

F/V Top Gun
Jeff Miles
PO Box 424
Port Orford, OR 97465

October 10, 2011

Mr. Dan Wolford, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

RE: Agenda Item E.9. 2013-14 Biennial Management Process – Part 2 (Adopt PPAs for a Range of Management Measures.

Dear Chairman Wolford,

I commercial fish out of Port Orford, OR. About 40% of my fishing is in the open access nearshore fishery. In the past lingcod has been an important fishery for our community. While the lingcod fishery has recovered, commercial fishermen have not seen any increase in fishing opportunity. I respectfully request the Council consider increasing access to the lingcod fishery in 2012 to provide more opportunity for nearshore fishermen.

In a regular fishing day, nearshore fishermen may catch and discard up to 400-500 lbs of lingcod per fishing trip. This is what happens in a fishery that has recovered but management measures have not been adjusted. I propose to retain lingcod instead of discarding the fish. I understand the amount retained (or the increase in trip limit) must consider impact to overfished species. I propose we increase the lingcod fishery to include fishing January 1 – April 30. As a starting point, I propose a limit in Jan-April of 250 lbs per month with a 50 lb daily trip limit. This proposal would allow some lingcod to be retained instead of discarded, the daily and monthly trip limits are low enough so as to discourage targeting, and the lingcod would be retained only as a function of daily, routine fishing operations. I recognize that the Council will need to analyze the impact to overfished species from various trip limit scenarios and will then decide the appropriate Jan-April trip limit/increase in response to the rebuilt lingcod stock.

Even a modest increase in lingcod would provide additional revenue to nearshore fishermen and their communities.

Sincerely,
Jeff Miles, F/V Top Gun

----- Original Message -----

From: [Mark Ludes](#)
To: PFMCcomments@noah.gov
Sent: Thursday, October 13, 2011 6:17 AM
Subject: Extending commercial lingcod season

PFMC Board;

It is my understanding that there is an option to increase the commercial lingcod season being addressed. I am in favor of this option for many reasons. Primarily, it is known, and data shows, that lingcod have rebounded much faster than expected. This alone should be enough to grant a small increase to help a struggling industry and economy.

Thank you for your time,
Mark Ludes

----- Original Message -----

Subject:Public Comment
Date:Tue, 11 Oct 2011 07:59:11 -0700
From:LYLE KEELER <crab101@wildblue.net>
To:pfmc.comments@noaa.gov
RE: Changes to management of lingcod fishery

Dear Council,

I am a commercial fisherman that fishes nearshore in Oregon. I have been fishing since 1969 out of Port Orford. We used to have a healthy lingcod fishery that we all fished in. I understand there were problems with lingcod stocks in the past but the lingcod fishery has recovered. I support a change to the lingcod fishery to increase fishing opportunity. Would the Council consider analysis of increased trip limits and increased season (open the winter months to fishing) and a slot limit? While I am nearshore fishing, I continually discard lingcod when I reach our limit and during the closed months. This is a sign to me of a healthy fishery that could allow more fishing opportunity. I understand there is an issue with overfished species bycatch and I encourage the Council to provide analysis to find out how to address that concern while allowing more fishing opportunity for the rebuilt stock.

Thank you for your consideration.

Lyle Keeler, F/V Dominion

----- Original Message -----

Subject:Public Comment

Date:Thu, 13 Oct 2011 15:56:17 -0700

From:Aaron Longton <aaron@oceanresourceteam.org>

To:pfmc.comments@noaa.gov

Dear Council Members:

I commercial fish for lingcod. The lingcod stock is rebuilt and ready for management review that could provide for increased fishing opportunity. Would you please include lingcod management in the 2013-14 groundfish review so nearshore fishermen can provide input and information along with staff analysis for new lingcod management? Fixed-gear fishermen have taken many fishing reductions over the past 10 years. Lingcod was severely reduced, our canary and yelloweye fisheries are gone, blackcod is in a decline, and the price we get for fish doesn't keep up with the increase in fuel and boat repairs to keep us on the water. The Council has a unique opportunity right now to manage the rebuilt lingcod stock to increase fishing opportunity.

