

Pacific Whiting Conservation Cooperative

Alaska Ocean Seafoods • American Seafoods • Glacier Fish Co. • Trident Seafoods

A Partnership to Promote Responsible Fishing

SENT VIA MAIL AND FAX

RECEIVED

SEP 02 2003

PFMC

August 28th, 2003

Dr. Don McIsaac
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220-1384

Re: comments on agenda item C.9, draft groundfish bycatch programmatic
EIS alternatives

Dear Dr. McIsaac:

Please consider the following comments submitted on behalf of the Pacific Whiting Conservation Cooperative (PWCC) regarding the alternatives proposed for the groundfish bycatch EIS program.

The PWCC favors adoption of alternatives 2 or 3, which essentially modify the existing bycatch management system. Both of these alternatives make the best use of available scientific data and involve incremental steps for improving data collection, fleet monitoring, and improving bycatch avoidance without undue expense to the groundfish fishery.

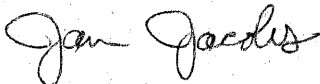
For a number of years the at-sea Pacific whiting fishery, both catcher-processors and motherships, have employed several voluntary measures to minimize bycatch. These vessels all carry (and pay for) 2 NMFS observers to sample all catches for species composition, and use electronic flow scales to accurately weigh 100% of all fish harvested, even though there is still no regulation in place that requires either flowscales or any observer coverage. Companies in these sectors have also voluntarily contracted (again at their own expense) with SeaState Inc., a private catch monitoring company, to track and analyze bycatch on a real-time basis, report bycatch hotspots to each skipper, and to close areas with high bycatch rates. The at-sea fleet has demonstrated that, almost without exception, it can keep bycatch within recommended guidelines and that it can operate successfully under the existing bycatch regulatory management program by utilizing voluntary measures which give it the tools to maintain low levels of bycatch.

However, the controls proposed in alternatives 4 and 6 such as fixed sector bycatch caps and/or permanently closed protected areas will reduce flexibility and the ability of fishermen to respond quickly to changing conditions. The bycatch of some species of fish can be minimized by avoiding certain areas and depths at certain times, but these conditions change from year to year and even within seasons such that annual sector caps or closed areas limit the ability of fishermen to respond on a real-time basis.

Further complicating the effectiveness of alternatives 4, 5 and 6 is the requirement for extensive administration and observer coverage of the groundfish fleet. All of the proposed "direct controls": the sector caps of alternative 4; individual catch and bycatch allocations of alternative 5; and the individual vessel bycatch caps, MPAs and full retention requirements of alternative 6 require monitoring and administration well beyond the current capabilities of the National Marine Fisheries Service and state agencies. These measures should only be considered when there is a realistic expectation that the funding will be available for effective implementation and enforcement. Nor do we support the establishment of permanently closed MPA's unless they are clearly defined to address biological problems that can only be resolved through the removal of fishing, and the species are shown to be closely associated with the area to be included within the MPA.

We feel that the greatest improvements in bycatch control in the short term will be obtained from reductions in fishing effort, ending the wasteful "race for fish", and in improvements in gear technology and usage. Experience has shown that a flexible management system allows fishermen to develop fishing practices that maintain viable sustainable fisheries.

Thank you for the opportunity to comment.



Jan Jacobs
President
Pacific Whiting Conservation Cooperative