9/5/2014

Mark Helvey, NMFS West Coast Region 501 W. Ocean Blvd., Ste. 4200 Long Beach, CA 90802.

## Attn: Pacific Bluefin Tuna

Mr. Helvey

Oceanside Senior Anglers is a 501 (c) (7) Fishing Club, located in Oceanside, California. Our club has over 600 members including spouses who regularly fish Southern California inshore and offshore waters. As a club we are writing this letter to voice our concern over the proposed Pacific Bluefin tuna petition filed by the Center for Biological Diversity (CBD).

Our membership is committed to ocean stewardship and we work to ensure future generations have the opportunity to continue the legacy of ocean sportfishing. Through our Kids Fishing program, we educate over 120 children each summer on ocean stewardship and fishing conservation.

Our club is involved in several science based Scripts-NOAA projects, including use of descending devices to reduce Barotrauma and bio-mass & migration tagging projects of Calico bass and Yellowtail. We support the efforts of the Sportfishing Association of California and in most cases agree with California Fish and Wildlife in their efforts to improve our coastal fisheries.

We are deeply concerned our fishing rights will be diminished if a complete moratorium on Pacific Bluefin tuna is imposed as outlined in the (CBD) Petition.

The efforts by non-governmental groups that force agendas in the name of conservation and lobby governmental offices for restrictive laws not based on sound science is in our opinion the wrong approach to conservation. Oceanside Senior Anglers has seen the effects of poorly written and subjective regulations, that in whole or part were pressed into law because of the lobbying effort of well-funded environmental groups. Our members recognize that the effects

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of natural and unnatural conditions are effecting our oceans, and in general support most recommendations or rule changes by governmental agencies, <u>if the changes are based on sound</u> <u>science and subjected to public review and debate</u>.

Based on information contained in the Federal Register, "Restrictions for Pacific Bluefin Tuna in the Eastern Pacific Ocean", the vast majority of tuna taken from the Pacific Ocean are not commercially harvested in US waters. The Inter-American Tropical Tuna Commission (IATTC) has set annual catch limits for IATTC members at 5000 metric tons. Yet, as noted in the publication, US commercial fishing vessels represent only two (2) percent of average annual landing for all fleets in the Eastern Pacific Ocean. Based on the 2012 stock assessment conducted by the International Scientific Committee for Tuna, NMFS concluded Pacific Bluefin Tuna were commercially overfished and at potential risk. It is clear sportfishing is an insignificant percentage of the overall catch in US waters. The southern California sport fishing industry should not be prohibited from catching fish in US waters. Our belief is the large commercial operations who sweep up large quantities of blue fin should bear the responsibility for the current state of the fishery. The commercial operations should have their catch limits reduced until the stock is deemed healthy.

Our members question how an organization as large at IATTC, NMFS, NOAA and the Pacific Management Council have allowed this fishery to be subjected to commercial overfishing?

Sport fishing off California has a minimal effect on highly migratory species, such as Pacific Bluefin tuna. Most sport fishermen, like those represented by our club, <u>would be willing to</u> <u>accept reasonable limits on the numbers of fish we take</u>, doing our part to improve the stocks if they are indeed threatened. Allowing some Bluefin to be taken for personal use with rod and reel or by spearfishing fits into a well-managed conservation plan. **We do, however, oppose an outright ban on sportfishing for bluefin. There has to be a balanced approach from the state, federal and international level.** 

## In Summation:

Oceanside Senior Angler members, their families and the sportfishing fleet we support are against the (CBD) petition prohibiting fishing for Pacific Bluefin tuna. The impact of a complete sportfishing closure is fool hardy when compared to the huge number of Bluefin caught by seiners who operate just a few miles south of US waters. We reject unsubstantiated and biased claims that the recreational anglers are responsible for a negative impact on the Blue Fin tuna fishery.

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As stated before, Oceanside Senior Anglers support sound science based fisheries management practices. Our hope is that further cooperative management and fisheries studies will be supported by IATCC, NMFS and NOAA that formulate a far reaching Pan Pacific plan for maintaining healthy stocks of Pacific Bluefin Tuna through conservation, enforcement, monitoring, public review and international cooperation.

Oceanside Senior Angler members, their families and the SoCal sport fishing fleet does not want to see the oceans bio diversity irreversibly damaged by abusive commercial fishing operations. Part of our legacy is to pass along sportfishing to future generations. Proper fisheries management is paramount in achieving this goal. We trust our voice will be heard through this venue and NFMS will bring sensibility to the issue at hand.

Thank You and Regards

Thomas "Bo" Bolender Vice President and Conservation Chair Oceanside Senior Anglers Oceanside, California