

Opposition to West-Coast Based Pelagic Longline Permits

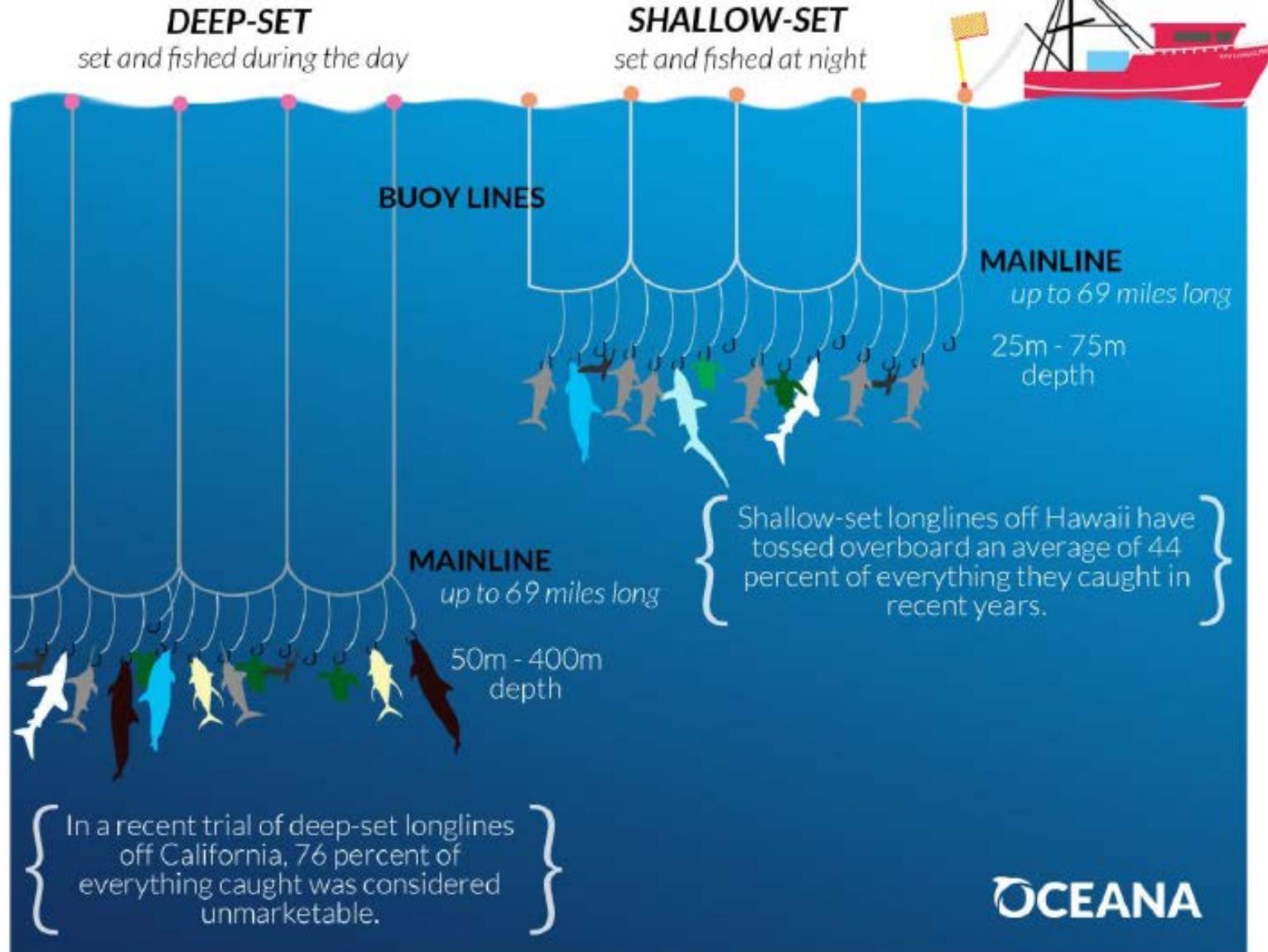
Geoff Shester & Tara Brock

November 19, 2019

Comments to Pacific Fishery Management Council

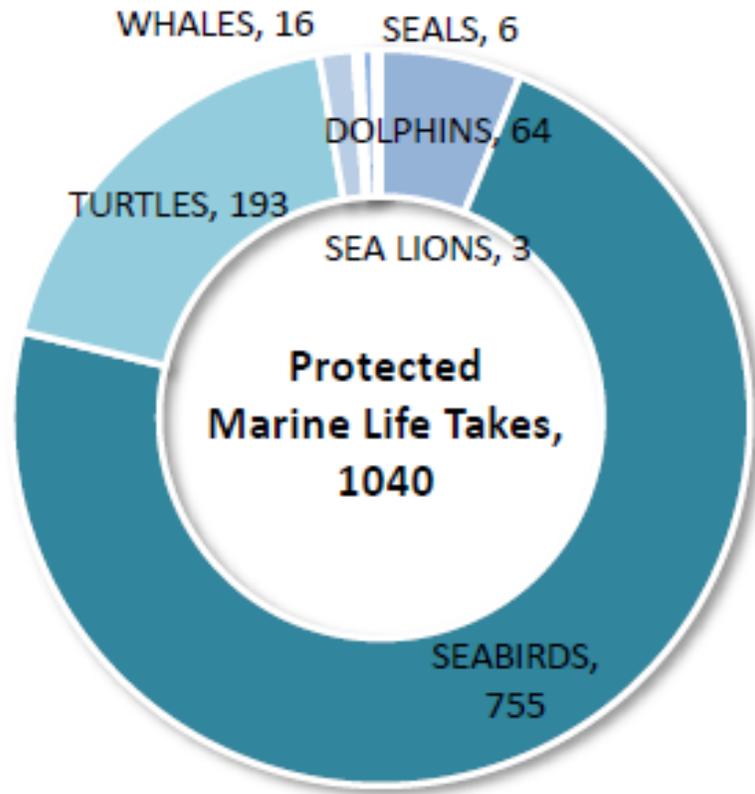


