

SCIENTIFIC AND STATISTICAL COMMITTEE REPORT ON FISHERY  
MANAGEMENT PLAN AMENDMENT 2 - HIGH SEAS SHALLOW-SET LONGLINE

The Scientific and Statistical Committee (SSC) reviewed a preliminary draft Supplemental Environmental Impact Statement (SEIS) for a proposed high seas shallow-set longline fishery. Dr. Kit Dahl and Dr. Steve Stohs of the Highly Migratory Species Management Team and Ms. Elizabeth Petras of National Marine Fisheries Service Southwest Regional Office were available to answer questions.

With regard to sea turtle protective measures, all of the action alternatives include 100 percent observer coverage and hard bycatch caps, which will ensure that take will not exceed that allowed by subsequent Endangered Species Act consultation. A lack of available data weakens the analysis of SEIS alternatives. Full evaluation of these alternatives requires information on spatial and temporal distribution of the target and bycatch species and response of the fishery to area restrictions. However, this proposal is for a fishery in an area that has not been fished in recent years, using significantly modified gear. The language and conclusions of the SEIS need to explicitly acknowledge uncertainty and simplifying assumptions to avoid giving a false sense of precision in the evaluation of alternatives. Nonetheless, the current document is sufficient for Council decision-making, with the caveat that catch rates and take estimates are imprecise and quantitative estimates of fishery profitability are not reliable at this time.

The SSC noted some shortcomings of the economic analysis that could be addressed but probably would not alter the general evaluation of the proposed alternatives. Evaluation of fishery impacts and profits for the alternative westward boundary designations should use available spatial information on swordfish catch per unit of effort (CPUE) as well as interactions with protected species. The current analysis holds swordfish CPUE spatially constant and oversimplifies redistribution of fishing effort. Likewise, most of the economic evaluation relies on cost estimates from the Hawaii-based fishery. Predictable differences between this fishery and the west coast-based fishery, such as distance travelled to the fishing grounds, should be documented in the analysis.

The evaluation of impacts and economic benefits of alternative fleet size limits is also quite uncertain. The opportunity costs associated with the required observer coverage should be explicitly evaluated, including identification of which fisheries might lose coverage if observers must be diverted to meet the 100 percent coverage required by this fishery. Uncertainty in the magnitude of fishery interactions with protected species and resulting take estimates should also be explicitly acknowledged.

In development of future Environmental Impact Statements, the SSC encourages further discussion about the ecosystem effects of different fisheries and gear types. The Highly Migratory Species Fishery Management Plan should approach the issue of bycatch and ecosystem effects comprehensively.