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March 6, 2014

Mr. Michael Tosatto  
Regional Administrator  
NOAA/NMFS Pacific Islands Region  
1845 Wasp Boulevard, Building 176  
Honolulu, Hawaii 96818  
*Facsimile: 808-973-2941*

*RE: Application for an experimental fishing permit (EFP)*

Dear Mr. Tosatto:

We respectfully request your consideration and approval of our attached application for an experimental fishing permit (EFP).

As you are fully aware, our entire region is struggling to survive the disaster experienced by all local longline fleets. This economic crisis is very real for the American Samoa longline fleet. We have sought assistance from the local government, from the Western Pacific Region Fishery Management Council (WPRFMC) and others to support the fleet to keep it afloat. In the meantime, our company has continued our efforts to address this crisis by trying alternate methods of fishing and improving efficiency of our operations. We have been in close contact with the WPRFMC staff regarding our efforts, and we are appreciative of their attention and support given to us thus far.

We appreciate your time and consideration of our attached application. As this is our first application for such a permit, we hope that there will be an opportunity to add information as needed for this application by your staff. Thank you for your time and attention.

Sincerely,

CHRISTINNA S. LUTU-SANCHEZ  
*For Longline Services, Inc.*

*Att:*

*Cc: Executive Director Kitty Simonds, WPRFMC  
ASG DMWR Director Ruth Matagi, WPRFMC Member  
ASG Port Administration Director Clair Tuia-Poumele, WPRFMC Member  
HTC Taulapapa Wil Sword, WPRFMC Member*

## **APPLICATION FOR EXPERIMENTAL FISHING PERMIT (EFP)**

DATE: March 6, 2014

APPLICANTS NAME: Longline Services, Inc.  
P. O. Box 997423  
Utulei Tramway Road  
Pago Pago, American Samoa 96799

### STATEMENT OF PURPOSE:

The purpose of this application for an EFP is to allow a larger size (>50 ft.) fishing vessel to fish within the American Samoa prohibited areas (LVPA). Having the identified larger vessel to fish in the closed areas will allow us to conduct exploratory fishing while reducing operating costs by accessing closer fishing grounds.

### BACKGROUND INFORMATION & GENERAL DESCRIPTION:

Permitted longline Vessels longer than 50 feet are not allowed to fish within a closed area that is more or less equivalent to 50 miles from shore. Since this prohibition has been in place, the number of alias (or smaller longliners) have decreased dramatically to only 1 – 2. In essence, there has not been any longlining within this closed area for many years, and there is a lack of data to show the impact of this regulation and how the management of these areas can be improved.

As a result of the economic disaster faced by the American Samoa longline fleet, Longline Services, Inc. has taken the lead in experimenting with alternatives to continue fishing and continue to survive. To date, three (3) of Longline Services, Inc.'s vessels have each completed an exploratory fishing trip based on moon phases, using vertical hand lines, fishing around identified rafts and also allowing for fresh fish to be delivered back to port. There has been mixed results, and while the first trips overall were not profitable, many mistakes were identified and incorporated in the plans to improve the next set of trial trips.

Every effort has been made to have the least operating costs for the trial trips. Two of the vessels realized losses, however the data that was collected helped to make the decisions for the next set of trips. The highest direct cost aside from labor is fuel for the vessels. Having access to closer fishing grounds will allow the vessel less operating expenses and more time to try different times and locations using these exploratory fishing techniques in the American Samoa longline and pelagic fisheries.

CONCEPT:

The identified larger vessel will be used to experiment different techniques and methods of longlining, specifically around rafts or FADs. If there are any identified rafts within the closed areas, the larger vessels will test different fishing techniques such as vertical lines, hand lines, different types of lures and baits, etc... while there is an opportunity to do in the vicinity of fish (assuming there is an abundance of fish aggregated at such a device). The permit requested will allow us to explore different options and methods at a low cost to our company, and the results will be beneficial to the entire American Samoa longline fleet.

GOALS:

In the long term, it is our hope that the data collected from these experiments will be used by the WPRFMC and NMFS to make better and informed management decisions not only for conservation purposes of our resources but also to address the needs of the fishermen of American Samoa – present and future.

In the short term, we hope for success in certain types of fishing methods so that we can share any success with our colleagues or other ASLL permit holders so that the fleet will continue to survive.

VESSELS COVERED:

FV PRINCESS YASMINNA  
USCG Documentation Number: 507268  
Home Port: Utulei, American Samoa  
Length of Vessel: 67.5  
Net Tonnage: 67 NRT  
Gross Tonnage: 98 GRT

DESCRIPTION OF SPECIES:

Target species will be Yellowfin, Bigeye, Albacore with bycatch that will also be kept such as Swordfish, Wahoo, Marlin, Skipjack.