Thank you for considering adding lingcod to the list for review in 2013-14.

Sincerely,

Aaron Longton, F/V Golden Eye

----- Original Message -----

From: [Eric & Ellen](#)

To: [P.Council](#)

Cc: Kelly.Ames@noaa.gov and [John DeVore](#)

Sent: Thursday, October 13, 2011 1:47 PM

Subject: RCA boundaries

Dear PFMC members,
My name is Eric Kramer. I am a commercial groundfisherman out of Oxnard, California. I would like to propose an adjustment to the RCA boundaries on Santa Rosa Flats. There is a fairly large area of water that is less than 60F in the vicinity of 33 43.012 north and 120 02.400 west.[see chart 18720] This area is way outside the line and cannot be fished, yet is a legal depth. I propose a donut hole of fishable water be established.

Sincerely, E.Kramer

----- Original Message -----

Subject:November Council Meeting Public Comment

Date:Thu, 13 Oct 2011 16:12:35 -0700

From:Leesa Cobb <leesa@oceanresourceteam.org>

To:pfmc.comments@noaa.gov

Dear Council Members,

I have commercial fished for 30 years in Oregon. I am writing to ask you to consider adding lingcod to the upcoming 2013-14 groundfish review.

The lingcod fishery is rebuilt. Fishermen are seeing more lingcod on the grounds -- which makes sense -- and discarding more fish as we reach our limit or fish during closed periods. We're seeing what your data shows -- the fish have come back.

A review of lingcod management would be timely and appropriate. There are several issues to address and analyze:

- * What fishing level is appropriate for the rebuilt stock?
- * Is the December - April spawning closure still needed? If so ,why is the sport season open during those months?
- * How does the Council manage an increase in the lingcod limit and also prevent impact to overfished species?

A review of lingcod management is needed right away. Thank you for your consideration.

Sincerely,
Chris Aiello
F/V J&C

----- Original Message -----

Subject:E.9. 2013-14 Biennial Management Process - Part 2

Date:Thu, 13 Oct 2011 11:04:10 -0700

From:Gene Fowler <geneandclaudia@gmail.com>

To:pfmc.comments@noaa.gov

Dear Chairman Wolford,

We have two boats that we commercial fish out of Port Orford, OR. Lingcod is an important fishery to us. We are glad that the lingcod fishery has recovered, however, we have not been given an increase in our quota. It would be beneficial for the nearshore fishermen if there were an increase in this fishery.

During the months that we are prohibited from retaining lingcod, we discard several hundred pounds of lingcod per fishing trip. Therefore, we support Jeff Miles' proposal of allowing fishermen to retain 250 pounds/50 pound daily limit of lingcod from January 1 - April 30. This would provide additional revenue to nearshore fishermen.

Sincerely,

Gene & Claudia Fowler, F/V Sea Hunt

F/V C Dawn

TO: Pacific Fisheries Management Council pfmtc.comments@noaa.gov
REF: ITEM E.9.2013/14 Management Process

This email is forwarded in support of extending the length of the commercial lingcod season. The Nearshore fisherman listed below highly recommend extending the lingcod season to twelve months and provide the following comments accordingly:

A. During the current closed periods fisherman are often forced to release substantial quantities of lingcod that are worth more income than the days total catch. Conversely, there are a few months during the open season when monthly quotas are not filled due to poor weather or that feeding conditions are poor. Averaging through a 12 period will increase the effectiveness/efficiency/and financial situation for many near shore fisherman.

B. All lingcod that are gill hooked throughout the closed season will certainly perish -- the current 7 month season promotes needless waste.

C. Sports lingcod season is open all year -- why not commercial ?

D. During the winter months nearshore fishing is challenging and often sparse. A 12 month lingcod season would increasing income during that period.

E. With fuel prices at high levels the nearshore fishery should be working towards better efficiency and improved practices. A twelve month season fits this criteria.