Pelagic Longlines

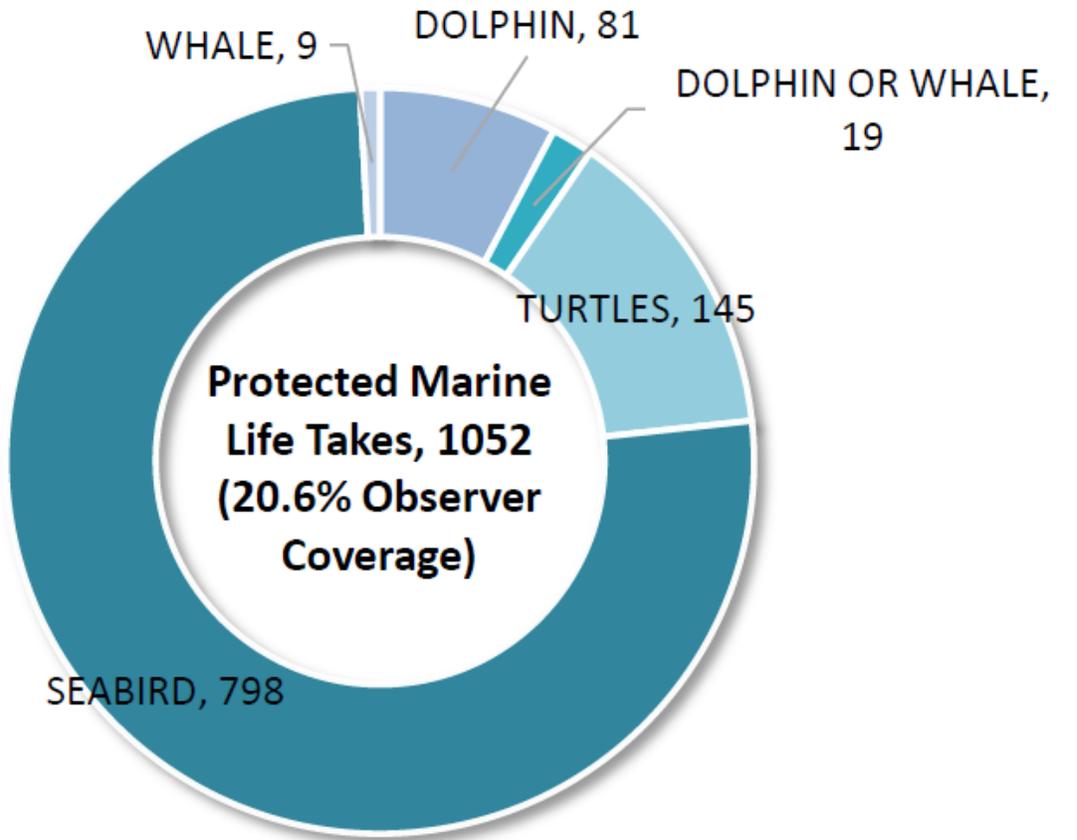


Both shallow-and deep-set longlines off Hawaii discard important and iconic marine life accidentally caught during fishing, including sea turtles, sharks, whales, albatrosses, and dolphins.