REQUESTED TERM OF EXPERIMENT:

To be able to access the prohibited large vessel area for a time period of twelve (12) months. Gear that will be used is longline, vertical lines and hand lines.

SUBMITTED BY:

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CHRISTINNA S. LUTU-SANCHEZ  
*For Longline Services, Inc.*



**U.S. DEPARTMENT OF COMMERCE**  
National Oceanic and Atmospheric Administration  
**NATIONAL MARINE FISHERIES SERVICE**  
Pacific Islands Regional Office  
Daniel K. Inouye Regional Center  
1845 Wasp Blvd. Bldg. 176  
Honolulu, Hawaii 96818  
(808) 725-5000 • Fax (808) 973-2941

March 20, 2014

Christinna S. Lutu-Sanchez  
Longline Services, Inc.  
P.O. Box 997423  
Pago Pago, AS 96799

Dear Ms. Lutu-Sanchez:

Thank you for application dated March 6, 2014, for an experimental fishing permit to conduct exploratory longline and vertical handline fishing around rafts and fish aggregation devices (FAD) within the large vessel area closure around American Samoa.

The National Marine Fisheries Service (NMFS) has reviewed your application and determined that it is not yet complete. Consideration of your proposed experimental activity requires a comprehensive assessment of the potential environmental impacts (direct, indirect, and cumulative). To complete this assessment, NMFS will need additional information including, but not limited to, comprehensive description of the rafts and FADs, the size and amount of longline and handline gear to be used, the number of trips to be taken, and the amount of fish harvest necessary to conduct the experiment.

We would like to set up a telephone meeting with you to discuss the additional information needed to complete your application and conduct the necessary analyses. Please contact Bob Harman at (808) 725-5170 or [bob.harman@noaa.gov](mailto:bob.harman@noaa.gov) to arrange this call.

Sincerely,

Michael D. Tosatto  
Regional Administrator

cc: Kitty Simonds, Western Pacific Fishery Management Council  
Ruth Matagi-Tofiga, American Samoa Dept. of Marine & Wildlife Resources  
Claire Tuia-Poumele, American Samoa Port Administration  
Taulapapa William Sword, Western Pacific Fishery Management Council



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May 1, 2014

Mr. Michael Tosatto  
Regional Administrator  
NOAA/NMFS Pacific Islands Region  
1845 Wasp Boulevard, Building 176  
Honolulu, Hawaii 96818  
Facsimile: 808-973-2941

*RE: Addendum to application for an experimental fishing permit (EFP)*

Dear Mr. Tosatto:

Thank you for your letter to us acknowledging our application and the opportunity for us to submit an addendum with more information and details to complete our application.

Attached is additional information requested via writing and phone conference with your staff to complete our application before you considering our request. Again, please let us know if you require anything else from us in reference to our request.

Thank you for your time and attention.

Sincerely,

CHRISTINNA S. LUTU-SANCHEZ  
*For Longline Services, Inc.*

*Att:*

*Cc: Executive Director Kitty Simonds, WPRFMC  
ASG DMWR Director Ruth Matagi, WPRFMC Member  
ASG Port Administration Director Clair Tuia-Poumele, WPRFMC Member  
HTC Taulapapa Wil Sword, WPRFMC Member*

**ADDENDUM TO THE  
APPLICATION FOR EXPERIMENTAL FISHING PERMIT (EFP)**

ORIGINAL SUBMISSION DATE: March 6, 2014

ADDENDUM SUBMITTED: May \_\_\_\_, 2014

APPLICANTS NAME: Longline Services, Inc.  
P. O. Box 997423  
Utulei Tramway Road  
Pago Pago, American Samoa 96799

ADDITIONAL DETAILS FOR APPLICATION SUBMITTED:

VESSELS COVERED:

FV PRINCESS YASMINNA  
USCG Documentation Number: 507268  
Home Port: Utulei, American Samoa  
Length of Vessel: 67.5  
Net Tonnage: 67 NRT  
Gross Tonnage: 98 GRT

- Additional Information for Purpose of Request:

Our objective is to allow a larger size fishing vessel to fish within the American Samoa prohibited areas (LVPA) to conduct exploratory fishing with alternate methods such as vertical longlining and/ or FADs that may be located during the fishing season so that the American Samoa longline fleet can better understand and be better prepared with alternate options with possible alternate markets (i.e. fresh fish) for the fleet to survive during the off-season months (January to May).
  
- Description of Project (overview):

Since the submission of our original application, we have had the chance to experience limited FAD fishing at different time periods. This experience has given us more information and has allowed us to provide more information about what we hope to do with this experimental fishing permit if granted.

