



THE BILLFISH FOUNDATION
CONSERVATION THROUGH RESEARCH, EDUCATION AND ADVOCACY

5100 N. Federal Hwy., Suite 200 • Fort Lauderdale, Florida 33308
(954) 938-0150 • (800) 438-8247 • Fax (954) 938-5311

September 30, 2019

National Marine Fisheries Service
Highly Migratory Species Division
1315 East-West Highway
Silver Spring, MD 20910

Transmitted Via Portal
www.regulations.gov
NOAA-NMFS-2018-0035

The Billfish Foundation and members of the recreational fishing and boating (manufacture, service, sales) industry listed in this letter represent diverse interests in the Atlantic Ocean and Gulf of Mexico, all contributing significantly to local and regional jobs and economies. We appreciate the opportunity to submit comments on the Proposed Rule to Modify Pelagic Longline Bluefin Tuna Area-Based and Weak Hook Management Measures.

As in the earlier NOAA/NMFS initiative, Research & Data Collection, in which opening waters closed to pelagic longline gear off the east coast of Florida and in the Gulf of Mexico, the current initiative, Weak Hook/Bluefin Pelagic Longline Gear Restricted Areas, includes nothing to benefit the recreational fishing nor the recovery of overfished Atlantic marlin. The State of Florida remains strongly opposed to opening the east coast closure for pelagic longline overfishing will continue and others species like dolphin and wahoo will be next. Those initiatives are solely to enhance landings by the commercial pelagic longline fishery, which is disturbing. NMFS scientists and scientists of the International Commission for the Conservation of Atlantic Tunas have made it clear that fishing pressure must be reduced on overfished marlin and other species, which is not reflected in your initiatives either.

The U.S. recreational fishery for highly migratory species should receive the same level of support as is directed to assist the fishery (pelagic longline) that overfished billfish, juvenile swordfish, some tunas, sharks, marine mammals and sea turtles. From an economic perspective, the recreational offshore fishing and boating industry, with the wide array of associated businesses and jobs, generates far greater financial returns to the nation than generated by pelagic longlining. [Note: Very few billfish anglers, boat owners, captains, or tournament directors contributed to the NMFS economic survey of

2016 and 2017 due to an extremely strong lack of confidence in how the economic data would be used and how it would be protected by the federal government.]

Weak Hooks in the Gulf of Mexico

The current weak hook initiative is another clear example of a strong bias in favor of the commercial pelagic longline industry, at the expense of the recreational fishing and boating industry, especially tournaments, and overfished blue marlin.

Cutting in half the required time pelagic longline vessels must use “weak hooks” in the Gulf of Mexico from year round to only January through June will result in more blue marlin killed by pelagic longline gear during four months of the billfish tournament season. Reduced availability of billfish interaction by anglers will negatively impact tournament participation and sponsorships, and thus reduce economic returns to coastal and regional communities. The Gulf region is already trying to adjust to changes following the BP oil spill. Gulf marine species have yet recovered and do not need additional pelagic longline pressure. Postponing the removal of the weak hook requirement until after September would strike some balance for each industry and billfish conservation. Otherwise the hooks should be required all year. Reducing pelagic longline mortality of Atlantic marlin is essential for the recovery of the species.

Designated Gear Restricted Areas

The two Gulf of Mexico (2 months – April & May – closed since 2015) Gear Restricted Areas and the one Northeastern United States Close Area (off NJ) (1 month – June – closed since 1999) proposed to be converted to Monitoring Areas (Preferred, Alternative A4,) should remain with current gear restrictions in place. Monitoring is only effective if an official government observer, not contracted commercial fishing industry observer/technician, is on board each vessel during each set. Merely monitoring pelagic longline vessels fishing in the Areas during billfish tournament season will not reduce billfish mortality, which will increase and reduce economic returns to coastal and regional communities.

The one Cape Hatteras Gear Restricted Area (GRA) (5 months – December – April - since 2015), proposed to be abolished as “duplicative” due to the success of pelagic longline vessels ability to avoid bluefin tuna under the IBQ program raises questions. The GRA management approach applied in the Hatteras Area differed from others for in the Hatteras Area federal government employees disqualified or qualified pelagic longline vessels to fish in the GRA based on the government’s established “performance metrics” (ratio of bluefin to target species - yellowfin, bigeye, swordfish, albacore, skipjack, shortfin mako, thresher, porbeagle sharks, dolphin, wahoo). No rigorous scientific evaluation was given the government’s metrics nor their application to each boat’s ability to avoid bluefin tuna. Since most all (85% 2018 - 2019) pelagic longline vessels, whose owner desired to fish inside the Hatteras Area, qualified to do so, we question whether the government’s “metrics” provided meaningful restraint to pelagic longline vessels in avoiding bluefin tuna, or did bluefin leave the area. Without observers or another recording system on each vessel during each set, a weak link in accountability remains, justifying no change in current management measures (B1), which doesn’t appear it would cause economic hardship since most vessels, whose owners desired to fish within the Area, were approved to do so.

The recreational offshore fishing and boating community/industry support responsible fishery management and conservation, but the current federal government initiative and the Research and Data Collection initiative do not put forth fair and equitable options for the recreational fishing and boating industry nor do they advance billfish conservation and that of other overfished species.

Sincerely,



Ellen M. Peel
President, TBF

Businesses:

American Custom Yachts
C&L Insurance
Dragonfly Boatworks
Fish Track and Buoy Weather
Florida Sportsman Magazine
Galati Yacht Sales
Garmin
Gulf Coast Yacht Group
Hilton's Fishing Charts & Atlantis Marine
Habitats
Hilton's Real Time Navigator
In The Bite
Johnson Towers - Western Branch
Marlin Magazine
R.J. Boyle Studio
Saltwater Sportsman Magazine
Saunders Yachtworks
Smith-Merritt Insurance
Viking Service Center
Viking Yachts Mfg

Organizations:

Golden Meadow Big Game Fishing Club
Houston Big Game Fishing Club
Jacksonville Offshore Sportfishing Club
Lighthouse Point Saltwater Sportsman Club
Mississippi Gulf Coast Big Game Fishing Club
Mobile Big Game Fishing Club

New Orleans Big Game Fishing Club
Orange Beach Sportfishing Club
Pensacola Big Game Fishing Club
Recreational Fishing Alliance

Tournaments:

Buccaneer Cup
Cajun Canyons Billfish Classic
Emerald Coast Blue Marlin Classic
Florida West Coast Bluewater Series
Gulf Cup
Mississippi Gulf Coast Billfish Classic
Orange Beach Billfish Classic
Pirates Cove Billfish Tournament
Texas Billfish Classic

Marinas:

Cypress Cove Marina
Orange Beach Marina