

C.11

Pacific Whiting Conservation Cooperative

4039 21st Ave W., Suite 400
Seattle, Wa. 98199

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.

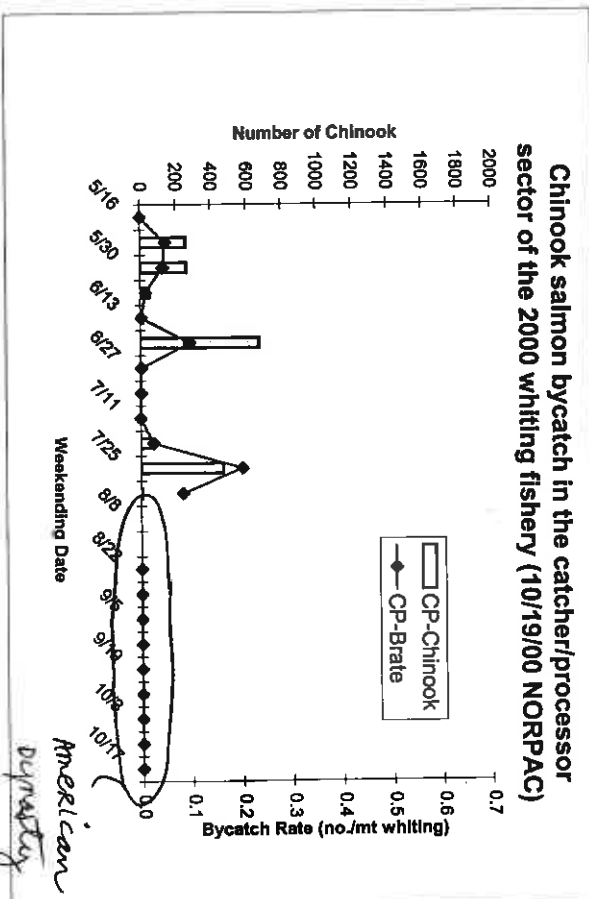
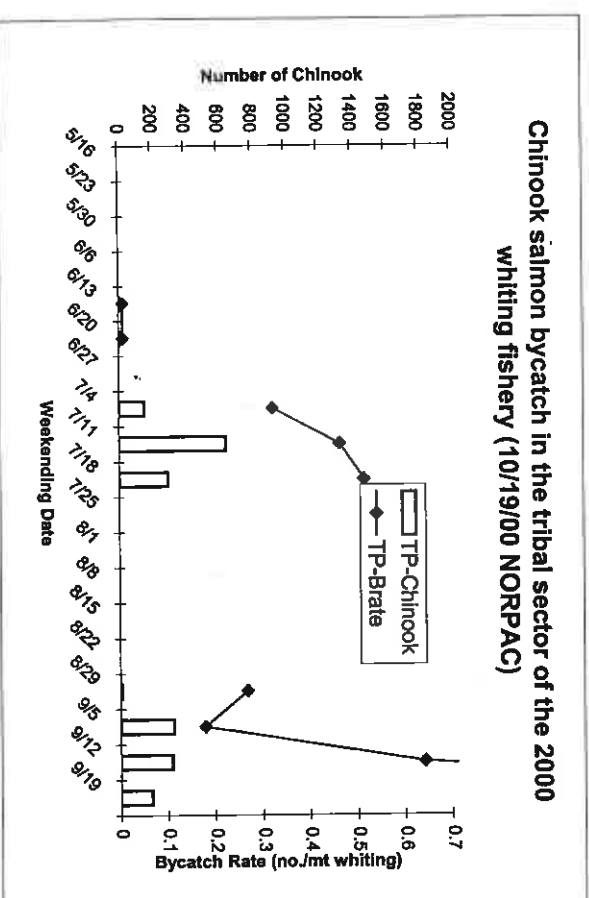
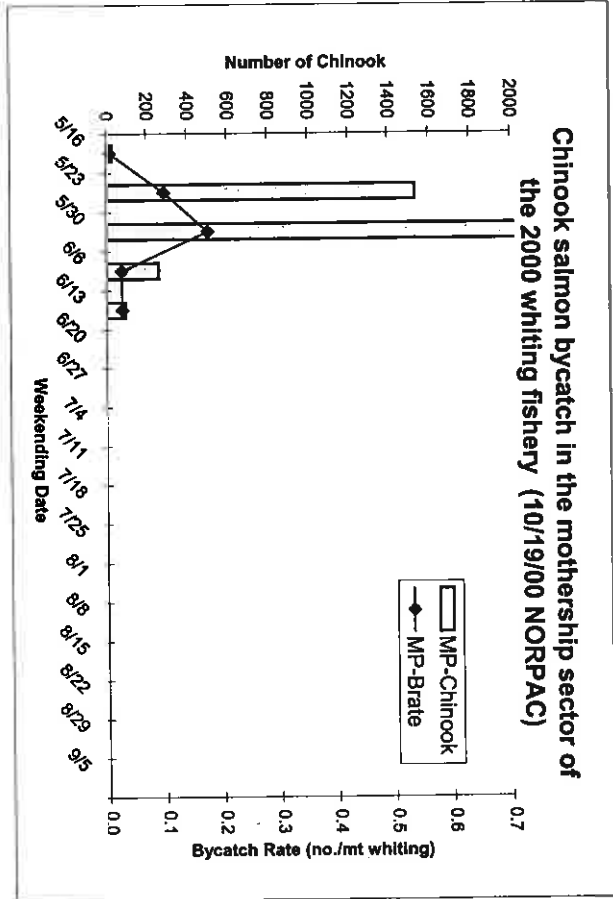
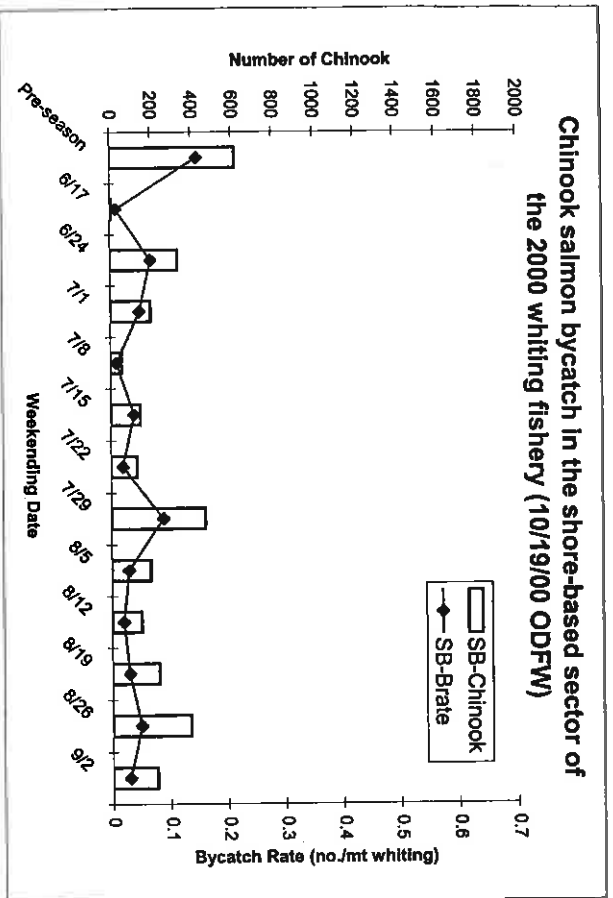
To shut down a fishery this clean is an astonishing contradiction of fundamental fishery management policies to encourage responsible fishing. It is hard to believe that there is no way to allow this type of fishing to continue, and instead, in essence penalize fishermen when they should be encouraged 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



