



November 18, 2019

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

***Re: Agenda Item J.3 - Scoping a Shallow Set Longline Fishery Outside the EEZ***

Dear Chair Anderson and Council Members:

For more than four decades, Wild Oceans has pursued ocean policies that promote the health of our open ocean ecosystem: low bycatch fisheries that yield high target species catch, live release of incidentally-caught or undersize fish, and cost-effective monitoring and management. For decades we have spoken to the Pacific Fishery Management Council opposing the authorization of a shallow-set longline (SSL) fishery outside or inside the West Coast Exclusive Economic Zone. Many of our concerns and those of still ring true for us as well as the hundreds of fishermen who have signed the attached letter and postcards. **Therefore, we ask you to end further consideration of authorizing a Pacific longline fishery and remove this item from all future agendas. We strongly recommend that you focus your time and effort on alternatives to multi-mile, multi-hook pelagic longlines as a means to fish commercially for swordfish and tunas.**

Further consideration of authorizing SSL gear is inconsistent with the Pacific Fishery Management Council's (Pacific Council) recent actions to reduce bycatch in the highly migratory species (HMS) fishery: 1) by approving hard caps on the drift gillnet fleet and 2) by following the national trend away from indiscriminate gear in highly migratory species fisheries as demonstrated by the Pacific Council's recent authorization of deep-set buoy gear. It is similarly inconsistent with the goal of the Highly Migratory Species Fishery Management Plan to minimize bycatch.

Longlines are indiscriminate, taking scores of different pelagic species on the same set, making it difficult for fishery managers and even fishermen themselves to distinguish between "target" and "non-target" catch. While the rate of some protected species interactions has decreased, the rate of finfish bycatch has remained steady, with the

Hawaii SSL fleet discarding nearly half its catch. Some mitigation measures, such as circle hooks, have increased survivability of unwanted sharks and billfish, but their survivability decreases with every hour left fighting on a hook, leaving their life in fate's hands.

Managers and conservationists in the Atlantic and Pacific have struggled for years to contain the bycatch of longlines, and have recommended research into shorter sets and soak-times for longlines and how they might enhance survival of incidentally-caught fish and undersize target fish. The Council should consider adopting a bona fide research program into the future of sustainable fishing, rather than justifying the continued use of multi-mile longlines that are both indiscriminate and difficult and costly to manage.

More recently, a new threat has emerged. Western Pacific SSL boats also use deep-set longline gear. Authorizing any west coast based SSL fishery will expand the use of DSL that comes with its own bycatch problems. The western Pacific DSL fishery reports fewer interactions with sea-turtles than SSL, but a dramatically higher rate of billfish catch. These billfish cannot be landed or sold in California or elsewhere on the west coast.

For these reasons we ask the Council to end further consideration of authorizing the use of SSL gear outside the EEZ and focus their time and resources on developing innovative gear and a model swordfish fishery.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Theresa Labriola', with a stylized, flowing script.

Theresa Labriola  
Pacific Program Director

November 18, 2019

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

***Re: Agenda Item J.3– Scoping an Amendment Authorizing SSL Gear Outside the EEZ***

Dear Chair Anderson and Council Members:

Keep Longlines Out Of The Pacific!

I do not support the use of multi-mile longlines in our ocean waters off of California, Oregon and Washington. Industrial-scale longlines catch and kill a vast amount of ocean wildlife including bluefin tuna, striped marlin, blue marlin, sharks, leatherback and loggerhead sea turtles.

I do support the use of more selective, actively-tended fishing gear that will keep fishermen on the water and significantly reduce the catching and killing of non-target ocean wildlife.

Keep longline vessels out of the eastern Pacific. Do not allow experimental or permanent longlines. It's not good for our wild oceans or our fisheries.

Sincerely,

Amanda Rewinkel	Merritt island, FL	A couple fish aren't worth killing hundreds of other sea life including endangered species
Brad Dreyer	Dallas , GA	As a recreational fisherman I oppose these efforts that have huge bycatch impacts on our fisheries. I travel and fish the west coast multiple times a year and bring my travel and economic impact dollars with me.

Bill Francois	Paris, TX	As an angler and conservationist, I'm writing to voice my opposition to allowing a pelagic longline fishery to operate out of West Coast ports. Pelagic longlines are an unsustainable gear that have a terrible track record of wasteful bycatch. The PFMC has demonstrated great leadership with the recent authorization of deep-set buoy gear as an alternate means for commercial fishermen to more sustainably harvest swordfish. We need to keep looking ahead to developing more sustainable means to harvest pelagic species, not behind at indiscriminate gear like pelagic longlines. As such I strongly urge the PFMC not to allow the development of a pelagic longline fishery to operate out of West Coast Ports.
Matt Giambruno	Reno, NV	I am an avid fly fisher that is all about sustainable initiatives.
Jeff Hartzler	Oviedo, FL	I am completely against the use of pelagic longlines in the Pacific Ocean. Actions taken by the council must be progressive with the focus on sustainable harvest. Please do not allow a destructive practice to take place.
Max Taub	Phoenix, AZ	I'm writing to state my opposition for allowing a pelagic longline fishery to operate on the West Coast of the United States. One reason for my opposition against long lines is that they incur extremely high numbers of bycatch. Along with that, longlines have been known for a high number of mortalities of endangered animal species such as sea turtles and birds. For example, in the Southern Ocean long line fisheries going after the Patagonian tooth fish have also caught thousands of sea birds on the lines when they had swallowed the bait intended for their desired catch. I hope that I clearly stated my opinion on the issue.

