

**From:** [Craig Severance](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** Testimony in favor: Opening BRFA  
**Date:** Monday, January 07, 2019 7:53:41 PM

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Aloha Board Members. I write this in support of DAR's "Request to OPEN 4 of the Existing Main Hawaiian Islands Bottomfish Restricted Fishing Areas and Request to delegate to the Chairperson the authority to implement the decision" I am a bottomfish fisherman and I serve the Council on its Scientific and Statistical and Social Science Planning committees. I have served on joint State and Council bottomfish working groups, am familiar with the academic literature on MPA, and have long term familiarity with the issues. However well intentioned the initial creation of the BRFA may have been, the lack of baselines has made it difficult to credibly assess BRFA effectiveness. Further, the lack of effective enforcement makes it difficult to know if poaching has undercut any potential value of the BRFA for fisheries replenishment. We regularly hear stories of cases of BRFA poaching outside Hilo, and even when the enforcement vessel launches, someone allegedly calls the boat involved. More importantly the new 2018 Deep 7 stock assessment is vastly improved, has undergone extensive peer and external review and sets an ACL and quota well above current catch and effort. We don't anticipate any dramatic effort increases. Trip reporting for the commercial catch allows for tracking of catches, closing the fishery if need be, and dealing with any overages. While some would argue that the BRFA provide an additional buffer, in my view that is unnecessary, and the BRFA have become superfluous. There have been social costs that were never assessed, and there are potential safety issues with some of the existing BRFA. So I support the effort of DAR to open 4 BRFA, and would suggest eventual consideration of opening all of them. Mahalo, Craig Severance Ph.D. Anthropology.