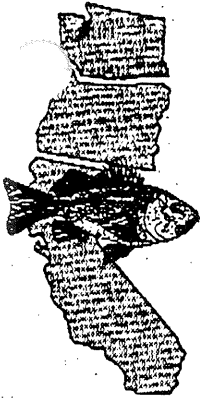


Public Comment D.8.  
June 2000



# Pacific Marine Conservation Council

*"Dedicated to the health and diversity  
of our marine life and habitats"*

340 Industry P.O. Box 59  
Astoria, OR 97103  
Office (503) 325-8188 1-800-343-5487  
Fax (503) 325-9681  
e-mail: pmcc@pacifier.com

## Board of Directors

**Fred Benka**  
Santa Barbara, CA  
Charter Skipper

**Jeff Boardman**  
Newport, OR  
Commercial Fisherman

**Scott Beley**  
Gold Beach, OR  
Commercial Fisherman

**Leesa Cobb**  
Port Orford, OR  
Commercial Fishing Family

**Ken Culver**  
Westport, WA  
Charter Skipper

**Frank Donahue**  
Santa Barbara, CA  
Commercial Fisherman

**Gunderson**  
Seaside, WA  
Marine Scientist

**Mary Hudson**  
Oakland, CA  
Environmental & Ocean  
Resource Attorney

**Steve Joner**  
Neah Bay, WA  
Tribal Biologist

**Phil Kline**  
Eureka, CA  
Commercial Fisherman

**Milton Love**  
Santa Barbara, CA  
Marine Scientist

**Michael Matson**  
Trinidad, CA  
Commercial Fisherman

**Mandy Merklein**  
Seattle, WA  
Fisheries Consultant

**Fred Munson**  
Seattle, WA  
Environmentalist

**Mark Newell**  
Tillamook, OR  
Commercial Fisherman

**Ronnie Pellegrini**  
Eureka, CA  
Commercial Fishing Family

**Joe Rohlsler**  
Waldport, OR  
Sports Fishing Advocate

**John Warner**  
Charleston, OR  
Marine Supplier

## Staff

**Rob Eaton**  
Executive Director

**Brewer**  
Office Manager

**Jennifer Hloster**  
Science Coordinator

**John Fuxell Jr.**  
Communications Coordinator

7 June 2000

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

RECEIVED

JUN 08 2000

PFMC

Comments on June 2000 PFMC agenda item D. 8., Plan Amendment to  
Address Bycatch and Management Measure Issues.

Chairman Lone and Council Members,

The Pacific Marine Conservation Council (PMCC), a coalition of  
commercial and sport fishers, marine scientists, and conservationists,  
respectfully submits these comments on Draft Amendment 13 to the  
Pacific Coast Fishery Management Plan and express our preferred  
alternatives.

Issue 1: Definition of the term "bycatch" in the FMP

PMCC preferred alternative: Alternative 2 – Magnuson-Stevens Act  
definition

Issue 2: Standardized reporting methodologies

PMCC preferred alternative: Alternative 3 – Implement observer program  
as soon as funding becomes available.

The implementation of an observer program, as supported by the  
Council's GMT and SSC, could be used to collect information leading to  
improved knowledge and data on such issues as, gear selectivity, total  
mortality, rebuilding rates of overfished species, and an increase of  
species-specific information such as age, maturity, fecundity, location,  
and conditions of capture. While we understand the current economic  
situation of the groundfish fishery necessitates seeking funding for this  
program outside of the groundfish fleet the mandates for bycatch  
quantification and reduction are clear. For this reason interim actions  
should be taken such as utilization of the bycatch information from the  
Enhanced Groundfish Data Collection Project as best available science  
for calculating bycatch rates and development of a full retention program  
with validation.

Issue 3: Bycatch reduction provisions

PMCC preferred alternative: Alternative 4 – Implement currently practicable changes to management measures.

Section 303 (a)(11) of the Magnuson-Stevens Act clearly requires the Council to (1) “establish a standardized reporting methodology to assess the amount and type of bycatch occurring in the fishery”, and (2) “include conservation and management measures that, to the extent practicable, first minimize bycatch and second, minimize the mortality of bycatch which cannot be avoided.” The list of management measures included in Alternative 4 are deemed “practicable” management measures for the reduction of bycatch and should be implemented immediately.

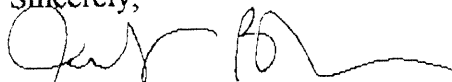
Issue 4: Annual management measures framework provisions

PMCC preferred alternative: Alternative 3 – Under this option, commercial and recreational management measures would become part of a framework for routine management measures.

PMCC is comfortable with the development of a framework for management measures such as those for overfished stocks for the explicit purpose of “achieving the rebuilding plans, reducing bycatch, preventing overfishing, allowing the harvest of healthy stocks as much as possible while protecting and rebuilding overfished and depleted stocks, and equitably distributing the burdens of rebuilding among the sectors.” We feel this caveat should remain and appear in the final document.

We look forward to your decisions on this agenda item at the upcoming Council meeting.

Sincerely,



Jennifer Bloeser