

December 14, 1999

Rebecca Lent, NMFS  
1315 East-West Highway  
Silver Spring, Maryland 20910

Dear Ms. Lent:

These comments are submitted according to directions contained in the ATTENTION ALL LONGLINE FISHERMEN, bulletin I received by fax dated 12/13/99.

First of all shouldn't the memo have been entitled ALL **PELAGIC** LONGLINE FISHERMEN? Was this a Freudian slip or just portend of things to come? Secondly, if NMFS is truly interested in saving sea birds, they need to contact the Seabird Rescue people in St. Petersburg and ask for data on what is killing most of the seabirds. I guarantee you it isn't pelagic longlines. What is killing them in such great numbers is recreational trolling gear. Why does NMFS ignore any bycatch on seabirds unless it can be attributed to commercial fishing gear? Doesn't NMFS have a legal obligation to address all sea bird mortality regardless of the political power of the sector responsible?

In looking at the map shown on the front side of the latest Matlock Memo, there evidently is no problem in the Gulf of Mexico east of 90 degrees or south of 26 degrees and of course no problem in the South Atlantic at all north of 34 degrees. The area proposed looks more political than biological. Have the northern pelagic longline fishermen made a deal with NMFS to sacrifice the southern pelagic longline fishermen? Is this rule part or akin to the proposed legislation worked out by CCA the Bluewater group and another sportfishing association. Was any input received from the fishermen who are to be discarded? Is this memo all they get to comment on? Where in the world is any fairness in this attempt to eliminate the food producing ability of these human beings we call commercial fishermen?.

The memo mentions a passing interest by NMFS concerning the socio-economic effects of the proposed rule. Our experience shows us NMFS cares not one whit for what it does to commercial fishermen or how much pain it causes. We believe this is just one more example of how Gary Matlock, is using his skill to eliminate commercial fishing in the south.

Matlock uses deathless prose in submitting this rule i.e.: *"Because targeted pelagic longline fishing for wahoo and dolphin in the proposed closure areas would result in similar bycatch rates of undersized swordfish, billfish and sea turtles, the Councils may wish to consider complementary actions to enhance the bycatch reduction afforded by this proposed rule."*

In other words Matlock is saying "ban longlines for dolphin and wahoo and I will approve it." He will propose public hearings dates in January 2000 and the hearing room will be

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full of anglers who will speak in favor of closing this area as many of them would ban all commercial fishing. There are only a small number of pelagic longline fishermen who, for the most part, are not organized in the south or they would have been included in the "most favored" list of fishermen who will be paid for getting out of the business under proposed legislation.

Under the proposed legislation, this same area I suppose would be closed and fishermen listed in the proposed bill would be compensated. Under this Matlock approach, fishermen will be banned from fishing and there is no compensation, retraining, or help of any kind to take the place of what has been a legal occupation until this Matlock rule makes it illegal.

On behalf of commercial fishermen everywhere who have been savaged by NMFS regulations, I submit our total opposition to the proposal to ban pelagic longline fishing in the areas shown on the memo attached and request further attempts to solve the problem without destroying more of the infrastructure of the domestic fishing industry.

Sincerely,

Robert P. Jones  
Executive Director  
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cc: SFA O,D,PP  
Gulf Council—South Atlantic Council  
other interested parties