

November 1, 2022

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

Re: Agenda Item G.3. – Drift Gillnet Fishery Hard Caps - Final Action

Dear Chair Gorelnik and Council Members:

Wild Oceans, The International Game Fish Association, American Sportfishing

DGN fishermen have access to other fishing opportunities, including swordfish, and the revenue is not fully considered in the Environmental Assessment. The analysis minimizes the potential economic value of the DSBG fishery by 1) limiting DSBG landings data to only include vessels also making landing in the DGN fishery and 2) averaging data from 2014, 2015, 2016 and 2017 when very few Exempted Fishing Permits were issued. If we instead consider all DSBG swordfish landings for 2018-2021, when 23 boats participated, the average ex-vessel revenue grows from \$232,019⁴ to \$796,414.⁵ California fishermen are also participating in the hook and line Pacific bluefin tuna fishery. The Environmental Assessment does not include analysis of this fishery, which had an average ex-vessel value of \$913,570 in the past five years (2018-2022).⁶

In addition to Alternative 2 - Rolling Two Year Hard Caps, we would welcome the addition of individual hard caps, specifically those outlined in Alternative 3, Option A.