

May 14, 2015

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

**RE: Agenda Item E.2: *OPPOSITION* to Final Approval of Highly Migratory Species Exempted Fishing Permit Applications**

Dear Ms. Lowman and Council members:

Thank you for your commitment to finding alternatives to drift gillnets that would allow for selective targeting of swordfish while significantly reducing bycatch. We are writing in opposition to Exempted Fishing Permit (EFP) proposals being considered by the Council that would allow large-scale pelagic longlines in the U.S. West Coast EEZ and drift gillnets into the Pacific Leatherback Conservation Area (PLCA). These proposals are not consistent with requirements to minimize bycatch and to protect and recover threatened and endangered species.

More than 35,000 U.S. citizens submitted public comments under Agenda Item E.3 asking the Council to not approve any EFPs for pelagic longlines in the U.S. EEZ and to not allow drift gillnets into the PLCA. There is nation-wide public opposition to the authorization of these unselective fishing methods off our coast.

Similar proposals have come forward in the past and they were ultimately rejected due to bycatch and endangered species concerns. Hawaii-style pelagic longlines have unacceptable levels of bycatch, and they create significant risk to endangered and declining Pacific leatherback and loggerhead sea turtles. Moreover, allowing drift gillnets back into the PLCA would risk killing leatherback sea turtles while they are migrating to, and feeding in, their critical foraging grounds off California and Oregon, as well as increasing the take of other protected marine life. The new EFP proposals should be rejected.

We commend the Council for approving EFPs to further explore deep-set buoy gear as a clean, profitable method to catch Pacific swordfish. We hope to see this method added to the Highly Migratory Species Fishery Management Plan as an allowable gear type to target swordfish. We believe it is beneficial to collect as much data on this gear type as possible.

Additionally, we are concerned about the sequence of key decisions related to bycatch reduction in the drift gillnet fishery. The Council has again delayed final action on drift gillnet hard caps (previously scheduled for November 2014, March 2015, and now June 2015), yet has scheduled

final action at this meeting on highly controversial longline and drift gillnet EFP proposals. We respectfully request that the Council prioritize drift gillnet hard cap implementation and a transition plan that ultimately prohibits this gear type.

Accordingly, we ask the Council to not approve EFPs for pelagic longlines or drift gillnet gear.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Enticknap', is centered on a light blue rectangular background.

Ben Enticknap  
Pacific Campaign Manager and Senior Scientist