Hawaii Shallow-set Longline Fishery Takes



Hawaii Deep-set Longline Fishery Takes



Source: NMFS Pacific Islands Regional Observer Program. 2007-2017
FOIA Docket Numbers: DOC-NOAA-2014-001640; DOC-NOAA-2017-000994



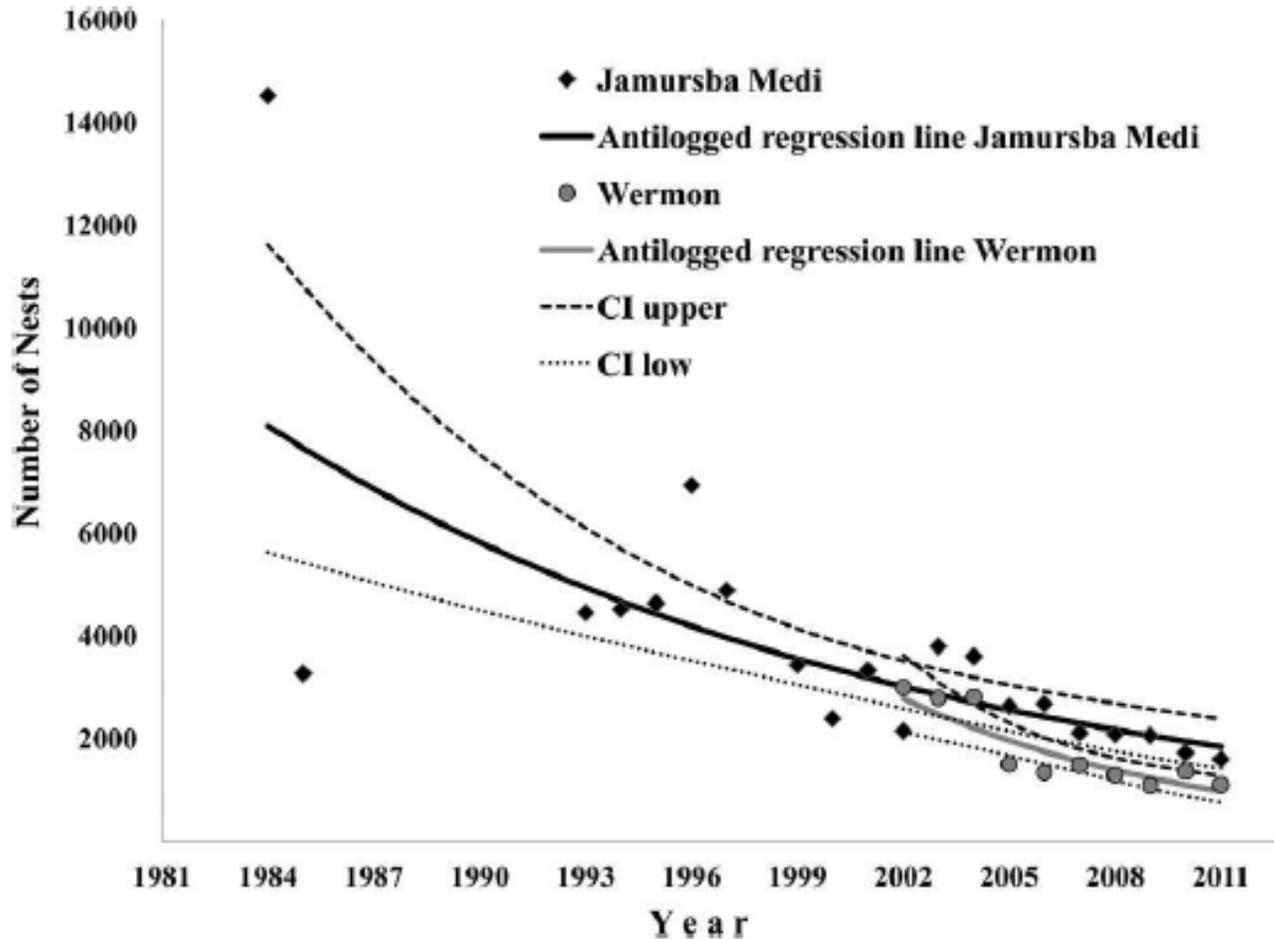
Images from Hawaii Shallow Set Longline fishery (2007-2017) obtained through Freedom of Information Act Request from NMFS Pacific Islands Regional Observer Program

