



June 3, 2015

Ms. Dorothy Lowman, Chair  
Pacific Fishery Management Council  
70 NE Ambassador Place, Suite 101  
Portland, OR 97220

*via email: [pfmtc.comments@noaa.gov](mailto:pfmtc.comments@noaa.gov)*

***Re: Agenda Item B.1 – Comments on Non Agenda Items***

Dear Chair Lowman and Council Members:

For more than forty years, Wild Oceans has represented recreational fishermen who want to protect the future of fishing. To this end, we have advocated for the advancement of commercial fishing gear that optimizes the target catch while minimizing bycatch and other adverse impacts on our ocean ecosystem.

The Pacific Fishery Management Council has been debating whether and how to manage drift nets and longlines to catch swordfish for well over a decade. Now it is time to give fishermen an opportunity to transition towards more economically and environmentally sustainable swordfish gear.

We request the Council initiate action at the June meeting to make deep set buoy gear (DSBG) an allowable gear in the Highly Migratory Species Fishery Management Plan (HMSFMP).

Although fishermen in the Atlantic have successfully used buoy gear to target swordfish, DSBG is not yet an allowable gear in the Pacific. Research suggests that DSBG can target swordfish off the west coast with minimal bycatch. For the past three years, the Pflieger Institute of Environmental Research has tested and modified the gear, confirming that 1) swordfish can be selectively targeted at depth, 2) non-target catch of species of concern are minimal, and 3) swordfish

caught on DSBG are of high quality and received by southern California markets at a premium price. DSBG catch composition is 94 percent targeted catch, consisting primarily of swordfish and opah.

In the past, the Council has heard heated debate and opposing views about the future of drift nets in the fishery, with requests from ending drift net fishing to opening the Pacific Leatherback Conservation Area to drift nets. In March, the Council heard instead about an alternative gear we can agree upon. The Council received three Exempted Fishing Permit applications proposing to use DSBG in the California Current Ecosystem. The proposals received overwhelming support from recreational, commercial, and conservation interests, a rare event, and a sure sign that the public is ready to adopt new, innovative fishing gear in the Pacific.

In March, the Council recommended that the National Marine Fisheries Service issue an Exempted Fishing Permit (EFP) for deep-set buoy gear (DSBG) to target swordfish in federal waters off California. If approved, the EFP will allow the applicants to deploy DSBG for two years, beginning this season.

By initiating an amendment to the HMSFMP now, the Council can ensure that, if approved, DSBG will become an allowable gear before the EFPs expire. This will allow EFP participants to transition seamlessly into the fishery.

Sincerely,

A handwritten signature in black ink, appearing to read "Theresa Labriola". The signature is fluid and cursive, with a long horizontal stroke at the end.

Theresa Labriola  
West Coast Fisheries Project Director