

Pacific Fisheries Management Council
7700 NE Ambassador Place, Suite 200
Portland, Oregon 97220-1384

Janice Baker
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RE: Vessel Monitoring Program

March 22, 2003

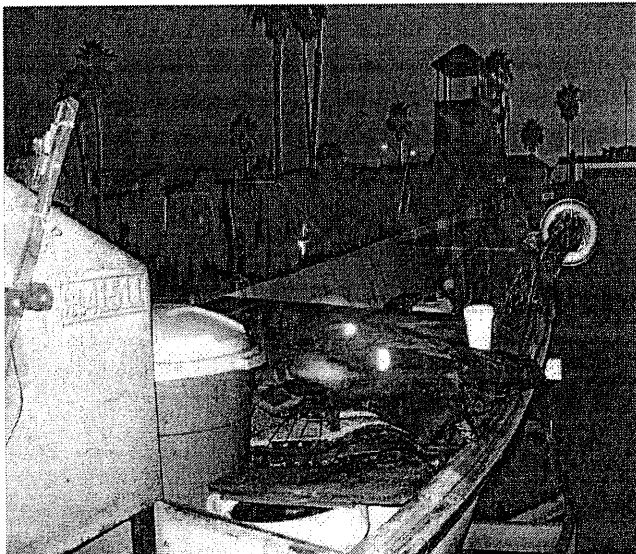
Dear Council Members:

I am a member of the Newport Dory Fleet in S. Calif. We are a historical small vessel fleet (dory boats) and open-air fish market located on the beach next to the Newport Beach pier. Our fishermen launch their vessels through the surf between 1-3 am and normally arrive back on the beach between 6-9 am on a daily basis as weather permits. Our catches are sold to the public at our open-air fish market approximately 50-60 yards from the surf line.

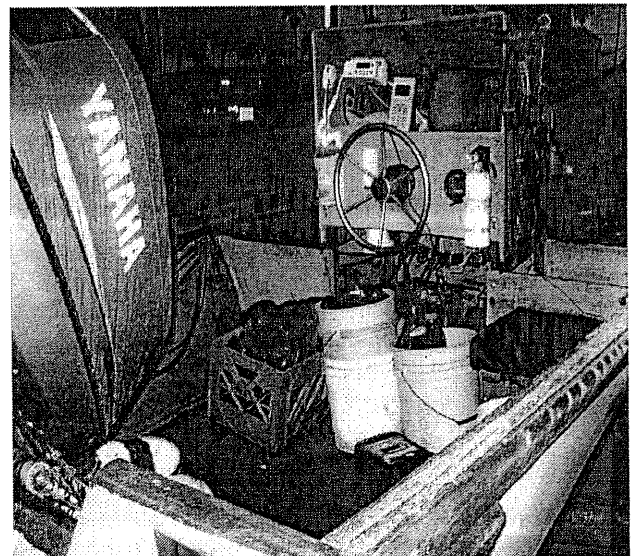
Our groundfish fishermen have limited entry permits (small fleet permits) and will fall under the VMS program being developed for the West Coast region. I am aware of the enforcement nightmare created with the depth-based closures and after reading the latest VMS draft document being prepared for entry into the Federal Register it brought up many concerns about the VMS program and how it is defined and implemented for the Newport Dory Fleet. I recently discussed these issues with Jonathan Pinkerton, the United States VMS program Manager, and he said that these issues have not been adequately discussed but need to be. Here are some issues to consider if the Newport Dory Fleet is going to successfully participate in the West Coast groundfish VMS program.

1. *Size and durability of the VMS units.*

Our vessels range 16 to 21 ft. in size powered with outboard engines and travel at 16-30 knots. This speed along with the design of the vessels causes a substantial amount of pounding, so a VMS unit would need to be durable enough to withstand the daily pounding it will get. Size of the unit is also a concern as there is very little space available when vessels are loaded for a daily fishing trip. Below are pictures a federal observer took that might make it clearer how limited on space our vessels are. A VMS unit needs to be small, durable, and waterproof, as there is no protection (cabin) from the elements of weather and moisture.



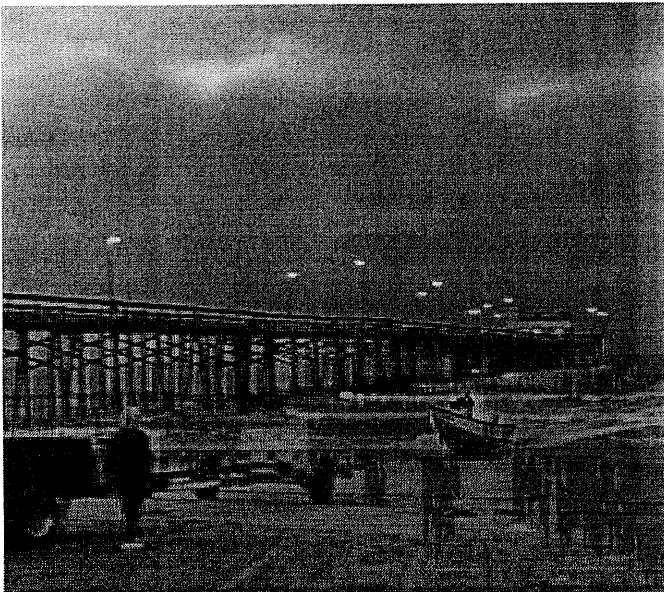
Loaded Dory vessel (bow)



(stern)

2. Vessel mobility and storage while not engaged in fishing activities.

Dory fishermen trailer their vessels to and from their home every day they fish. This creates the problem of using a VMS that is activated when the vessel is mobile even if the mobility is not while the vessel is at sea. When we trailer our vessels home the movement would trigger the VMS system to start signaling and would be monitoring us to our homes. This is an invasion of our privacy as well as creates additional monitoring fees while not engaged in fishing. A mobility triggered VMS system would also be a power drain from the only battery on the vessel that is only recharged while the engine is running. Therefore, the Dory Fleet needs a VMS system that can be turned off when the vessel is not fishing, or be able to easily remove and store the system when the daily fishing activities are finished.



Vessels are mobile after fishing operations stop

3. Cost and maintenance of the VMS units.

Because the cost burden of VMS unit and its maintenance will likely be the responsibility of the vessel owner/operator, it is important that the VMS unit is cost effective and durable enough for Dory Fleet operations. If a VMS unit is not durable enough for routine dory fishing activities the unit will need to be repaired or replaced often. This will cause the Dory fishermen an on going financial hardship, as well as loss of fishing time each time a VMS system fails.

I ask the Council members to consider the Dory Fleets concerns and these specific issues while developing and adopting the West Coast VMS program.

Thank you,

Janice Baker
Newport Dory Fleet, CA