Specifically, with the assistance of some U.S. purse seine captains/ boat owner(s), we were able to identify a few rafts that drifted into the American Samoa EEZ that supposedly had fish. Although it was difficult to locate the rafts with limited equipment on our longliners, we did manage to locate some of them. Our experiences thus far has taught us several facts that still remain to be reconfirmed, and these are:

- Fish is more likely to accumulate under the raft between 1:30am – 7:00 am;
- After this time, they tend to scatter around the raft, and it has been beneficial for us to set a partial longline set in a horse-shoe shape about 3-4 miles from the raft. The line is set taking into consideration the wind direction and current so that the nets from the raft are drifting away from the line and not towards our lines to avoid possible tangling.
- We have been using small manual reels that are hauled by hand, and to learn about the different species and what is available, we have marked our vertical lines with different fathom depths starting from 80 fathoms to 120 fathoms. Typically, we put 12 circle 14/0 hooks per line and drop them fast into the water with the intent to pick them up within approximately ½ hour with hooks starting at 100m and one every 20 fathoms.
- This vertical LL takes place at night when the fish is congregating under the raft from approximately 1:30 to 6-7:00am. At the end of this process, our vessels have moved out and set the LL as described above (1600-1800 hooks). The crew rests until evening when the LL is picked up again and then starts the process of vertical LL again.
- We have experiences that fish starts biting before the full moon and also after the full moon. Last year, we produced more a week before the full moon (first quarter). This year it has been more after the full moon.
- We also have experienced very bad weather and have learned that we should not get too close to the raft. The best distances are still yet to be determined. However, during bad weather, it is very difficult to stay afloat with the raft, and if we tie up to the raft, the vessel ends up destroying the raft.
- In two of our trips with FADs, we had NMFS observers on board, and they were also able to witness the different options that we were trying. One of the most apparent observations is the limited marine protected species observed. We expected to find a lot more birds, etc..

at the rafts, but this is not the case here in American Samoa waters as compared to such countries like Ecuador, Costa Rica, Solomon Is., etc... An important note is that the method of vertical LL and also regular longlining is very selective where we are setting at certain depths to target certain species specifically for us, the larger tuna.

- Description of Species:

Target species will be Yellowfin, Bigeye, Albacore with bycatch that will also be kept such as Swordfish, Wahoo, Marlin, Skipjack.

As our trips have been redesigned to be shorter and only closer to full moon (more cost efficient), we have estimated that these trips would cost between \$25,000 to \$30,000. In consideration of costs, we would need to have fish valued at this amount to be able to break-even. At current fish prices, this would be equivalent to a delivery of approximately 15,000 to 20,000 lbs of fresh fish or 15,000 to 20,000 lbs of frozen albacore or approximately 40,000 lbs of frozen yellowfin.

- Approximate times and places fishing will take place, the type, size and amount of gear to be used:

- Fishing trips will be once a month – around the full moon time between the first quarter and last quarter.
- Gear used: Longline Reels (standard) for regular longlining and Manual LL reels for the vertical lines to be hauled by hand.
- Gear:
  - Vertical LL:
    - Manual LL reels to be hauled by hand
    - Lines are marked at lengths from 80 fathoms to 120 fathoms
    - 14/0 Circle Hooks
  - Longline (partial set – if around a raft):
    - LP Longline Reel (hydraulic-motor driven)
    - LP Shooter
    - 14/0 Circle Hooks (approximately 1500 – 1800 hooks per set)
    - Mackerel Bait
  - Longlining (full set – if no raft):
    - LP Longline Reel (hydraulic-motor driven)
    - LP Shooter

- 14/0 Circle Hooks (approximately 3000 hooks per set)
    - Mackerel Bait
  - Market for fish caught:
    - Frozen albacore, tuna: to be delivered to AS canneries;
    - Fresh Fish: to be delivered to Samoa Tuna Processing for fresh fish processing or local market. Other option for processing and marketing fresh fish in Honolulu and Los Angeles is being explored by Tautai-O-Samoa Fishing Association members.
  - FADs:
    - For previous trips, we have received information from the US seiner Daniela as well as Trimarine owned vessels. These are FADs that are no longer reachable by them and had floated into the American Samoa EEZ. These are FADs (rafts) that we tried to follow and locate. During the last trips also, we ran into a raft that was owned by a Chinese vessel. We do not have contact with foreign owned FADs, and they would not give us any information, however, we have found them during our fishing trips. Longline Services, Inc. at this time does not have the resources to deploy our own rafts, and as we are limited to the AS EEZ, we would need to have rafts that are anchored so they don't drift outside the EEZ. However, our experiences have taught us that the rafts that are floating and have aggregated fish over months produce a lot more fish and safer to fish on. The anchored rafts do not produce as much and can pose a hazard not only to the environment but possibly the vessels.
- Other Community Benefits:
  - The alia longline fleet has all but diminished. We think that data collected from this experiment can also help the alia fleet to identify another way of bottomfishing (i.e. vertical) as the highest cost is to locate the fish. However, if they have access to information of where some rafts are located, they can go there directly, and we are learning how we can catch that fish around FADs.

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