

Oceanside Senior Anglers

December 7, 2016

Subject: Petition to List Pacific Bluefin Tuna  
NOAA-NMFS-2016-0100-001

Oceanside Senior Anglers, Inc. is a 501 (c) (7) Fishing Club located in Oceanside, California. Our club is comprised of over 360 members who primarily fish the Eastern Pacific, from Alaska down to Cabo San Lucas.

Our club is writing to inform the National Marine Fisheries Service (NMFS) we believe the petition submitted by the Center for Biological Diversity (CBD) is flawed or biased in many areas, especially in their belief recreational fishing over utilizes the resource. Our club wrote the NMFS in 2014 supporting a reduced limit of Pacific Bluefin Tuna (PBFT) from 10 to 5 on the US west Coast. The CBD lobbied for a complete shutdown of the fishery. The compromise of two (2) PBFT per day has proven the recreational fishing community will support logical regulations and reduced limits. We feel the current daily limit of 2 fish is reasonable. It is a fact that the recreational take of PBFT is minuscule compared to the huge seiner impacts.

Our club also feels that it is unreasonable to consider placing areas of habitat off limits to all fishing if indeed the PBFT are placed on the Endangered Species List. The banks off of Southern California are already included in existing MLPA's and Cow Cod Conservation areas. Eliminating these areas from recreational fishing is unwarranted, especially for a HMS species which spends a small portion of their life cycle on SoCal's outer banks. The banks are also not considered by current science to be breeding grounds for the PBFT.

The fact that a Highly Migratory Species (HMS) such as the PBFT crosses many international boundaries complicates the issue, we understand this. What we do not understand is the inability of the NMFS to effectively coordinate a rule based system with the Inter-American Tropical Tuna Commission (IATTC) and the Western and Central Pacific Fisheries Commission (WCPFC) to further reduced the commercial seining operations.

The inability to effectively set and control a reduced commercial take from Japan, Mexico, Korea and Chinese Taipei proves other nations do not take this as seriously as the United States. Though we do not agree with the majority of the CBD petition, we do agree with their position concerning international regulations. Existing international regulations do not adequately protect the PBFT.

Common sense seems to have evaded to the process. If and when NOAA decides the petition warrants additional scientific study, we trust the study will be conducted in a transparent and open fashion. Placing a HMS on the endangered species list while international law and regulations continue to support commercial seining operations outside of US water would be a travesty. Protecting the PBFT under the Endangered Species Act, while other nations continue to exploit the resource will not benefit the recovery efforts that we all want to see.

This letter will be circulated to our club members who will have the option to send it directly to NMFS.

Thomas "Bo" Bolender

President and Conservation Director  
Oceanside Senior Anglers