



International Game Fish Association

300 Gulf Stream Way, Dania Beach, Florida, 33004 U.S.A.

Phone: (954) 927-2628 • Fax: (954) 924-4299

December 27, 2016

Barry Thom
Regional Administrator
NMFS West Coast Region
1201 NE Lloyd Blvd.
Portland, OR 97232

Re: NOAA-NMFS-2016-0123; Protected Species Hard Caps for the California/Oregon Large-Mesh Drift Gill Net (DGN) Fishery

Dear Mr. Thom,

The International Game Fish Association (IGFA) appreciates the opportunity to comment on the proposed rule and accompanying draft environmental assessment implementing hard caps on protected species in the drift gill net (DGN) fishery.

IGFA is very supportive of implementing hard caps on the DGN fishery under the authority of the Magnuson-Stevens Fishery Conservation and Management Act (MSA), but only as an interim measure in transitioning to more selective fishing gears. Bycatch measures under MSA authority exceed the requirements of the Marine Mammal Protection Act (MMPA) and the Endangered Species Act (ESA) and, as such, provide more conservation benefit in terms of bycatch reduction to specific fisheries and to the broader marine ecosystem. In addition, MSA bycatch guidelines provide a greater precautionary buffer than the limits stipulated in both the MMPA and ESA.

The IGFA recommends one-year hard caps, as stipulated in Alternative 5, over rolling two-year hard caps outlined in the agency's preferred alternative (6). Because typical observer coverage in the DGN fishery is less than 20 percent and comprehensive knowledge of post release survival of protected species is lacking, we further suggest that one-year hard caps be based on entanglements and not just observed injuries and mortalities. The National Marine Fisheries Service has also determined that one-year hard caps based on entanglements as stipulated in Alternative 5 will provide the most benefit to these species and result in the largest reductions of bycatch compared to other alternatives. Furthermore, in order for hard caps to meet bycatch reduction goals, observer coverage must be enhanced to 100 percent, as current observer coverage is insufficient to accurately estimate bycatch take and thus reduces the efficacy of hard cap limits.

We hope you find these comments constructive. It is the IGFA's hope that DGN bycatch can be better regulated in the short term through enhanced observer coverage and one-year hard caps based on entanglement. Again, however, we view these only as interim measures for reducing bycatch, while taking additional steps to achieve an economically

viable and ecologically sustainable commercial swordfish fishery. In doing so, we urge NMFS and the Pacific Fishery Management Council to continue moving forward in authorizing more selective gear such as deep set buoy gear.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Schratwieser', with a long horizontal stroke extending to the right.

Jason Schratwieser
IGFA Conservation Director

The International Game Fish Association is a not-for-profit organization committed to the conservation of game fish and the promotion of responsible, ethical angling practices through science, education, rule making and record keeping.

Email: HQ@igfa.org • Website: www.igfa.org