



September 26, 2016

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

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

Dear Mr. Thom:

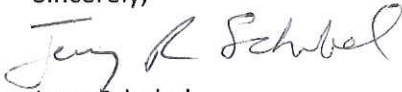
The Aquarium of the Pacific and its Seafood for the Future program support the authorization of the exempted fishing permit (EFP) for two longline vessels to fish within the U.S. West Coast exclusive economic zone (EEZ) for a 2-year period. This gear is currently prohibited within the EEZ under the Pacific 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 sustainably harvest swordfish, tunas, and tuna-like species while proving to be an economically viable alternative to drift gillnets.

We need to eat more seafood sourced from responsible fisheries and producers to reduce our impacts on the planet. In addition to supplying seafood with a lower carbon footprint, U.S. fisheries are among the best managed in the world and are an important source of healthy and responsible seafood. The Magnuson-Stevens Fishery Management, Marine Mammal Protection, and Endangered Species Acts have proven successful in the reduction of bycatch in fisheries. Despite this, more than 90 percent (by value) of the seafood consumed in the U.S. is imported. Data for swordfish alone from the Office of Science and Technology within your agency shows that from 2004-2014, Americans consumed almost 21,000 metric tons (mt) annually with a little more than 18,000 mt or 87 percent of that product harvested by foreign fleets that may or may not fish under similarly rigorous management.

Responsible fisheries management must be adaptive and include a suite of potential alternative gear types that are developed, tested, and adapted using the best available science and technologies. Potential alternatives must also allow local fisherman to continue to meet the consumer demand for the targeted species on a local level rather than sending it to global sources, some of which are far more environmentally destructive. In the case of swordfish, deep-set buoy and strategically implemented longline gear types have the potential to accomplish just that. This model could serve as a blueprint for phasing out destructive drift gillnet fisheries around the world. It is essential that we seize this opportunity to lead the way toward global bycatch reduction by creating a transition plan that results in economic stability for the fishermen and coastal communities, as well as protection of the environment. Serving as an example of how this can be achieved will increase the likelihood of adoption in fisheries where bycatch is poorly regulated and highly destructive.

It is imperative that the Council adopt measures that allow alternative gears, including longlines, to be tested and utilized by the fleet that will further reduce bycatch, while maintaining the economic viability of the West Coast swordfish fishery.

Sincerely,



Jerry Schubel
President and CEO
Aquarium of the Pacific



Kim Thompson
Program Manager
Seafood for the Future/Aquarium of the Pacific