

U.S. Department
of Transportation

United States
Coast Guard



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United States Coast Guard

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July 15, 2002

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PFMC

Dr. Donald O. McIsaac
Executive Director
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, Oregon 97220-1384

Dear Dr. McIsaac:

Thank you for this opportunity to present several safety concerns regarding recent and potential adjustments to the Council's Groundfish Management Plan.

The proposed emergency rule to shift the limited entry trawl fleet targeting Dover sole, thornyhead & sablefish (DTS Complex) to waters beyond 250 fathoms beginning September 1, 2002, may create significant safety issues for some vessels in this fleet. Trawlers off Oregon & Washington will be forced to transit approximately 40 miles offshore to reach open fishing grounds, and these extended transits will result in longer exposure to harsh weather conditions, especially during winter months. This problem is compounded by the slow speed of these boats, which will limit their ability to return to port before sea conditions become hazardous. Also, many of these vessels are relatively small: already handicapped in seakeeping ability by their size, these boats will need to add weight topside (cable) in order to set their trawl gear at greater depths. This potential combination of prolonged exposure to foul weather and additional topside weight on smaller vessels is a significant safety concern.

I must also note that the recently enacted closure of all recreational groundfish fishing south of Cape Mendocino to waters inside 20 fathoms increases the potential for mishap within this fishery. Previously, the charter fishing vessels and the many recreational boats targeting groundfish had expansive areas in which to fish. The changes that took effect on July 1, however, have forced both fleets to operate in much closer proximity. Given the large number of vessels that participate in this fishery, this situation may increase the risk of collisions at sea, especially during periods of reduced visibility. Additionally, the average recreational boater often does not have the requisite local knowledge of bottom contours and wave dynamics to fully avoid such inshore hazards as grounding or exposure to breaking seas. This combination of greater vessel density and a requirement to navigate shallower waters may present increased risks to the boating public in certain areas.

I fully appreciate the extremely difficult scientific, sociological, legal and economic constraints that the Council must balance while also trying to meet the Magnuson Act's requirement to

16214
July 15, 2002

promote the safety of human life at sea. Please ask the Council and your staff to consider the issues I have noted as they work to optimize the Groundfish Management Plan.

If you have any questions about these issues, please contact my Chief of Law Enforcement, Commander Fred Myer, at (206) 220-7304.

Sincerely,



ERROLL BROWN
Rear Admiral, U.S. Coast Guard
Commander, Thirteenth Coast Guard District

Copy: Commandant (G-OPL-4)
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