



June 9, 2022

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

**Re: Agenda Item G.4 – Drift Gillnet Fishery Hard Caps**

Dear Chair Gorelnik and Council Members:

Wild Oceans, the International Game Fish Association, American Sportfishing Association and Coastal Conservation Association of California are invested in the sustainable management of our Pacific highly migratory species and the removal of indiscriminate fishing gear from our oceans. We support the transition of the California swordfish fishery from drift gillnets to sustainable gear with minimal bycatch or negative impacts on the open ocean ecosystem. In the meantime, we stand behind the Council's effort to develop hard caps on the drift gillnet fishery. We encourage the Council and National Marine Fisheries service to finalize this action as soon as possible.

We represent conservation minded recreational anglers and businesses. Cumulatively, recreational fishing contributes more than \$2.5 billion to California's coastal economy every year. For many decades, California's recreational fishing community has embraced conservation measures intended to sustain and rebuild fish populations. We are troubled when we see fishing practices that fail to safeguard precious and valuable ocean resources and marine life.

In particular, the large mesh drift gillnet in California has historically taken a significant toll on non-targeted species as it seeks swordfish. This includes billfish that have high value in the recreational fishery, where the fish are typically released alive, whereas marlin have no commercial value whatsoever since commercial take is prohibited. Large mesh drift gillnets also kill marine mammals, sharks, turtles, and other species without commercial value.

In the past two years, the drift gillnet fishery has changed its focus to target Pacific bluefin tuna, another economically and culturally valuable recreational fish. This shift

coincided with the observed take of two humpback whales (the last observed take of a humpback whale was in 2004). Hard caps can provide an effective conservation backstop, to limit harm to protected and endangered species when the fishery changes behavior or when species shift in response to changing ocean conditions.

We have actively participated in state and federal development of best fishing practices for the California swordfish fishery. In 2015, we supported the Council's careful consideration of the benefits and risks associated with drift gillnets and the decision to adopt hard caps on bycatch.

We continue to support hard caps as a way of limiting the bycatch of endangered and threatened mammals and sea turtles by drift gillnets until the gear is phased out or replaced with selective, sustainable alternatives. Hard caps will incentivize the remaining gillnet fishermen to take extra caution before setting for swordfish or tuna or other marketable species and provide accountability measures on the remaining fleet.

There is a national and global movement to eliminate the ecological damage caused by drift gillnets by removing the gear and adopting greener alternatives. We look forward to working with the Council to change the tide from indiscriminate industrial gears toward fisheries that support small scale, high yield, low bycatch fisheries, the future of fishing in California.

Sincerely,



Theresa Labriola  
Wild Oceans



Jason Schratwieser  
President  
The International Game Fish Association



Wayne Kotów  
Executive Director  
Coastal Conservation Association of California

Larry Phillips  
Pacific Fisheries Policy Director  
American Sportfishing Association