

To: Graig Heberer

Things to consider when planning the structure of the shallow-set long line fishery seaward of the EEZ on the west coast.

1. Right now Hawaiian swordfish boats have a limited number of sets and a quota of interactions with turtles. These two issues economically keeps the Hawaiian fleet operating in there region which usually begins in the 1st quarter and sometimes extends into the 2nd qtr. However the Hawaiian Long Line Association (HLA) is pushing for a much higher number of sets allowed and an increase in the number of interactions with turtles.(which is fine by me) but this would allow the Hawaiian swordfish fleet to begin their efforts off of the west coast during the 3rd and 4th qtr. which would create a fleet size or amount of effort to great for many environmental issues.
2. Implementation of a West Coast Limited Entry Permit into the SSSL fishery off the west coast with qualifying criteria with past history of SSSL and Drift gillnet (which should be a small number) would give fishery managers time to regulate the amount of effort on the resource, observer funding, and ESA issues. This would also give individuals who gave up DGN (in mid to late 90's)and switched to SSSL an opportunity to recoup from the financial hardship when they were subsequently regulated out of the SSSL fishery. Given the potentially small number of qualifiers you could then draw from the DGN fishermen who have a current DGN permit with a history of operating in the Pacific Leatherback Conservation Area or some other form of entry level.
3. By limiting the number of WC LE Permits to fish seaward of the EEZ there wouldn't be a need for a maximum number of sets or hooks allowed by the SSSL fleet which could also dampen interest into the fishery by DGN fisherman who have no set limits other than area and seasonal closures. However if there is a large amount of interest into the SSSL fishery within a few years, set limits and ESA interactions quotas could then be put in place more accurately with recent and past collected data.

4. Don't over regulate if possible because it's very difficult to relax or resend implemented regulations. Many times in the past, industry has been successful in making adjustments to a fishery to satisfy problem issues.
5. There would not be a need for boundaries of the western longitudes due to the economics of fuel costs and travel time involved with operating to far from the west coast.
6. There are other issues such as gear, bait, bird mitigation set times, and probably a host of ESA items that can be hammered out on the advisory panel level. I feel the most important need right now is to get the go ahead (green light) from the Council, California Coastal Commission, or anybody else who can stop this plan.

SINCERELY, THANK YOU
JOHN GIBBS

FRANK CRIVELLO APPROVES OF THIS ALSO