



P.O. Box 8353, Eureka Cal. 95501
707-444-0431
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LIAM N. MASSEY
President

JUN 11 2002

Dear Council Members:

June 11, 2002

I would like to take this opportunity to comment on the proposed Closure to Trawling of the West Coast Continental Shelf.

My business has been supplying trawl gear to the groundfish fleet on this coast since 1979. In the past five years, we have seen our business cut in half as a result of the starvation policy you have carried out in an attempt to manage the fisheries on this coast. I feel that a closure of the shelf would mean we could no longer remain in business.

The Council's policy of ever-decreasing trip limits has reached its' final conclusion; the resource has been wasted, the processing and supply infrastructure has contracted, the fishing vessels have become unsafe and in some cases, completely unseaworthy. These vessels are now faced with fishing for less fish and less money, while paying more for the necessary supplies with which to do so. In my opinion, a closure of the shelf is an admission of the failure of this management policy, and a golden opportunity for more lawsuits against N.M.F.S.

Let me list the fisheries which my business supplies and which will be impacted by this closure: the multi-species fishery for petrale and English sole, sand dabs, pink shrimp, California halibut, and cucumber; the midwater fisheries for hake and chilipepper; the California and Washington fisheries for prawns. A blanket closure would mean the loss to the nation of these fisheries and the loss of the participants' livelihoods.

I will follow this letter with two more describing the difficulties I face as, firstly, a gear supplier and secondly, as a frustrated gear design technician.

I would ask you to consider very carefully this proposed closure and its' impact on the United States fishing industry which is composed of many hard working American men and women. In conclusion, please step back and try to figure out some other plan to manage our national seafood resource: Systematically destroying the economic viability of commercial fishing and thus precipitating a Final Full Closure is not a management method.

Sincerely,

Liam N. Massey, President
Pacific Trawl Co. Inc.



PACIFIC TRAWL CO., INC.

Trawls and Trawl Supplies

P.O. Box 6353, Eureka Cal. 95501
707-444-0431
Fax 707-444-2751

LIAM N. MASSEY
President

Dear Council Members:

June 11, 2002

I have been in the business of supplying trawl gear to the West Coast commercial fleet since 1979. Prior to that, I was a trawler owner and operator. Gear changes and trawl selectivity have been both a career and a hobby all my life. All of my spare resources of time and money have gone to support this interest. I consider myself an expert in this field.

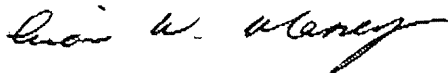
As such, I am dismayed and confounded with your decision to close the U.S. Western Continental Shelf to groundfishing because of the need to rebuild a few species of rockfish, without first looking into methods of excluding them from trawls.

To the best of my knowledge, the only attempt initiated by the Council to deal with this problem was the 8" footrope modification to trawls a couple of years ago. That *solution* was an ill-conceived reaction by the industry under pressure from the Council to avoid full closure. It did not take into account the damage it would to the ocean bottom, and consequent vulnerability to future lawsuits which could ensue against the industry. It was an indirect and inappropriate attempt to deal with a problem and its' limited success is hardly a surprise.

I am a firm proponent of trawling as the only method of catching many species of fish in an economical and responsible manner. Numerous research papers and books have been written on exclusion methods for trawls and none have been looked into for use on this coast. Apparently, the Council finds it easier to close down a fishery and jeopardize the livelihoods dependent upon it rather than deal with the problems associated with it.

I respectfully ask that you pursue all alternatives to a full closure. There would be little benefit to the nation, and the cost would be loss of livelihood for the many American taxpaying individuals, families and businesses who depend on the ocean for a living.

Sincerely,



Liam N. Massey, Gear Engineer
Pacific Trawl Co. Inc.



PACIFIC TRAWL CO., INC.

Trawls and Trawl Supplies

P.O. Box 6353, Eureka Cal. 95501
707-444-0431
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LIAM N. MASSEY
President

Dear Council Members:

June 11, 2002

I have been in the business of supplying trawl gear to fishing vessels on the West Coast of the U.S. since 1979. I would like to take this opportunity to acquaint you with some of the difficulties I encounter while attempting to do this.

In the past five years, I have seen my own business drop by half, two other netmakers go out of business, and the only two manufacturers of P.E. netting in the U.S. quit the business.

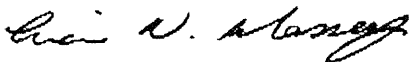
Everything we use in this industry is imported. This includes: netting, wire rope, floats, chain, shackles, rope and trawl links. In order to obtain reasonable pricing, we have to order by container lots, 10-20 ton at a time. With netting for example, we must purchase a minimum of ten ton per order, and minimum of 600 lb. per twine/mesh size. In order to cover all the requirements in the various fisheries we supply, we carry 24 mesh/twine size combinations. All of these sizes are not manufactured by the same netting factory, some come from Asia and some from Europe. From the time we place the order, we expect to receive the material in three to six months, depending on the supplier.

With this timetable, we have been forced to second guess what fishery management might do a year in advance. If mesh sizes, or method of measuring mesh is changed, we are faced with a loss of the inventory we carry for that fishery and the necessity of placing an order for the new size, assuming we can come up with the volume and money to do so. At best, we might have the new material in six months.

Please take this situation into account when contemplating gear changes. To the best of my knowledge no gear supplier on this coast has been consulted about the impacts of regulation change. We must have at least six months advance notice of the changes in order to, hopefully, sell off some old inventory and be able to order new.

Thank you for your time.

Sincerely,



Liam N. Massey, Fishing Gear Supplier
Pacific Trawl Co. Inc.

