



Pacific Marine Conservation Council

"Dedicated to the health and diversity
of our marine life and habitat"

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March 1, 2000

Public comment on agenda item G.1
March 2000

Jim Lone, Chair
Pacific Fishery Management Council
2130 SW Fifth Avenue, Suite 224
Portland, OR 97201

Dear Chairman Lone,

RE: Support for needed changes in yellowtail bycatch of the on-shore whiting fleet

The Pacific Marine Conservation Council, whose 260 members have backgrounds including commercial, recreational and charterboat fishing, marine science and environmental activism is concerned about the increases in yellowtail bycatch in the on-shore whiting fishery.

We believe changes need to be made and suggest the Council enact as a minimum the following:

- 1) a yellowtail TAC reduction that is equitably distributed among the fleets; and
- 1) as a condition of approval of the exempted fishing permit, the Council initiate a vessel trip and vessel cumulative cap for yellowtail bycatch that would be based on an on-shore whiting fleet cap of 375 mt., and reestablishing observers as necessary to monitor bycatch;

In addition, we would also support:

- 1) mandating rockfish and salmon excluders in whiting nets;
- 1) creating sanctions against vessels which exceed vessel caps;
- 1) establishing an on-shore whiting fleet bycatch cap of 375 mt;
- 1) delaying approval of the EFP until April 2000 to allow time for further actions to be brought before the industry and the Council
- 1) eliminating the exempted fishing permit.

This is an issue that has been before the Council for at least two years now. PMCC testified in April of '99 and again in November '99 about its concerns. The industry has acknowledged the problem and has successfully sought

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from the Council the authority to fashion its own plan. A report is to be made at the March 2000 meeting. The Groundfish Management Team has also prepared options for Council consideration.

Last year, other fisheries had to be closed because the on-shore whiting fleet, unconstrained by vessel or fleet caps, took too many yellowtail. In addition, there have been rumors that some processors, using less than ethical tactics, have "requested" that some vessels bring in larger loads of yellowtail. The intimation has been that this was a cost of that vessel's doing business with that processor, or that the processor offered some kind of incentive if that "request" was honored, and some vessel operators felt compelled to honor the "request". Instituting vessel bycatch caps would eliminate any pressure being placed on a vessel by a processor.

PMCC believes the problem is not fleet-wide and supports the industry attempt to fashion its own plan. However, if that plan is too difficult to craft, or if it does not address the fundamental concern of increased and unnecessary bycatch of yellowtail, then PMCC asks the Council to take the actions noted above.

Thank you for your consideration of these comments and for doing what is necessary to protect yellowtail rockfish and other fisheries which rely on their harvest, and mandated in the Sustainable Fisheries Act.

Sincerely,



Bob Eaton
Executive Director