



We support the proposed phased-in limited entry (LE) DSBG fishery south of Pt. Conception. The Magnuson-Stevens Fishery Conservation and Management Act (MSA) gives broad discretion to establish a LE system to achieve optimum yield in the West Coast HMS fishery.<sup>1</sup> The MSA defines optimum yield as the amount of fish which “will provide the greatest overall benefit to the Nation, particularly with respect to food production and recreational opportunities, and taking into account the protection of marine ecosystems” and “is prescribed as such on the basis of the maximum sustainable yield from the fishery, as reduced by any relevant economic, social, or ecological factor.”<sup>2</sup> Establishing a LE program in the DSBG fishery would promote the achievement of optimum yield by creating more economic value in the fishery, promoting the production of higher quality and higher value food, protecting recreational opportunities, and helping avoid unforeseen impacts on marine species.

The phased-in LE permit program will support steady market growth and ensure supply does not outpace demand. DSBG offers current swordfish fishermen and new fishermen an opportunity to increase the supply of high quality, locally caught fish to West Coast markets and generate significant income for fishermen without the unsustainable level of bycatch associated with other gear types like drift gillnets or pelagic longlines. DSBG fishing trips yield a higher percentage of higher quality fish that receives a higher price per pound than drift gillnet or longline caught swordfish. This higher price per pound gives DSBG a revenue advantage that could maximize the economic viability of the U.S. West Coast swordfish fishery and boost local economies.

By limiting the number of vessels on the water initially and phasing in permits, we can ensure that overcrowding and overfishing do not adversely affect the DSBG fishery or swordfish resource in the future, particularly in the face of a changing ocean and shifting climate. This process will help NOAA Fisheries identify any significant on-the-water issues if they arise and make modifications, such as time-area closures, to accommodate recreational fishing activity, tournaments or other high profile, high value events, or to protect the resource should overfishing



