



August 10, 2005

RECEIVED

Pacific Fisheries Management Council
Mr. Donald K. Hansen, Chairman
7700 NE Ambassador Place, Suite 200
Portland, OR 97220-1384

AUG 12 2005

PFMC

RE: S. 1549 – COOPERATIVE HAKE IMPROVEMENT AND CONSERVATION ACT

Dear Chairman Hansen:

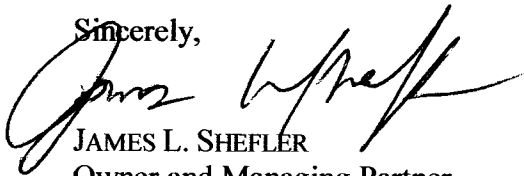
High Tide Seafoods is a wholesale processor of salmon, black cod, halibut, Dungeness crab and assorted groundfish caught in the waters off the Washington Coast and in Puget Sound. We have been in operation for nearly 30 years. Last year, we processed over 5,000,000 pounds of product.

Recently, we have been exploring the possibility of adding hake (whiting) to our production. We have potential investors and other financial resources and we have met with the local Port authority concerning facility and other support. From our research, expansion into hake production is viable and feasible – it appears there are currently insufficient processing facilities in Washington to meet the demand for these fish.

S. 1549 would prohibit us from expanding into this market. This bill defines a “qualified processor” as one who has operated from 1999 through 2004 and processed at least 1,000,000 pound of whiting during each year. Obviously, High Tide Seafoods does not meet the standard as a “qualified processor.” The intent and effect of S. 1549 appears to provide current processors a market advantage and effectively eliminate any potential competition, such as High Tide Seafoods.

Please do not support S. 1549. A careful reading of the proposed legislation reveals that it does little to protect or truly manage the resource, but does protect the economic interests of those currently involved in fishing or processing whiting. This kind of special interest, restraint of trade, legislation should not be endorsed.

Sincerely,



JAMES L. SHEFLER
Owner and Managing Partner



June 28, 2005

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AUG 11 2005

PFMC

Mr. Don Hansen, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220

Dr. William T. Hogarth
Assistant Administrator for Fisheries
NOAA/NMFS
1315 East-West Highway, Room 14555
Silver Springs, MD 20910

Re: Trawl Groundfish/Whiting Quota Share Program

Dear Chairman Hansen, Dr. Hogarth and PFMC Family:

United Catcher Boats (UCB), a trade association of trawl catcher boat owners, strongly supports the development and implementation of a comprehensive whiting quota share program. UCB does not support a single industry sector quota share program by federal legislation that excludes inclusion of the remaining two industry sectors and excludes the active involvement of the Pacific Fishery Management Council (PFMC) in formation of a rationalization program. We support a three-industry sector (shoreside/catcher boat, mothership/catcher boat and catcher processors) whiting quota program developed by a combination of industry cooperative efforts together with the PFMC and appropriate federal legislation. The added federal legislation would, in our view, serve two roles. First, it would facilitate needed actions which cannot be accomplished by the PFMC, and second, it could serve as a funding mechanism for the more complex and longer term development of a quota share rationalization program for traditional West Coast groundfish--trawl fisheries for groundfish other than whiting. We further believe that a cooperative three industry

sector/PFMC/legislative approach developed in concert with MSFCMA National Standards will generate quota share programs not only for whiting, but will be followed by traditional groundfish, that will best serve the West Coast fishing industry and communities over the long-term. We offer the following details.

Proposed Legislation "Cooperative Hake Improvement and Conservation Act"

Efforts by the "inshore whiting sector" to advance the rationalization of the West Coast whiting fishery are commendable but should, in our view, be re-directed. We have met with inshore sector leaders (MTC and processors), discussed a more comprehensive whiting rationalization approach and requested that their proposed legislation be retracted.

A Better Map To Rationalization

Taken as a whole, the process of developing a quota share rationalization program for West Coast trawl groundfish is a huge job and one that could take several years to develop and implement. While large in volume, whiting rationalization is a much simpler task. UCB supports bifurcation and a faster track development of whiting rationalization.

We believe that whiting rationalization should be approached as a comprehensive program. The program would include the three sectors: inshore catcher vessels/processing plants, offshore catcher vessels/motherships, and catcher processors. In addition to whiting allocations and quota share management, the whiting rationalization program must include a comprehensive bycatch management system for each of these sectors.


The development roadmap that would be most efficient and cost effective while transparent and open to all stakeholders, may well be a combination of PFMC actions and legislative actions. The Council may wish to follow a template similar to that followed by the North Pacific Fishery Management Council (NPFMC) in the "crab rationalization program" which utilized both Fishery Management Plan (FMP) and coordinated federal legislation. Industry leaders in all three whiting sectors already have considerable experience in quota share/rationalization programs. Moreover, these sectors have also completed work on whiting rationalization concepts and options that could be piped into the PFMC process for further review and analysis. Cooperative efforts and tools would save time and money.

