

VMS

Subject: VMS
From: "chuck smith" <csmith1@surfbest.net>
Date: Thu, 17 Mar 2005 16:24:00 -0800
To: <Mike.Burner@noaa.gov>

RECEIVED
MAR 17 2005
PFMC

Dear Mr. Burner:

I have been commercial fishing (open excess) for the last 25 yrs. I started fishing out of Neah Bay Wa. I fished there until the north coast was shut down. Then I went to La Push Wa. and fished along the coast for ling and rock fish. I fished there until we were not allowed to fish inside 3 miles of the coast. (lots of opportunity outside 3 miles!). I fished the rock pile off La Push, 9 miles from land. Now I can only fish outside the hundred fathom curve (20 to 30 miles off shore), because the inside waters are all closed.

I have been fishing from a boat that is 20' long and has limited space. I am now required to have survival suits, EPIRBs and all the other mandated safety equipment aboard my boat, it will not be long before there will be no room for fish.

There is not room on my boat for the VMS system. I do not have the cabin room, or the over head space for the antenna where it will be 6' (which I believe is the recommended distance) from the VHF/CB antenna or GPS.

Every year we are allowed less fish with more restrictions, fuel and bait cost more each year. Now the added cost of the VMS.

your consideration on this matter will be appreciated

thanks

Charles Smith

PS: Increases the black cod quotas for the summer months to help off set the cost would be nice (small boats can only safely fish from May to Oct. weather)

RECEIVED

MAR 31 2005

PFMC

VMS (B-5)

Dear Council Members

This letter is regarding expansion of mandatory VMS. I fish a 22' dory out of Pacific City. There are a number of concerns for dory fishermen concerning VMS.

COST - Over recent years we have seen our black rock fishery go from wide-open fishery to severely restricted by quotas and closures. Our fishery is further limited by access to the ocean due to weather and surf conditions as our boats launch directly into the surf. By fishing hard last year, during available breaks in the weather and staying within our quotas, I was able to gross just over \$5,000 on black rock. With the recent introduction of black rock as a limited entry fishery, another fee was added. Our available monthly quotas were also cut in half this year starting at only 1,000# in a two-month period. **Any additional cost to the fishery will make it a non-profitable.**

BENEFIT - The purpose stated for VMS is to prevent boats from fishing rockfish in the RCA. None of our rock fishing takes place in the RCA since our entire reef lies inside of 27 fathoms. **There is no benefit in placing a VMS in a boat that does not fish black rock in the RCA.**

MAINTAINING - An open style boat that crashes through the surf tends to get things wet. My radios need to be replaced on a regular basis because of the moisture. In times of bad weather or no fishing my boat is taken down for repairs and sometimes stored for months with the batteries pulled. Keeping a VMS running 24-7-365 would mean taking it into the house and hooking it up to a converter. **Maintaining a VMS on a dory in Oregon's weather and fishing conditions is near impossible.**

DECLARING FISHERY - having to declare what fishery you will participate in on a given day will remove the flexibility that allows a small boat to be profitable. Allowing for seasons and quotas, I can launch in the morning with the ability to participate in up to 5 different fisheries. It depends on the weather, what's biting, what's needed in the markets and can even change several times during the day. **It is impossible for a dory to declare and stay profitable.**

Black rock fishing is marginally profitable as it stands and any other fee or reduction in quota will, for all practical matters, end a 100-year tradition.

Thank-you for your time and attention to this matter,

Craig Wenrick
Pacific City, Oregon



OREGON SALMON COMMISSION

B-5

Public Comment
received 4-4-05

**Pacific Fishery Management Council
7700 NE Ambassador Place, suite 200
Portland, OR 97220-1384**

RE: Vessel Monitoring System (VMS) for Salmon Trollers

The Oregon Salmon Commission wants to express its strong opposition to the proposed requirement that salmon trollers have VMS on their vessels.

The Oregon Salmon Troll Fleet has taken the lead in gear restrictions to avoid impacts on other species. Since 1991, salmon trollers have fished with only 4 spreads per line resulting in reduced impacts on Oregon Coast Natural Coho (OCNs). Initial analysis shows that the 4-spread rule produces a reduction in encounters with specific rockfish in the RCA as well. This allows a salmon fishery with the retention of some rockfish for the Salmon Fleet inside the RCA.

VMS expansion to the Salmon Troll Fleet would be a significant financial burden to a fleet that will already have tremendous cutbacks in salmon fishing opportunity this year.

The Oregon Salmon Commission and the entire Salmon Troll Fleet that it represents asks the Council Members to please vote "No" on the expansion of VMS to our salmon vessels.

Thank you for your consideration.

A handwritten signature in cursive script that reads "Nancy Fitzpatrick".

**Nancy Fitzpatrick, Administrator
Oregon Salmon Commission**