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September 12, 2014

Ms. Dorothy Lowman, Chair  
Pacific Fishery Management Council  
1100 NE Ambassador Place, #101  
Portland, OR 97220

RE: Agenda Item G.4: New or Routine Management Measures for 2015-2016 HMS Fisheries

Dear Chair Lowman and Council Members:

At its June 2014 meeting, the Pacific Fishery Management Council (PFMC) directed its Highly Migratory Species Management Team (HMSMT) to provide alternatives for the Council to consider that would “reduce recreational catch of Pacific bluefin tuna by modifying current trip and possession limits and/or other recreational management measures.”<sup>1</sup> In response, the HMSMT produced a report that included four proposed alternatives, along with a discussion of considered but rejected alternatives.<sup>2</sup> This report was also informed by several documents produced by the California Department of Fish and Wildlife (CDFW), which are also contained in the September 2014 Briefing Book.<sup>3</sup> In light of these reports, and recognizing the severely depleted status of the Pacific bluefin population, The Pew Charitable Trusts recommends that the Council consider the following management options:

- 1) Implement an annual catch limit of 208 metric tons, as recommended by the Inter-American Tropical Tuna Commission (IATTC) Scientific Staff, which could be managed by a sliding scale possession limit, bag limit, and other measures (e.g., season limit) as necessary to reduce catch to that level.
- 2) If an annual catch limit is not immediately feasible due to deficiencies in the current reporting and monitoring regulations,
  - a) Implement Alternative 3 with a daily possession limit of 1 fish per angler per day with an associated possession limit of 3 fish per angler for multi-day trips ( $\geq 3$  days). These limits should apply to all bluefin landed in California ports, regardless of whether the fish were caught in U.S. or Mexican waters,

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<sup>1</sup> PFMC. Decisions Summary Document. June 20-25, 2014

<sup>2</sup> HMSMT. Report on Management Measures for 2015-2016 Fisheries: Recreational Bluefin Tuna Fishery

<sup>3</sup> CDFW. Reports 1-3

- b) Implement additional measures needed to reduce catch to the scientifically-advised level including, for example, a temporal closure at some point during the peak July-September season,
- c) And immediately work with the California Department of Fish and Wildlife to develop a process and deadline for improving the timeliness of reporting and monitoring, as well as establishing and implementing the annual catch limit and sliding scale possession limit.

These steps will allow the PFMC to fulfill its mandate under the Magnuson-Stevens Fishery Conservation and Management Act to develop domestic regulations to address the relative impact of the domestic fishing fleet,<sup>4</sup> while still allowing recreational fishermen and charter vessels to target Pacific bluefin as part of their trips.

### **An Annual Catch Limit for Pacific Bluefin**

While historically the balance of commercial and recreational catch by U.S. fishermen has fluctuated, currently the majority of U.S. landings of Pacific bluefin are made up of recreational catch. Recreational landings have been increasing rapidly in recent years, and reached an estimated 982 metric tons in 2013, the highest level reported since at least 1990.<sup>5</sup> This is well above the 208 metric tons cap recommended by the IATTC Scientific Staff in 2014.<sup>6</sup>

Implementing an annual catch limit of 208 metric tons would be the most effective way to reduce the US recreational catch of Pacific bluefin to this scientifically recommended level. This limit could then be managed by a sliding scale possession limit, which would allow managers to provide fishing opportunities throughout the season, but still avoid catch that exceeds the annual limit. A similar sliding scale retention limit system has been successfully used to manage a portion of the US Atlantic bluefin commercial fishery for over 10 years.

However, as noted in the HMSMT report, “existing monitoring systems are not adequate” to implement in-season management measures, such as hard catch limits or a sliding scale possession limits. Therefore, the Council must take other actions immediately.

### **A Reduction of the Current Possession Limit**

Taking into consideration the need to improve monitoring before an annual catch limit can be effectively implemented, Pew recommends the Council consider immediately reducing the possession limit to 1 fish per angler per day. Such a possession limit would not only reduce the impact of the recreational fishery in US waters, but also lower catch in Mexican waters, where on average more than 80% of the Pacific bluefin landed in the U.S. is caught.<sup>7</sup> While reducing overall catch, it would also preserve the ability for recreational fishermen and charter vessels to continue to target Pacific bluefin on their trips. The impact to individual fishermen would also be minimized, as 81.5% of the commercial passenger

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<sup>4</sup> Federal Register Volume 78, Number 131 (Tuesday, July 9, 2013), 41033

<sup>5</sup> HMSMT. Report on Management Measures for 2015-2016 Fisheries: Recreational Bluefin Tuna Fishery

<sup>6</sup> IATTC. Recommendations by the staff for conservation measures in the eastern Pacific Ocean. SAC-05-16. May 2014. <http://iattc.org/Meetings/Meetings2014/MAYSAC/PDFs/SAC-05-16-Conservation-recommendations.pdf>

<sup>7</sup> HMSMT. Report on Management Measures for 2015-2016 Fisheries: Recreational Bluefin Tuna Fishery

fishing vessel bags recorded between 1990 and 2013<sup>8</sup> and 99% of the private vessel bags recorded between 2008 and 2013<sup>9</sup> contained 1 or fewer bluefin.

Based on the data presented in the HMSMT report, a possession limit of one would achieve a 54% reduction in catch compared to existing regulations.<sup>10</sup> Recalling that such a reduction from current levels would still produce an annual catch above the recommended level of 208 metric tons, the Council could consider implementing additional management measures including seasonal closures that would reduce catch to below the IATTC-recommended level.

### **A Timeline for Action to Improve Monitoring of the Fishery**

Along with the immediate short-term reduction in the possession limit, Pew recommends that the PFMC agree on a timeline for improving monitoring of the recreational bluefin fishery and establishing and implementing long-term annual catch limits that could be managed by a sliding scale possession limit. For example, the PFMC could work with the State of California to revise its logbook reporting rules, shortening the timeline for submission from the current requirement of 4 weeks, and ensuring more timely analysis and transfer of collected information to NOAA Fisheries.

Thank you for your consideration of these comments. We look forward to working with you as the PFMC moves to implement a plan that will help lead to the recovery of the Pacific bluefin tuna population.

Sincerely,



Amanda Nickson  
Director, Global Tuna Conservation



Paul Shively  
Manager, U.S. Oceans, Pacific

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<sup>8</sup> CDFW presentation to the HMSMT, July 29, 2014

<sup>9</sup> CDFW Report on Bag Reduction Options for the Recreational Take of Pacific Bluefin Tuna, September 2014, [http://www.pcouncil.org/wp-content/uploads/G4b\\_CDFW\\_Rpt1\\_SEPT2014BB.pdf](http://www.pcouncil.org/wp-content/uploads/G4b_CDFW_Rpt1_SEPT2014BB.pdf)

<sup>10</sup> HMSMT. Report on Management Measures for 2015-2016 Fisheries: Recreational Bluefin Tuna Fishery. Page 12