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U.S. Fish and Wildlife Service
P.O. Box 49567
Atlanta, GA 30345

RE: NRDA Draft Phase IV Early Restoration Plan and Environmental Assessments

Dear Trustees:

The Pew Charitable Trusts appreciates the opportunity to submit the following comments on the Draft Phase IV Early Restoration Plan and Environmental Assessments published by the Natural Resource Damage Assessment (NRDA) Trustees. We support the proposed Pelagic Longline Bycatch Reduction project, the first and only Early Restoration project that will directly benefit pelagic fish and other marine wildlife in the offshore areas of the Gulf of Mexico.

This project is a much-needed first step toward mitigating some of the damage to pelagic marine wildlife caused by the 2010 *Deepwater Horizon* oil spill. It will benefit the affected species by reducing pelagic longline bycatch of spawning western Atlantic bluefin tuna, as well as other threatened species such as sharks, billfish, sea turtles and marine mammals. At the same time, it will help longline fishermen transition to more selective fishing gears that will keep them employed and maintain market supply of the target catch (*e.g.,* yellowfin tuna, swordfish). The proposed $20 million will provide the alternative gears to fishermen and training on how to use the gears effectively. A recent study found that the alternative gears, namely greenstick gear and buoy gear, are viable alternatives to pelagic longline gear, effectively catching yellowfin tuna and swordfish, respectively, while having very low bycatch and bycatch mortality.[1]

The Gulf of Mexico is the primary spawning ground of the western Atlantic bluefin tuna population, a stock depleted to just 55 percent of the 1970 level – a time at which industrial fishing had already taken its toll on the population.[2] Adult bluefin travel to the Gulf of Mexico for up to six months each spring to spawn, and bluefin larvae depend on the Gulf's warm water and eddies for survival.[3] There are two known spawning hotspots, one each in the northeastern and northwestern Gulf of Mexico.[4]

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[1] Kerstetter D, M Appleman, J Secord. 2014. Alternative Gears Pilot Program: Evaluation of Greenstick and Swordfish Buoy Gears in the Gulf of Mexico – Final Report. Nova Southeastern University Oceanographic Center. Dania Beach, FL.

[2] Standing Committee on Research and Statistics (SCRS). 2015. Report of the 2014 Atlantic bluefin tuna stock assessment session. (Madrid, Sept. 22-27, 2014). ICCAT Collective Volume of Scientific Papers, 178 pp. http://iccat.int/Documents/Meetings/Docs/2014_BFT_ASSESS-ENG.pdf.

[3] Teo SLH, A Boustany, H Dewar, MJW Stokesbury, KC Weng, S Beemer, AC Seitz, CJ Farwell, ED Prince, and BA Block. 2007. Annual migrations, diving behavior, and thermal biology of Atlantic bluefin tuna, *Thunnus thynnus,* on their Gulf of Mexico breeding grounds. Marine Biology 151:1-18.

Block, BA, A Boustany, M Castleton, G Shillinger. 2013. Using Electronic Tags to Inform Temporal and Spatial information on Spawning Biology of Atlantic Bluefin Tuna in the Gulf of Mexico. SCRS/2013/091.

Teo, SLH and BA Block. 2010. Comparative influence of ocean conditions on yellowfin and Atlantic bluefin tuna catch from longlines in the Gulf of Mexico. PLoSONE 5: e10756. doi:10.1371/journal.pone.0010756.

[4] Teo, SLH and BA Block. 2010. Comparative influence of ocean conditions on yellowfin and Atlantic bluefin tuna catch from longlines in the Gulf of Mexico. PLoSONE 5: e10756. doi:10.1371/journal.pone.0010756.

The oil spill occurred at the peak of the 2010 spawning season in the bluefin's northeastern Gulf spawning hotspot. Scientists estimate that the spill degraded 10 to 50 percent or more of the bluefin's known Gulf of Mexico habitat.[5] Research is ongoing, but studies have confirmed that the spill damaged Atlantic bluefin tuna health, particularly among the early life history stages.[6] This proposed project will help to mitigate this damage by protecting an estimated 50.5 metric tons of spawning bluefin tuna. The January through June proposed repose period is appropriate to cover the time-period when bluefin are spawning in the Gulf.

Starting April 1, 2015, the National Oceanic and Atmospheric Administration's Fisheries Service has prohibited pelagic longlining in two areas in the northern Gulf of Mexico each April and May to protect bluefin. This proposed Phase IV project will supplement those gear-restricted areas by compensating fishermen to extend the spatial and temporal coverage of the new longline closures on a voluntary basis. To ensure the proposed Pelagic Longline Bycatch Reduction project is complementary to the new closures, the Trustees are wisely recommending that as a condition of participation in the project, fishermen may not transfer their Gulf of Mexico bluefin individual bycatch quotas to other fishers in the Gulf or Atlantic.

On behalf of The Pew Charitable Trusts, we would like to thank the Trustees for the opportunity to comment on the proposed Phase IV projects. We look forward to continuing to work with the Trustees to promote a complete transition from pelagic longline gear to more selective alternative gears in the Gulf of Mexico. Doing so requires changes in the structure of the fleet (*e.g.,* to smaller, more fuel-efficient vessels) to maximize the profitability of the alternative gears. This proposed Phase IV project is a critical first step, and we encourage the Trustees to support a full transition of the fleet in one of the later restoration phases.

Thank you for your time and consideration.

Sincerely,

Lee Crockett

Lee Crockett
Director, U.S. Oceans
The Pew Charitable Trusts

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[5] Haas, E., Walli, A., Senina I. 2010. Deepwater Horizon oil spill spatial chronology and habitat interaction mapping: deliverable D4 summary report, ESA Contract Change notice 4200020096 to the ESA DUE Project DIVERSITY – Supporting the CBD (20009/06/I-EC), 45pp.

Muhling BA, MA Roffer, JT Lamkin, GW Ingram Jr., MA Upton, G Gawlikowski, F Muller-Karger, S Habtes, WJ Richards. 2012. Overlap between Atlantic bluefin tuna spawning grounds and observed Deepwater Horizon surface oil in the northern Gulf of Mexico. Marine Pollution Bulletin 64:679–687.

[6] Brette, F, B Machado, C Cros, JP Incardona, NL Scholz, and BA Block. 2014. Crude oil impairs cardiac excitation-contraction coupling in fish. Science 343(6172):772-776.

Incardona, JP, LD Gardner, TL Linbo, TL Brown, AJ Esbaugh, EM Mager, JD Stieglitz, BL French, JS Labenia, CA Laetz, M Tagal, CA Sloan, A Elizur, DD Benetti, M Grosell, BA Block, and NL Scholz. 2014. *Deepwater Horizon* crude oil impacts the developing hearts of large predatory pelagic fish. PNAS doi: 10.1073/pnas.1320950111.