



**Western
Pacific
Regional
Fishery
Management
Council**

Agenda Item G.3.a
Supplemental WPFMC Letter
September 2015

September 11, 2015

Don McIsaac
Pacific Fishery Management Council
7700 NE Ambassador Pl # 101
Portland, OR 97220

Dear Don:

As you are aware, we were somewhat taken aback by the content of your scoping document on the subject of establishing a West Coast shallow-set longline fishery and associated regulations.

The Western Pacific Council may not have a problem with such an initiative in principle, but we have concerns with the scoping document.

What set our teeth on edge was the mention of developing a mechanism for transferring latent Hawaii longline permits to a West Coast shallow-set fishery. This is the first time we have heard of this idea and would have appreciated prior consultation on the matter. The scoping document does not mention the difficulty and complexity in developing a transfer mechanism for the privately-held permits and the compensation costs involved. Moreover, there is substantial permit turnover in the Hawaii longline fishery and the issue of latent permits in the fishery is not a simple one.

Another issue we have with the scoping document is the manner in which the Hawaii longline fishery is discussed. At first blush, it appears the Pacific Council wants to take Hawaii permits to make their own, and then create further incentives (e.g. fishing inside the EEZ off California) to lure Hawaii longline vessels to land in West Coast ports.

To facilitate better coordination in the future, please provide us the opportunity to review drafts of documents that involve the operation of vessels and fisheries that we manage.

We look forward to hearing the outcome of the Pacific Council's discussions on this agenda item.

Sincerely,

Kitty M. Simonds
Executive Director