

HIGHLY MIGRATORY SPECIES ADVISORY SUBPANEL REPORT ON NATIONAL
MARINE FISHERIES SERVICE REPORT

The Highly Migratory Species Advisory Subpanel (HMSAS) reviewed the National Marine Fisheries Service (NMFS) report on the Deep-Set Buoy Gear (DSBG) Authorization and National Environmental Policy Act (NEPA) Analysis (Agenda Item J.1.a, NMFS Report 1, March 2019). We recognize that the completion of a preliminary draft Environmental Impact Statement still will require input from observer, logbook, and landings data from DSBG exempted fishing permits in 2018, which are still unavailable. We also believe that economic data of the 2018 and past seasons including catch per unit of effort estimates, as well as an analysis of DSBG swordfish markets, needs to be included. We believe that inclusion of all this information is necessary for a complete NEPA analysis.

On the issue of revisiting hard caps, the HMSAS believes that if the Council wishes to do so, the hard cap numbers considered should be informed by **science-based** methodologies such as Population Assessments, Potential Biological Removals and/or Pacific offshore Cetacean Take Reduction Team recommendations for marine mammals, and Endangered Species Act Biological Opinions for listed turtles.

PFMC
03/10/19