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

RE: Agenda Item G.2 - Swordfish Management Plan and Hard Caps FPA

Dear Chair Lowman and Council members:

This summer, Greenpeace released its ninth edition of *Carting Away the Oceans*, an annual report ranking US supermarkets on seafood sustainability. The latest report showed that there is significant work the US retail sector must do to address destructive fishing and overfishing around the globe, and applauding industry leaders and exposing those lagging behind is key to getting supermarkets to take responsibility and play their part in protecting our oceans and the people who depend on them.

The Pacific Fishery Management Council (Council), meanwhile, has a responsibility to ensure that West Coast fisheries are providing high-quality, sustainable seafood that responsible retailers and restaurants can be proud to deliver to their customers. It is for that reason that we are increasingly concerned by this Council's inaction in transitioning away from one of our most destructive domestic fisheries – the drift gillnet fishery off the California coast.

Greenpeace has listed swordfish on its “Red List,” a scientifically compiled list of 22 marine species that, for a variety of reasons, should not be made commercially available. In the case of swordfish, our main concern is that gear types used to catch swordfish result in tremendous bycatch of marine mammals and endangered species. The drift gillnet fishery is no exception.

Although the fishery is small – fewer than 20 active boats – it kills more whales, dolphins and porpoises than all other West Coast fisheries combined. That is simply unacceptable under any standard and is not how our fisheries should operate. It's time to end the use of this destructive gear type.

The Council has the opportunity to establish a schedule and process for transitioning away from drift gillnet (DGN) gear toward a more sustainable fishery. In the meantime, we urge the Council to establish firm protections for marine animals by adopting a Final Preferred Alternative (FPA) that implements annual hard caps on high-priority protected species based on entanglements, creates performance objectives on finfish and other bycatch species, and requires 100 percent monitoring in the DGN fishery.

Additionally, we urge the Council to develop a Swordfish Management and Monitoring Plan that includes a transition away from drift gillnet gear to more selective and actively tended gears and

produce a clear timeline and schedule for authorizing deep-set buoy gear (DSBG) under the Highly Migratory Species (HMS) Fishery Management Plan (FMP).

We recognize that changing an industry like the drift gillnet fishery for swordfish is no easy task. But drift gillnets are a destructive gear type and Californians are ready for a transition, particularly given that deep-set buoy gear presents a viable alternative to keep fishermen thriving. We join with other major conservation organizations in calling for this Council to transition to alternative gears as rapidly as possible – Greenpeace would be interested in joining with others to ensure that there are ample, high-value markets for West Coast swordfish that is caught sustainably and with minimal bycatch. Until then, we will continue urging retailers and consumers alike to steer clear of swordfish caught off the California coast.

Please make sustainability a reality in the swordfish fishery.

Sincerely,

A handwritten signature in black ink, appearing to read "Jackie Dragon". The signature is fluid and cursive, with the first name "Jackie" being more prominent than the last name "Dragon".

Jackie Dragon
Senior Oceans Campaigner

Cc:

Jerry Brown, Governor of California

Chuck Bonham, Director, California Department of Fish and Game



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

RE: Agenda Item G.2 - Swordfish Management Plan and Hard Caps FPA

Dear Chair Lowman and Council members:

The mission of the California League of Conservation Voters is to protect and enhance the environment and the health of all California communities by electing environmental champions, advancing critical priorities, and holding policymakers accountable.

Our members care deeply about the health of the Pacific Ocean and take pride in our coast, where families and entire communities depend on a healthy ocean, including well-managed fisheries. Unfortunately, sometimes this collective pride in our state's natural resources doesn't equate to sound management or policy-making.

In the California drift gillnet fishery for swordfish, 64 percent of the catch is thrown overboard, including prized game fish, sea turtles and marine mammals. Over the past 30 years, concerned people throughout California have been calling attention to the dangers of a drift gillnet fishery for swordfish. Now, citizens around the country are aware of this important issue and are advocating for change.

