

Comments to the LWTRT

From William McLellan

General Comments

After is all said and done with vertical line reductions, it will remain important to develop and implement a successful gear marking system. I appreciate the efforts NMFS and some members of the team (including members from industry) have undertaken to produce a viable gear marking system. Though, over the years it appears a constant stream of “no, can’t do that” by industry has forced the team into these nearly decade long gyrations to continue incremental percentage decrease in large whale takes. Plenty of gear is taken off from whales each year during disentanglement and necropsy efforts but it remains largely unidentified due to a wholly inadequate gear marking system. If we could determine the exact gear and time it was set we could very surgically target areas and gear types for closures. As is now proposed, we need to determine the relative merits between proposals with i.e. 34.7% reduction in vertical lines and 34.5% reduction and somehow justify the impact. Gear marking is vital to reduce the mortality once and for all.

I find it extremely frustrating and disturbing that when the vertical line co-occurrence model was originally rolled out (at the Providence meeting?) the scientific team members uniformly stated that abundance of whales cannot simply be modeled as zero in any of the grids. Surveys are designed to cover direct areas of the ocean and the areas beyond the trackline strip width are then assigned densities in relation to the densities encountered on the trackline. While surveys might not encounter whales in every grid cell, whales do move between the grid cells and will be present in cells at levels above zero. This point was made and it was thought that it would be addressed. At the next meeting, the point was brought up again to be addressed, but now we hear it is “too late” to go back and alter the model to assign levels above zero to all cells. Makes me wonder if there was an agenda from the beginning...

Specific Comments

I support the NMFS proposal in waters off the coast of Maine covered under current LMA plans.

I do not support either of the Maine state plans as trawling up to strings of 20 or more will only contribute more exceedingly strong vertical line that can become severely entangled on whales. Larger line basically anchored to long trawl strings will produce more serious entanglements as gear is cinched down around the head and flippers of whales.

I support the closure and complete removal of gear described in the Jordon Basin closure plan. This area has gear that is fishing extremely deep. These long thick vertical lines I am convinced is causing a bulk of the mortality of large whales. Eliminating this gear will reduce mortality dramatically.

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I support the Great South Channel Sliver proposal as it appears to provide nearly equal gear reduction as many other proposals with a very small area closure.

I support the Rhode Island effort reduction plan.

Wrap-up

Many of these plans are based on gear being removed from the water and not being fished for the duration of the plan. It is clear that this reduction in over all effort will not take place as many will simply move their gear to other open locations. My concern is that the closures will ultimately produce a “wall-effect” where gear is soaked right on the border of the closures in hopes of luring target species from what will become essentially temporal reserves. That is always the problem with closures.

This returns me to the problem of not having gear adequately marked to determine where and when it was being fished. If gear were marked we could solve entanglements and affect only the areas and gear types that are directly taking whales. Until gear is marked effectively we will not solve the entanglement problem without continuing down the path or more restrictive closures. I hope that the agency would be able to impress that on the industry in extremely clear terms.