

October 20, 2000

Mr. Jim Lone, Chairman
Pacific Fisheries Management Council

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Dear Mr. Lone:

Subject: A.F.A. Sideboards

I am the owner of two shoreside whiting boats; one is A.F.A. qualified and one is not.

I am concerned that picking a window period as late as September 1999 will increase the size of the shoreside whiting fleet.

The boats that entered the fishery after 1998 are boats that were A.F.A. qualified and have sold their pollock rights. If they hadn't sold these rights they would be fishing pollock in the Bering Sea.

My interpretation of the A.F.A. statute is that vessels which enjoy the benefits of the A.F.A. should not use those benefits to impact other fisheries. In my opinion that is what would happen if the council extends the window period into 1999.

I can give you three examples where these boats impacted the rest of the whiting fleet by participating in this fishery since August of 1999.

1. I lost an at-sea market because the owner of one of the A.F.A. qualified vessels that sold their pollock negotiated a deal that would include a larger opportunity in the offshore whiting fishery so two boats were cut out of that fleet.
2. In 1999 these boats shortened our season. They got markets to fill in for boats that wanted to go qualify for A.F.A. and then go fish out of Kodiak for the rest of the season. The owners of the boats that filled in on these markets wrote letters to the council stating how they saved many jobs in Newport, but what I found was that it cut every other plant and whiting boats seasons' short.

3. In the 2000 season one of these boats were given a market in Newport. It appears to be that this market was made available because the owners of the A.F.A. qualified vessel could give the manager of the shoreside plant an offshore market for his personally owned vessel. When this happened it displaced two coastal boats that had been fishing whiting for the plant in the past. These vessels weren't able to find other whiting markets.

It seems to me at a time when the council is looking at reducing fleet size it would be unconscionable to allow more effort into the fleet.

Sincerely,



Mark Cooper, President
Persistence Fisheries, Inc.