The Pacific Fishery Management Council (Council) has a unique role to play. The Council can establish a schedule and process for transitioning away from drift gillnet (DGN) gear toward a more sustainable fishery. We urge the Council to take the following actions:

1. Establish firm protections for marine animals by adopting a Final Preferred Alternative (FPA) that implements annual hard caps on high-priority protected species based on entanglements, establishes performance objectives on finfish and other bycatch species, and requires 100 percent monitoring in the DGN fishery.
2. Develop a Swordfish Management and Monitoring Plan that includes a transition away from drift gillnet gear to more selective and actively tended gears;

3. Produce a clear timeline and schedule for authorizing deep-set buoy gear (DSBG) under the Highly Migratory Species (HMS) Fishery Management Plan (FMP).

According to the California Wildlife Action Plan authored by the California Department of Fish and Game, "by learning what threatens the state's wildlife and the steps that can be taken to reduce those threats, California's residents have the opportunity to become more active stewards of this precious resource, ensuring that the Golden State remains the wildlife state for generations to come."

We've learned of the threat the drift gillnet fishery for swordfish poses to marine wildlife. Now our active stewardship of the Pacific Ocean requires us to call upon the Council to transition the swordfish fishery away from drift gillnets. Please heed this call.

Sincerely,

A handwritten signature in cursive script that reads "Jena Price".

Jena Price
Legislative Affairs Manager
California League of Conservation Voters

Cc:

Jerry Brown, Governor of California
Chuck Bonham, Director, California Department of Fish and Game



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

RE: Agenda Item G.2 – Swordfish Management Plan and Hard Caps FPA

Dear Chair Lowman and Council Members:

I write to you on behalf of the Azul, an environmental advocacy organization working to empower Latinos with the means to effectively manage and conserve coastal resources. Our primary efforts lie in engaging the community in environmental stewardship and inspiring those we work with to assume greater responsibility for their ecological footprints. We believe it is critical that we continue to make every effort to ensure that our ocean ecosystem can thrive for generations to come.

As you know, in California swordfish are commonly harvested using drift gillnets (DGN). This method of fishing is indiscriminate, entangling turtles, marine mammals and all other sea creatures that attempt to swim through. Despite the fishery's small size, more marine mammals drown in these nets than all other west coast fisheries *combined*. Public commentary on the dangers and cruelty of this fishing gear has been present for over 30 years, and we ask that the Council respond to its constituents and act.

The Council members have an exciting window of opportunity to establish a process and schedule for the removal of drift gillnets in the Swordfish industry while still ensuring the economic prosperity for all those who rely upon it.

We encourage the Council to implement annual hard caps based on entanglements, establish performance objectives on bycatch species, and require 100 percent monitoring of the fishery. Additionally, we urge you to develop a Swordfish Management and Monitoring Plan that incorporates a transition away from DGN towards more selective gears, which should include authorizing the use of deep-set buoy gear (DSBG) as soon as possible.

At Azul, we believe that in order to maintain the balance of our marine ecosystem, we must treat the ocean and its inhabitants with respect and consideration for the future. Thank you, on behalf of our organization and those we serve, for continuing to protect our oceans in an effort to keep our waters lively and diverse.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marce', with a stylized, cursive flourish.

Marce Gutiérrez-Graudiņš
Founder / Director, Azul

Cc:

Jerry Brown, Governor of California

John Laird, California Secretary for Natural Resources



AMERICAN CETACEAN SOCIETY

Orange County Chapter

21195 Cedar Lane, Mission Viejo, CA 92691 - info@acsorangecounty.org

September 11, 2015

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

RE: Agenda Item G.2 – Swordfish Management Plan and Hard Caps FPA

Dear Chair Lowman and Council Members:

The American Cetacean Society (ACS) is a nonprofit organization working to protect dolphin, porpoise and whale populations through education, conservation and research. I am writing to you on behalf of the Orange County chapter, as we see great potential for the Pacific Fishery Management Council to put an end to the many inhumane and avoidable deaths of marine mammals from outdated fishing gear.

California's swordfish fishery remains one of the few places in the world where drift gillnets (DGN) have not yet been replaced with more selective and actively monitored gear. While the fishery is small, more marine mammals drown from entanglement than all other fisheries along the west coast **combined**. Marine mammals have been protected under federal law for more than forty years, yet in 2015, their populations remain jeopardized because we continue to deploy this outdated, dangerous and unsustainable method of fishing.

