August 1, 2013

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

RE: South of Humbug Policy Committee Recommendations

Dear Mr. Wolford:

The Humboldt Area Saltwater Anglers, Inc. (HASA) wish to express their appreciation to the International Pacific Halibut Commission (IPHC), the members of the South of Humbug Workgroup (Workgroup) and the South of Humbug Mountain Pacific Halibut Policy Committee (Committee) for their efforts in resolving recreation Pacific halibut quota issues in the South of Humbug subarea (SOH). We appreciate our ability to be involved and to have an opportunity to comment during the Committee meeting on July 30, 2013.

The Committee appeared to conclude that the following measures would assist in achieving the catch reduction necessary for the 2014 Pacific halibut season in the SOH:

1. Workgroup Alternative 6: Separate the SOH at the Oregon/California border.
   a. The Committee seemed to favor sub option 6a: Incorporate the Oregon portion of the SOH into the Central Oregon coast subarea.
2. Reduce the recreational catch in the California SOH by 40% to 50% of the five year average catch of 22,223 net pounds. The Committee seemed to favor utilizing some combination of the workgroup Alternatives 3a, 3b and 3d to accomplish the desired reduction.

The HASA supports the utilization of the above alternatives to set the catch limit for the 2014 Pacific halibut season. While other alternatives were reviewed and discussed, we feel the above alternatives provide the most angler opportunity and the best support for the economic viability of the commercial passenger fishing vessels and the recreational fishing dependent businesses in the California SOH.

We urge the Pacific Fisheries Management Council to seriously consider the efforts of the Workgroup and Committee as well as supporting the economic base of the California SOH subarea by providing the most Pacific halibut fishing opportunity for the recreational anglers.

Sincerely,

Cliff Hart
President of Humboldt Area Saltwater Anglers, Inc.

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August 13, 2013

Pacific Fisheries Management Council
Dorothy Lowman, Chair
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

Dear Chair Lowman and Council Members,

The Oregon South Coast Fishermen is the largest sport fishing organization in Curry County, with nearly 100 members who are actively involved with the Oregon STEP program and heavily involved in local fisheries management programs. Our membership includes several small boat owners who fish primarily out of the Port of Brookings Harbor. We thank you for this opportunity to comment on the South of Humbug Pacific Halibut Workgroup Preliminary Management Measure Analysis.

After careful review of the draft workgroup document dated July 2013, participation in a workgroup webinar and a thorough discussion at the public meeting held in Brookings, Oregon on August 12, 2013 we offer the following comments from our organization.

We support Alternative 6b., the establishment of a new subarea from Humbug Mountain to the Oregon/California Border. Our decision is based on several factors:

1. Maintaining the current Humbug Mtn. to Mexico subarea is impractical given the different harvest monitoring and management programs in California and Oregon. Port sampling in Oregon is already in place and is greatly facilitated by having only two Ports, Brookings and Gold Beach, to sample. Oregon sampling is real time and with direct observation of landed catch, which aids in accurate reporting of length and species. Oregon can quickly respond to in season adjustments and closures. Oregon has a seasonal limit for halibut. In essence, Oregon can manage a quota fishery effectively while California is better suited to manage a fishery based on a set number of days on the water to achieve a harvest target.

2. An alternative to salmon fishing is important for Oregon Ports in the Klamath Management Zone. While we have enjoyed liberal ocean salmon seasons over the last three years, the historic record shows that in most years our salmon fishing opportunities will be limited by Klamath River impacts, particularly in August and mid to late July. It is important to the local community to have a unique fishing opportunity available to attract fishermen and provide stability to our local community. This is particularly important to Brookings which does not have the robust estuary fishery that
exists at Gold Beach on the Rogue River. We are particularly concerned with maintaining the local bait and tackle businesses that are already competing with Fred Meyer and Bi Mart and who are totally dependent on income from fishermen. Based on the data available, inclusion in the Central Oregon Coast subarea would most likely not provide much fishing opportunity in August and late July.

