

June 14, 2016
Ms. Dorothy M. Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

RE: Agenda Item D.4 – Initial Scoping of Biennial Specifications and Management Reference Points and Management Measures

Dear Chair Lowman and members of the Council,
My name is Jonathan Gonzalez and I am from Santa Barbara, CA where I work full-time as an artist at a skateboard company. I spend my spare time volunteering as an advocate for responsible fisheries management and I'm also President of the Ventura County Commercial Fishermen's Association.

The situation summary of this Agenda Item notes that no regulatory adjustment proposals were identified as of the advanced briefing book deadline. However, with respect to National Standard 1, I want to ask the Council to begin the process of addressing the outdated estimates of MSY and OY in the HMS FMP. I understand that this task extends beyond the scope of activities considered during the biennial process, but given the fact that no other regulatory proposals are on the table, I see this as an opportunity to use this three meeting process to address this very important issue.

According to the situation summary of this Agenda Item, Table 4-3 on page 44 of the HMS FMP lists estimates of MSY and OY based on outdated information from prior to 2004 when the FMP was published. Table 4-3 is also problematic because the definitions for some stocks listed have changed since 2004. For example, Table 4-2 lists proxies for the EPO swordfish stock (that is now subject to overfishing) when in fact the vast majority of catch in the West Coast swordfish fisheries is coming from the Western and Central North Pacific Ocean stock (which has been referred to as underutilized). Because of this, the Council has to waste time responding to a declaration of overfishing of a stock that is not vulnerable to fisheries managed under the HMS FMP. But there are more important concerns here...

First and foremost, National Standard 1 states: "Conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery for the United States fishing industry." The use of the word "shall" in National Standard 1 is of particular importance because other National Standards are not phrased as mandates, but rather are modified by such language as "to the extent practicable." Considering the fact that the majority of swordfish we consume in the U.S. is imported from foreign fleets that target the EPO stock, are we unintentionally contributing to overfishing of the EPO swordfish stock by failing to achieve OY domestically? That being said, how can we achieve optimum yield if we don't even know what it is?

Thank you for your attention and consideration.

Jonathan Gonzalez
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