



Port Orford Ocean Resource Team

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Mr. Donald K. Hansen
Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Dear Chairman Hansen:

I am writing to express concern about an issue which affects nearshore hook and line fishermen. We were alarmed to hear that commercial nearshore fisheries could be severely impacted by in-season adjustments to prevent overharvest of yelloweye rockfish. We understand the soft targets for nearshore fisheries modeled an impact of around a metric ton of fish for the present harvest limits. While it was thought that this would be plenty of fish to accommodate the nearshore fishery in 2009, the GMT reports that recent observed bycatch rates might require as much as a 50% reduction in commercial catch of black rockfish to achieve the scorecard target. We believe that all nearshore species harvest opportunities would likely be adversely affected if new black rockfish limits are put in place. We strongly urge the Council to modestly increase the soft target for our nearshore fisheries – overall impacts to yelloweye are still very small compared to other sectors. We also recommend that the GMT review statistical estimates associated with bycatch projections for these smaller fisheries. Is there a possibility that small sample sizes or larger variation in sample data could lead to problems in estimating impacts? Also, as yelloweye and other overfished species recover, nearshore fisheries with its small scorecard target may be adversely affected as the nearshore is the place where younger fish will recruit first.

We know that the Council considers our fleet of nearshore vessels as Open Access, yet all of our vessels are under state limited entry permits and are no longer Open Access from a state perspective. These fishermen make an important contribution to our small community and we ask that you consider this when setting soft targets for rebuilding plans, using observer data, and making in-season adjustments.

Sincerely,

Leesa Cobb
Executive Director
Port Orford Ocean Resource Team