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We also have sufficient information to know that longlines have unacceptable rates of interactions with protected species.

Since 2007, the comparable Hawaii SSSL fishery has caught more than 755 protected seabirds including black-footed and Laysan albatross that target the sinking baited hooks as they are deployed, and 193 endangered sea turtles including the severely depleted leatherback sea turtle.

By any reasonable standard, the wasteful mortality associated with bycatch and dead discards of marine life in pelagic longline fisheries throughout the world is appalling. The waste continues despite attempts to reduce bycatch. Regulations requiring the use of circle hooks and mackerel type bait reduced the number of turtle interaction and increased survivability of unwanted sharks and billfish, but survivability decreases with every hour left fighting on a hook. This problem is inextricably linked to the nature of longline gear. That is why we oppose extending the experimentation or use of longlines into west coast waters.

We ask NMFS to consider the impact of longlines on the open ocean ecosystem. We know that the removal of top pelagic predators can impact the open ocean ecosystem and reshape the entire structure of ocean food webs, yet the California Current ecosystem still teems with sharks, seals, tunas, swordfish, whales, albatross and sea turtles in part because of the absence of industrial longliners. This diversity fuels a multi-billion dollar ocean based recreational industry including fishing, whale watching and bird watching.

We urge NMFS to focus on authorizing Deep Set Buoy Gear and Linked Buoy Gear (DSBG) and exploring modifications to DSBG. The Notice of Intent alleges that without additional lawful,

