

From: Pflieger Institute of Environmental Research, PIER

Chugey Sepulveda, PhD, chugey@pier

Re: Deep-set buoy gear EFP observer coverage issues

Agenda Item F5

PIER consulted in length with the management team at the La Jolla HMSMT meeting on 5/14/2015 regarding the hurdles and associated consequences of 100% observer coverage.

We urge the Council to please re-visit the observer coverage mandate and consider reducing it to 50% based on the below information as well as the support from the HMS Management Team and community. Unlike all other EFP applications submitted in 2015, this application (1) has four years of rigorous testing by both research and cooperative vessels, (2) uses a gear design that is specifically tailored for the west coast following a published protocol (Sepulveda et al., 2015¹), (3) has research oversight and has been shown to be exceptionally clean with a 96% marketable species catch to date.

As outlined in the EFP application, the PIER-supported proposal will be performed under the guidance of a research team, with daily check-ins, log books and observer records to quantify all catch and fishing activities. We request that the Council move towards a compromise of 50% coverage so that the work can provide the best and most rigorous assessment of the gear over the entire fishing season. The reduction in coverage (from 100% to 50%) would double the number of proposed sets performed during the EFP window. Given funding constraints and observer costs (\$600/day) we are severely restricted by the 100% mandate. Given the high cost of observation (\$600/day) we have already been forced to eliminate several vessels from consideration.

Briefly I will re-cap the primary points we would like the council to consider in their decision.

1. Over 10,000 hook-hours have been deployed using the PIER-deep-set techniques through NOAA and cooperative research funding.
2. Over all study years (2011 to 2014) bycatch rates have been consistently low.
3. 100% coverage will reduce both EFP performance and the information available for future management decisions.
4. 50% coverage is more than adequate to detect even the rarest of events (NOAA Technical Memo; pers. Comm. J. Carretta, NOAA, SWFSC La Jolla).

Thank You for your consideration,

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¹ SEPULVEDA, C.A.; C. HEBERER, and S. A. AALBERS. 2015. Development and Trial of Deep-set Buoy Gear for Swordfish, *Xiphias gladius*, in the Southern California Bight. Mar. Fish. Rev. doi: dx.doi.org/10.7755/MFR.76.4.2

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