Agenda Item H.4.c
Supplemental Public Comment 7
(Electronic Only)
March 2015

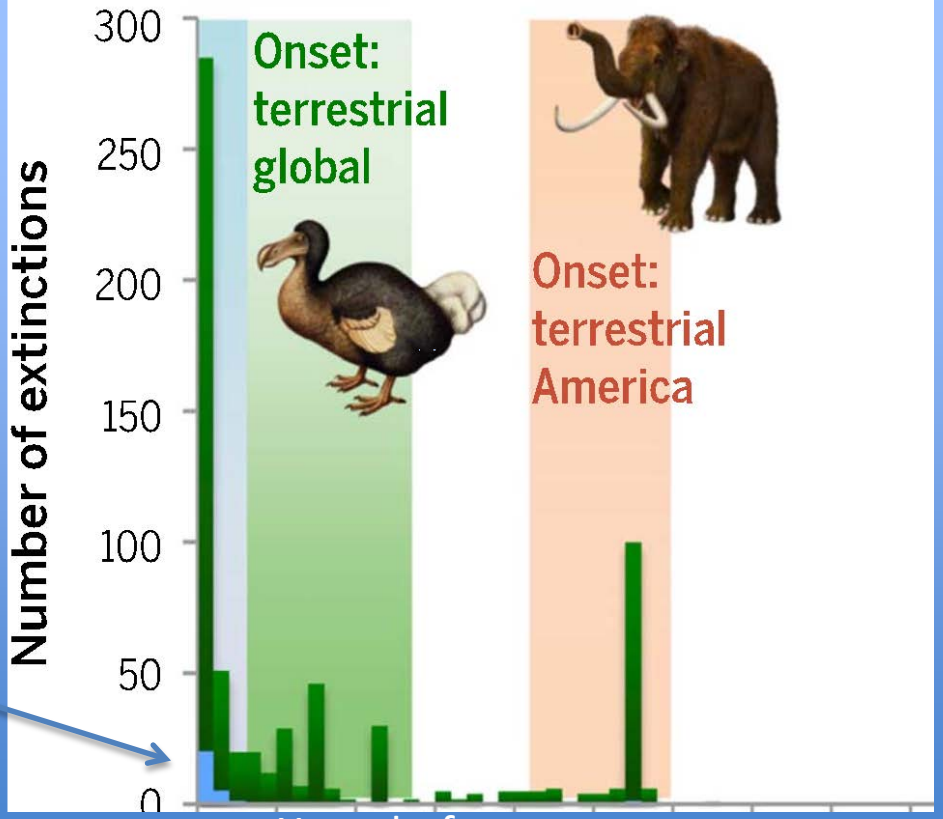
Time to Transition Away from Drift Gill Nets

Turtle Island Restoration Network

March 11, 2015

State of the oceans

Marine Extinctions



From McCauley, et al., (2015) *Science* 347:248

TURTLE ISLAND RESTORATION NETWORK
FIGHTING FOR A BLUE-GREEN PLANET

CA Drift Gill Net is among the 20% worst

Percentile	20%	40%	60%	80%	100%
Range of discard rates	0-14%	14-27%	27-40%	41-61%	62-96%

Kelleher, K. (2005). *FAO Fisheries Technical Paper. No. 470*

California Drift Gill Net Fishery discard rate: 64%

Forty years of of experiments

- 1982 - 12 mile exclusion to protect pinnipeds.
- 1986 - Additional closures to protect gray whales.
- (1989 U.N. bans large scale pelagic DGNs)
- 1990 - Additional closures, concerns regarding shark catch.
- (2001 - Washington prohibits DGN)
- 1997 – Nets lowered 36 feet
- 2001 - Pacific Leatherback Conservation Area.

Over 20% of the catch is of threatened species

- Sperm whales - endangered
- Leatherback - endangered
- Loggerhead - endangered
- Common thresher shark
  - 90-day ESA finding
  - CMS – Appendix II
- Bigeye Thresher
  - – IUCN Vulnerable
  - CMS – Appendix II
- Blue Shark – IUCN Near Threatened
- Longfin Mako – IUCN Vulnerable
- Shortfin Mako – IUCN Vulnerable
- Smooth Hammerhead – IUCN Vulnerable, CITES Appendix II
- Giant Manta Ray
  - IUCN Vulnerable
  - CITES – Appendix II
- Basking Shark
  - IUCN Vulnerable
  - CITES Appendix II
- Spiny Dogfish – IUCN Vulnerable
- Megamouth* - IUCN DD
- Bluefin Tuna – IUCN Vulnerable
- Blue Marlin – IUCN Vulnerable

The consequences of getting it wrong

1. Sperm Whales

Stock Assessment

- Moore & Barlow
  - low growth rates: 0.6% - 0.8%,
  - “precision was low” with CI ranging from -10% to +9%
- SAR uses generic cetacean growth rate of 2%
  - Whitehead (2002) estimates 1% (0.7% to 1.5%)
  - Moore & Barlow estimates under 1%

Fifteen species to manage

Extinction is guaranteed

Even with 80% confidence that management is right for each of 15 species, this implies a…

98.8% chance of pushing at least one species toward extinction.

