



**Western
Pacific
Regional
Fishery
Management
Council**

December 1, 2016

President Barack H. Obama
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear Mr. President,

The purpose of this letter is to provide you information on the impacts facing the Hawaii fishing and seafood industries as a result of your decision to expand the Papahānaumokuākea Marine National Monument (PMNM).

Under the statutory authority provided under the Magnuson-Stevens Fishery Conservation and Management Act, the Western Pacific Regional Fishery Management Council (Council) has the responsibility to develop conservation and management measures for all domestic fisheries within our region. As such, we are required to examine the economic, social, and cultural effects of conservation and management measures, including effects on fishermen, fishery-related businesses, small businesses, coastal communities, fish stocks and habitat.

At the Council's 168th meeting held in October 2016, NOAA Fisheries Pacific Islands Fisheries Science Center presented information on the potential direct and indirect economic impacts on the Hawaii longline fishery as a result of the monument expansion. The direct impact on the Hawaii longline fishery is a loss of fishing grounds that resulted in nearly 10 % of the fishery's total landings in recent years. The impact, however, is not proportional among fishery participants, as some vessel captains utilize those fishing grounds to a greater extent than others. Over the last five years, Hawaii longline vessels in the expansion area caught about 2.5 million pounds per year of tuna and other pelagic species, worth on average \$8 million.

The loss of these fishing grounds will have an immediate and long-term effect on the participants in these fisheries. It will also affect shore-side businesses and coastal communities that rely on this fishing industry. The closure of these fishing grounds will result in a loss of more than \$9 million to fishery support businesses (e.g., fuel and gear suppliers), \$4.2 million in household income, more than 100 jobs, and tax revenue of around \$500,000 to the State of Hawaii. The Council is working with PIFSC on further analysis of the economic impacts from the expansion. However, we believe the federal government should mitigate these impacts through direct compensation to Hawaii longline fishery participants. Compensation would lessen the impact on fishery participants who may need to increase the size of their vessel or purchase more fuel and supplies to make longer fishing trips to high seas fishing grounds. Hawaii longline owners may also find the need to upgrade their vessels so they can compete more efficiently with

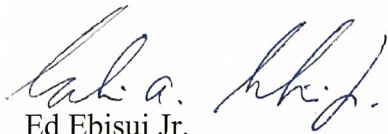
fleets from Japan, China, Taiwan, and Korea. Compensation would also help fishermen who want to leave the fishery and train for other livelihoods.

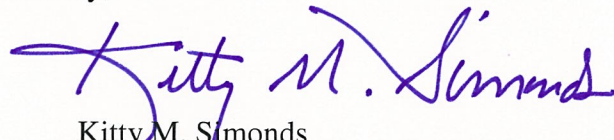
The proclamation to expand PMNM directs the Secretary of Commerce, in consultation with the Secretary of the Interior, to implement regulations to prohibit commercial fishing in the PMNM expansion area. The referenced statutory authority to promulgate the fishing provision in Proclamation 9478 is the MSA. The process to develop federal fishing regulations under the MSA inextricably involves the regional fishery management councils. The Council, at our 168th meeting held last month, initiated a process to amend the Hawaii and Pelagic Fishery Ecosystem Plans and to develop associated proposed regulations that would prohibit commercial fishing, allow non-commercial fishing, and allow Native Hawaii subsistence fishing with the PMNM expansion. The Council's process to develop the FEP amendments and regulations, which includes public scoping and environmental analysis, should take approximately 12-18 months. To help alleviate impacts from Monument expansion on the Hawaii longline fleet, the Council requests delayed implementation of the commercial fishing prohibition for 5 years.

There is precedent for phasing out fisheries in newly designated marine monuments including 5 years for the NWHI bottomfish fishery in the PMNM and 7 years for red crab and American lobster fisheries in the Northeast Canyons and Seamounts MNM. The Hawaii longline fishery is a global leader in sustainable practices as recognized in the White House Fact Sheet (8/27/2016) on the monument expansion. The immediate prohibition on fishing in the monument expansion area will not affect the stock status of any fish caught by the Hawaii longline fishery. A phased approach is appropriate.

Lastly, the Council did not support the expansion of PMNM. However, the Council takes its role under MSA seriously and will fulfill its duty to recommend regulations that implement the fishing provisions of Proclamation 9478.

Sincerely,


Ed Ebisui Jr.
Chair


Kitty M. Simonds
Executive Director