

**HIGHLY MIGRATORY SPECIES ADVISORY SUBPANEL
 REPORT ON DEEP-SET BUOY GEAR (DSBG) AUTHORIZATION – FINAL ACTION**

The Highly Migratory Species Advisory Subpanel (HMSAS) appreciates and supports the detailed analysis put forth by the Highly Migratory Species Management Team (HMSMT) in analyzing the factors listed under MSA §303(b)(6). We would like to offer the following comments which are to be considered in addition to the HMSMT’s guidance.

- The 303(b) analyses do not consider the growing private recreational sector that is now targeting swordfish off Southern California at depth. This is a relatively new trend that is growing rapidly and should be considered in future spatial crowding analyses.
- The current spatial analyses also do not take into consideration the uneven distribution of the resource and the potential this behavior has on crowding. Swordfish tend to aggregate over certain bottom features, which then attract fishing effort into that area. This draws concern for overcrowding, social conflicts and reduced catch rates.
- The HMSMT economic analysis shows that with an increase in effort in 2018 there was a decrease in both catch per unit of effort (CPUE) and market price of deep-set buoy gear (DSBG) fish. Given the low profit margin for deep-set operations, the HMSAS feels that an open access fishery may negatively impact economics of the entire fishery.
- There is limited information on the population dynamics of swordfish in the Southern California Bight (SCB) and recent presentations to the Council have shown that stock structure remains uncertain. Further, there has been no discussion on the potential open access may have on localized depletion and the impact this may have to local fishers.

FINAL ACTION

The HMSAS recommends adopting the Council’s preliminary preferred alternatives (PPA), which authorizes DSBG as Limited Entry (LE) in the Southern California Bight and Open Access elsewhere. Regarding the ‘Ranking Category’, the HMSAS proposes a modified option, HMSAS Sub-Option 7 (Modified PPA) as shown in Table 1 below:

HMSAS Sub-Option 7: Modified Preliminary Preferred Alternative			One Permit Issued Per Individual
Ranking Category	Potential Permits		Cumulative Total
1. "Active" EFP Recipients <i>(10 obs. Sets by 12/31/2018)</i>	20		20
2. "Active" DGN Permit <i>(1 DGN landing, 2013/14-2017/18 seasons)</i>	29		43
3. "Active" EFP Recipients <i>(10 obs. Sets by Final Rule. Up to 77 additional EFPs already approved, plus EFPs approved in the future may qualify)</i>	TBD		TBD
4. "Active" Swordfish (harpoon) Permit <i>(Possess 2018/19 permit, 1 HPN landing, 2013/14-2017/18 seasons)</i>	17		TBD
5. "Inactive" DGN Permit <i>(No DGN landings since 03/31/2013)</i>	37		TBD
6. Demonstrated Swordfish Experience <i>(04/01/2013 – Final Rule)</i>	TBD		TBD
7. Other Applicants <i>(First-come, first-serve)</i>	300 minus Cumulative Total		300

RATIONALE

This is based upon Sub-Option 6 contained in HMSMT's Supplemental [Report 3](#), with slight modifications to adequately accommodate those individuals who have contributed significantly to develop DSBG as well as the historic fishery participants. In item 1, the term 'obs.' is unnecessary because everyone who fished under exempted fishing permits were required to have their first 10 sets observed. In item 6, no date is needed, only that someone adequately demonstrate their commercial swordfish experience.

PFMC
09/16/19