



September 27, 2019

Mr. Craig Cockrell  
HMS Management Division  
Office of Sustainable Fisheries, F/SF1  
National Marine Fisheries Service  
1315 East-West Highway  
Silver Spring, MD 20910

RE: Comments on NOAA-NMFS-2018-0035

Dear Mr. Cockrell,

On behalf of America's millions of recreational anglers and boaters, along with the fishing tackle and boat manufacturing industries, we appreciate the opportunity to comment on the Draft Regulatory Amendment to Modify Pelagic Longline Bluefin Tuna Area-Based and Weak Hook Management Measures. Our primary concern is NOAA's Preferred Alternative C3 that would allow longline fishing in Gulf of Mexico Gear Restricted Areas (GRAs) enacted by Amendment 7 to the 2006 Consolidated Highly Migratory Species Management Plan. **As such, our collective organizations strongly urge the agency to adopt Alternative C1: No Action for Gulf GRAs.** Additionally, we would like to voice support for the agency's Preferred Alternative D2 for the seasonal requirement of weak hooks in the Gulf of Mexico.

**Spring Gulf of Mexico Restricted Areas:**

Western Atlantic bluefin tuna have been in a severely depleted state since the 1960s. These fish can live up to 35 years, don't reach sexual maturity until age 10, reproduce in discrete spawning locations and fetch exceptionally high market prices—all of which have made this stock susceptible to commercial overexploitation.

NOAA has prohibited the use of longlines as a directed bluefin fishery since 1981 and ICCAT has banned the targeting of bluefin in the Gulf of Mexico since 1982. Nevertheless, prior to Amendment 7 entering into force, annual dead discards of bluefin tuna in the Gulf of Mexico longline fishery were upwards of 69 mt. It is important to note that the Gulf of Mexico is the western stock's only known major spawning ground and that every bluefin encountered there is of western origin with the objective of spawning. In comparison, eastern origin fish now account for up to 63 percent of bluefin in the West Atlantic. As such, the Gulf of Mexico is the only location where we can guarantee protection for the western stock.

The Gulf of Mexico GRAs are working better than expected and have greatly benefited western Atlantic bluefin tuna. In just four years, they achieved a 70 percent reduction in annual bluefin mortality. Prior to their implementation, the pelagic longline fleet was exceeding its quota by as much as 218 percent. In total, these GRAs reduced mortality in the Gulf of Mexico from 41 percent of the entire longline fleet's bluefin mortality to just 7 percent. As a result, the U.S. longline fleet is no longer exceeding its quota.

Removing the conservation gains we've seen by eliminating GRAs in the Gulf of Mexico is illogical and premature, at best. The western Atlantic bluefin stock biomass is only estimated to be between 45 and 69 percent of what it was in 1974, when it was already in a depleted condition. Even more troubling is that the current quota for western bluefin is projected to lead to further declines in stock abundance. As such, now is not the time to consider removing measures that protect spawning western Atlantic bluefin tuna in the Gulf of Mexico and **we again urge NOAA to adopt Alternative C1: No Action for Gulf GRAs.**

**Gulf of Mexico Weak Hook Alternatives:**

NOAA Fisheries has required year-round use of weak circle hooks in the Gulf of Mexico since 2011. These thinner-gauged hooks are designed to straighten and release large bluefin tuna that are hooked on longline gear. Weak hooks have been successful and have reduced dead discards in the Gulf of Mexico by nearly 75 percent.

That said, weak hooks have also increased the catch of white marlin and roundscale spearfish, although the increased catch may be attributable to other factors such as increased local abundance of these species in the Gulf of Mexico. Nevertheless, the recent 2019 ICCAT white marlin stock assessment reports that the stock is still in a severely depleted state with a current biomass of only 58 percent of that which would achieve maximum sustainable yield. **As such, we support Preferred Alternative D2 that would only require the use of weak hooks in the Gulf of Mexico from January through June.**

Requiring weak hooks for this six-month period would still afford protection for spawning bluefin tuna outside of established GRAs during their peak spawning months and would also allow the use of traditional circle hooks during the rest of the year coinciding with months that typically have higher white marlin catch rates.

Thank you for your consideration.

Sincerely,

Glenn Hughes, President  
American Sportfishing Association

Jeff Crane, President  
Congressional Sportsmen's Foundation

Chris Edmonston, VP Government Affairs  
BoatU.S.

Guy Harvey, Chairman  
Guy Harvey Ocean Foundation

Jeff Angers, President  
Center for Sportfishing Policy

Nehl Horton, President  
International Game Fish Association

Patrick Murray, President  
Coastal Conservation Association

Thom Dammrich, President  
National Marine Manufacturers Association