



# SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

4055 FABER PLACE DRIVE, SUITE 201  
NORTH CHARLESTON, SOUTH CAROLINA 29405  
TEL 843/571-4366 FAX 843/769-4520  
Toll Free 866-723-6210  
Email: safmc@safmc.net Website: www.safmc.net

George Geiger, Chairman  
Duane Harris, Vice Chairman

Robert K. Mahood, Executive Director  
Gregg T. Waugh, Deputy Executive Director

June 19, 2007

Mr. Michael Clark  
HMS Management Division, OSF  
National Marine Fisheries Service  
1315 East West Highway  
Silver Spring, MD 20910

Re: I.D. 030107C

Dear Mr. Clark:

Thank you for reopening the comment period on the application for an Exempted Fisheries Permit (EFP) submitted by Blue Water Fishermen's Association. On Wednesday evening, June 13, 2007 (as part of the June Council meeting) the Council held a public comment session to provide interested individuals an opportunity to express their views on the Blue Water Fishermen's EFP request prior to consideration by the Council. On June 14<sup>th</sup>, after reviewing the application and considering the written and oral comments received, the Council voted to recommend that the HMS Management Division deny the Blue Water Fishermen's EFP request.

*The majority of Council members expressed the following concerns about the EFP request:*

- *The request does not fit the EFP mold (it is much more comprehensive and of a much greater magnitude than the Council has commented on in the past);*
- *If the proposed areas are to be reopened to long lining it should be accomplished through the FMP amendment process;*
- *The large number of vessels (13) was viewed to constitute a fishing fleet not a research project;*
- *The research proposed could be carried out in areas already open to long lining;*
- *Members questioned the NMFS ability to provide 100% observer coverage and if this amount of observer effort is an appropriate use of scarce observer resources in the southeast;*
- *The areas proposed to be opened to long lining in the EFP were closed because they were determined to be nursery areas for juvenile swordfish;*
- *The EFP is an attempt to harvest more swordfish to maintain quota share and the Council understands the need to retain US swordfish quota share, however, the majority did not believe the requested EFP is the proper way to achieve this goal.*

If you require any additional information or would like a copy of the minutes of the Council deliberations, please do not hesitate to contact me.

Sincerely,

*George Geiger*

George Geiger  
Chairman

cc: SAFMC Members and Staff  
Monica Smit-Brunello  
Joe Kimmel and Phil Steele