



March 30, 2017

Mr. Herb Pollard, Chair  
Pacific Fishery Management Council  
70 NE Ambassador Place, Suite 101  
Portland, OR 97220

*via email: [pfmtc.comments@noaa.gov](mailto:pfmtc.comments@noaa.gov)*

***Re: Agenda Item C.4: Future Council meeting and Workload Planning***

Dear Chair Pollard and Council Members:

Wild Oceans is writing with regard to the Highly Migratory Species schedule for the June 2017 meeting of the Pacific Fishery Management Council (Council). Specifically, we make the following recommendations:

**Provide agenda time at the June 2017 Council meeting for presentation and review of finfish bycatch performance standards in the drift gillnet fishery.**

At its September 2015 meeting, the Council adopted drift gillnet performance metrics for non-ESA-listed marine mammals and finfish. The first fishing season that the DGN fishery operated under performance metrics was from May 1, 2016 through January 31, 2017. The observer data from this fishing season will be available prior to the June Council Meeting.

At the March 2017 Council meeting, the Council discussed alternatives for reviewing this information, either through a Highly Migratory Species Management Team report or through the Stock Assessment and Fishery Evaluation Report. While the Council did not specify a means to receive this information, the Council did express an intent to review the information in June to determine whether the fishery exceeded a performance metric and to determine if additional management measures are needed to further reduce bycatch.

The June 2017 schedule for Highly Migratory Species does not currently include an agenda item to receive and review this drift gillnet performance metrics for the 2016-2017 season. We suggest adding an agenda item to the June 2017 meeting that is dedicated to the presentation and review of the finfish bycatch performance measures.

***Maintain a schedule that includes the presentation and discussion of a full range of alternatives for deep-set buoy gear authorization.***

In advance of the March 2017 Council meeting, National Marine Fisheries Service (NMFS) prepared a Supplemental NMFS Report<sup>1</sup> that included presentation and selection of a range of alternatives for deep-set buoy gear (DSBG) authorization at the June 2017 meeting. We support maintaining this schedule.

We have pursued full implementation of a DSBG fishery because six years of research has demonstrated that it *can* catch swordfish with minimal bycatch. When we look to the future of fishing, we imagine safer, more selective, more sustainable fishing methods than longlines or driftnets. We imagine gear that is not only friendly to the environment, but friendlier to fishermen and fishing communities, too. The Pflieger Institute of Environmental Research has conducted six years of research, first optimizing buoy gear for fishing for swordfish at depth, then testing the gear through a rigorous research program, and finally engaging commercial vessels to fish using DSBG. The Council has since witnessed growing interest in the gear from harpoon fishermen as well as seasoned drift gillnet fishermen and has approved more than ten DSBG exempted fishing permits.

The NMFS Report presents valuable guidance for the Council regarding the workload involved in authorization of DSBG. We encourage the Council to reaffirm its commitment to authorizing deep-set buoy gear as currently tested and configured and according to the schedule presented by NMFS. To accomplish this, we ask the Council to reassign the HMSMT the task of developing a full range of alternatives for the Council's review at the June 2017 meeting.

Thank you for your consideration and dedication to advancing best fishing practices that protect the future of fishing.

Sincerely,



Theresa Labriola  
Pacific Program Director

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<sup>1</sup> Agenda Item C.5.a., Supplemental NMFS Report, March 2017.