

November 11, 2019

Phil Anderson, Chairman  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220-1384

[Ref: Scoping a Potential Amendment Authorizing  
Shallow Set Longline Gear Outside the West Coast's EEZ](#)

Dear Chairman and Council Members,

On behalf of The Billfish Foundation (TBF) and the recreational offshore fishing community and the related industry, we appreciate the opportunity to comment to the Pacific Fishery Management Council (PFMC)'s published intent to receive public input on possible authorization of a West Coast shallow-set longline (SSLL) fishery to fish for swordfish outside the U.S. West Coast Exclusive Economic Zone (beyond 200 nm). We apologize that we did not become aware of the comment deadline until today, we respectfully request you share our comments with Council members and staff.

While most applaud the PFMC's recent decision to phase-out drift gillnets fishing for swordfish, due to unacceptable levels of bycatch of numerous species, including those important to the offshore recreational fishery, this recently published notice of possible authorization of a SSLL fishery is surprising and sends a contradictory message. Replacing the anticipated benefits of bycatch reduction that can accrue by phasing out gillnets with consideration of authorizing a SSLL off the West Coast indicates a failure to genuinely commit to improving stock status, reducing bycatch and bycatch mortality, supporting responsible fishing or supporting coastal communities. Surely the PFMC's management and conservation ethic is stronger than merely replacing unsustainable fishing with another form of unsustainable fishing. Deep-set buoy gear produces far less bycatch rates than does SSLL gear. TBF opposes authorizing any SSLL inside or outside the West Coast EEZ and suggests that instead, the PFMC focuses on the positives of developing the buoy fishery for swordfish.

The fact that an SSLL fishery already operates in international waters beyond the West Coast's EEZ, comprised of vessels authorized by the Western Pacific Fishery Management Council (WPFMC) and fishing as part of the Hawaii fishery, makes the current potential option more surprising. Some of those vessels operate out of California, land swordfish in California, yet you, the PFMC, have no benefit of that fishery's landings data nor do you have any management authority over its actions.

Instead of giving consideration to authorizing more SSLL vessels to operate off the West Coast of the U.S. and increasing bycatch mortality, we recommend the PFMC drop the considered action. Another SSLL fishery off the West Coast would demonstrate a disregard of West Coast communities, reduction of bycatch and bycatch mortality, sustainable management, conservation and responsible fishing.

We strongly encourage a rigorous and extensive scoping process of the currently presented option to authorize a SSLL off the U.S. West Coast. Thank you for the opportunity to comment, we look forward to following the PFMC's actions on the subject.

Sincerely,

Ellen M. Peel  
President

Cc: Organizations, businesses and individuals within the offshore recreational fishing community  
Executive Director, PFMC  
Regional Administrator, NMFS