

March 11, 2015
Ms. Dorothy M. Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

RE: Agenda Item H.4 – Drift Gillnet Management and Monitoring Plan Including Final Action on Hard Caps

Dear Chair Lowman and members of the Council,
My name is Jonathan Gonzalez and I am from Santa Barbara, CA. I have worked full-time as a professional graphic designer the last 16 years and I blog over at EatUSseafood.com. I am here to represent the public-at-large as a volunteer advocate for responsible fisheries.

(Slide 2) So what is our purpose for being here today? As for the public, we are here without pay to advocate for or oppose Council actions because we are concerned, even though Council actions do not affect our livelihoods. ENGOs are here today because it is their job to be here, and they are paid to be here. On the other hand, fishermen are taking time off of work to be here today in hopes of saving their job. The PFMC is here today because of the Magnuson-Stevens Act. The fate of a fishery and the families and communities that depend on them is in the hands of the PFMC, and depends on whether or not the Council fulfills its purpose of adhering to the MSA National Standards. This Agenda Item is a huge deal.

(Slide 3) The first of the three Council actions under this Agenda Item is to approve the purpose and need statement, including goals and objectives for a draft gillnet management and monitoring plan. I am opposed to the draft “purpose” because reducing bycatch below the levels currently permitted by law is not practicable and will stifle efforts to maintain or enhance a viable west coast HMS fishery. I am opposed to the draft “need” because in regards to National Standard 9, the proposed action is not needed because it seeks to reduce bycatch to an extent that is not practicable.

(Slide 4) The draft management and monitoring plan has three main goals, and each goal has its own set of objectives. I am opposed to Goal #1 because the objectives fail to comply with National Standards 1, 2, 5, 7, 8, 9 and 10. I am opposed to Goal #2 because the objectives fail to comply with National Standards 1, 2, 5, 6, 7, 8 and 9. I support Goal #3 because the objectives will help to maintain or enhance the DGN fishery.

(Slide 5) The second Council action under this Agenda Item is to provide guidance on further development of the management and monitoring plan. Considering there is a POCTRT meeting this month, a swordfish workshop coming up in May, and the possibility of new data coming from the EFP’s, I feel the Council should wait at least one year before providing any guidance in regards to further developing the management and monitoring plan.

(Slide 6) The last of the three Council actions under this Agenda Item is to adopt a Final Preferred Alternative for hard caps. According to the HMSMT Report, the PPA will create a “substantial decline” in economic performance with only a “small improvement” in bycatch performance. Furthermore, 100% monitoring has not proven to be feasible yet, and in most cases the one-year hard caps under consideration combined with observer coverage rates

below 50% would result in a fishery closure if only one take/M&SI is observed. For these and several other reasons I support the No Action Alternative for hard caps.

(Slide 7) According to the HMSMT Report, most of the implementation issues discussed for hard caps in the previous slide as well as other issues would need to be considered with respect to performance objectives. For these and several other reasons I support the No Action Alternative for performance objectives.

(Slide 8) Both NMFS and Frank Orth and Associates have routinely inspected DGN vessels and have excluded certain vessels for safety or accommodation reasons. Removing the unobservable exemption could get someone killed on the ocean. This is a huge deal. Furthermore, future funding levels are uncertain and a move to 100% observer coverage with all (70%) of the additional costs borne by industry would reduce variable profits per set by about 50% according to the HMSMT Report. For these and several other reasons I support the No Action Alternative for fishery monitoring.

(Slide 9) If the Council decides to take action on this Agenda Item, I believe you would fail to comply with 8 out of the 10 National Standards, which undermines the Council's purpose for being here today, not to mention the loss of a responsible fishery, livelihoods, etc.

(Slide 10) Last Monday was Dr. Seuss' birthday so I thought I'd share a quote of his that I believe applies directly to this Agenda Item. "*Sometimes the questions are complicated and the answers are simple.*" The simple answer to this complicated Agenda Item is for the Council to slow down and wait for more scientific data before taking any action at all.

(Slide 11) On a positive note, the Blue Serengeti, as I like to refer to it, is thriving with healthy marine mammal populations! Scientists and whale watchers are seeing more whales today than they have seen in their entire lives. This is something that should be recognized and celebrated a lot more in my opinion. It's important to note that the restoration of all of these stocks coexisted with the status quo DGN management measures.

(Slide 12) As far as priorities go, the fact that over 42,000 sea turtles were legally killed in 2012 alone is the elephant in the room that deserves more attention from ENGOs that aim to save sea turtles. It's important to note that the CA DGN fishery has had zero observed sea turtle mortalities in over 15 years.

(Slide 13) On another note, I feel it's important to point out another model of sustainability. After nine years of fishing, the Ventura II retained 95% of its catch and did not interact with a single sea bird or marine mammal and only caught one sea turtle. Of the nine U.S. regional fishery management councils, the PFMC is the only one that authorizes a longline fishery, and then prohibits longline fishing within its jurisdiction. I ask that you please enact the management standards required under federal law, and allow Pete Dupuy to fish with longline gear within West-coast waters.

Thank you for your attention and consideration.
Jonathan Gonzalez