

ENFORCEMENT CONSULTANTS REPORT ON PROPOSED CHANGES TO CATCH  
SHARING PLAN AND 2007 ANNUAL REGULATIONS

The Enforcement Consultants (EC) has reviewed the materials as they relate to Catch Sharing Plan.

We would like to address the proposal submitted by the Port Orford Ocean Resource Team.

The proposal attempts to follow the program that occurs north of Point Chehalis with one major exception, the Port Orford proposal allows participation of open access vessels. Because of this distinction, the Port Orford option does not limit participation through the requirement of a Limited Entry permit.

The area for the proposal is created by drawing a line just South of Bandon, Oregon and the Oregon/California Border. Enforcement has always made a point of discouraging lines being drawn in the ocean. This proposal creates a management area that requires enforcement to monitor restrictions in an area and the need to restrict access of other fishers. While we have area management in other fisheries, this area has fairly limited enforcement resources (2 Officers).

An additional concern is with the inclusion of open access vessels with smaller sablefish limits. This may actually become a target fishery and not a bycatch reduction program, because the same bycatch ratio North of Chehalis fishery is being used. The Port Orford Resource team does not feel this will happen. A fisherman in their group stated they have been catching about 1 halibut for every 500-600 lbs of sablefish in this area. Under the proposal based on an average size of around 20 lbs per halibut, a fisher could catch approximately 7 halibut for the first 1,000 lbs.

Finally the proposal has been very confusing to this point. If it goes out for public comment, we are not sure people will clearly understand the proposal.

PFMC  
09/15/06