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August 7, 2019

Taotasi Archie Soliai  
Chair  
Western Pacific Regional Fishery Management Council  
1164 Bishop St. Ste. 1400  
Honolulu, HI 96813

**Re: Council action regarding Hawaii Longline Shallow-set Sea Turtle Framework**

Dear Chairman Soliai:

The Hawaii Longline Association (HLA) supports Council action to amend the Pelagics FEP to establish the loggerhead and leatherback sea turtle management framework for the Hawaii shallow-set longline fishery. HLA does not oppose the Council adopting Alternative 4, which reflects the regulatory components of the recently signed Biological Opinion (BiOp) on the shallow-set fishery.

HLA strongly supports the removal of the loggerhead hard cap. That measure was included as a “safety net” when the shallow-set fishery re-opened in 2004 because the effectiveness of new measures designed to reduce loggerhead interactions was uncertain. Since 2004, those new measures—primarily the hook and bait requirements—have proven very effective, as loggerhead interactions have been reduced by over 90% compared to pre-2004. Accordingly, the loggerhead hard cap no longer serves any regulatory purpose. In addition, during the recent Section 7 consultation, HLA supported sea turtle interaction trip limits; however, we continue to oppose mandatory vessel limits. While we recognize that the Council has little ability to deviate from the measures listed in the BiOp, we note that vessel limits and the leatherback hard cap are overly punitive, and do not correspond with the fishery’s negligible impact on loggerhead and leatherback sea turtle populations.

It has been nearly 16 months since NMFS reinitiated consultation on the fishery, and in both 2018 and 2019 the fishery has been closed prematurely. The importance of this highly monitored, comprehensively managed fishery cannot be denied as it produces over half of the nation’s domestic supply of high-value swordfish. North Pacific swordfish is not subject to overfishing or is overfished, and the fishery does not jeopardize any ESA-listed species.

It is imperative that this fishery reopen on January 1 and we are confident that the fishery will continue to provide benefits to Hawaii and the Nation. HLA will continue to work with the Council and NMFS to further improve and refine the sea turtle management measures.

Mahalo for considering these comments.

Sincerely,

Eric K. Kingma, PhD  
Executive Director

cc: WPFMC members  
Fred Tucher, Chief, NOAA General Counsel, Pacific Islands Section