

April 28, 2011

Sarah McLaughlin
Highly Migratory Species Management Division
National Marine Fisheries Service
55 Great Republic Drive
Gloucester, MA 01930

RE: RIN 0648–BA65, Atlantic Highly Migratory Species; Atlantic Bluefin Tuna Quotas and Atlantic Tuna Fisheries Management Measures

Dear Ms. McLaughlin:

We, the undersigned recreational fishing stakeholders, submit the following comments on Proposed Rule, RIN 0648-BA65, to modify the Atlantic bluefin tuna base quotas for all domestic fishing categories. If finalized, this proposed rule would cause every sector besides the surface longliners to suffer significant quota losses so the surface longline industry can continue to fish and maintain its status quo incidental catch levels of bluefin tuna. **NMFS must not finalize this rule.** Instead, we request that NMFS pursue other more conservation-oriented measures that do not penalize recreational fishermen, including closing areas such as the Gulf of Mexico to surface longlines as a means to protect bluefin tuna.

The proposed rule would take 160 metric tons off the top of the overall bluefin tuna quota for 2011 and 2012 to account for the dead discards—dead bluefin tuna thrown overboard—by the surface longline fleet targeting swordfish and yellowfin tuna. **While accounting for the dead discards from the surface longline fleet is beneficial, taking the dead discards out of the quotas for more selective sectors of the fishery, such as recreational fishermen is unfair and provides no incentive for the surface longline fishery to reduce its incidental catch of bluefin tuna.**

In the past, the U.S. could make up for the incidental catch of bluefin tuna on surface longlines by carrying forward unused quota from the previous year. However, with new international requirements, this is no longer an option. In order to fix the problem, NMFS is proposing to institutionalize the incidental catch of bluefin tuna - which have no economic value because it cannot be kept - at existing levels so the surface fleet can continue to operate without any change. **Doing so would perpetuate the use of wasteful surface longlines, which in addition to bluefin tuna, catch and kill a diverse array of sport fish including blue marlin, white marlin, sailfish, and various shark species.**

The proposed rule would simultaneously take fishing opportunities away from recreational fishermen that provide substantial economic benefits to coastal communities with little environmental impact. **This proposal gives surface longliners a free pass, increases their quota allocation and forces all other sectors to lose quota to pay for it.** This is not an acceptable solution for the environment, recreational fishermen, or coastal communities.

As recreational anglers, we appreciate the opportunity to comment on this proposed rule. **We commend NMFS for attempting to account for the dead discards of bluefin tuna from the surface longline fishery, but we do not support penalizing recreational fishermen to do so.** There are better alternatives to this proposed rule. To ensure effective long-term conservation of bluefin tuna, NMFS should prohibit surface longline fishing in the Gulf of Mexico, where the fleet caught 111mt of bluefin

tuna in 2008 and 2009. The Gulf of Mexico swordfish catch constitutes only 16% of U.S. landings. Prohibiting surface longlines in the Gulf of Mexico will not eliminate all of these landings as there are alternative gears approved to catch swordfish, but it will provide a substantial conservation benefit to bluefin tuna and other species important to recreational anglers such as blue marlin and sailfish.