



THE BILLFISH FOUNDATION

CONSERVATION THROUGH RESEARCH, EDUCATION AND ADVOCACY

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Margo Schulze-Haugen
Chief, Highly Migratory Species Division
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD

Sent Via Email
NMFS.hms.pllefp@noaa.gov

Dear Margo,

The Billfish Foundation (TBF) opposes approval of the application for an Exempted Fishing Permit (EFP) that would allow 6 pelagic longline boats to fish in Florida's East Coast Longline Closed Zone. Since 2001 the National Marine Fisheries Service's (NMFS) closure of the zone stock abundance has increased of swordfish, sailfish, yellowfin and other species, which is apparent when you are on the water. Increased fish abundance generates increased participation, which increases economic returns to businesses in Florida. The replacement of longline gear by buoy gear has reduced bycatch of juvenile swordfish, sea turtles and overfished sharks, including dusky sharks, and produced fresher swordfish for markets.

The argument that buoy gear is cleaner than pelagic longline gear was made clear by Dr. Dave Kerstetter and longline boat owner Scott Taylor in a featured story on CNN. Please view and listen for yourself.
<http://www.cnn.com/videos/world/2012/10/15/zarella-eco-swordfish.cnn>

Authorizing longline gear to fish within the Closed Zone could cause the conservation successes gained to be reversed. No reasonable explanation can be given to consider the EFP application, other than once an application is received the NMFS must give it review and public notice.

Why not continue to build upon the realized conservation successes that were generated by the agency's closures of the waters in the zone? Any doubt as to the results of a change in policy should err to benefit the marine resources. Allowing longline boats in the zone will likely drive down stock abundance by killing sharks, including dusky, marlin, sailfish, sea turtles, some juvenile swordfish and many other species. The U.S. commercial swordfish quota deficit cannot be landed from within the closed zone.

Do not authorize the EFP and jeopardize the fish, sea turtles, sharks, related businesses or the great recreational and buoy gear fishing opportunities. I cannot see a credible basis for considering what is being proposed as a research project in the closed zone; especially in light of the applicant's own testimony on CNN.

Sincerely,

Ellen Peel
President