Mr. Philip Anderson, Chair Pacific Fishery Management Council 7700 NE Ambassador Place, # 101 Portland, OR 97220 Via email: pfmc.comments@noaa.gov Agenda Item J.6.b Public Comment 1 September 2017

Dear Chairman Anderson and Council Members,

We are writing to you as fishermen in California's swordfish fishery and participants in ongoing gear experimentation (under EFPs with Dr. Chugey Sepulveda at PIER). As we see it, The Council now has a rare opportunity with authorization of deep-set buoy gear to provide expanded harvesting options for our fishery that can allow fishermen like us to profitably target the swordfish stock and avoid the interactions with other species that have been at the center of so much recent attention.

Both the standard buoy gear and linked buoy gear are new viable gears for helping fishermen increase yield of a high quality, high value product. The fishermen in this fishery welcome new options.

That said, we have serious concerns in how the recent decision on hard caps rule will impact those of us active in the swordfish fishery. Since this announcement, certain groups are working behind the (again) to develop state legislation to ban the use of drift gillnets. While this is not in the current scope of the proposed rulemaking to authorize buoy gear, such legislation would negatively impact a fleet that has already experienced tremendous economic hardship and continued uncertainty. The fleet has already seen big drops in the number of active fishermen participating in the swordfish fishery.

We ask the Council to recognize the new climate under which this gear is now being considered. The Council needs to balance the need to ensure bycatch is avoided with the goal of achieving optimum yield of this healthy swordfish stock and minimizing socioeconomic impacts on fishing communities. We ask you to not rush through this rulemaking without providing us all the tools we need to be successful moving forward. Fishermen need as many options and as much flexibility as possible to make this fishery work.

We ask that you 1) prioritize the simultaneous authorization of both standard and linked buoy gear for use in this fishery, to be used along with the fishery's existing gears and 2) provide as much flexibility as possible in the management of this fishery to help businesses like ours succeed.

Thanks for your consideration.

Sincerely,

Kelly Fukushima



Kit Dahl - NOAA Affiliate <kit.dahl@noaa.gov>

Fwd: Please authorize deep-set buoy gear

1 message

PFMC Comments - NOAA Service Account comments@noaa.gov>

Mon, Jun 19, 2017 at 10:30 AM

To: Kit Dahl <kit.dahl@noaa.gov>

Cc: Mike Burner < mike.burner@noaa.gov>

-- Forwarded message -

From: mleonardtyson@hotmail.com <mleonardtyson@hotmail.com>

Date: Fri, Jun 16, 2017 at 11:28 AM

Subject: Please authorize deep-set buoy gear

To: pfmc.comments@noaa.gov

Dear Chair Lowman and council members:

I am writing to encourage you to keep authorization of deep-set buoy gear on track in 2016. By taking this action, the Pacific Fishery Management Council can help to meet its stated commitment to reduced bycatch as outlined in its draft Swordfish Fishery Management and Monitoring Plan from September 2015.

Off the West Coast, hundreds of animals are unnecessarily entangled and killed by drift gillnets.

Fortunately, better alternatives are available. Deep-set buoy gear uses a hook-and-buoy system that enables fishermen to drop their hooks as deep as 1,200 feet to reach swordfish during the day. The gear boasts a 94 percent marketable catch rate, meaning that almost all of what is caught can be kept and sold. Buoy gear has been tested by scientists and cooperating fishermen with minimal bycatch of nontarget species and a consistent catch of swordfish. In fact, if buoy gear authorization stays on track, it will have received six years of extensive testing on the West Coast by the time it is allowed on the water.

Deep-set buoy gear has other benefits in addition to reducing bycatch. Fishermen are able to catch and put the fish on ice quickly, so swordfish caught with buoy gear is of the highest quality. This means a higher price for innovative West Coast fishermen and a tastier, more sustainable choice for consumers.

For several years, the Pacific council has stated concerns about bycatch from drift gillnets in the swordfish fishery. Deep-set buoy gear provides a real opportunity to address bycatch while ensuring an alternative that supports sustainable fisheries and local economies on the West Coast. Please authorize deep-set buoy gear in 2016.

Sincerely,

M. Tyson 246 Hillcrest Dr Sonora CA 953705721 **United States**

Pacific Fishery Management Council 7700 NE Ambassador Place, Suite 101 Portland, OR 97220

Phone: 503-820-2280 Toll Free: 1-866-806-7204 Dear Chairman Anderson and Council members,

It is no secret that fishermen operating in the west coast swordfish fishery have experienced significant economic hardship for years, due to science and management, many considered questionable at the time. As bycatch measures reduced access to some of the most productive fishing grounds, fishermen saw substantial declines in opportunities to fish and revenue, making continued participation in the swordfish fishery extremely challenging especially in certain parts of the coast.

Understandably, many fishermen moved on to other fisheries. Some left permanently (letting their permits lapse) while others decided to maintain a foothold in the swordfish fishery by annually paying significant permit fees. They did this not only in the hopes that the management of the swordfish fishery would improve and the fishery would once again provide opportunities for them, but in recognition that fisheries are, by nature, dynamic and that their fishing businesses are stronger by having diverse opportunities across fisheries. We write to you today as just a few of the many fishermen who made that choice to maintain swordfish permits or invest in them as a part of our fishing businesses, and who are committed to maintaining the opportunity to access the fishery and/or the value of these significant investments that have been made.

Today, the authorization of new low-bycatch gears (deep-set buoy gear) is an opportunity for permit holders to sustainably participate in this fishery and increase U.S. production of sustainable swordfish. As the Council and NMFS move towards authorization of deep-set buoy gear, they should strongly consider the needs and concerns of <u>all current permit holders</u> to ensure this rulemaking is successful and inclusive and doesn't further disadvantage fishermen that may have stopped participating in the fishery but maintained their permits.

Therefore, we ask you to support the authorization of standard buoy gear *and* linked buoy gear for use immediately. A delay in either would limit economic opportunities for fishermen to selectively harvest this healthy stock. We also ask that while developing the permitting scheme for federalization, the Council includes and adopts qualification criteria that recognize fishermen's history of participation in the fishery and investment in maintaining a swordfish permit.

Sincerely,

William Murtha Ron Troutman Bill Blue

F/V Mary Vincent F/V Autumn Star Morro Bay Commercial

Fishermen's Organization

Geoff Bettencourt Joe Mantua Porter McHenry

F/V Miss Moriah F/V Haida Queen HMB Seafood Mktg Association