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From: **Dave Croonquist** <dcroonquist@gmail.com>

Date: Thu, Feb 9, 2017 at 4:16 PM

Subject: Request for re-allocation of sablefish quota back to the Washington halibut sport fleet

To: kelly.ames@noaa.gov, Gretchen.hanshew@noaa.gov

Cc: Phil Anderson <pmand001@comcast.net>, "Reed, Heather J (DFW)"

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Ms. Kelly Ames et al,

We would like to request that the 2A Catch Share Plan for 2017 (link below) and future years be amended at the March 10 PFMC session on Pacific Halibut Management (agenda item H.2) by removing the wording "... (except as provided in section (e)(3) of this plan) ..." in section (f) SPORT FISHERIES (1) (i), (ii), (iii), and (iv). This would provide the Washington sport fishing halibut fleet with its full share of halibut as found in section (b) ALLOCATIONS which gives 35.6% of the non-Indian TAC to the Washington sport fishery.

The Washington sport fishery has been capped at 214,110 lbs. of halibut for a number of years. As the Total Allowed Catch (TAC) goes up, the recreational fleet has been providing what would have been our share of harvest quota to the "incidental take" of halibut during the sablefish fishery. Since 2003, we've given up an average of about 40,000 lbs per year to the sablefish fishery. The quota we've been giving up over the years would help extend our seasons and provide much needed economic support to our coastal communities. It would also provide for safer fisheries by allowing us on the water during better weather and sea conditions.

In 2015, we gave up 10,348 lbs, in 2016 it was 49,686 lbs, and for 2017 we're being asked to give up 70,000 lbs which is the sablefish ceiling for "incidental take" before any overage rolls over to the recreational fishery. Under the current 2A plan, the recreational fleet should get an additional 23,652 lbs for our 2017 catch share bringing our total to 237,762 lbs. The return of the sablefish shares to the recreational fleet allocation as stated in (b) of the 2A CSP would provide us with an increase of 93,652 lbs which would bring our total to 307,762 lbs. This would add time on the water to our 2017 fishery and, if the TAC stays up, more fishing time in future years. We understand that the TAC can fluctuate. We can live with the lean times, but would enjoy the good times that a higher share will provide us and have a positive impact on communities businesses.

With the 2017 TAC for 2A at 1.33 million pounds, the non-Indian commercial share is increasing 37,915 lbs over the 2016 allocation 265,402 lbs. Using the 2A plan for the non-Indian commercial allocations, this would leave 20,314 lbs available for the "incidental take" by the sablefish fleet and allow for increases for the primary halibut fishery and the incidental take during the salmon troll fishery.

This request is in-line with supplemental WDFW report E.1.a submitted to the PFMC in November, 2016 concerning the incidental catch of halibut in the Sablefish fishery N. of Point Chehalis:

“Therefore, as discussions on potential allocation changes move forward, WDFW would be interested in considering whether revisions to the sablefish incidental allocation were warranted. Further, given that the sablefish incidental allocation came from the Washington sport allocation, WDFW would expect that any changes to the sablefish incidental allocation would shift back to the Washington recreational fishery.”

Thank you for your consideration.

Dave Croonquist

Sequim, WA

Cc: City of Port Angeles, Port of Port Angeles, PSA, CCA, WDFW

2017 Catch Share Plan http://www.pcouncil.org/wp-content/uploads/2017/02/Final_2017_PACIFIC_HALIBUT_CATCH_SHARING_PLAN_FOR_AREA_2A.pdf