PUBLIC Comment C.8.E
Management Measures for 2002

June 12, 2002

Chris Fryer
2132 Oregon Street
Berkeley, CA 94705

Dr. Donald McIsaac
Executive Director,
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220

Dear Dr. McIsaac,

As a diver, I am very concerned about recent scientific reports noting the declining and serious nature of the rockfish fishery in the Pacific. I understand that the Pacific Fishery Management Council will be discussing these reports at their June meeting. Due to the dire nature of these reports, I urge you to close the rockfish (also known as groundfish) fishery until good science notes that it can again be sustainably fished. I know that there are a number of fishing techniques and other fisheries, including squid and shrimp fishing, that also affect rockfish population through bycatch. I urge you to restrict these destructive fishing practices and reduce fishing levels on other fisheries to allow the rockfish stocks to replenish.

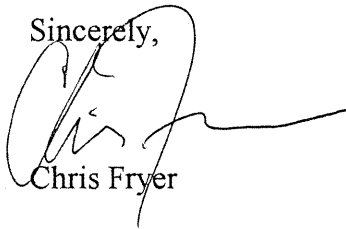
Older scientific reports underestimated the dire state of rockfish populations. It is time for the PFMC to act now to restrict fishing that affects rockfish populations. I am a California scuba diver and have seen a steady decline in large rockfish over many years.

Again, this trend must be reversed and the rockfish populations allowed to replenish. Close areas where overfishing has occurred and keep them closed until depleted rockfish stocks have been rebuilt.

I understand that closures related to rebuilding the rockfish populations will have a profound affect on the commercial fishing industry. Please know that I will also contact my state and federal representatives and urge them to assist financially to minimize the impact on working people.

Thank you for your time.

Sincerely,



Chris Fryer

To: Pacific Fishery Management Council

From: Tracy Grogan

Date: June 13, 2002

I am writing because I am concerned about recent scientific reports that some of our rockfish populations are seriously depleted and continue to decline at increasing rates. As a diver, consumer and conservationist, I have seen become acutely aware of the growing impact we have on that decline. I have taken it upon myself to alter my dining habits and to educate others about depleted fish stocks such as swordfish, "sea bass", bluefin tuna, orange roughy, and sharks, among others. But this grassroots activity can never grow beyond low levels of adherence unless organizations and governing bodies take up the cause.

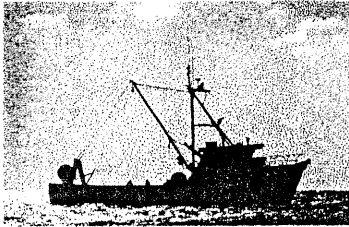
I urge the PFMC to use its position and standing to act immediately to reduce fishing levels in order to rebuild our depleted fish stocks. Without intervention, the commercial viability of this fish can be measured in single-digit years. I urge you to close areas where overfishing has been occurring, and keep them closed until the depleted stocks have been rebuilt.

Even as efforts, such as aquaculture, are introduced as long-term solutions to the conflict between the need to feed this planet and the need to create sustainable practices, we are challenged to make sacrifices in the short term. You have an opportunity to serve your constituents (all those who make a living or put food on the table from our troubled fisheries) in both the long and short term. One need look no further than the east coast fisheries to see that short term greed will ultimately lead to depleted stocks and bankrupt fishermen. It is in the best interest of each of us to limit fishing in such a way as to create a sustainable stock.

You are in a unique position to bring this to reality. I urge you to support limitations and even bans on the commercial harvesting of rockfish in a manner that is first consistent with sustainability and, only when the first goal is achieved, the healthy continuation of commercial fishing in this region. If you do not achieve the first, the second will soon collapse.

Thank you for the opportunity to comment,

Tracy Grogan



HUNTER ENTERPRISES

Bill C. Hunter

June 12, 2002

P.O. Box 336

Fields Landing, CA 95537

Dear Council Members:

Phone: (707) 441-1070

Fax: (707) 441-4856

hunter@northcoast.com

We would like to comment on the proposed Closure to Trawling of West Coast Continental Shelf.

Our family has been in the fishing industry four generations on the Pacific Coast and we had one of the largest processing plants on the West Coast (Eureka Fisheries Inc) which has recently closed it's doors after 50 years of business. This closure was strictly due to the ever decreasing amount of fish allowed by the Council and the National Marine Fisheries to be landed. Our Pacific Coast communities have been hard hit economically by the decisions being made by the Council and the NMFS.

We are in complete agreement with the statements issued recently by a number of Congressmen on our behalf regarding the Magnuson Act and the PFMC and NMF's many Management Plans. They clearly understand the needless and "scientifically unjustified assault" by the NMFS, PFMC, and the various environmental groups to use the Magnuson Act against the fishing industry. These members of Congress are committed to a reasonable approach to protecting both the fishery and the fishing industry. They know that the Magnuson Act must be amended immediately.

The Amendment to the Magnuson Act is only one step that must be taken to insure that the industry remains viable. The PFMC's management plans the last five years have drastically reduced the fishing industry, putting many processors, vessels, and people out of business while attempting to manage the fisheries. We feel these policies and decisions have been made using poor science and have ignored the industry's experience and knowledge when compiling the data. Decisions have been made solely on the side of caution and fear of law suits being filed by environmental groups.

The closure of the shelf is an admission of failure of the management policy. There are many other methods including gear changes and trawl selectivity that could be used to protect certain fish species. These alternate methods would be a better solution for fisheries management than Closure to Trawling of the West Coast Continental Shelf.

We urge you to carefully consider the effects your decisions will have on the fishing industry and the communities of the entire West Coast, as well as the seafood resource.

Sincerely,

G.A. (Gib) Hunter
Bill C Hunter

ALLEN CODY • DENNIS GAYLE • EL CERRITO • FISHWISH
OREGON FLYER • TRAVIS WM. • WARRIOR II • WINGA