We ask that you take appropriate steps to mitigate the high bycatch numbers by establishing a Swordfish Management and Monitoring Plan that includes a transition to more sustainable and selective gears and outlines a clear timeline for authorizing the use of deep-set buoy gear (DSBG). Additionally, we urge the Council to adopt a Final Preferred Alternative (FPA) that implements hard caps on high-priority protected species and requires 100 percent monitoring to make these actions effective.

Making sustainable fisheries management in California a reality has been a long-fought battle. We understand that change is a careful and difficult process, which is why we are calling on you to take measures to help bring the fishing industry to the same standard of environmental sustainability that California proudly champions.

Thank you for your tireless work to create a healthier Pacific Ocean for future generations.

Sincerely,

FOR THE ACS-OC BOARD OF DIRECTORS

Mike Makofske, President



September 11, 2015

Dorothy Lowman, Chair
Portland, Oregon 97201
Pacific Fishery Management Council
1100 NE Ambassador Place, #101
Portland, Oregon 97220

Dear Chair Lowman and Council members:

RE: Agenda Item G.2 - Swordfish Management Plan and Hard Caps FPA

Dear Chair Lowman and Council members:

On behalf of The Marine Mammal Center (TMMC), I write this letter to encourage the Pacific Marine Fisheries Council to transition away from drift gillnet gear toward a more sustainable fishery.

TMMC is a non-profit hospital, research and education organization that has treated more than 20,000 seals, sea lions and other marine mammals in its 40 year history. TMMC's federally authorized rescue operations occur over 600 miles of California's coastline from Mendocino to San Luis Obispo County and, as of 2014, in the Hawaiian Islands. Patient care at TMMC allows the achievement of two additional mission priorities: scientific research and education. Each marine mammal patient affords TMMC staff and colleagues tremendous learning opportunities and our research team is an internationally recognized leader in advancing the science of marine mammal health, and by extension the health of the oceans. At TMMC, we believe strongly in promoting greater stewardship of the oceans and we conduct extensive education programs for school children and visiting members of the public.

Amongst the animals treated by TMMC, about 8% are negatively impacted by direct human action. Marine debris, and specifically, fishing lines and nets, are a significant cause of entanglements in the marine mammals we treat. Historically, TMMC has responded to 204 cases of monofilament netting entanglement, with 107 of those occurring since 2000. Nineteen such cases were treated between 2000 and 2004, 34 between 2005 and 2009 and 64 thus far from 2010 to 2015. Twenty such cases have occurred in 2015, alone. While varying surveillance efforts and the presence or absence of response teams influence these numbers, and while we

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Monterey Bay – PO Box 778 – Moss Landing, CA 95039 – T 831.633.6298 – F 831.633.5927
San Luis Obispo – 1385 Main Street – Morro Bay, CA, 93442 – T 805.771.8300 – F 805.771.8304
Anchor Bay-Fort Bragg – T 415.289.SEAL
Ke Kai Ola – Hawaiian Monk Seal Hospital – 73-731 Makako Bay Drive – Kailua Kona, HI 96470

know that drift gillnets are just one of a few indiscriminate fishing gears that are likely causing these entanglements, the trend is a concern.

As the Council considers its options, TMMC strongly encourages that fishery management includes the use of innovative gear that decreases the likelihood of incidental by-catch, and shifts toward more selective and actively tended fishing gears. During any such transition, we encourage the provision of ample personnel to monitor the fishery and make observations to ensure compliance with agreed measures. Increased monitoring will also bring greater accuracy to entanglement counts to increase our understanding of the impact of the fishery.

In conclusion, as witness to the damage inflicted upon marine mammals by indiscriminate fishing practices such as the drift gillnet fishery, TMMC encourages the Council to develop a plan to transition to more selective and environmentally sustainable gear types and move toward a fishery that can be a model for bycatch minimization.

Thank you for considering our input on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Boehm". The signature is fluid and cursive, with a large initial "B".

Jeffrey R. Boehm
Executive Director