November 02, 2000

Mr. Jim Lone, Chairman
Pacific Fisheries Management Council
2130 SW Fifth Avenue, Suite 224
Portland, Oregon 97201

Re: Inseason Adjustments, Agenda item C.11

Dear Mr. Lone:

I am writing on behalf of the Pacific Whiting Conservation Cooperative to comment about a unique situation in this year’s Pacific whiting fishery. For the first time in many years, the fishery caught more than 11,000 chinook salmon, obligating NMFS to reinitiate consultation on the groundfish biological opinion. A few weeks ago, the Makah Tribe released 10,000 MT of unharvested whiting quota, for reallocation to the non-tribal fishery sectors, and there is a possibility that another 15,000 MT of whiting could also become available for harvest by the non-tribal fishery before the end of this year. But because the 11,000 chinook level had been reached, NMFS was not able to reallocate the Makah quota.

As a sector, the catcher-processor chinook salmon bycatch rate this year is .028 chinook/metric ton of whiting harvested, almost one-half of the recommended industry guideline of .05 chinook/MT. But even more remarkable than this is what has occurred over the last four months. Only one catcher-processor, the American Dynasty, has been fishing since July and in four months has harvested over 16,000 MT of Pacific whiting, 0 chinook salmon, 0 yellowtail rockfish, and 1.6 MT of widow rockfish (a rate of .0001 MT widow/MT whiting) which is a fraction of the overall fishery rate. These bycatch amounts are most likely the lowest levels of bycatch ever recorded in the long history of the whiting fishery.

Under these current conditions, the risk of additional chinook salmon (or rockfish) bycatch is minimal at best but NMFS is not able to allow continued harvesting. We have even proposed to NMFS that when one additional chinook is reported by any of the whiting fishery sectors, fishing for that sector is prohibited for the balance of this year. Apparently even these protections are not sufficient to allow the fishery to continue.

To shut down a fishery this clean is an astonishing contradiction of fundamental fishery management policies to encourage responsible fishing. It is hard to believe that there is no way to allow this type of fishing to continue, and instead, in essence penalize fishermen when they should be encouraged and rewarded. The impact of closing the whiting fishery before the 2000 total ABC is reached will total in the millions of dollars in lost revenues.

It should be a high priority of NMFS, the whiting fishing industry, and the Council to ensure that a situation such as this does not occur next year.

Sincerely,

Jan Jacobs
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**Table I - Comparison of Catches of Yellowtail Rockfish, Halibut, and Motherlifes by Species**

2000 Pacific Whiting Fishery