



August 25, 2018

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

Agenda Item H.2: Final Recommendations on Non-Deep-Set Buoy Gear Exempted Fishing Permits (EFPs)

Dear Mr. Anderson,

As leading recreational fishing and boating organizations, we wish to express our concern over the Council's consideration of an Exempted Fishing Permit (EFP) application for deep-set longline gear within the EEZ off of California, Washington and Oregon.

Longline gear, of any fashion, is not currently permitted inside the US West Coast EEZ due to the high incidence of bycatch of non-targeted and endangered species. We do not believe that authorizing an EFP to test longline gear, in any capacity, is an appropriate course of action given the fact that other alternative gear, which is actively tended, has already been thoroughly tested with promising results.

Our organizations have repeatedly urged the Council to phase out drift gillnets (DGN) and provide commercial fishermen with a more ecologically and economically viable alternative in the form of deep-set buoy gear (DSBG). Extensive testing through the EFP process over the last seven years has proven that DSBG results in a much lower incidence of bycatch and bycatch mortality. The recent [Review of the California Drift Gillnet Fishery](#) commissioned by the American Sportfishing Association clearly outlines that DSBG has the second lowest bycatch (2%) of any gear targeting swordfish and that DSBG-harvested swordfish fetch nearly double the market price of that harvested with DGN.

We want commercial fisherman to be able to provide a high-quality product to American consumers with gear that has minimal impacts to the environment. As such we urge the Council not to endorse an EFP for a new longline fishery. Instead, we ask that the Council proceed with, and prioritize, authorizing DSBG which has already been extensively tested, with the ultimate goal of terminating the use of DGN gear. Doing so represents the best course of action for commercial fishermen, consumers and the West Coast's marine resources.

Thank you for your consideration.

Cc: Mr. Kit Dahl



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