April 2, 2009

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

Dear Chairman Hansen:

The Port Orford Ocean Resource Team would like to bring to the Council’s attention a concern regarding its policy for in-season adjustments that reduces opportunities for small boat ports. We understand the Council’s policy currently does not allow consideration of in-season adjustments until the June Council meeting. For several years, the Limited Entry Fixed Gear sablefish trip limits for the DTL fishery have resulted in the LE fixed gear fleet under-achieving the OY (this was referenced in the Council newsletter). At time in the past this was brought to the attention of the Council and the DTL was increased, but the increase was too late in the season to access the fish. The primary reason for boats not being successful with season adjustments implemented in October-December is that weather is much more severe that time of year and we have fewer fishing days. When in-season adjustments are made late in the year, the increase comes too late in the season for small boat fishing communities, like Port Orford.

For the 2009 season, we ask the Council to revisit its current policy of waiting until June for soliciting recommendations for in-season adjustments and consider an increase in the Fixed-gear sablefish DTL to be implemented in May or June.

We recognize that a better way to approach this issue long-term is to start the year with a DTL that is at the correct level. We would like the Council to consider increasing the amount of the LE fixed gear sablefish (daily) trip limit during its annual specifications process so as to allow more of the OY to be taken, especially in areas where bycatch rates of overfished species are low.

Thank you!

Sincerely,

Leesa Cobb  
Executive Director  
Port Orford Ocean Resource Team