



## Pacific Whiting Conservation Cooperative

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

### *A Partnership to Promote Responsible Fishing*

Dr. Steve Freese, Acting Assistant Regional Administrator  
National Marine Fisheries Service  
7600 Sand Point Way NE, BIN C15700  
Seattle, WA 98115-0070

Dr. Freese,

Please accept these comments on behalf of the Pacific Whiting Conservation Cooperative (PWCC). The PWCC is comprised of the four companies that operate fishing vessels in the Catcher-Processor (CP) sector of the Pacific whiting fishery. The PWCC was formed in 1997 to promote efficient utilization of the whiting resource and to minimize bycatch in the whiting fishery. The PWCC also sponsors research to facilitate improved understanding of Pacific coast groundfish population dynamics. These comments are in response to your July 18, 2005 letter to whiting industry participants.

Your letter highlights National Marine Fisheries Service (NOAA Fisheries) concerns about salmon bycatch in the 2005 whiting fishery. Specifically, bycatch rates of Chinook salmon in the whiting fishery are higher than normal and it is likely the annual bycatch limit of 11,000 Chinook salmon will be exceeded. You encourage whiting industry participants to take immediate action to voluntarily reduce bycatch to the maximum extent possible. During 2005, PWCC vessels have fished exclusively outside 100 fathoms to minimize our bycatch of salmon. For the season, our salmon bycatch rates are well below the acceptable level of 0.05 Chinook salmon/metric ton of whiting specified in the 1999 Biological Opinion. In response to your request, we are prepared to move out to 150 fathoms for the remainder of the 2005 fishery to ensure that our salmon bycatch rate stays below 0.05 salmon/mt.

We recognize that fishing outside of 100 fathoms might not be practical for other sectors of the whiting fishery. Moreover, treaty Indian tribal fisheries are constrained to fishing within their usual and accustomed (U&A) areas.

However, the PWCC is deeply concerned that if immediate measures are not taken to reduce salmon bycatch rates NOAA Fisheries will be forced to take Draconian measures that could severely impact the CP sector of the whiting fishery. If NOAA Fisheries were to close the directed whiting fishery when the annual bycatch limit of 11,000 Chinook is exceeded, the CP sector stands to forego 30-40,000 mt of Pacific whiting, an economic loss of tens of millions of dollars. Therefore, we request guidance from NOAA Fisheries about specific remedial measures available to address salmon bycatch in the whiting fishery. Given the significant potential economic loss to PWCC companies, we request NOAA Fisheries seriously consider more surgical measures to address specific problems rather than a blunt closure of the whole directed fishery. For example, we request NOAA Fisheries consider emergency action to allow Tribal fisheries to operate outside of Tribal U&As (i.e., in waters deeper than 100 fathoms) for the remainder of the 2005 fishery.

Thank you for considering these suggestions. The PWCC stands ready to do what is necessary to ensure salmon bycatch rates stay below 0.05 salmon/mt in our sector of the fishery. If NOAA Fisheries determines that inseason actions are needed to curtail salmon bycatch, we urge you to employ precise remedial measures to address specific problems. Generic measures, such as closure of the directed fishery, would result in unnecessary and severe economic harm.

Sincerely,

Daniel A. Waldeck  
Executive Director

**Subject:** [Fwd: Pineapple Trawls]  
**From:** "PFMC Comments" <pfmc.comments@noaa.gov>  
**Date:** Wed, 20 Jul 2005 09:01:14 -0700  
**To:** John DeVore <John.DeVore@noaa.gov>  
**X-Mozilla-Status:** 0001  
**X-Mozilla-Status2:** 00000000  
**Return-Path:** <pfmc.comments@noaa.gov>  
**Received:** from [10.0.0.108] ([65.106.153.163]) by mercury.akctr.noaa.gov (Netscape Messaging Server 4.15 mercury Jun 21 2001 23:53:48) with ESMTP id IJXOI200.CAS for <John.DeVore@noaa.gov>; Wed, 20 Jul 2005 09:01:14 -0700  
**Message-ID:** <42DE754A.1020508@noaa.gov>  
**Reply-To:** fwtrawl@newportnet.com  
**Organization:** Pacific Fishery Management Council  
**User-Agent:** Mozilla Thunderbird 1.0 (Windows/20041206)  
**X-Accept-Language:** en-us, en  
**MIME-Version:** 1.0  
**Content-Type:** multipart/mixed; boundary="-----090502050505050208010800"