F. The current 7 month lingcod season creates major market instabilities. When the lingcod season shuts down wholesale buyers, who also purchase other nearshore species, disappear and in some cases do not return the following year. For the town of Brookings this is a major problem in that all buyers come long distances to procure our products -- we have no "local buyers". Also consider that when lingcod is unavailable for extended periods, the end users will switch to products from Canada and local products eventually disappear from the market place. We are at the point that in this "tourist/fishing" town virtually all Brookings based restaurants do not serve "local caught fresh fish". A full 12 month season is mandatory in regards to maintaining an open and viable market. Providing product consistently throughout a 12 month period will promote buyer continuity and improve market stability.

Brookings Fisherman/Owners endorsements:

Name	F/V
James Pierce	Navmax
Shawn Roberts	Endless Wanderer.
Jim Piscitello	LiveFish
Jason Piscitello	LiveFish
Gerald Mikell	Fishbuster7
John Griffith	Sea Chicken Two
Wesly King	Evie
Steve Stringham	Kyrie Eleison
John Terebesi	Lady Louise

Howard Riegel
Bill Woods

Beach King
Resident

Cc: jandmiles@frontier.com
steve5455087@hotmail.com
foghorn@hughes.net



Port Orford Ocean Resource Team

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Mr. Dan Wolford
Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

RE: Agenda Item E.9. 2013-14 Biennial Management Process – Part 2 (Adopt PPAs for a Range of Management Measures).

Dear Chairman Wolford:

Our organization works to ensure the long-term sustainability of Port Orford's ocean resources and our community that depends on them.

We understand it is necessary to restrict a fishery before a stock is over-fished, and we also look for increased fishing opportunity on healthy stocks. The lingcod fishery has rebuilt and the timing seems right to look for new management measures that will allow for additional harvest. We would greatly appreciate the Council adding a 2013-2014 Management Measure to address increased fishing opportunity for lingcod.

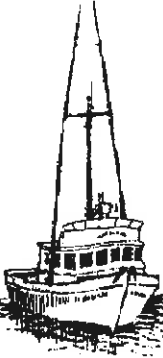
We understand that increased fishing opportunity for lingcod in the nearshore could impact overfished species and that analysis should be done to determine an appropriate level of lingcod fishing to minimize impacts. It is important to note that the nearshore fishery has an increasing rate of lingcod discards when the trip limit is reached or the season is closed. We support retention of lingcod bycatch – a goal of the Port Orford Stewardship Area is to reduce bycatch and discards in all of our fisheries.

Thank you for considering including lingcod on your list for 2013-14 management measures for further analysis.

Sincerely,

A handwritten signature in black ink that reads "Leesa Cobb".

Leesa Cobb
Executive Director



Port of Port Orford

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RE: Agenda Item E.9. 2013-14 Biennial Management Process-Part 2 (Adopt PPAs for a Range of Management Measures.)

Because Ports are mandated by ORS 777 to promote economic activity, this letter is written in support of increased commercial quotas for ling cod in the Port Orford area. It is reported to us, from all user groups, that lingcod stocks in the Port Orford area are robust. It makes good economic sense to expand this fishery. Although our data collection lacks any scientific basis, the anecdotal reports we hear on the dock would indicate there would be no adverse effects to the resource from this expansion. We are confident in this position because of the Port Orford fleets self-imposed ban on keeping gravid females. Thank you for your serious consideration of this proposal.

Gary Anderson

A handwritten signature in cursive script, appearing to read "Gary Anderson".

Port Manager
Port of Port Orford

Mr. Dan Wolford

Chairman

Pacific Fishery Management Council

7700 NE Ambassador Place, Suite 101

Portland, Oregon 97220-1384

RE: Agenda Item E.9. 2013-14 Biennial Management Process – Part 2 (Adopt PPAs for a Range of Management Measures.

Dear Chairman Wolford,

I am a Live Fish Buyer in Port ORford, OR, for Nor Cal Seafood, Inc. I have spent a lot of time talking to commercial fishermen. And what I hear a lot about is the large amount of Ling Cod they have to release from Dec to May, because they are not allowed to keep them.

I would like to see a small quota for Ling Cod in the winter month. This quota would help the fishermen make a few dollars but would not impact the Ling Cod. Also it would help the live market in the winter month when there's not a lot of fish out there. What a live buyer needs is fish year round to keep the market going.

Sincerely
Justin Nowlin
Nor Cal Seafood Buyer