



Agenda Item B.1.b
Public Comment 3
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Mr. Barry Thom
NOAA National Marine Fisheries Service
SUBJECT: Comments on Draft Environmental Assessment: Consideration of an Exempted Fishing Permit to Fish with Longline Gear

10/03/16

Dear Mr. Thom:

I have been working with the Pacific Fisheries Management Council and Council stakeholders in the U.S. West Coast swordfish fishery for the past five years to develop tools that support sustainability and improved fisheries management.

During this time, I have closely followed Council proceedings and the developments within the fishery. I know that there is a pending request for an exempted fishing permit (EFP) for two longline vessels to fish within the U.S. West Coast exclusive economic zone (EEZ) for a 2-year period. I urge you to strongly consider approval of the EFP, as long as there is 100% observer cover and full and rigorous adoption of bycatch mitigation measures for sea turtles and seabirds on those vessels.

My colleagues and I are working with the Council and NOAA stakeholders to develop a decision-support tool, titled EcoCast, that can support dynamic fisheries management by providing stakeholders with information on how target and non-target species distribution are shifting in response to changing oceanographic conditions. The goal of EcoCast is to provide stakeholders with information which will allow them to make better informed decisions on where to allocate fishing effort based on the shifting likelihoods of encounter with target and non-target species. We are keen to continue to develop these products to continue to serve the needs of the Council and fishery stakeholders. Although we have not developed the product with pelagic longlines in mind, we are confident that, with necessary resources, the product can be modified should NOAA support this gear shift.

Pelagic longlines, when employed with the suite of bycatch mitigation measures for sea turtles and seabirds such as side-setting, integrated line weights, tori line etc., present a viable fishing method to sustainably fish for swordfish. Approval of the EFP with 100% observer coverage and bycatch mitigation measures would allow for a safe test of whether pelagic longlines can provide commercially viable harvest of swordfish while concurrently meeting conservation goals of a clean, bycatch limited fishery and socioeconomic goals of providing safe, sustainable seafood and seafood jobs for California and the US. A longline EFP with clear performance criteria and guidelines can provide important information on whether the U.S. West Coast can meet its local, seafood consumption demands while maintaining high conservation standards using pelagic longline gear. There is considerable research that demonstrates that with the necessary suite of mitigation measures and 100% observer coverage, pelagic longlines offer a reliable and clean way of harvesting swordfish. I urge you to support this EFP.

Sincerely,

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