

Mr. Barry Thom
Regional Administrator
NOAA National Marine Fisheries Service
1201 Northeast Lloyd Boulevard, Suite 1100
Portland, OR 97232



Dear Mr. Thom:

SUBJECT: COMMENTS ON DRAFT ENVIRONMENTAL ASSESSMENT: CONSIDERATION OF AN EXEMPTED FISHING PERMIT TO FISH WITH LONGLINE GEAR

The undersigned support the authorization of the exempted fishing permit (EFP) for two longline vessels to fish within the U.S. West Coast exclusive economic zone (EEZ) for a 2-year period. This gear is currently prohibited within the EEZ under the Pacific Fishery Management Council's Highly Migratory Species Fishery Management Plan. Approval of the EFP would exempt this prohibition to allow for the collection of scientific data to determine if this gear can be fished sustainably for swordfish, tunas, and tuna-like species while proving to be an economically viable alternative to drift gillnets.

It is important to recognize that the overwhelming majority of preferred seafood consumed in the USA is imported. In fact, data for swordfish alone from the Office of Science and Technology within your agency shows that from 2004-2014, the United States annually consumed almost 21,000 metric tons (mt) with a little more than 18,000 mt or 87 percent of that product harvested by foreign fleets.

This EFP is an important step toward curtailing bycatch externalization in the global swordfish fishery. The domestic swordfish fishery is sustainably and scientifically managed under the MSA, and complies with all requirements of the Endangered Species Act (ESA) and Marine Mammal Protection Act (MMPA), enforcement of which your agency oversees. This fact has been demonstrated in the Hawaii and U.S. East Coast longline fisheries. These successful fisheries are the result of collaborative efforts between U.S. scientists and fishermen to significantly reduce bycatch impacts associated with pelagic longlines by improving gear technologies, improvising deployment strategies, and monitoring ecosystem conditions. Reducing the U.S.'s reliance on foreign, significantly less-regulated fisheries will end up improving marine biodiversity conservation efforts, as well as improve the resilience and sustainability of the domestic and international swordfish fisheries.

U.S. pelagic longline fishing strategies are not commonly practiced by those foreign fleets that the USA relies upon to meet its seafood demands. With the globalization of the seafood trade and weaker environmental oversight for foreign fisheries, we question whether the United States is really conserving marine biodiversity by restricting or prohibiting the U.S. fleet while consuming fishery resources harvested elsewhere? We believe U.S. fishermen can and do harvest highly migratory species with insignificant impact to the marine ecosystem because they operate within ESA and MMPA constraints, unlike their foreign counterparts. This will be confirmed by the 100 percent, at-sea EFP observation requirement.

To that point, we believe that the real need for the EFP is a conservation one to demonstrate that the U.S. West Coast can sustainably harvest swordfish and other highly migratory species and thereby reduce its dependence on foreign sources. The EFP can go a long way to provide important information to verify that the U.S. West Coast can become more self-sufficient in meeting its seafood consumption demands rather than depending on other nations to do that for us. Accordingly, we urge you to consider broadening the need statement in the draft environmental assessment to include conservation and to approve the EFP.

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