Pacific leatherback sea turtles

NMFS Species in the Spotlight

“Most likely to go extinct in the near future”

Pacific leatherback nests at 2 primary index beaches in Indonesia



85% decline in 3 decades, Tapilatu et al. 2013



Continued decline off California

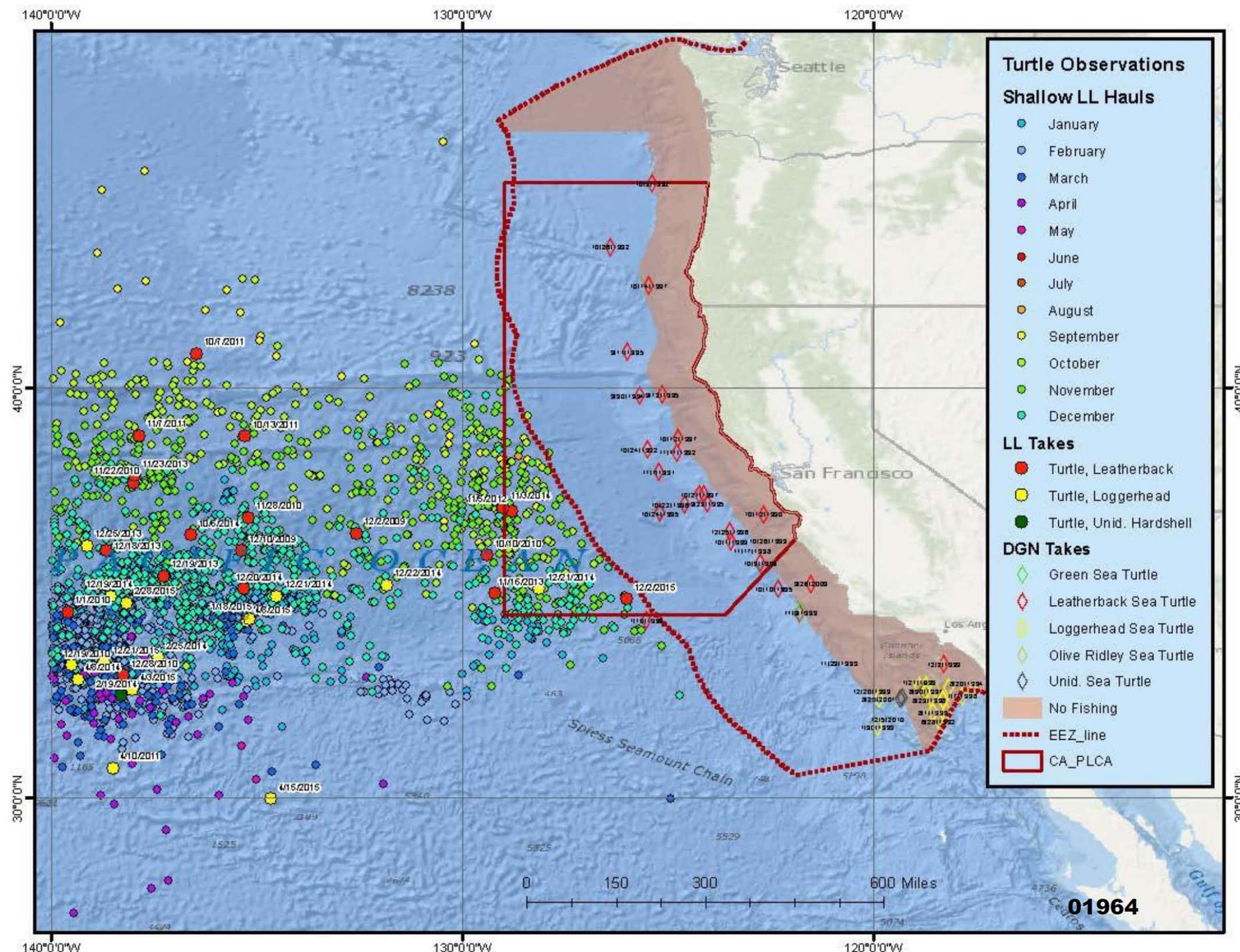
Benson et al. 2018. A LONG-TERM DECLINE IN THE ABUNDANCE OF LEATHERBACK TURTLES, *DERMOCHELYS CORIACEA*, AT A FORAGING GROUND OFF CALIFORNIA, USA