Carson Deer	Houston, TX	I'm writing to voice my opposition to allowing a pelagic longline fishery to operate out of West Coast ports. Pelagic longlines are an unsustainable gear that have a terrible track record of wasteful bycatch. The PFMC has demonstrated great leadership with the recent authorization of deep-set buoy gear as an alternate means for commercial fishermen to more sustainably harvest swordfish. We need to keep looking ahead to developing more sustainable means to harvest pelagic species, not behind at indiscriminate gear like pelagic longlines. As such I strongly urge the PFMC not to allow the development of a pelagic longline fishery to operate out of West Coast Ports
William Hallman	Delran, NJ	I'm writing to voice my opposition to allowing a pelagic longline fishery to operate out of West Coast ports. Pelagic longlines are an unsustainable gear that have a terrible track record of wasteful bycatch. The PFMC has demonstrated great leadership with the recent authorization of deep-set buoy gear as an alternate means for commercial fishermen to more sustainably harvest swordfish. We need to keep looking ahead to developing more sustainable means to harvest pelagic species, not behind at indiscriminate gear like pelagic longlines. As such I strongly urge the PFMC not to allow the development of a pelagic longline fishery to operate out of West Coast Ports.

David Keen	Newport Beach, CA	I'm writing to voice my opposition to allowing a pelagic longline fishery to operate out of West Coast ports. Pelagic longlines are an unsustainable gear that have a terrible track record of wasteful bycatch. The PFMC has demonstrated great leadership with the recent authorization of deep-set buoy gear as an alternate means for commercial fishermen to more sustainably harvest swordfish. We need to keep looking ahead to developing more sustainable means to harvest pelagic species, not behind at indiscriminate gear like pelagic longlines. As such I strongly urge the PFMC not to allow the development of a pelagic longline fishery to operate out of West Coast Ports.
Elizabeth Munsey	San Diego, CA	I'm writing to voice my opposition to allowing a pelagic longline fishery to operate out of West Coast ports. Pelagic longlines are an unsustainable gear that have a terrible track record of wasteful bycatch. The PFMC has demonstrated great leadership with the recent authorization of deep-set buoy gear as an alternate means for commercial fishermen to more sustainably harvest swordfish. We need to keep looking ahead to developing more sustainable means to harvest pelagic species, not behind at indiscriminate gear like pelagic longlines. As such I strongly urge the PFMC not to allow the development of a pelagic longline fishery to operate out of West Coast Ports.
James Leahy	Long Beach, CA	Long lines and nets are unattended death traps.
Mark Gorian	SAN CLEMENTE, CA	No long lines in Calif !
Sione Kulihaapai	Vista, CA	Please help keep multiple long lines out of our waters! We don't want this toxic fishery in our waters!

Kevin Small Sr	Houston, TX	The bycatch is uncontrollable and will do enormous harm
Dennis Sullivan	Warwick, RI	Too many endangered species are being killed for no good reason. It's a cruel sick practice.

Eric Abrams	Bow, NH	Richard Klyver	Lamoine, ME
Quinn Abrams	Exeter, NH	Robert Kurz	Laguna Niguel, CA
Thomas Armbruster	brigantine, NJ	Sally Kurz	Laguna Niguel, CA
Ron Arnold	Ontario, CA	Madeline Labriola	Westerly, RI
Martin Arostegui	Coral Fables, FL	Max Lomax	St Merryn, BC
Connie Arthur	Chattanooga , TN	Paul Long	Medford, NJ
Ka'imi Asbury	Sacramento, CA	Wade Loofbourrow	Juneau, AK
Matt Bahm	Corvallis, OR	Peggy Lopipero-Langmo	San Francisco, CA
Norman Baker	Sequim, WA	Nicolette Ludolphi	Bremen, AE
Art Baker	VIRGINIA BEACH, VA	Michael Maher Sr	EL CAJON, CA
Christopher Barachowski	Olathe, KS	Raymond Mansolino	Del Mar, CA
Simon Barrett	BATH, ot	Jordan Margolis	babylon, NY
John Bello	Ashburn, VA	Al Marry	Hawthorne , CA
Julie Brown	Miami, FL	Ryan Martin	Ames, IA

