



February 29, 2012

Mr. Dan Wolford
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Dear Chairman Wolford and Council Members,

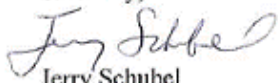
The Aquarium of the Pacific and its Seafood for the Future program strongly support the efforts of the National Marine Fisheries Service (NMFS) to revitalize the West Coast swordfish fishery. Particularly, we support adaptive measures that will enable alternative gear and regulations to further protect the leatherback turtle and other bycatch species, while enhancing the economic viability of the domestic swordfish fleet.

Over the past decade, the U.S. swordfish fisheries have been vilified for unsustainable practices. As a result, many of the men and women who depend on these fisheries have spent countless time, money, and resources to abide by the rules and regulations put forth by the Council and the NMFS. We applaud the Council's implementation of conservation measures such as the Pacific Leatherback Conservation Area (PLCA), however maintaining and/or creating healthy and viable domestic fisheries to support the fishing industry and the American appetite for seafood such as swordfish is also important.

In the U.S., swordfish fleets have drastically declined. Specifically, the Pacific drift gill net fleet has dropped from 129 vessels in 1990 and 1994 to 32 in 2009. These dramatic declines have resulted in the importation of more than 75% of the swordfish to the U.S. to bridge the gap between consumer demand and the dwindling domestic landings. Forty percent of these imports come from countries within the Eastern Pacific Ocean, where recent data suggest the leatherback turtles populations are particularly fragile. Many of these countries have few or no regulations to protect these and other special status species that may become bycatch of the swordfish fisheries.

The measures taken by the Council to protect the leatherback turtles are admirable and should not be discounted, however the unintended consequence—the dramatic decline of the domestic Pacific swordfish fishery needs to be addressed. The Council should adopt measures that allow alternative gear to be tested and utilized by the fleet. In addition, we support the continued efforts by NMFS to gather timely and relevant data to enable more adaptive measures that will further reduce bycatch, while maintaining the economic viability of the West Coast swordfish fishery.

Sincerely,


Jerry Schubel
President and CEO
Aquarium of the Pacific


Kim Thompson
Program Manager
Seafood for the Future