



**Western  
Pacific  
Regional  
Fishery  
Management  
Council**

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PFMC

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Don McIsaac  
Executive Director  
Pacific Fishery Management Council  
7700 NE Ambassador Place  
Portland, Oregon 97220-1384

Dear Don:

The Western Pacific Council would like to congratulate the Pacific Council on completing the Highly Migratory Species Plan for the U.S. West Coast. The development of this plan will stabilize management of U.S. pelagic fisheries across the Pacific, particularly as the new plan tries to harmonize as much as possible with the Western Pacific Council's Pelagics FMP. The following is a synthesis of comments on the HMS Plan made by WP Council staff.

**Species to be managed**

The list of species to be managed is similar to this Council's pelagics management unit. We note that moonfish and pomfrets are not included in the list, although longline vessels operate from the U.S. West Coast and presumably land these species. Is there a reason for their exclusion from the management unit? The list of pelagic sharks is more limited than this Council's which in addition to the blue, thresher and mako sharks also includes silky shark, oceanic whitetip shark, longfin mako shark, salmon shark. The silky and oceanic white tip sharks reflect the warmer tropical waters in which some of our fisheries operate.

We note the protection extended to white, megamouth and basking sharks as well as halibut. The banning of the landing and sale of striped marlin marks a clear difference in perspective between our two regions. Marlins are a popular food fish throughout the Western Pacific and we realize that this puts us out of step with attitudes in the mainland U.S. However, what is the biological basis for preventing commercial exploitation of striped marlin? Why should this apply to landings of striped marlin from longline vessels, which would be caught outside the EEZ and be well beyond the range of recreational fishermen? If there were competition for striped marlin by longline fishing within the EEZ this would be understandable, since there may be direct competition between the two sectors. However, high seas catches of striped marlin are unlikely to have a demonstrable influence on recreational catches.

## **Fisheries to be managed**

The main difference between our two regions in terms of fishing gears to be managed is this Council's ban on the use of drift gillnets within the EEZs of the Western Pacific, which was based primarily on the non-selective nature of the fishery and its impacts on protected species. We thought that the proposal to shift gillnetters over to longline fishing was a neat solution to concerns about gillnetting, but the current hyperbole and hysteria generated by some conservation and recreational fishery organizations has effectively made this proposal untenable. Under the circumstances, the continuation of the status quo for no longline fishing within the EEZ off the West Coast is the most tenable alternative. Longline vessels operating from the West Coast have "traditionally" never operated within the EEZ and structured their operations around high seas fishing so the status quo will have little to no impacts.

Similarly the 44 deg N ban for purse seine operations continues a status quo already in effect. A factor not appreciated about typical purse seine operations is that they are only suited to tropical latitudes, where winds are generally light, and do not create problems with the "sail" effect when the purse seine is being hauled. We note that there is little discussion on fish aggregating devices (FADs), particularly untethered FADs, which have become a major issue in both the eastern and western Pacific. The overarching concern in our region is the catch of juvenile bigeye and yellowfin tunas, as well as the much larger bycatch associated with these type of FAD.

In terms of recreational fishing activity, this is a major sector of the fishing industry in both our two regions, including charter-vessel fishing. The California-based long-range charter operations mark a clear difference between our two regions, although there is some interest in long-range charters to distant seamounts in Hawaii.

## **Framework**

The framework process is well thought out and described. The biennial management cycle is an interesting approach, however, our experience has been that events can occur over relatively short time periods, requiring an accelerated response. The American Samoa fishery doubled in fleet size and quadrupled in terms of fishing effort during six months in 2001.

## **Longline fishery**

The management measures for longline fishing, other than the EEZ prohibition mirror those for the Western Pacific, including the measures developed in the March 30, 2001 Final Environmental Impact Statement. Looking at the alternatives for longline fishing within the EEZ, numbers 2 and 4 appear to be rather similar, i.e. some form of exempted fishing experiment, either to provide data for a bycatch reduction program or to see if longline fishing can be conducted in an eco-friendly manner. Are these so different that they need to be elaborated separately?

**MSY and overfishing control rules**

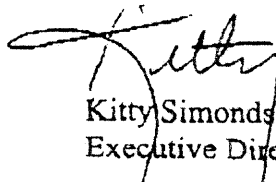
The MSY and overfishing control rules for West Coast HMS present no surprises, and make extensive reference to control rules developed for the Western Pacific pelagics. The different reference points for sharks versus tunas and tuna like species reflect the susceptibilities of and lower resilience of elasmobranch populations to fishing. The consideration of OY in an international context also makes sense since most of the HMS species need to be managed across their range, which requires international management.

**Essential Fish Habitat**

The EFH descriptions are similar to those given for pelagic species in the Council's 1998 Comprehensive SFA amendment. The HMS Plan notes that this Council's FMP has a different type of framework relating to EFH, but acknowledges differences in habitat utilization and plan development and design. It might be useful, however, to begin thinking about how both Council's could minimize differences between the two EFH sections in both FMPs.

Thank you for this opportunity to comment on the West Coast HMS Plan. We hope that the comments made here are useful and will assist in finalizing the document.

Sincerely



Kitty Simonds  
Executive Director

cc: Rod McInnis  
Svein Fougner  
Charles Karnella