Drag on the U.S. economy

- Benefits v. Costs:
  - Observers
  - Biological
  - Analysis
  - Regulatory Analysis
  - Litigation costs

Transfer Effect

ONLY occurs where

1) No U.S. sources can take up supply
   - Harpoons, Buoy gear
2) Foreign sources increase effort
   - Displacement, not transfer

This is largely hypothetical

International Sanctions

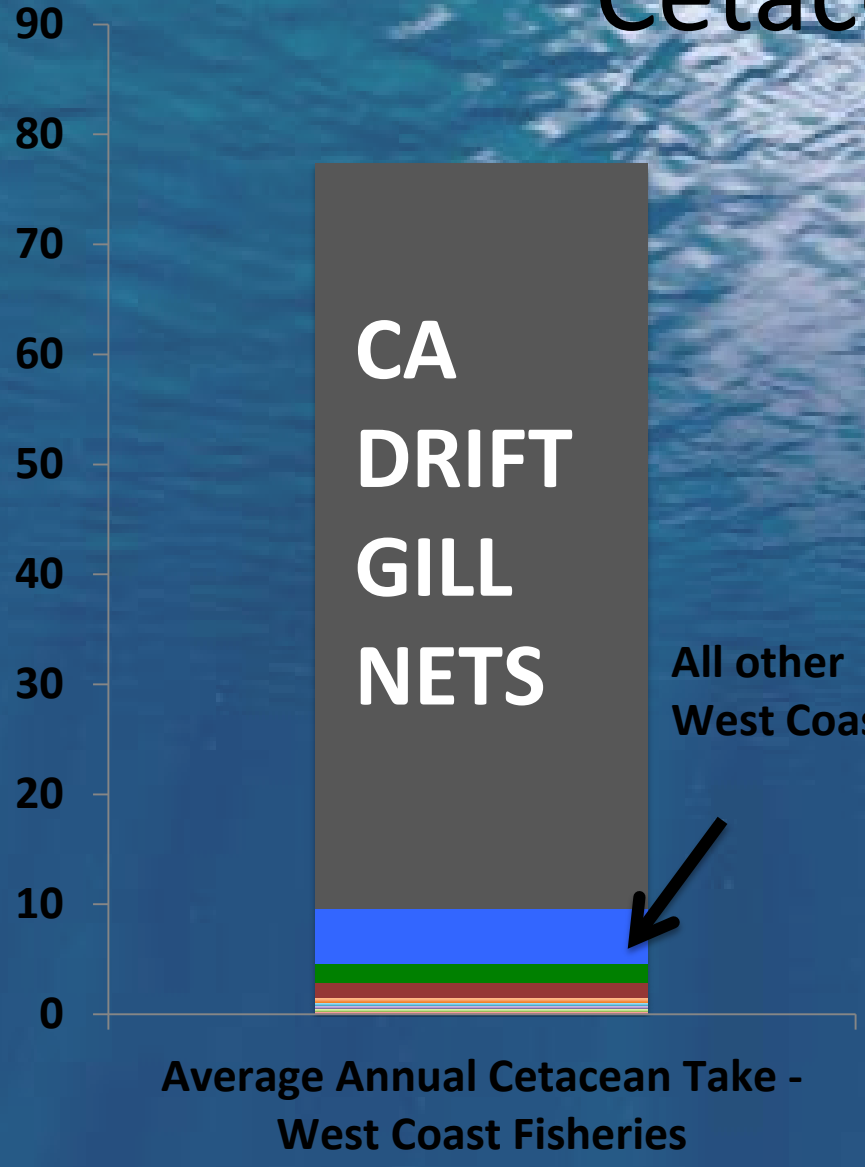
MMPA

- Section 101(a) requires bans of products from fiheries have been caught with commercial fishing technology which results in the incidental kill or incidental serious injury of marine mammals in excess of United States standards.

