



February 5, 2008

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

RE: Establishing a Bycatch Committee

Dear Mr. Hansen and Council members:

In the past few years, in writing and in testimony, Oceana has consistently requested that the Council and National Marine Fisheries Service count, cap and control bycatch. We have ongoing concerns about the bycatch of salmon, rockfish, corals and sponges plus the incidental take of sea turtles, marine mammals and seabirds captured in West Coast fisheries. Even with existing bycatch mitigation measures and programs, the issue of bycatch in the Pacific remains serious and continues to have major implications for individual species, ecological communities and sustainable fisheries. In order to continue to advance programs designed to count, cap and control bycatch, we request that the Council establish a bycatch committee charged with overseeing and ensuring the development of practicable measures to minimize and avoid bycatch in all managed fisheries.

In November 2006, the Council approved a groundfish bycatch work plan outlining a schedule for considering practicable bycatch measures. While the work plan contains multiple programs in which bycatch may be addressed, such as the trawl individual quota program or groundfish harvest specifications, there is no specific committee or Council initiative to ensure measures are developed. Establishing a bycatch committee would be a reasonable and responsible approach to focus ongoing efforts. Further, we reiterate our request for annual hearings to discuss bycatch as a way to review discard data and identify where improvements can be made. This committee would be an appropriate forum for such a review. The bycatch committee could review current monitoring and reporting efforts and develop specific proposals for minimizing and avoiding bycatch in each of the Council's ongoing management programs.

While the Council and NMFS have implemented some measures to minimize and avoid bycatch such as the Rockfish Conservation Areas and caps on select overfished species taken in the whiting fishery, it is necessary to continue to develop innovative and practical solutions. Focused attention by a specific committee reporting on bycatch will keep this a priority issue before the Council.

We look forward to continuing work with you on this issue and we hope you will pursue this request to form a bycatch committee.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Ayers", written over a light blue rectangular background.

Jim Ayers
Vice President

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Enticknap", written over a light blue rectangular background.

Ben Enticknap
Pacific Project Manager

Subject: Limited entry albacore
From: Tom and Lori Wraith <amylyn@wave.net>
Date: Tue, 18 Mar 2008 12:12:59 -0700
To: Kit.Dahl@noaa.gov

This is a letter we wrote in 2006, we would again like to support limited entry for albacore, we are also supporting Mike Sheadore in his letter to the PMFC. Tom and Lori Wraith wrote:

PFMC Council Members,

My name is Tom Wraith. Commercial fishing has been my sole occupation since I graduated from high school in 1972. I am writing you to voice my concern on the future of the coastal albacore fishery, and urge your council to consider some form of limited entry for this valuable and vulnerable fishery.

In the course of my career I have owned and operated a progression of three boats with my current vessel "Amy Lyn" #595-206, a 54 foot steel whaleback design that I jig and bait pole fish for albacore in the summer and Dungeness crab fish in the winter. I have fished for albacore from my first season as a boat owner and commercial fisherman and every year since for the past 33 years. I also have at one time or the other fished and held permits for, hook and line rock cod, coastal troll salmon, drag fished for pink shrimp and driftnet shark and swordfish.

All of these fisheries that I have participated in have one thing in common, they were all open access when I started fishing them and are now managed under some form of limited entry. Through the years a combination of changes in the other fisheries: reduction of harvest and opportunities-rock fish, salmon, and consolidation of permits and effort-IQF's etc. for Alaskan fisheries, halibut, crab, salmon has left the albacore fishery in its current status as open access, extremely vulnerable to effort shift and over capitalization.

This climate of reduced opportunity elsewhere in the industry coupled with the looming potential for harvest limits and management on an international level would seem to be a collision in the making. In the last several years there has been an unmistakable buzz and air of speculation as to the eventual status of the albacore fishery. There is also a growing fear, shared in my opinion almost unanimously by the long time participants, that without some form of regulation the future and viability of the albacore fishery is in jeopardy. As I have witnessed in other fisheries in the past, the longer a fishery remains open access, and new boats continue to enter the fishery amid this air of speculation and uncertainty, the harder it is to arrive at an acceptable level of effort. **It is with these concerns in mind that I strongly urge you to consider this situation your obligation to address.**

Thank you for your time,

Tom Wraith

TLC Inc.

Fishing Vessel "Amy Lyn"

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