3. Weather south of Cape Blanco is unique. Wind on the ocean is a limiting factor for fishing along all of the Oregon Coast. The area south of Cape Blanco is unique in that during periods of very high temperatures in the northern portion of the Sacramento Valley and inland valleys of Oregon, a deep thermal trough forms off the northern California Coast which produces strong winds along the coastline from Port Orford to Northern California. These high winds, often gale force, essentially shut down fishing in Gold Beach, Brookings and Crescent City for periods of up to two weeks, while ocean areas north and south are not as severely affected. The positive effect of these winds is increased upwelling and cooler near shore ocean temperatures, which are beneficial for salmon fishing but which place us at a disadvantage when trying to "compete" with Central Oregon Ports for quota.

We ask that you support the establishment of a new subarea from Humbug Mountain to the Oregon/California Border and that we be allocated a small quota of between 4000 and 6000 pounds of Pacific halibut. We would foresee no changes to the current season structure until we have had time to assess the development and progress of this fishery.

Thank you for this opportunity to provide input to this important decision.

Sincerely,

Tony Hobbs, President

cc: Roy Ellicker, Director ODFW
     Gway Kirchner, ODFW
     Ted Fitzgerald, Port of Brookings/Harbor
Dear Ms. Lowman and Council Members,

Since October 2011 the Council has addressed the halibut catch south of Humbug Mountain, Southern Oregon and Northern California. The Council has formed a work committee and a policy committee to bring suggestions to the Council so this area will stay within its halibut allotment.

I attended the last work group webinar, the last phone-in policy meeting, the public meeting with CDFW in Eureka and a phone-in with CDFW. From this information and my reading I have come up with the following suggestions to help reduce the Halibut catch in the south of Humbug Mountain area. I have placed them in the order of importance.

1. Move the control line to the California/Oregon border. Oregon and California have different regulations. Anglers in Oregon can travel south and continue fishing after the central Oregon allocation has been reached whereas California anglers only have a 0.62% of the 2A allotment of halibut.

2. No combo trips of halibut and salmon. I believe this will reduce the halibut catch by more than 19% that the work group proposes. For now in California, if an angler catches their salmon limit early, as they have in the last two years, then they will halibut fish for a few more hours. Halibut is too valuable as a game fish and too limited to become just another fish in an angler’s daily multiple species catch.

3. At the last work group webinar, California produced the percentage of halibut that was caught each day of the week. I was very disappointed that this information was not given to the policy group nor was it given at the CDFW public meeting in Eureka. If the control line is moved to the California/Oregon border, then days of the week become a very viable option. With the control line moved and no combo trips with salmon, I believe we could fish four days a week, Wednesday, Thursday, Friday and Saturday; this option would reduce our harvest by about 50%, the goal stated by the Policy Committee.

I believe this is a fair effort to reduce the halibut catch that would meet the Committee recommendation. Since there has been a halibut survey done in Northern California this year, but the data will not be available until December, it seems premature to severely close down halibut fishing until that data is presented and California receives a fair and equitable amount of the 2A halibut allotment.

Thank you for your consideration.

Mary Marking
1456 Whitmire Ave
McKinleyville, CA 95519
707-839-2073
August 21, 2013

Ms. Dorothy Lohman, Chairwoman
Pacific Fishery Management Council
7700 N.E. Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Re: Agenda Item D.2. Pacific Halibut Management in the South of Humbug Mt. Subzone of 2A

Dear Chairwoman Lohman:

In October of 2011, the IPHC expressed concern to the Council regarding the harvest level in the South of Humbug Subzone (SOH). That prompted action by the Council to appoint a Committee to study alternatives for the SOH and report back to the Council. The Committee then appointed a Working Group to detail specific information and develop data regarding various Alternatives that could be considered by Management to reduce the harvest within the SOH. The Committee met in December 2011 and reported back to the Council in March 2012. The Committee recommended the following:

- the IPHC extend their survey efforts down to the Punta Gorda, California area
- that the Working Group provide data for the following management options:
  - Prohibit targeting of P. halibut on salmon and groundfish trips
  - Restricting the days of the week; including at least one weekend day
  - Open May through July 15 and September through October
  - Open May through June and August through September
  - Examine the potential for harvest reduction of other time and area closures off California

