Dear Dr. McLissac:

The Highly Migratory Species Fishery Management Plan (HMS-FMP) development team made a lot of progress at the Pacific Grove, CA meeting held on January 31 - February 2, 2000. Reports and discussions were extremely detailed and thorough. These discussions raised a couple of issues I hope will be considered by the Team and by the Council.

First, I am disappointed in the criteria established for categorization as either a 'management-unit species' or 'associated species'. The team established that one of the criteria that must be met before inclusion within the 'management unit species' category was appreciable landings (or potentially appreciable landings). I feel strongly that catch should replace landings for this criterion. If a HMS-gear type significantly impacts another resource, then that resource should be managed under the FMP, regardless of its economic value. For example, ocean sunfish are the most predominant species caught by drift gillnets, yet under the current criteria, this species cannot be considered a management-unit species. That seems irresponsible.

A second point that I hope you will consider for inclusion in the FMP is the development of performance standards that are measurable and tractable. Although I know you intend to include performance standards, I urge you to make these standards clear, and to provide enough flexibility within the plan to allow changes in fishing gear, fishing methods, and other management measures that promote efficient and selective fisheries. For example, I understand that drift gill nets are permitted within the EEZ for California swordfish fisheries, whereas use of pelagic longlines within this area is illegal. If Federal regulations follow this example, then I encourage you to develop a framework that is flexible enough to allow changes in regulated fishing gears if technological advances produce new methods that result in bycatch reduction (i.e., exceed the performance shown by drift gill nets). Currently, researchers from Norway, Japan, USA, and other nations are working on species-selective baits and species-selective fishing methods for longline fisheries. I expect longlines will become very species selective in the near future. In fact, the Wildlife Conservation Society is involved with a demersal longline project in the Gulf of Alaska that developed a bait that efficiently catches Pacific halibut and sablefish, but
selects against other species (such as dogfish shark and skate). If a species-selective bait (or longline fishing technique) becomes available for pelagic longlines that is (a) efficient for catching target species and (b) significantly reduces the bycatch of shark and other species, then I hope the plan will be flexible enough to allow/encourage fishers to switch gear types from drift gill nets to pelagic longlines (or whatever new fishing technique may be developed to reduce bycatch and bycatch mortality). The FMP must include provisions to allow rapid responses to potential technological advances and other unanticipated occurrences throughout the framework adjustment process.

Thanks for considering these thoughts.

Sincerely,

Daniel L. Erickson
Fisheries Scientist
Wildlife Conservation Society