

Exhibit C.5.d
Public Comment
September 2002



THE
INSTITUTE
FOR
FISHERIES
RESOURCES

www.ifrfish.org

Southwest Office
P.O. Box 29196
San Francisco, CA
94129-0196 USA
Tel: 415/561-FISH
Fax: 415/561-KING

Northwest Office
P.O. Box 11170
Eugene, OR
97440-3370 USA
Tel: 541/689-2000
Fax: 541/689-2500

21 August 2002
Dr. Hans Radtke
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, Oregon 97220

RECEIVED

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PFMC

RE: 2003 Pacific Groundfish Management Measures

Dear Mr. Radtke,

The Institute for Fisheries Resources (IFR) is a nonprofit organization affiliated with the Pacific Coast Federation of Fishermen's Associations (PCFFA). IFR works as a public service research and conservation organization to help protect marine and anadromous fishery resources.

While we are not commenting on the current management alternatives before the council, we are obviously concerned about their impacts on fishermen and the coastal communities they support. In response to this current crisis we would like to respectfully encourage the Council to use this opportunity to increase the amount of scientific study and knowledge of our marine resources.

Specifically, we propose that the Council increase the amount of experimental fishing permits (EFP), such as the EFP proposed for Steve Fitz at the June 2002 Council meeting for research using Scottish Seine gear. These permits, as long as they are carefully observed and well researched, enable fishermen, researchers, and managers to accurately assess different fishing methods and their impacts on fisheries resources.

In correlation with this we also would encourage the Council to help foster more cooperative research using fishermen's knowledge. Collaborative research

The Institute for Fisheries Resources is a Non-Profit, Non-Governmental Organization, affiliated with the Pacific Coast Federation of Fishermen's Associations, working for sustainable fisheries.

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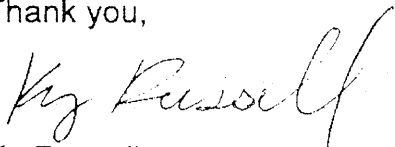
projects between fishermen and scientists can benefit all involved. Fishermen will be more likely to validate scientific studies in which their knowledge and expertise has played a part in shaping. Likewise, scientists can benefit from fishermen's knowledge of accessible areas, and be more likely to get a complete picture of what is happening in the ocean when collaborating with those individuals who are in the water the most. These research projects should also be enlarged to include representative samples from the entire area over which the Council has jurisdiction. It will be increasingly difficult to justify basing management decisions for the Pacific Coast on surveys that do not include samples from the entire Pacific Coast.

Lastly, we encourage the Council to increase stock assessments to an annual or semi-annual timeline. It is obvious from the current situation that the tri-annual approach is not satisfactory. There is too much time for a situation to escalate to a crisis when there is so much time between assessments. When using fishermen to help collect data and encouraging cooperative studies, there could be a continual presence of data collection throughout the year, allowing for this type of innovative methodology.

We encourage the Council to form and enhance a collaborative research committee that can help to foster these types of activities. We at IFR would be happy to help with this, as we are connected with both scientists and fishermen through our current work.

Thank you for this opportunity to comment. We appreciate all of the work that you are doing and understand the tough decisions you will be forced to make in the coming weeks. We hope that you will be able to create a model for increasing science and research collaborations to help our fisheries and the overall marine environment.

Thank you,



Ky Russell
Sustainable Fisheries Coordinator
Institute for Fisheries Resources
kr_ifr@pacbell.net