2000 PACIFIC WHITTING FISHERY
ALL SECTORS

TABLE 1 - Comparison of Catches of Yellowtail Rockfish, Widow rockfish, Salmon, Halibut and Miscellaneous Groundfish in the Pacific Whiting Fishery, through October 19, 2000.

SPECIES	MOTHERSHIPS PROCESSORS						CATCHER/ PROCESSORS		SHORE-BASED PROCESSORS		TOTAL WOC	
	TRIBAL MOTHERSHIPS mt	Rate	NON-TRIBAL MOTHERSHIPS mt	Rate	ALL * MOTHERSHIPS mt	Rate	mt	Rate	mt	Rate	mt	Rate
Whiting Allocation	32,500		47,900		80,400		67,800		83,800		232,000	
WHITTING	6,251		46,840		53,091		63,871		85,565		202,527	
Yellowtail Rockfish	100	0.016	286	0.006	386	0.007	270	0.004				
Widow Rockfish	10	0.002	151	0.003	161	0.003	69	0.001				
All other groundfish	66		102		168		193					
TOTAL GROUNDFISH	6,427		47,379		53,806		64,403					
Percent over/under Whiting Allocation	-80.8%		-2.2%		-34.0%		-5.8%		2.1%		-12.7%	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate	Number	Rate	Number	Rate
Chinook	1,947	0.311	4,421	0.094	6,368	0.120	1,828	0.029	3,320	0.039	11,516	0.057
Non-Chinook (including salmon unidentified)	0		27		27		88		24		139	
Total Salmon	1,947		4,448		6,395		1,916		3,344		11,655	

Data sources: Catcher/processor and motherhip data is total catch data (retained plus discard) from Alaska Fisheries Science Center Observer Program.
Shore-based data from Oregon Department of Fish and Wildlife.
* Sum of tribal and non-tribal data.