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June 10, 2010

Chairman David Ortmann
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220

RE: Agenda Item B.6 - Regulatory Deeming for Fishery Management Plan Amendment
20 (Trawl Rationalization)

Dear Chairman Ortmann and Council Members:

I have been personally involved in West Coast fisheries for more than 45 years. My two brothers and I, along with our partners, currently own 4 trawlers all of which we have been operating for more than 20 years and have consistent catch history in groundfish during the qualifying years for the Trawl Rationalization Program.

I wish to confirm our solid support for the Trawl Rationalization Program which this Council and NMFS has so diligently developed. We support this Deeming process and support this Council and the NMFS efforts to continue to move the Trawl Rationalization forward without delay.

I am the managing owner of one of our vessels, F/V SEADAWN, which just completed its participation in the unrationalized 2010 Mothership Whiting fishery. The waste of bycatch and in the value of the Whiting resource itself is simply unacceptable. In the Olympic fishery we are forced to fish when the season opens regardless of the condition of the Whiting and regardless of the bycatch risk. This year we were barely able to keep our bycatch within the limits imposed on us which continually poses an unacceptable risk to our directed fishery. Also, when operating in the Olympic mode we were forced to fish even though the majority of the Whiting available was extremely small resulting in significantly reduced value. The Trawl Rationalization Program will allow participants to schedule their participation in the groundfish fishery at a time when bycatch is low and when the Whiting is of the highest value. The resource and the Industry simply cannot afford another year of an Olympic fishery.

I understand in discussions with others that there is a lot of concern and fear among groundfish fishermen about the impacts of the Trawl Rationalization Program. I can relate to that concern as one who has been through the AFA Pollock Rationalization Program in Alaska. During the development of AFA, vessel owners (including myself) were very fearful of the unknown, but once this program was implemented and the benefits of a rationalized fishery became apparent a

clear consensus of the participants are supportive. This support applies to the rationalized Crab fishery and the Halibut/Black Cod fishery in Alaska also.

It is unfortunate that at this particular point in time and at the eleventh hour there are those who are still trying to fuel the fire of the apprehension among fishermen who have not participated previously in a rationalization programs. The reasons for the objections being put forward and the requests for delay in the form letters the processors are having fishermen sign has nothing to do with the rhetoric contained therein. The reason the processors are asking for delay with the ultimate goal of killing rationalization is all about loss of power. Processors, in general, are upset because they didn't get catch shares of traditional groundfish. Then there is Pacific and Frank Dulcich that want to continue to extend their monopolization of West Coast Groundfish so as to control not just the processing but as many vessels as they can acquire as well. Pacific and Frank Dulcich don't like the ownership caps in this rationalization plan because it is not consistent with their intent to monopolize this Industry. There is also the concern among processors that they may actually have to pay a fair price to fishermen as a result of rationalization. These processors are feeding misinformation to fishermen in an effort to get fishermen to support delaying rationalization at this late date with the intent of killing it once they get a delay.

This Council and NMFS are at a threshold point now to either allow a few greedy processors to successfully orchestrate an eleventh hour delay with a long term plan to kill rationalization or stay the course and move the plan forward. We believe the time for debate was over once the Council approved this amendment following a long, arduous and fully transparent process involving the public, fishermen and processors. To now allow this unadvertised effort to delay this important plan would be tragic and a disservice to the Council process that has involved countless participants, thousands of hours of meetings and days/weeks of Council time. This effort to delay this important program is procedurally out of order and must be rejected. Now is the time not to look back but to look forward and implement this plan for the conservation of the resource as well as the long term economic well being of the Industry.

In conclusion, we appreciate the efforts of this Council and NMFS on spending the countless hours in developing this very complex Trawl Rationalization Program. We urge you to continue moving the program forward so it may be implemented as scheduled in January 2011 so this valuable West Coast resource can be properly conserved and stabilized.

Sincerely,

Fred A. Yeck