Moratorium Protection Act

- allows action against countries that have not adopted regulations "to end or reduce such bycatch that is **comparable to that of the United States"** 16 U.S.C § 1876k

Cetaceans


90
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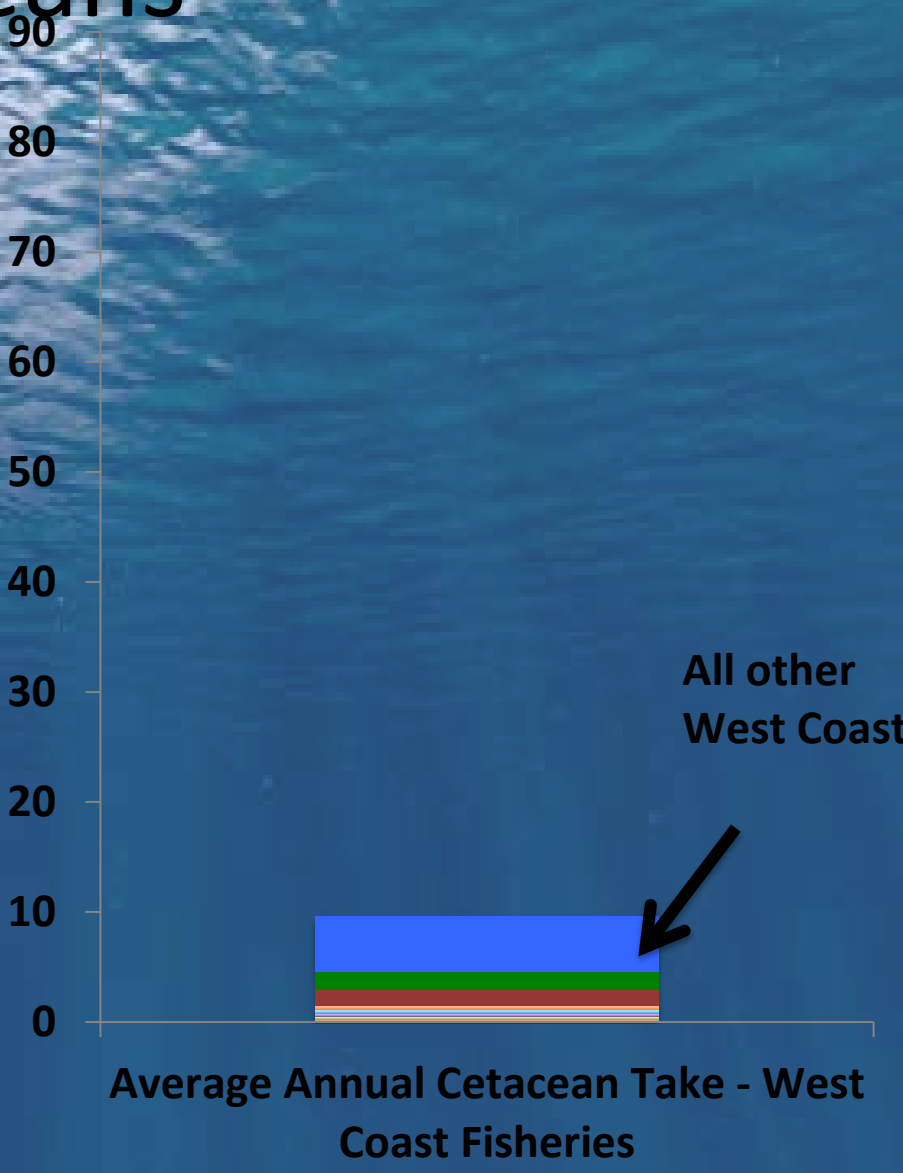
CA DRIFT GILL NETS
All other West Coast
Average Annual Cetacean Take - West Coast Fisheries


90
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All other West Coast
Average Annual Cetacean Take - West Coast Fisheries

Actions

1. Develop a robust transition plan
2. During transition, hard caps with a substantial margin of safety
3. Keep the PLCA closed
4. Don’t bother with longlines

Scientific Community

230 scientists, representing

- Ten countries
- over 100 institutions,
- 30 faculty from Stanford University and the University of California

United State Congress

- Senator Dianne Feinstein
- Rep. Jared Huffman
- Rep. Doris Matsui
- Rep. Sam Farr
- Rep. Lucille Roybal-Allard
- Rep Michael M. Honda
- Rep. Mike Thompson
- Rep. Jerry McNerney
- Rep. Grace F. Napolitano
- Rep. Zoe Lofgren
- Senator Barbara Boxer
- Rep. Alan Lowenthal
- Rep. Adam Schiff
- Rep. Anna Eshoo
- Rep. Barbara Lee
- Rep. John Garamendi
- Rep. Mark DeSaulnier
- Rep. Earl Blumenauer (OR)
- Rep. Jim McDermott (WA)

“I want our oceans to look like this.”

“I want my children to see these species.”

Zola Thurston, age 10