November 4, 2019

Phil Anderson, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

Barry Thom, Regional Administrator
NOAA Fisheries West Coast Region
7600 Sand Point Way NE, Bldg. 1
Seattle, WA 98115

Re: Agenda Item J.3 - Scoping an Amendment Authorizing SSLL Gear Outside of the EEZ

Dear Mr. Anderson and Mr. Thom,

As leading local, national, and international recreational fishing organizations, we are writing to express our concern about permitting industrial pelagic longline vessels to operate from West Coast ports. While we support sustainable commercial fishing practices, industrial pelagic longlining has an abhorrent record of wasteful bycatch and unsustainability. This practice contravenes our collective goals of reducing bycatch and protecting fishing opportunities for the future. Therefore, we are against the use of any pelagic longlines off the California coast. We also do not want to see any development of a pelagic longline infrastructure.

The use of industrial pelagic longlines will increase bycatch. Industrial longlining for highly migratory species involves either shallow set longlines (SSLL), targeting swordfish, or deep set longlines (DSLL), targeting bigeye tuna. Since 2007, the Hawaii SSLL fishery has caught and discarded 46% of its catch and at least 88 different non-target species. This includes the bycatch of striped marlin, blue marlin, sailfish and spearfish. The Billfish Conservation Act of 2012 and its technical amendment passed in 2018 prohibits the importation, landing or sale of these fish in the continental United States. Hawaii is now the only state that may land and sell marlin, sailfish and spearfish, and these fish must be retained there. This Act intended to reduce the demand and subsequent fishing mortality for these species, thereby protecting them for recreational catch and release fishing. Increasing longline activity will concomitantly increase the bycatch of billfish, for which there is no legal market for in the continental United States, thus contravening the intent of the Act. By any reasonable standard, the wasteful mortality associated with bycatch and dead discards of marine life in pelagic longline fisheries throughout the world is appalling.

Ecologically, longlines can fundamentally change the California Current Large Marine Ecosystem. Unlike Hawaii or the western Atlantic and Gulf of Mexico, the California Current has never been subjected to an industrial longline fishery for swordfish or tunas and adjacent areas outside the EEZ have experienced relatively light fishing effort. The removal of top pelagic predators, which would certainly result from longlining, can negatively impact the oceanic food webs. The California Current ecosystem still teems with sharks, seals, tunas, swordfish, whales, albatross and sea turtles in part because of limited industrial longline activity. This diversity and abundance fuels a multi-billion dollar recreational fishing economy, as well as other ocean-based activities including whale and bird watching.
The extensive bycatch and damage to open ocean ecosystems caused by pelagic longlines is well-documented in scientific literature. As forward-thinking fisheries managers, we urge you to look ahead towards innovative gear like deep-set buoy gear to increase our domestic seafood production and domestic job opportunities for the next generation of US fishermen, not behind at indiscriminate gear like pelagic longlines. If we cannot sustainably regulate longlines, then the Council must choose sustainable gear.

Sincerely,

Theresa Labriola
Pacific Program Director
Wild Oceans

Danielle Cloutier, PhD
Pacific Fisheries Policy Director
American Sportfishing Association

Mike Parks
President
Balboa Angling Club

Robert Chavers
President
Laguna Niguel Billfish Club

Chris Bailey
President
Dana Angling Club
Roland Sevilla
Chartemaster
Kingfisher Anglers Club of Southern California

Ron Owens
President
SoCal Sportfishing Club

Matt Groff
President
South Bay Anglers Club

Luke Burson
Dana Wharf Rod & Reel Club

Tom Raftican
President
The Sportfishing Conservancy

Don Herman
President
Southern California Tuna Club

Gary F. Brennan
President
San Diego County Wildlife Federation

Debbie Sharpton
Conservation Vice President
Southwest Council
Fly Fishers International

Ramon Cendejas
President
Marina Del Rey Anglers

Gerry Graf
President
Oceanside Senior Anglers

Ali Hussainy
CEO
BD Outdoors

Kat Shitanishi
President
Owner American Corporation
cc. California Governor Gavin Newsom
Wade Crowfoot, California Secretary for Natural Resources
Chuck Bonham, Director, California Department of Fish and Wildlife

Carey Graves
Vice President of Sales
Daiwa Corporation

Jianwei Li
CFO
Phenix Rods & Accessories, Inc.

Phil Morlock
V.P. Government Affairs
Shimano North America Holding Inc./Shimano Canada Ltd.

Doug Lasko
President
Okuma Fishing Tackle Corp.