Mr. Don Hansen
Dr. William Hogarth
June 28, 2005
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These comments are provided in hopes of re-shaping a process in motion. UCB stands ready to continue working with other industry members, with the PFMC and with our legislatures to secure a rationalized whiting fishery for all sectors.

Respectively,

UNITED CATCHER BOATS

A handwritten signature in black ink that reads "M. E. Hall". The signature is written in a cursive style with a large initial "M".

Margaret E. Hall
President

cc: Mr. Donald McIsaac, PFMC
Mr. Phil Anderson, WDFW
Mr. Bob Alverson, FVOA

RECEIVED

James M. Seavers
1075 SE Spruce Way
Newport, OR 97365

AUG 2 2005

PFMC

August 24, 2005

Mr. Donald Hansen
Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Ste. 200
Portland, OR 97220
Fax: 503-820-2299

Dr. William Hogarth
Administrator
NOAA Fisheries Service
1315 East West Highway
Silver Spring, MD 20910
Fax: 301-713-1940

Dear Dr. Hogarth and Mr. Hansen:

I am writing to request your support and the support of the Pacific Fishery Management Council for US Senate Bill 1549 recently introduced by Oregon Senator Gordon Smith to establish cooperative harvest management for Pacific whiting.

I have been involved in the Pacific whiting fishery for nearly 20 years, and was one of the original fishermen to deliver shore-side when that sector was established. I now own and operate two vessels in the whiting fishery, the F/V Seeker and F/V Miss Sue, and manage a third, the F/V Pacific. These three boats employ ten full time crew members between them.

Cooperative management of Pacific whiting is long overdue. Coops will improve management of the whiting fishery, allow vessels to avoid bycatch of non-targeted species, and offer our industry—fishermen, processors, supporting businesses—greater economic opportunities and economic certainty.

Most importantly, cooperative management as outlined in the draft legislation will offer consistent monitoring and scientific study of the whiting fishery. This way we can take the guesswork out of whiting management, and better plan for the next season using near-real-time information instead of data that is months or even years old. We can do better- a lot better.

I look forward to working with the Council to build upon the plan outlined in the federal legislation. Together, I believe the Council, NOAA, the whiting industry and Congress can develop a plan that will dramatically improve the way we manage this fishery.

Sincerely,


James M. Seavers
Newport, Oregon

Senate Staff Draft

Sections Approved by Council (No Objection To)

- Defn: Limited Access Privileges Page 4, Lines 10-16
- SEC 302(g) SSC Pages 7-9
- Council Functions SSC Sets TAC Page 9, Lines 17-20
- Council Functions Notice of Mtgs Page 10, Lines 1-12
- Council Training Program Pages 10-11
- Council Coordinating Committee Pages 11-12
- Environmental Review Pages 13-15
- Limited Access System Pages 15-16
- Did Not Review – Fishing Communities Page 19-21
- Limited Access System (Continued) Pages 21-25
- Did Not Review – Processors Pages 26-31
- Information Collection Page 32
- Auction Programs Pages 33-34
- Cost Recovery & Effect on Share Pages 34-35
- Cooperative Enforcement Agent Pages 36-41
- Bycatch Reduction Pages 42-43
- Collection of Information Pages 44-45
- Access to Certain Information Pages 45-46
- Cooperative Research Agreements Pages 46-48

Sec 304(e) retain 10 yrs – failed

PACIFIC FISHERY MANAGEMENT COUNCIL

7700 NE Ambassador Place, Suite 200
Portland, Oregon 97220-1384

CHAIRMAN
Donald K. Hansen

EXECUTIVE DIRECTOR
Donald O. McIsaac

Telephone: 503-820-2280
Toll Free: 866-806-7204
Fax: 503-820-2299
www.pcouncil.org

August 31, 2005

Ms. Margaret Hall
United Catcher Boats Association
4005-20th Avenue West, Suite 116
Seattle, WA 98199-1290

Dear Ms. Hall:

We received your letter supporting development of a comprehensive three-sector whiting individual quota program, with Council involvement and supported by appropriate federal legislation. Your letter also requested a bifurcation of the process for considering individual quotas for the trawl fishery, with the placement of whiting rationalization on a faster track.

Your letter will be provided to the Council for its consideration under legislative matters at the September 2005 Council meeting. This topic will come up during the Legislative Committee meeting on Monday, September 19 and on the Council floor on Friday, September 23 (Agenda Item B.3), at which time you may provide verbal testimony. Additionally, an agenda item on individual quotas for the trawl fishery has been tentatively scheduled for the November 2005 Council meeting. This may provide you with another opportunity to provide additional testimony to the Council on this topic.

Sincerely,



D. O. McIsaac, Ph.D.
Executive Director

JLS:rdd

c: Dr. William Hogarth
Mr. Robert Lohn
Council Members