Larry Brown	Playa Del Rey, CA	William McSpadden	Rancho Santa Margarita , CA
David Campbell	Encinitas, CA	Michael Medina	Alhambra , CA
Cris Carney	San Jose, CA	Yvonne Meredith	laguna niguel, CA
Reed Cass	Cromwell, CT	John Miller	Fairfax, CA
David Cazenias	Leesburg, VA	Karly Miller	Goleta, CA
Marcos Cercvantes	Oxnard, CA	Cristina Mittermeier	Nanoose Bay, BC
Joseph Chavarria	Dana Point, CA	Drucilla Mothley	Chaska, MN
Robert Chavers	Laguna Hills, CA	Julia Moyse	Walsall, ot
Arthur Choate	Coral Gables, FL	Nick Nichols	El Cajon, CA
Stephanie Choate	Tulsa , OK	Clarke Ohrstrom	The Plains, VA
Alec Connah	Telford, ot	John Pamperin	Phoenix, AZ
Melissa DeBiasse	Baton Rouge, LA	Philip Pattengill	North Richland Hills, TX
Ramiro De Loza	Long Beach , CA	Daniel Potrepka	Silver Spring, MD
Steve Dennish	Kailua Kona , HI	Teressa Pucylowski	Monterey, CA
Susie Dodd	Birkenhead, ot	Antar Pushkara	Eugene, OR
Marie Dougherty	oakland, CA	Stacie Rackley	St. Louis, MO
Ryan Doyle	Brooklyn, NY	Daniela Ramos	Aurora, CO
Kristina Duncanes	Homestead, FL	Craig Rappaport	San Marcos, CA



Sander Elliot	Carbondale, CO	Connor Record	Greenwich, NY
Steve Epstein	kailua-kona, HI	Gary Rice	Marco Island, FL
Stephen Faes	Kalaheo, HI	Eric Rogger	Los Angeles, CA
Katrina Ferguson	Seattle, WA	Kim Rowlett	Cleveland, TN
Rick Gaffney	Kona, HI	Anthony Shanley	San Diego, CA
Barry Gibson	East Boothbay, ME	Scott Sitra	Miami, FL
John Gill	Stillwater, MN	Meg Smith	Babylon, NY
Russ Glod	Jenks, OK	Stephen Smith	Raleigh, NC
Ken Goldsmith	Williamsburg, VA	Cory Smith	San Diego, CA
Trever Gowdy	Manchester, MA	Nancy Smith	San Diego, CA
Thomas Grasek	Romulus, NY	Linelle Smith	Toms River, NJ
Kyle Gromen	Springboro, OH	Travis Spaulding	Tavernier , FL
Pamela Gromen	SPRINGBORO, OH	Sara Staley	Woodacre, CA
Timothy Gross	West Mifflin , PA	Garrett Steele	Nashville, TN
Carol Haley	corpus christi, TX	Roger Stephens	Saugus, CA
Kayla Halliday	St. Thomas, VI	Bradley Stouffer	Coeur D'Alene, ID
Tara Harris	Aurora, CO	Jack Straw	The Plains, VA
Melina Harris	Aurora, CO	Kevin Terrell	Minden, WV
Ian Heller	Stanford, CA	Richard Terrell	Monroeville, PA

Jason Horn	Mosier, OR	Michael Thron	Olney, MD
Gabriel Iglesias	Miami , FL	Darrel Ticehurst	Hillsborough, CA
Darren Jacobs	Springfield, MA	Larry Tiger	WESTMINSTER, CA
Robert Jennings	Kihei, HI	Will Tomlinson	Nassau, ot
Scott Keeley	Pittsburgh, PA	Jessica Vargas	Naples , FL
Rober Keiser	S. Miami, FL	Joan Vernon	KEY BISCAYNE, FL
Elizabeth Kelly	London, ot	John Vingas	San Diego, CA
Bernard Kepshire	Corvallis, OR	Chris Werner	Corona, CA
Ashley Kidd	Pasadena, CA	Robert Whitley	New Braunfels, TX
Lurah Klaas	Bozeman, MT	Jenni Work	phoenix, AZ
Sabrina Kleinknecht	Pahrump, NV	Jenna Zech	Santa Barbara, CA



**IT'S TIME TO SPEAK OUT!**  
**KEEP**  
**LOONGLINES**  
**OUT OF THE**  
**PACIFIC**

**Keep Longlines Out Of The Pacific!**

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I do support the use of more selective, actively-tended fishing gear, like deep set buoy gear, that will keep fishermen on the water and significantly reduce the catching and killing of non-target ocean wildlife.

Keep longline vessels out of the eastern Pacific. Do not allow experimental or permanent longlines. It's not good for our wild oceans or our fisheries. Instead, permit the use of selective, actively-tended gear, like deep set buoy gear. The Pflieger Institute of Environmental research confirmed that 1) swordfish can be selectively targeted at depth using deep set buoy gear, 2) non-target catch of species of concern are minimal, and 3) swordfish caught with buoy gear are of high quality and received by southern California markets at a premium price.

Signature:

Name:

Street Address:

City:

State:

Zip:

email: