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April 2, 2016

The Honorable Barack Obama President The United States of America 1600 Pennsylvania Ave NW Washington, DC 20006

Dear Mr. President,

As president of the Hawaii Longline Association, I am writing to express our concern about a proposal to expand the Papahanaumokuakea National Monument around the northwestern Hawaiian Islands.

The Hawaii Longline Association (HLA) is a nonprofit organization formed to represent and advance the interests of individuals and entities involved in the Hawaii-based commercial longline fisheries, and to promote participation by industry in fishery conservation and management decisions. HLA represents approximately 150 active longline fishermen based primarily in Honolulu.

The longline fishery is the largest fishery in Hawaii. It is a model fishery under comprehensive controls to limit fish catch and ensure sustainable stocks, maintain an economically healthy fishery, and protect sensitive marine species like sea turtles, seabirds, and marine mammals. I have enclosed two documents that describe the longline fishery and its characteristics and importance to Hawaii.

Expansion of the Monument is not only unnecessary as it would not improve conservation of marine resources, but such an action would send a terrible signal to our members - and to the entire seafood industry of Hawaii - that you have concluded that fishing is no longer a socially acceptable activity and that the fisheries of Hawaii should be relegated to a second class industry. Expansion of the Monument would not add to the protection of marine resources of the region compared to the protection attributable to the current Monument. Expansion of the Monument would indicate that you believe that the Magnuson-Stevens Fishery Conservation and Management Act (MSA) is a failure - an indication that is totally at odds with other statements by the Administration.

To the last point first. Your Administration has reported that the MSA is a success. The Administration has reported that there has been exceptional progress in establishing sustainable and economically healthy fisheries, including rebuilding dozens of fish stocks that had become overfished in the past. This is a result of exemplary collaboration between the National Marine Fisheries Service with the fishing industry and other interested parties through the regional fishery management councils under the MSA. It is through such collaboration that the proper balance between protection of fish stocks and other marine resources and production of sustainable fish products and recreational fishing opportunities is struck. It is not clear why the proponents of expansion of the current Monument want you to disregard this record of success, or why you would agree that the current institutional arrangement is a failure. The MSA is a success and it works. If changes in management of marine resources outside the boundary of the current Monument are needed, then the proponents should demonstrate why changes are needed and present to the Western Pacific Regional Fishery Management Council their recommendations for the best alternatives and the scientific basis for those recommendations. Then the Council can use existing authority and decision processes, including appropriate environmental analyses, to determine the best, science-based way to proceed. Existing institutions and authorities should be used to the extent possible.

The current Monument provides absolute protection to all marine resources within 50 miles of the northwestern Hawaiian Islands (NWHI). There are no known threats to the resources outside the Monument but inside the U.S. exclusive economic zone (EEZ) around the NWHI. To the extent it occurs at all, fishing in these waters is limited to fishing by U.S. vessels and is directed solely at highly migratory species that are not dependent on the EEZ. Closing these waters will not in any substantive way add to protection of these stocks, which are under management controls established by a regional fishery management organization (the Western and Central Pacific Fisheries Commission) under a treaty to which the U.S. is a party. The mandate of that commission is to ensure that fishing does not drive the stocks below their maximum sustainable yield. Expansion of the Monument will in no way add to the conservation of the stocks under the Commission's purview. As for other species - seabirds, marine mammals, sea turtles - the U.S. vessels are under the strictest controls of any longline fleet to ensure that those species are protected. These species are visitors to and not dependent on waters beyond the current Monument; they are fully protected in the waters within 50 miles of the NWHI, waters that

would perhaps be more important to these species. Expansion of the Monument will in no way add to protection of resources from harm from climate change.

It is important to recognize that the current Monument closes all waters within 50 nautical miles to fishing. This means the closure is actually 100 miles across - 50 miles east and 50 miles west of all the NWHI, as well as waters between islands. Expansion of the Monument to encompass the full EEZ would close waters in a 400 mile-wide band of closed waters - a four-fold increase in exclusive economic zone waters closed to fishing. This is all EEZ - waters which are supposed to be available to U.S. fishers and not to foreign fishers. The EEZ was established to ensure that Americans alone would have access to these waters - but expansion of the Monument would deny Americans access to those waters. This would be a very unfortunate condition.

Fishing has always been an important part of the social and economic fabric of Hawaii. The people of Hawaii are closely aligned with the ocean around them and its resources. It is well known that the people of Hawaii have a much higher seafood component in their diets than most other Americans. Fishing is a highly respected occupation. The Hawaii longline fishery delivers almost all the fresh tuna and associated species available in Hawaii. Thousands of Hawaiians - owners and crew, fish buyers, wholesalers, delivery services, food service workers, fishing business suppliers - rely on the longline fishery for jobs as they work together to get dinner from ocean to plate. Expansion of the Monument might not drive everyone out of business, but it would be another unwarranted attack on the fishery and to the extent the domestic fishery is reduced, markets and consumers would be faced with either not eating tuna or eating imported tuna.

In sum - expansion of the Monument serves no substantive conservation purpose, it would signal that you think the U.S. fishery management institutions that have previously been hailed as successes are not in fact successes, it would deny Americans access to fish in the EEZ, and would threaten a way of life and the economic vitality that Hawaii fisheries represent.

HLA sincerely recommends that you not take action to expand the Papahanaumakuakea Monument.

Sincerely,

Sean Martin, President

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