1 sea turtle mortality in US West Coast EEZ every 6 years will delay recovery

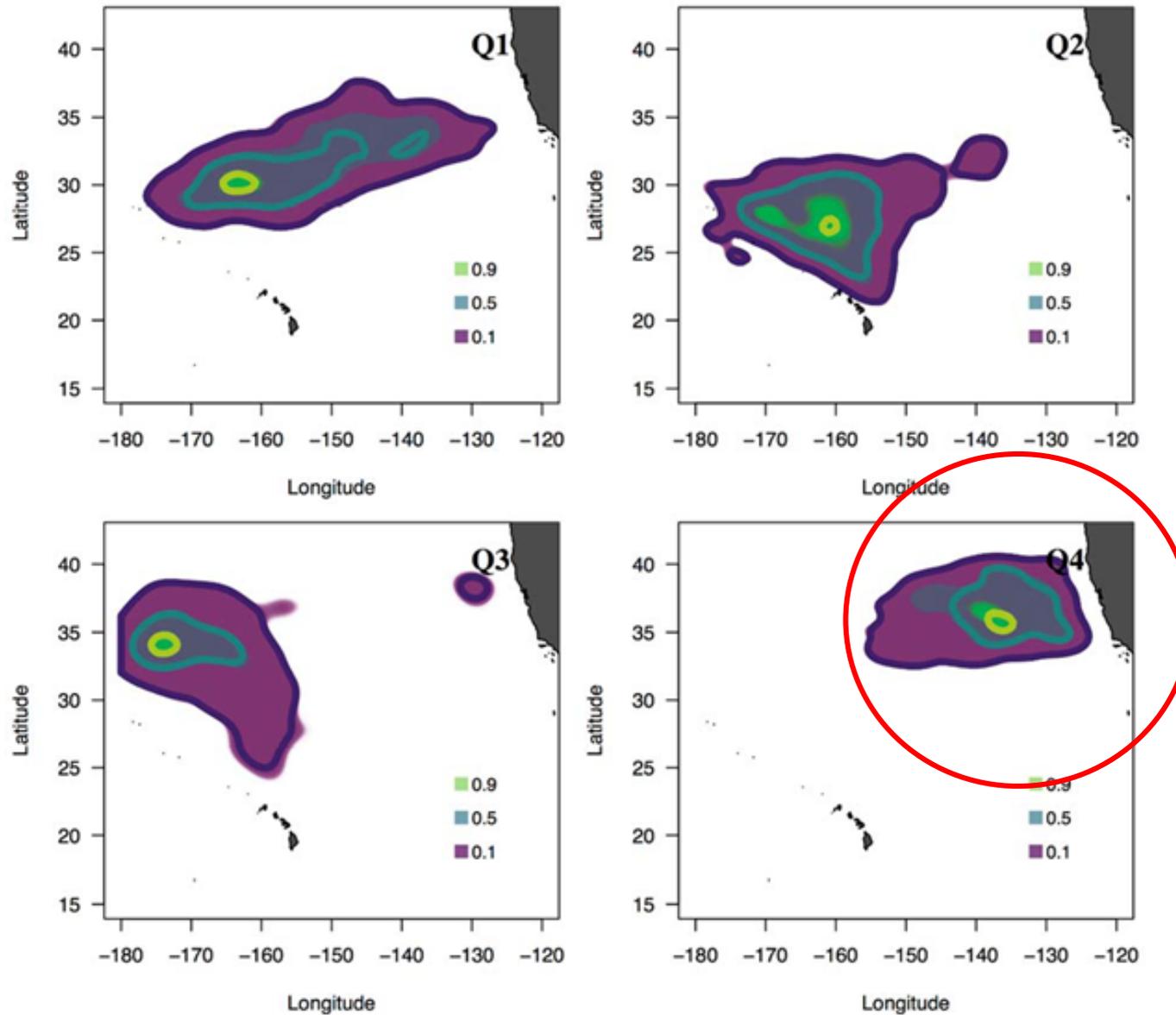
Curtis et al. 2015. Estimating Limit Reference Points for Western Pacific Leatherback Turtles (*Dermochelys coriacea*) in the U.S. West Coast EEZ

Leatherback (Red) and Loggerhead (Yellow) sea turtle takes in the Hawaii SSLF fishery.