----- Original Message -----

**Subject:** Pineapple Trawls  
**Date:** Wed, 20 Jul 2005 08:50:22 -0700  
**From:** Sara Skamser <fwtrawl@newportnet.com>  
**To:** <pfmc.comments@noaa.gov>

Hello to the council,

My name is Sara Skamser. My husband John and myself own Foulweather Trawl in Newport, Oregon. We have been involved in the development and construction of the selective flatfish trawl (pineapple) from the beginning and we would like to update you on some of our reports from fishermen.

This season we have built 18 new pineapple trawls and cut back another 4 existing 2 seam trawls (which seem to work very well). In previous years we had sold 6 new Pineapples. Sizes range (footrope length) from 58' to 100', with the 80' version being the most popular.

We have asked the fishermen to call and give a report on the performance of their cut back nets.

We got comments across the board that were very similar. "That net fishes real good. And CLEAN!" "We are afraid to tow more than an hour" "We have to shut down to get the fish in the hold" "I am saving 3 gallons an hour in fuel" "That net is fun to fish because it is so easy to handle" "I wish I had one of these years ago" "Its the weirdest net I've ever seen, but it really catches"

Most of our sales were Newport and south. One Astoria boat got one. The Newport fleet also went a step farther and have started using 5 1/4" BK (between the knots) codend web instead of the legal limit mesh of 4 1/2" BK. They are not retaining as many small fish and are not losing any marketable fish. They also feel as though the net fishes better longer because it is not filling up with junk. We also hear that there is a lot of fish out there.

All in all, the guys are real happy with the nets. Extremely happy. The boats farther south seem to have better luck fishing the net in deeper water. Some performance differences we are seeing is just the difference of areas being fished. Everyone is seeing good performance on the beach. We have to believe they are honestly astonished on how clean they are fishing with the comments we keep getting.

This has obviously been wonderful for us and exciting in its own little beach dragger way. Our Pineapple theme song is "Day Tripper" (one way ticket, man. It took me soooo long to find out....)

Thank you for your time,  
Sara Skamser

Pacific Fishery Management Council

**Subject:** [Fwd: FW: Re: Request to Rescind Fish Closures for Boccaccio]  
**From:** "Mike Burner" <Mike.Burner@noaa.gov>  
**Date:** Fri, 01 Jul 2005 09:26:28 -0700  
**To:** John DeVore <John.DeVore@noaa.gov>  
**X-Mozilla-Status:** 0001  
**X-Mozilla-Status2:** 00000000  
>**From - Tue Jul 05 08:** 53:13 2005  
**X-Mozilla-Status:** 0001  
**X-Mozilla-Status2:** 00000000  
**Return-Path:** <mike.burner@noaa.gov>  
**Received:** from [10.0.0.110] ([65.106.153.163]) by mercury.akctr.noaa.gov (Netscape Messaging Server 4.15 mercury Jun 21 2001 23:53:48) with ESMTP id IYJ0G00.7OP for <John.DeVore@noaa.gov>; Fri, 1 Jul 2005 09:26:40 -0700  
**Message-ID:** <42C56EB4.5010907@noaa.gov>  
**X-Mozilla-Status:** 0200  
**User-Agent:** Mozilla/5.0 (Windows; U; Windows NT 5.0; en-US; rv:1.7.2) Gecko/20040804 Netscape/7.2 (ax)  
**X-Accept-Language:** en-us, en  
**MIME-Version:** 1.0  
**Content-Type:** multipart/alternative; boundary="-----040003050901070802070203"

fyi

----- Original Message -----

**Subject:**FW: Re: Request to Rescind Fish Closures for Boccaccio  
**Date:**Thu, 30 Jun 2005 10:25:34 -0700  
**From:**Hoover Ng <hooverng@hotmail.com>  
**To:**Mike.Burner@noaa.gov

