKI	Eberbach	Baden-Warttemberg	
MARY TANOURY	Grosse Pointe	MI	
YVETTE TAPP	Santa Fe	NM	GO ORGANIC VEGAN, HUMANS!
PAUL TARLOWE	Hackettstown	NJ	
LAUREN TARTAGLIA	Brooklyn	NY	
CHARLOTTE TAYLOR	London		
SHAWN TAYS	Manchester	CT	
TERRY TEDESCO-KERRICK	Phoenix	AZ	
MICHELE TEMPLE	Woodside	NY	
MEL TEMPLET	Pottsboro	TX	
NATALIE TENNISON	Castle Rock	CO	
DONNA THELANDER	Kailua Kona	HI	
DENISE THOMAS	West St Paul	MN	
JAMES THOMAS	Chapel Hill	NC	
ROBERT THOMSON	Southfield	MI	

PETER TIJERINA	Chicago	IL	
THOMAS TIZARD	Kailua	HI	
SACHA TODD	fayetteville	AR	
WILLIAM TONER	Mc Graw	NY	
HELEN TOROSIAN	Fredericksburg	VA	
JOHN TOVAR	Cedar Falls	IA	
CASSANDRA TREPPEDA	Elmsford	NY	
JAMES TRIMM	Falls Church	VA	
TRACY S TROTH	Pearl	MS	
JACKIE TRYGGESETH	Grand Marsh	WI	
NIINA TURUNEN	Stockholm		
R-LAURRAINE TUTIHASI	Oracle	AZ	
FRANCINE UNGARO	Southington	CT	
KLAAS VAAK	rotterdam		
TERRY VACCARO		NJ	
RIO VALENCIA	midlothian	VA	
JENNIFER VALENTINE	Massapequa Park	NY	
DAVID VALENTINO	Morganville	NJ	
JACOBA VAN SITTEREN	Austin,	TX	It's time to ban the drift gill nets EVERYWHERE.
MIKE VANLANDINGHAM	Shawnee	KS	
KEVIN VAUGHT	Antioch	TN	
PATRICIA VAZQUEZ	Mexico City		
SHALON VAZQUEZ	Columbus	OH	
GARY VEDVIK	Pittsford	NY	

ORDELL VEE	Madelia	MN	
ALEJANDRA VEGA	Buenos Aires	AL	
KENT VELLA	Tucson	AZ	
DIANE VERNA	Alta	WY	
EVELYN VERRILL	Prescott	AZ	
MICHELE VILLENEUVE	Kingsport	TN	Please be responsible and ethical and protect innocent marine life.
JOSEPH VINCENT	Harvey	LA	Waste is the product of an idiot.
OLGA VINOGRADOVA	Borok		
SUSAN VIROSTEK	Killingworth	CT	Gill net fishing is wasteful and detrimental to the entire ecosystem. Please prohibit this practice!
ANDREAS VLASIADIS	athens	greece	
ANCA VLASOPOLOS	Centerville	MA	
SUSAN VOGT	Fairbanks	AK	this is long overdue!
THOMAS VOSIK	Christiansburg	VA	
DJ WAGNER	Henrico	VA	
VICKIE WAGNER	Three Oaks	MI	
LINDA WAINE	Taunton	MA	
LAWRENCE WALKER	Hanover	MA	
CAROL WALKER	Winthrop	MA	
DONALD WALKER	Conway	MA	
KAREN WALKER	BROOKLYN	NY	
JULIA WALLER	London		
JANET WALLS	Minden	NV	

KEN WARD	Gloversville	NY	
DIANA WARD	St Petersburg	FL	
RALPH WARD	Commerce	TX	
JEFFREY WARD	New York	NY	
DORIS WARNSTEDT	Cologne	North Rhine-Westphalia	
SHAWNA WATSON	Winnipeg	Manitoba	
ESTHER WEAVER	Highland	NY	
KRYSTAL WEILAGE	Butte	MT	
KATARZYNA WEISS	Wodzisław Śląski	Poland	
JOSEPH WENZEL	Maplewood	MN	
QUENTIN WENZEL	Stroudsburg	PA	
KEN WENZER	Laurel	MD	
ANDRE WEST	Bronx	NY	
BRUCE WHEELER	Savannah	GA	
JESSICA WHEELER	New Orleans	LA	
PHYLLIS WHITE	Yorktown	VA	
WILLIAM WHITE	Fort Walton Beach	FL	
LISA WHITE	Fruitland	MD	These nets must be banned, we do not need to continue killing our marine life needlessly!!!!
JUDY WHITEHOUSE	Phoenix	AZ	

JODI WICK	silver spring	MD	
DANNA WILLIAMS	Athens	GA	
DONALD WILLIAMS	Somerville	MA	
SUSAN WILLIAMS	Lakewood	CO	
BEVERLY WILLIAMSON-PECORI	Mc Kees Rocks	PA	
LINDA WILSCAM	Vernon Rockville	CT	
KENDRICK WILSON	Tucson	AZ	
WALT WILSON	Lexington	NC	Stop the waste of our precious resources
THOMAS WINDBERG	Austin	TX	
PATRICIA WINKELMAYER	Ocean Pines	MD	
CHARLES WIRTH	Hurley	SD	
JENNIFER WITTLINGER	Steamboat Springs	CO	We are systematically destroying the ocean ecosystem and this nets are a big part of the problem!
ANDREW WOITKOSKI	Pittsfield	MA	
ALAN WOJTALIK	Baltimore	MD	
NIKKI WOJTALIK	parkville	MD	
DARLENE WOLF	Naples	FL	
ROBERT WOLF	Naples	FL	
JOYCE WOOD	Bayfield	CO	The oceans are already at risk as food sources because of huge gyres of bits of potentially toxic plastic waste. We should be trying

			to preserve the best possible conditions for ocean life instead of putting it under further stress.
ROTH WOODS	Ann Arbor	MI	
NANCY WOOLLEY	Stoughton	MA	
JULIE WREFORD	Newport		
TRIGG WRIGHT	Spring	TX	
FILIP WUYTS	MEERHOUT		
SAMANTHA WYSOCKI	Portland	CT	
SUSAN YARNELL	Chapel Hill	NC	
JOAN YATES	Westbrook	ME	
DENNIS YEE	Scottsdale	AZ	
OLIVER YOURKE	Brooklyn	NY	
BARBARA ZAHA	St Charles	IL	
JAN ZANONI	glenview	IL	
ELLEN ZIMMERMAN	South Portland	MA	
PAULETTE ZIMMERMAN	St. Louis	MO	
OLIVIA ZORUMSKI	Newport News	VA	
SANDY ZOUZANEAS	dover	NH	
BARRY ZUCKERMAN	Middleton	NY	