

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 SSL 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 (SSL), targeting swordfish, or deep set longlines (DSL), targeting bigeye tuna. Since 2007, the Hawaii SSL 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



Jason Schratwieser  
Acting IGFA President &  
Conservation Director  
The International  
Game Fish Association



Danielle Cloutier, PhD  
Pacific Fisheries Policy Director  
American Sportfishing  
Association



Bill Shedd  
Chairman  
Coastal Conservation  
Association of California



Mike Parks  
President  
Balboa Angling Club



Alan Baron  
President  
Tuna Club of Avalon



Robert Chavers  
President  
Laguna Niguel Billfish Club



Chris Bailey  
President  
Dana Angling Club



*Roland Sevilla*  
10-22-19

Roland Sevilla  
Chartermaster  
Kingfisher Anglers Club of  
Southern California



*Ron Owens*

Ron Owens  
President  
SoCal Sportfishing Club



*Matt Groff*

Matt Groff  
President  
South Bay Anglers Club



*Luke Burson*

Luke Burson  
Dana Wharf Rod &  
Reel Club



*Tom Raftican*

Tom Raftican  
President  
The Sportfishing Conservancy



*Don Herman*

Don Herman  
President  
Southern California Tuna Club



*Gary F. Brennan*

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



Carey Graves  
Vice President of Sales  
Daiwa Corporation



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



Jianwei Li  
CFO  
Phenix Rods & Accessories,  
Inc.



Doug Lasko  
President  
Okuma Fishing Tackle  
Corp.

cc. California Governor Gavin Newsom  
Wade Crowfoot, California Secretary for Natural Resources  
Chuck Bonham, Director, California Department of Fish and Wildlife