>From: "FGC" <FGC@dfg.ca.gov>  
>To: <hooverng@hotmail.com>  
>CC:  
><Assemblymember.Ron.Calderon@assembly.ca.gov>, <governor@governor.ca.gov>, <Senator.Romero@sen.ca.gov>  
>Subject: Re: Request to Rescind Fish Closures for Boccaccio  
>Date: Thu, 30 Jun 2005 09:59:38 -0700  
>  
>Dear Mr. Ng,  
>  
>These closures were set by the Pacific Fishery Management Council  
>(PFMC). The California Fish and Game Commission had to amend its  
>regulations to conform with those of the PFMC.  
>  
>You should contact the PFMC with your request. See the PFMC's web site  
>at <http://www.pcouncil.org/>  
>  
>Sherrie Koell  
>California Fish and Game Commission  
>  
>>> "Hoover Ng" <hooverng@hotmail.com> 06/29/05 3:52 PM >>>  
>Dept of Fish and Game currently has severe restrictions for boccaccio,  
>a  
>type of rock fish. Each angler is limited to one per day.  
>  
>I went fishing yesterday, June 28, 2005, on the "Gentlemen", a 3/4 day  
>boat  
>out of Channel Island Sportfishing in Oxnard, California. I could not  
>  
>believe the number of boccaccio and the size of each that were caught.  
>Even  
>though we all limited out at one each, and kept moving to different  
>spots,  
>we still kept catching them. It was a shame to return them to the  
>water  
>because most of them were dead already!!! As you know, these rock fish  
>die  
>when they come up to the surface and cannot be returned alive to the  
>water.  
>  
>I have a busy schedule and when I am able to go fishing, which is not  
>that  
>often, I'd like to be able to keep the fish I catch unless there is a  
>real

>threat to certain species. It would have been a much better experience  
>to  
>have been able to keep these so called "overfished" boccaccio or salmon  
>  
>groupers.  
>  
>Please rescind the fish closure for boccaccio.  
>  
>To Governor Schwarzenegger, State Senator Romero and State  
>Assemblymember  
>Calderon, could you talk to the Department of Fish and Game Commission  
>to  
>rescind this fish closure? If they won't listen, can you sponsor  
>legislation to rescind the fish closures for boccaccio in Southern  
>California?  
>  
>Hoover Ng  
>1929 Deerpeak Drive  
>Hacienda Heights, CA 91745  
>  
>

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**Mike Burner**  
**Staff Officer**  
**Pacific Fishery Management Council**  
**Phone: (503) 820-2280**  
**Toll Free: (866) 806-7204**  
**Fax: (503) 820-2299**

July 15-05

DEAR Council,

When I STARTED Rock fishing IN 1975  
out of Coos Bay the Rock Limit WAS  
Twenty Five. THE LIMIT HAS BEEN Reduced  
Every since, BUT THE Council Needs  
TO NOT OPEN THE SEASON ON ROCKS TIL  
MAY 1st and Close it IN Sept.  
Everyone TRYS to fish when Ling Cod  
ARE Close IN, AROUND SPAWNING TIME, ONE  
REASON FOR CHANGE IN TIME TO fish ROCK.

PLEASE MAKE a SHORTEN SEASON, THAT WAY  
we CAN HOPE TO CATCH Eight Fish NEXT  
YEAR, THANK you SO Much

Terry Jensen  
450 Merrill St.  
Coos Bay OR  
97420

RECEIVED

JUL 18 2005

PFMC