

American Sportfishing Association
Coastal Conservation Association
Center for Coastal Conservation
International Game Fish Association
National Marine Manufacturers Association

December 20, 2012

Mr. Craig Cockrell
Highly Migratory Species Management Division (F/SF1)
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910

Dear Mr. Cockrell,

Thank you for the opportunity to respond to the announcement sent as a courtesy to the public that the National Marine Fisheries Service (NMFS) will be considering Exempted Fishing Permits (EFPs) for anticipated projects during the coming year. Our organizations are particularly concerned with the possibility of purported “research” that would allow commercial longline vessels to fish in the Charleston Bump and Florida East Coast marine conservation zones where the use of surface longline gear has been prohibited for more than a decade.

The closures were put in place to reduce the bycatch mortality of juvenile swordfish, white and blue marlin and sailfish. The success of the zones has been widely documented by NMFS researchers as well as others from outside the agency. The conservation goals set forth as the basis for creating the closed areas are being achieved and could be considered one of the most creative and successful ecosystem management efforts ever undertaken by the agency.

In light of that, we would be extremely disappointed if NMFS seriously considers allowing the use of longline gear to harvest highly migratory species and other species within these conservation zones. We are somewhat shocked that the agency would set forth a generic description of research that would “investigate bycatch ‘hotspots’” within this area. We do not believe that such notice to the public is sufficient to allow for an objective evaluation of the potential EFP. The designation of this conservation zone was predicated on the fact that the area was, in fact, a bycatch “hotspot.” The removal of the gear has resulted in substantial reductions in the mortality of swordfish, billfish and sea turtles, and fish stocks

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have responded positively to this measure. All logic would lead one to believe that reintroducing this gear into the closed zone would simply create a new bycatch hotspot.

It should be noted that the last proposal for an EFP allowing the use of longlines in this closed area was soundly rejected by the South Atlantic Fishery Management Council and the State of Florida, and caused a huge uproar in the sportfishing community. There is no reason to believe the reaction will be any less emphatically negative this time. We request an affirmative response stating that no EFP will be considered for allowing the use of longline gear in existing conservation zones.

Sincerely,

Mike Nussman, President
American Sportfishing Association

Pat Murray, President
Coastal Conservation Association

Jeff Angers, President
Center for Coastal Conservation

Rob Kramer, President
International Game Fish Association

Thom Dammrich, President
National Marine Manufacturers Association