



**University of California at Berkeley Chapter
Society for Conservation Biology**

October 30, 2001

The University of California at Berkeley Chapter of the Society for Conservation Biology looks forward to the finalization of a highly migratory species fishery management plan (HMSFMP) for public review and would like to draw your attention to several issues that we hope will be addressed adequately in that draft. In particular, we have concerns about the following fisheries:

- California high seas pelagic longline fishery
- California/Oregon swordfish drift gillnet fishery
- California tuna gillnet fishery

All of these fisheries have recorded interactions with protected species, as well as significant economic and regulatory discard mortalities of finfish.

California high seas pelagic longline fishery

The California high seas pelagic longline fishery is now fishing for swordfish in much of the same waters, using nearly identical gear, where the Hawaii based longline swordfish fishery operated.

As you are probably aware, the Hawaii based swordfish longline fishery was closed earlier this year by court order due to interactions with the Endangered Species Act (ESA) listed sea turtle species. The new biological opinion issued for this fishery was a "jeopardy" opinion regarding both leatherback and loggerhead turtles.

There is no reason to doubt that the California high seas longline fishery is not responsible for nearly identical interactions as that of the HI swordfish longline fishery. We also have no idea of the survival rate of discarded finfish in this fishery. It has no observer program.

California/Oregon drift gillnet fishery

The California/Oregon drift gillnet fishery for swordfish currently operates within the west coast 200 mile exclusive economic zone (EEZ). Following legal actions filed last year by environmental organizations, a new biological opinion was issued that again is a "jeopardy" opinion for leatherback and loggerhead turtles.

The National Marine Fisheries Service (NMFS) has responded by establishing a time and area closure for the critically endangered leatherback sea turtle off northern California and Oregon. However, in light of the "jeopardy" opinion, and the cumulative impacts of other fisheries



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In conclusion, we recommend the final draft HMSFMP options incorporate following:

1. The new HMSFMP seriously evaluate the cumulative impacts of all its fisheries on protected species and reduce those impacts significantly;
2. All fisheries implement an observer coverage plan in order to effectively assess impacts on protected species, as well as other non-targeted finfish species;
3. Various gillnet fisheries be regulated and permitted in a coherent manner that does not allow fishers to avoid certain protective regulations by changing its so-called "intended target species";
4. No new EEZ longline fishery be allowed.

Advocacy of the Berkeley Chapter of the Society for Conservation Biology does not necessarily reflect the views of the National Society for Conservation Biology.

Thank you for your consideration.

The UC Berkeley Chapter of the Society for Conservation Biology