

June 19, 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 B.1: Open Public Comment - Shallow Set Longline Fishery Scoping

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,



A handwritten signature in black ink, appearing to read "Theresa Labriola".

Theresa Labriola
Pacific Program Director
Wild Oceans



A handwritten signature in black ink, appearing to read "J. Schratwieser".

Jason Schratwieser
Conservation Director
The International Game Fish Association



A handwritten signature in black ink, appearing to read "Bill Shedd".

Bill Shedd
Chairman
Coastal Conservation Association of California



A handwritten signature in blue ink, appearing to read "Danielle Cloutier".

Danielle Cloutier
Pacific Fisheries Policy Director
American Sportfishing Association



Mike Parks

Mike Parks
President
Balboa Angling Club



Robert Chavers

Robert Chavers
President
Laguna Niguel Billfish Club



Chris Bailey

Chris Bailey
President
Dana Angling Club



Alan Baron

Alan Baron
President
Tuna Club of Avalon

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