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comments on our letter to the President

1 message

Paul Dalzell <paul.dalzell@noaa.gov> Sun, Jun 5, 2016 at 10:58 PM

Cc: allison.ikeda@noaa.gov, athline.clark@noaa.gov, Kitty Simonds <kitty.Simonds@noaa.gov>, Eric Kingma <eric.kingma@noaa.gov>

Hi Don:

Thank you for your comments on the letter (& attachments) from the Western Pacific Regional Fishery Management Council to President Obama. I think your comments were fair and balanced; on the one hand noting the importance of the NWHI to the Hawaii longline fishery, and the mechanism by which the Hawaii longline fleet can access bigeye allocated to the US Territories. The two month closure for the fishery between August and October was exacerbated by the closure in the Eastern Pacific Ocean (EPO) in response to the IATTC bigeye limit of 500 mt for longline vessels > 24 m. While smaller vessels could and did still fish in the EPO during the closure in the Western and Central Pacific Ocean (WCPO), it's a long way to go in a small vessel and the last quarter of 2015 was particularly challenging, with something like a dozen tropical storms and cyclones which menaced all fishing vessels in the North Pacific, but especially in the EPO.

I agree that seamounts are biodiversity hotpsots in an otherwise relatively featureless abyssal plain, but they are in no danger from our longline fisheries which fish way above these structures. Most of the seamounts are much deeper than the deepest hooks (400 m) set by the longliners and catch a range of epi and meso-pelagic predatory fish which are distributed across the entire North Pacific. You are correct about the studies on tuna which suggest limited movement of yellowfin tuna but not of bigeye tuna. Unlike bigeye tuna, yellowfin, though a tropical tuna, is able to spawn at relatively high latitudes. Thus since yellowfin can both feed and spawn around Hawaii, there is little incentive for them to move on elsewhere, unlike bigeye which appear to need to spawn in lower more equatorial latitudes.

Given that we may have a local stock of yellowfin, it means that we can potentially manage the stock, however, this should not include cutting off most of the US EEZ around the Hawaiian Islands to longline fishing. The local handliners and trollers, together caught more yellowfin tuna than the longline fishery, which caught about 1.5 million lbs in 2013, while recreational trollers catch anywhere between 4-12 million lbs of yellowfin annually. Lastly, in this paragraph you cite the MRAG report to ISSF on MPAs for pelagic species. However, the example cited supports the argument for leatherback turtles not tunas. Juvenile stages of bigeye tuna are vulnerable to purse seine fishing around fish aggregating devices (FADs), largely in the equatorial Pacific. This will not be addressed by a larger monument. Key management measures for bigeye and yellowfin tunas in the EPO and WCPO are to reduce the impact of purse seining around FADs which is now the principal source of fishing mortality, exceeding that from longline fishing.

Your summary of Jeff Polovina's work on the North Pacific pelagic ecosystem is correct, but this is as a result of all longline fishing, not just the Hawaii fishery which accounts for about 4% of the fishing effort in the WCPO and 2% in the Pacific as a whole. We are grateful to you for citing the NMFS PIFSC quarterly research bulletin which summarizes Jeff and Pheobe's work. I found that it is incorrect in its interpretation of Jeff's paper in ascribing all these ecosystem changes solely to the Hawaii longline fishery, which is a small part of a much bigger longline fleet in the Pacific. We contacted the folks at PIFSC to alert them to the incorrect statements on the bulletin page, and they agreed that observed changes are simply due to fishing and not to a specific fleet. The take home message from Jeff's paper is that fishing will influence the ecosystem but we've known this for a long time and the changes observed by Jeff and his co-workers are consistent with our understanding of ecosystem fishery impacts. Moreover, there is an apparent inconsistency with the science and what is happening in the fishery, where for the last two years the catch rates of bigeye have increased by about 36% with regular catches of large (> 200lb) fish. It's going to be interesting to see how this trend shapes up in the future as fishing continues and with the impacts of climate change, which may ultimately have a greater effect of the ecosystem.

In paragraph 6 of your comments, yes, you are correct, we do contradict ourselves, shark attacks on pups (if I remember correctly) largely occur at French Frigate Shoals, and by Galapagos sharks. I would add though that monk seals are at risk from tiger sharks and the seasonal migrations of great whites.

Again, thanks for the review of our letter and supporting paper. Best regards

PD

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