Source: NMFS West Coast Region. April 28, Protected Species Workshop Presentation, Christina Fahy.



Ensemble Random Forest



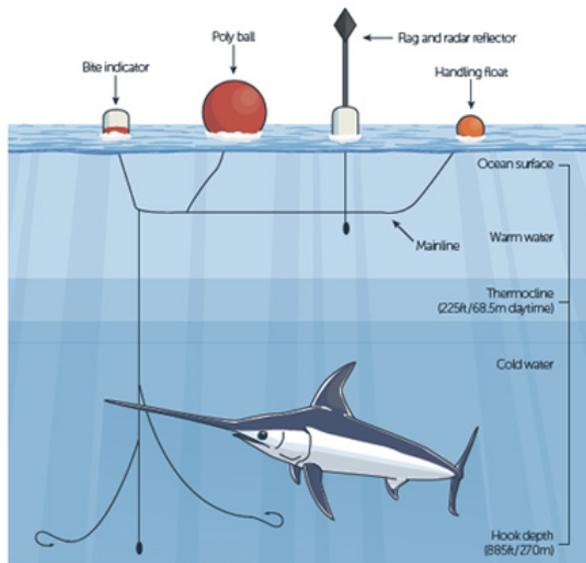
NMFS Biological Opinion, June 2019. Figure 52. Areas of highest interaction between leatherback sea turtles and the Hawaiian shallow-set longline fishery by quarter. Source: Siders et al. (2018).

Too many boats with too many turtle takes

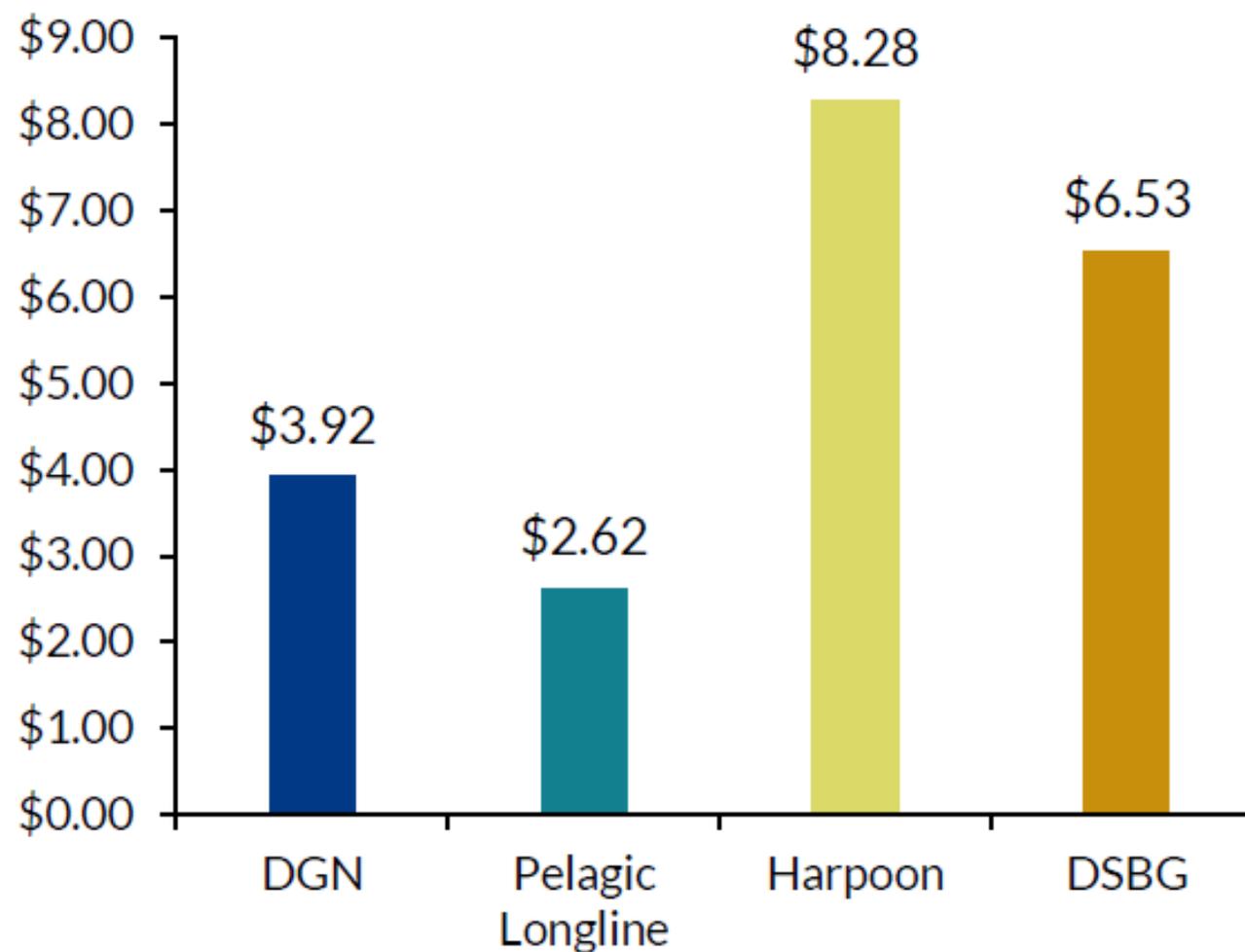
- Hawaii fishery closed early in 2018 and 2019 due to excessive takes of ESA-listed turtles
 - Circle hooks and blue-dyed non-squid bait
 - Already use Turtle Watch
 - Current mitigation measures insufficient to reduce turtle take
- No evidence that a WC-permitted fishery would have lower bycatch rates or takes of protected species
- Given Hawaii effort there is no room for additional WC effort

