



Kit Dahl - NOAA Affiliate &lt;kit.dahl@noaa.gov&gt;

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**Fwd: Protect Pacific leatherback sea turtles**

1 message

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

Tue, Feb 9, 2016 at 12:09 PM

To: Kit Dahl - NOAA Affiliate &lt;kit.dahl@noaa.gov&gt;

----- Forwarded message -----

From: [Brittany.Pyke@gmail.com](mailto:Brittany.Pyke@gmail.com) <[Brittany.Pyke@gmail.com](mailto:Brittany.Pyke@gmail.com)>

Date: Tue, Feb 9, 2016 at 12:05 PM

Subject: Protect Pacific leatherback sea turtles

To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

Dear Chair Lowman and Council members:

Please reject any exempted fishing permit (EFP) applications proposing to use pelagic longline or drift gillnet gear in the Pacific Leatherback Turtle Conservation Area (PLCA).

The PLCA was created for a reason: The California and Oregon coast from Point Sur, California, to Lincoln City, Oregon, is a critical feeding area for Pacific leatherbacks in late summer through the fall after their epic migration across the Pacific Ocean. The PLCA has reduced the number of leatherback deaths in the fishery from 112 between 1990 and 2001 to near zero between 2001 and 2012.

Opening the PLCA to the use of fishing gear with documented bycatch problems would be detrimental to the continued survival of this endangered species and inconsistent with the Council's intent in approving EFPs to research and develop new and innovative gears with significantly reduced bycatch. Again, please reject any applications proposing to use pelagic longline or drift gillnet gear in the PLCA and focus instead on developing alternative fishing gear that is more selective and actively tended.

Thank you for your time,

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Thank you for your comments to the Pacific Fishery Management Council. Your comments have been received and will be forwarded to the appropriate staff member for processing.

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February 29, 2016

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

William Stelle, Regional Administrator  
NOAA Fisheries, West Coast Region  
760 Sand Point Way NE  
Seattle, WA 98115

RE: Comments on Council Agenda Item F.2. Reports on ongoing EFPs

Dear Chair Lowman,

We are keenly interested in the innovative approaches of the EcoCast project for the future of fisheries worldwide. Dynamic oceans management holds great promise for focusing fishing effort and reducing environmental impacts. We applaud the work of the EcoCast scientific team, but we do have several key questions about the technique's potential effectiveness in application to the drift gillnet fishery. As you know, we are profoundly concerned with the environmental impacts of drift gill net gear, so we are strongly interested in examining the potential of this method to reduce the environmental impacts as applied to drift gill net gear specifically.

First, we recognize that the species of greatest concerns are very rare, which means that geographic modeling of such species will be difficult. Since such species are rare, we tend to lack of kind of rich geographic data sets we would ideally have in order to establish reliable relationships between locations and oceanographic data. This is particularly true with highly vulnerable species such as the Pacific leatherback sea turtle, the loggerhead sea turtle and sperm whales. Thus, we would recommend the Council to examine whether

models of the rare high priority species will be sufficiently reliable to predict the location of high priority species and thus to eliminate the risk of high priority species take.

Second, several of the bycatch species for which performance measures have been established are sharks that prey on similar diets as swordfish, such as the blue shark or mako shark. Since abundances of marine species tend to be patchy, we are concerned that aggregations of sharks are likely to co-occur with swordfish. Thus, we would suggest that the council monitor the results to identify whether the modeling results can identify large areas where swordfish occur but bycatch species do not. If these predators do generally co-occur, avoiding bycatch with nonselective gear is likely to prove difficult.

Third, we are mindful of the extraordinary scientific complexity of the task of generating predictions for a small group of species. However, the drift gill net fleet takes animals from some fifteen rare, vulnerable, threatened or endangered species, including at least three endangered species and a suite of marine mammals. Although the EcoCast project represents an exceptional scientific effort, we would recommend that the council investigate what would be required to establish similar predictive models for the remaining species of concern, especially the high priority species identified by the council to be subject to hard caps.

Finally, we are interested in the ability of these models to account for climate change. Unfortunately, we are entering into a period of unprecedented conditions and novel spatial distributions of many if not most marine species. Our understanding is that these predictive models are based on predominantly historical data to develop relationships between oceanographic conditions and species distributions. Thus, we would suggest that the Council examine how well these models are expected to perform under conditions outside the range from which the models are generated.

EcoCast team is engaged in excellent work in developing new methods for 21<sup>st</sup> century fisheries and deserves full support. However, before relying fully on such methods to make management determinations, we would urge the Council to carefully examine the performance of these models in light of these considerations to determine whether they will be an adequately effective method to address the underlying issues with drift gill nets.

On the other hand, we expect that these efforts will be extremely valuable with respect to selective gear, such as deep set buoy gear. Since selective gear avoids environmental impacts through selectivity, issues with difficulties in predicting bycatch species become less daunting. Thus, we suspect that the dynamic ocean modeling holds its greatest promise for selective gear types that will truly and effectively benefit from the use of these methods.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'D. Karpa', with a stylized flourish at the end.

Doug Karpa, J.D., Ph.D.

Legal Program Co-Director and Science Policy Director