



September 30, 2016

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

COMMENTS ON DEA FOR LL EFP

Dear Mr. Thom,

On behalf of Environmental Defense Fund, I am writing to provide public comment on the recently released Draft Environmental Assessment (DEA) for Consideration of an Exempted Fishing Permit (EFP) to Fish with Longline Gear in the West Coast Exclusive Economic Zone (EEZ).

As a nation, we import approximately 92% of our seafood, often from places with little or no environmental controls and high bycatch rates of sensitive species. It is therefore critical that we develop sustainable and accountable sources of domestically caught fish. To that end, the Pacific Fishery Management Council (Council) has developed a draft Swordfish Management and Monitoring Plan that calls for the development of new gear types to responsibly increase the harvest of swordfish and other pelagic species. It was with this objective in mind that EDF publicly supported, and the Council approved, the EFP application under consideration.

Pelagic longlining has often been maligned by many in the environmental community due to its historical bycatch rates of seabirds and marine mammals. However, modifications to the gear and new strategies for deployment have significantly reduced these interactions and virtually eliminated Leatherback mortality in the Hawaiian longline fishery. As a result, a number of longline fisheries are now certified as sustainable by the Marine Stewardship Council (MSC).

These successes are encouraging and we will believe that careful testing of pelagic longline gear outside of 50nm on the West Coast is warranted. The precautionary design of the EFP including full observer coverage, gear requirements, area restrictions, and a Leatherback mortality cap of one will help ensure that conservation concerns are addressed and that testing does not pose a threat to sensitive species.

We believe that the analyses and assessments contained in the DEA are thorough and

demonstrate that carrying out the EFP under the identified conditions will not represent a substantial risk to any species or the ecosystem. Based on those analyses and the risk mitigation measures, we support the preferred alternative given the enhanced data that two vessels will be able to provide. We are familiar with the EFP proponents who are not only exceptional fishermen but have the project management expertise to effectively collect data and communicate findings. This is also reflected in their award from NOAA's Bycatch Reduction and Engineering Program.

In the early 2000s, the groundfish fishery was declared a federal disaster and many on the West Coast were calling for the end of trawling. Fifteen years later, the fishery is now MSC certified due to increased accountability and improved management. We believe the environmental community needs to be open to this kind of potential for progress and recognize the ability of effective management to achieve sustainability with any gear type.

We commend the Council for adopting the goal of responsibly increasing domestic supplies of swordfish and advancing it by approving this EFP application. We encourage NOAA to do the same and issue the EFP with terms and conditions consistent with Alternative 3.

Sincerely,



Shems Jud
Pacific Regional Director, US Oceans Program
Environmental Defense Fund