Projected Production of Deep Set Buoy Gear

- 2019 Draft EIS Projection
- Most likely swordfish catch in a given year is 4,030 individuals (280 mt)
- Expected average swordfish price is \$5.67 per pound
- Estimated \$3.5 million in total annual revenues



Average ex-vessel price per pound



Source: PFMC. Swordfish Landings by fishery, 2008-2017. June 2018.
Agenda Item G.7 Attachment 2

Proposed Action Does Not Address so-called “Transfer Effect”

- Given constraints on effort due to protected species, unlikely to provide enough swordfish to make an appreciable difference in meeting US demand, meaning we would continue to import at the same level
- Both MMPA and MSA have provisions that address imports of foreign-caught fish that do not meet U.S. standards
- Most recent Biological Opinion on HI shallow-set longline fishery found no empirical evidence that the transfer effect occurs

No Need for Action

- California fishermen already participate in Hawaii longline fishery outside EEZ, opportunity already available to purchase permits
- Deep set buoy gear provides profitable way to increase domestic West Coast swordfish fishing and should be allowed to develop
- Reasons for Council decision in 2009 are still relevant, some even more compelling than a decade ago

What has changed?

2009	2019
Proposal included all current gear specifications required in Hawaii fishery and authorized 10 permits	No new modification to the gear have been proposed or tested. Hawaii gear specs in place for last 14 years.
Leatherback sea turtle in decline and listed as endangered	Leatherbacks named one of NOAA's species in the spotlight and are critically endangered – most recent biological opinion out of Hawaii shows...
Loggerhead sea turtles listed as threatened	Loggerhead sea turtles listed as endangered
Hawaii SSL fishery subject to sea turtle hard caps and numerous lawsuits	Hawaii SSL fishery shut down in 2018 and 2019 due to interactions with loggerhead sea turtles.
DGN fishery operating off the West Coast without 100% monitoring or hard caps	DGN fishery continues to operate off the West Coast with average of more than 50% discard rate and without 100% monitoring and hard caps
An authorized fishery would not reduce imports	An authorized fishery would not reduce imports
Deep-set buoy gear not yet developed	Council has approved a DSBG fishery, proven profitable with minimal bycatch
Few reports of whale entanglements off West Coast	Major increase in reported entanglements and management implications in West Coast fisheries

Requests

- Affirmatively reject any further consideration of a West Coast permitted pelagic longline fishery outside the EEZ and remove this item from all future Council agenda items
- Oppose any effort to reintroduce pelagic longlines inside the US EEZ
- Explore ways to build on and scale up deep-set buoy gear, including linked buoy gear
- Request NMFS provide options for addressing concerns over imports under existing laws up to and including import bans