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June 3, 2014

Ms. Dorothy Lowman, Chair Pacific Fishery Management Council 1100 NE Ambassador Place, #101 Portland, OR 97220

RE: Agenda Item F5a – HMSMT Report on Future Council Meeting Agenda and Workload Planning

Dear Chairman Lowman and Council Members.

The Nature Conservancy (TNC) supports the Council's efforts to encourage industry-led innovation and experimentation through the development of exempted fishing permits (EFPs) for the drift gillnet (DGN) fishery. The five EFP applications submitted and reviewed at the March 2015 meeting offered an attempt to address the Council's stated policy intent to 'encourage alternative gears that can provide for a viable commercial fishery with significantly better bycatch performance than the past DGN fishery' (Nov 2014 Decision doc).

Since the March 2015 decision on EFPs, some applicants have considered how the requirements would impact their projects. At the May 13-15, 2015 HMSMT meeting in La Jolla, Dr. Chugey Sepulveda and David Haworth described their concerns with Council decisions regarding their EFPs, and potential solutions were discussed. The HMSMT report submitted under this agenda item lays out a strong rationale for Council members to re-evaluate their decisions with regard to these two EFPs.

Based on our previous and current experience for developing and conducting EFPs in the groundfish fishery, we know that it is no small investment of time, energy or financial resources to pursue and complete a successful EFP. We further recognize that EFPs are the right vehicle for testing whether a new type of gear or harvest method will help improve the conservation and economic performance of this fishery. Although there is risk involved, protocols are put in place to mitigate those risks via a rigorous study design, monitoring and reporting requirements, and through EFP terms and conditions set by NMFS in collaboration with applicants.

We support the recommendations of the HMSMT in this matter, and hope that Council members are able to give consideration to this issue. Collaborative efforts such as these proposed by the EFP applicants will help provide new information to both NMFS and the Council that can inform ongoing efforts to assist with revitalizing the West Coast swordfish industry by promoting innovation of sustainable harvest techniques for fishermen.

Sincerely,

Melissa Stevens

Fisheries Project Director

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