

July 15, 2021

Mr. Randy Blankinship  
HMS Management Division  
Office of Sustainable Fisheries, F/SF1  
National Marine Fisheries Service  
1315 East-West Highway  
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RE: NOAA-NMFS-2018-0035

We the undersigned organizations representing recreational fishermen, conservationists, and scientists appreciate the opportunity to submit these comments on the reconsideration of the conversion of the Spring Gulf of Mexico Gear Restricted Areas (GRAs) to a Monitoring Area. Our diverse coalition is unified in our opposition to the National Oceanic and Atmospheric Administration (NOAA) Fisheries' April 2020 rulemaking that reopened the Gulf GRAs to pelagic longline fishing. The reopening of the GRAs was met with overwhelming public opposition and, most importantly, was inconsistent with science-based policy. The GRAs proved a highly effective conservation measure to protect western Atlantic bluefin tuna at the peak of their spawn. Removing them potentially harms western Atlantic bluefin tuna, as well as U.S. commercial and recreational fishermen. Information collected since the removal of the GRAs reinforces the importance of these time-area closures. Consistent with Congress's directive within Fiscal Year 2021 appropriations legislation, we urge NOAA Fisheries to take this opportunity to reinstate the GRAs.

Starting in 2015, NOAA Fisheries closed two areas totaling 26,858 square miles in the Gulf of Mexico during April and May to pelagic longline fishing. Following more than six years of scientific analysis and stakeholder consultation, NOAA Fisheries designed the GRAs to balance fishing opportunities with protections for depleted western Atlantic bluefin tuna at the peak of their spawn in their primary spawning area. Between 2015 and 2019, the Gulf GRAs successfully mitigated the decades-old problem of high mortality and dead discards of spawning bluefin. Actual conservation benefits ultimately exceeded those NOAA Fisheries projected during rule development. During the three years the GRAs were in effect, bluefin mortality decreased 88 percent in April and 81 percent in May, when compared to the three years prior to the GRAs. Dead discards totaled just 2.5 mt in 2019, down from 69 mt in 2012, a 96 percent reduction. Not only were bluefin protected during the GRA period, but there was a concurrent 38 percent increase in target catch of yellowfin tuna for the Gulf pelagic longline fishery.

While NOAA Fisheries is now asking for ["additional information that would inform the agency's reconsideration of the Spring Gulf of Mexico Monitoring Area,"](#)



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