

October 2, 2023

Randy Blankinship
Highly Migratory Species Management Division
Office of Sustainable Fisheries (F/SF1)
NMFS, 1315 East-West Highway
Silver Spring, MD 20910

Dear Mr. Blankinship:

The undersigned representatives of recreational fishing and boating and marine conservation appreciate the opportunity to provide comments on the proposed rule for Highly Migratory Species (HMS) Amendment 15 (Draft Amendment 15). After careful review of the issue and in consideration of the concerns raised by stakeholders at public hearings and the HMS Advisory Panel (HMS AP) meetings, we request that all action on commercial longline spatial management areas be removed from Draft Amendment 15 and deliberated under a separate amendment to the HMS Fishery Management Plan. Our justification for this request and preferred approach is supported by the following comments.

As delineated in Draft Amendment 15, the proposed amendment comprises two overarching components:

- 1) Examination of the existing commercial longline spatial management areas.
- 2)

substantial time series and standardized catch per unit effort measurements, it is essential to recognize that other gear types and fishery components can provide valuable fisheries dependent data for monitoring and assessment of HMS fisheries.

In recent years, the number of longline vessels and sets has declined. In contrast, several open-access categories, iET R(i)325oring aies