These options were detailed in 6 Alternatives discussed at length by the Working Group in a Webinar on June 12, 2013. Following that meeting CDFW held a meeting on July 18, 2013 in Eureka to present these alternatives to the public and gather public comment (about 30 anglers were in attendance). It was of interest that the days of the week data (Alternative 2) presented at the Working Group meeting was omitted, even though very specific information had been presented at the June 12 webinar meeting. The discussion focused around Alternative 6 to move the management line down to the 42 degree line (CA/Ore border), Alternative 1 for harvest rates during combined salmon/and or rockfish trips; and finally, monthly closures were discussed (Alternative 3 & 5). Alternative 4 was deemed unimportant (MPA affects) and essentially dismissed. The public was evenly split in opinion to consider Alternative 2 and Alternative 3, and Alternatives 1 and all agreed to implement Alternative 6 to move the management line. The Policy Committee concluded by proposing to consider moving the management line (Alt 6) and close halibut fishing in August and the last two weeks in July.
Those monthly closures would effectively reduce catch by about 50% to an estimate 12,000 to 13,000 pound annual harvest. The effects of “effort shift” would have to be followed. Greg Williams of the IPHC also related the California Survey was concluded but the results would not be published until December of 2013.

CDFW then held and additional teleconference with the public on July 30, 2013 to solicit our comments on how we the public would react and how we would be affected by an August closure for halibut (with the latter two weeks closed in July as a back-up position); and moving the management line down to the 42 degree line at the CA border. Basically the six options had been whittled down to two options at this point (Alternatives 3 and 6).

The Council has scheduled the September Meeting for a preliminary preferred alternative to be put out for public review with a final decision to be made in November of this year.

My first impression is that any action should be tabled until March of 2014 so that the IPHC can provide us with the first survey completed in California for over thirty years. Why is there a rush to implement harsh management measures to reduce harvest in the SOH when the data necessary to assist in this decision will not be released until after the Council has acted? The Council has sufficient time in the spring and early summer of 2014 to institute management measures, if deemed necessary, since only August and the latter half of July is being considered by the Committee.

However, if the Council is determined to move forward on the Alternatives as presented by the Committee I would choose the following options in this order of importance:

1. That Alternative 6 to move the management line to the CA/Ore border be implemented.
2. That Alternative 2 (restrict days of the week) remain in consideration.

As the California Sports Representative I have all the private boaters and Charter Fishers to be concerned about. If we restrict August and the portions of July we have effectively eliminated halibut opportunity for Shelter Cove and the bulk of the halibut season for Trinidad. Recall that Shelter Cove Rockfish season closes after Labor Day and the early season is rough, windy and has little halibut success. July and August are the bulk of the halibut season and Trinidad will suffer approximately a 50% loss of their business in moorings and tourist interest. Halibut has become a very serious fishery for out-of-area tourists. Some Charter Operators expressed that 50% of their summer booking interest is for halibut fishing only, as salmon can be caught over the entire coast north of Half Moon Bay. Many Charter Operators cease operation after the salmon season in early September and move to the rivers to augment their business. Trinidad removes their mooring from Trinidad Bay after the salmon season since launching from private boaters reduces launches from over twenty per day to less than five per day on average. Also, south winds begin to blow making launch operation risky and difficult. Loss of the July and August months for halibut will be a severe revenue loss to these boat launch operations.
Every Charter Boat Operator I spoke with, with the exception of one, would rather have three days per week over the length of the season rather than block closures. If the goal is to reduce harvest by 50%, the days of the week option is every bit as valid as any other option presented, and it does not unduly penalize Shelter Cove and Trinidad with their launch operations. Blocking out the summer months for halibut will surely favor the locals who live around Humboldt Bay but will effectively eliminate the launch facilities and out-of-area fishers who do not travel past the end of August.

3. If the Salmon combo trips were eliminated that would allow probably one more day per week on the water, since the majority of halibut caught are by those who first fish for salmon and switch over to halibut once their salmon limit is achieved.

No matter what option is applied, “effort shift” will occur. Our area has historically had a long history of halibut landing and is being only allocated 0.62%, while Washington State has about 70% when the tribal effort is included and Oregon has the remainder of about 29.4%. Perhaps that formula was deemed appropriate in 1988 when these allocations were first instituted, but conditions have changed and the CSP should be re-examined in the near future. Halibut is an economically valuable fishery for our area. We believe the current allocation is unfair, lacks parity and the CSP is based on outdated population estimates. We respectfully request the Council address this concern in the coming year to correct this inequity. Thank you for your consideration.

Tom Marking, GAP Representative
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