

----- Forwarded message -----

From: Cookiemn58@GMail.com <cookiemn58@gmail.com>
Date: Mon, Oct 13, 2014 at 2:26 PM
Subject: 2015 Halibut Regs
To: pfmc.comments@noaa.gov

Please support Option 4 below.

Alternative 4: Increase the California sport share by three percent, for a total allocation of four percent, when the 2A TAC is less than one million pounds by reducing the three major non-treaty group allocations. When the 2A TAC is greater than one million pounds, the first one million pounds of the 2A TAC shall be distributed according to the Alternative 4 allocations. For the portion of the 2A TAC that exceeds one million pounds, the California sport allocation would increase to five percent of the non-treaty share by reducing the three major non-treaty group allocations.

Thank you,

Michael Lublin

From: Steve Haines <redrider62@yahoo.com>
Date: Mon, Oct 13, 2014 at 2:31 PM
Subject:
To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

In studying G1 concerning Pacific Halibut and the fishery, we are instead casting our vote for alternative 4. Thank you

Steve Haines... Recreational fishermen...[707-445-0613](tel:707-445-0613)... area code 95503

From: <dwoolz@sbcglobal.net>
Date: Mon, Oct 13, 2014 at 2:04 PM
Subject: 2015 Proposed Changes for Halibut Fisheries in Area 2A
To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

Gentleman,

My name is Dick Woolsey and I am a long time resident and angler of the North coast of California. In response to new information indicating a higher abundance of Pacific halibut and greater fishery interest in this area than when the CSP was originally adopted, I feel that Northern California should receive a higher allocation than has been given to us in the past. Therefore, I support Alternative 4 which increases our halibut quota to 4%. I hope you will consider and adopt this alternative.

Sincerely, Dick Woolsey

From: Tom peters <tpete@reninet.com>
Date: Mon, Oct 13, 2014 at 4:59 PM
Subject: pacific halibut allocations
To: pfmc.comments@noaa.gov

I am writing to support Alternative 5 for the California Sport Halibut season in 2015.
There are 4 reasons I support this Alternative.

1. The Survey data easily support that harvest level in California.
2. A robust halibut fishery provides a critical alternative for the charter and sports fleet when salmon is closed.
3. Halibut is the only accessible fishery for small boats out of Eureka, the major halibut port in the area, when salmon season is closed.
4. There are no other competing fisheries in this area. It is a “sport fishing” area only.

I also support a 50,000 pound cap of halibut harvest for California. This should allow a full May 1 to Oct. 31 season. This limit will no doubt be approached in those years with a shorter salmon season. We do not know from year to year what the salmon season will be. We do know it will be variable.

The charter boats and the sport fleet have only 2 alternatives out of Eureka. One is bottom fish but the fleet must travel almost 20 miles to the south and confront possible afternoon NW winds getting home.

The second is halibut. The fishery ranges up and down but much fishing is done straight out or slightly north of Humboldt Bay, within 5 or 6 miles. This allows smaller boats a shot and makes for a much safer trip home when the wind starts to blow (and it always blows!).

The trawl fishery historically landed as much as 2 million pounds of halibut into Eureka. Now there is almost NO pressure from that fleet. There is NO native directed halibut fishery in this area. The only harvest of halibut in California is by the sport fleet.

Since surveys have brought to light the fact that there is a substantial number of halibut in Northern California, it seems only fair that a reasonable harvest of those fish be allowed. Doing so will not affect the harvest in other areas as they will never get a chance to catch these fish anyway.

For these reasons I ask you to support ALTERNATIVE 5 with a 50,000 pound cap for the 2015 California Pacific Halibut season.

Thank you.
Tom Peters
221 Dollison St.
Eureka, CA 95501
[707-445-1666](tel:707-445-1666)
tpete@reninet.com

----- Forwarded message -----

From: Aaron Martin <yurokfish@gmail.com>

Date: Thu, Oct 16, 2014 at 10:39 AM

Subject: California Halibut Allocation

To: pfmc.comments@noaa.gov

Hello PFMC Council:

Thank you for working to manage our West Coast fisheries. I know it can be a difficult and complicated task and I certainly appreciate all of your efforts. I am writing in regards to Pacific halibut management and catch share allocations for the 2015 season. I appreciate the effort that went into creating 5 alternatives this season, which appears to be an effort to create a more fair and efficient catch share allocation for all stakeholders.

Please support Alternative 5. It is the only fair alternative that supports what the science has said for our area. Please make the right choice.

Thank you

Aaron Martin
343 Chartin Rd
Blue Lake, CA 95525

----- Forwarded message -----

From: John Martin <jmartin@lassencollege.edu>

Date: Thu, Oct 16, 2014 at 8:25 AM

Subject: Northern California Halibut Allocation

To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

PFMC Board Members,

Please consider supporting alternative 5 which would raise California's allocation to 5%. One of the reasons you should support this alternative is from what I read on your own web site is the science supports it. Your own surveys show that northern California supports a much larger percent of the biomass than anyone believed prior to those surveys.

So by continuing to keep California's allocation at or near its current low allocation you are in effect requiring the overfishing of other areas, allocations that by your own science should be in northern California are shifted to other areas where science does not support those numbers. This shift is not only causing what I believe to be overfishing, it is economically unfair and penalizes the small fishing communities of northern California.

Please consider Alternative #5 lets use the science and try to be fair.

Sincerely, John Martin
Susanville, CA

----- Forwarded message -----
From: Bert Colbert <bert.colbert@gmail.com>
Date: Mon, Oct 13, 2014 at 7:14 PM
Subject: 2015 Area 2A halibut fisheries
To: pfmc.comments@noaa.gov

Dear PFMC Members,

I ask that you consider the catch data from the Northern California and Southern Oregon long line study that was done last Fall in making your decision for the upcoming 2015 season. It was shown that we have a large biomass of Pacific Halibut here and can sustain the meager amount we are catching in relation to minuscule catch quote we are allotted by the IPHC. We need to encourage the recreational "fishing tourism" that comes to the North Coast. The fishable days are limited by ocean conditions that keep many boats near shore or in port for probably 1/3 of the season (total days from May 15 to October 31, minus bad weather days)

I ask that you lift the ban that was imposed for the month of August. This was proposed and offered by the sport fisherman (HASA) and commercial charter boats to appease the notion that we are "over fishing" this resource. Unfortunately, the data from the long line study became available after we already supported this option. Now that it is evident that we have a healthy Pacific Halibut population, there is no need for the closure and the season should resort back to what it was prior.

Sincerely,

Bert Colbert
1759 Old Arcata Rd.
Bayside, CA. 95524
[\(707\) 496-3626](tel:(707)496-3626)

----- Forwarded message -----
From: **Seth Naman** <swnaman@gmail.com>
Date: Thu, Oct 16, 2014 at 2:10 PM
Subject: 2015 Area 2A halibut fisheries
To: pfmc.comments@noaa.gov

PFMC,

I am writing in regards to Pacific halibut management and catch share allocations for the 2015 season and to urge you to support Alternative 5. As you know, the 2013 IPHC survey off the California coast revealed that there is over 100,000 pounds of exploitable biomass in California waters. Key metrics (such as size at age) are also very favorable off of the California Coast. The data is clear: the fishery has been resilient to past effort and can clearly support continued harvest at intensities similar to the past.

California brings a significant volume contribution to the table and enables other stakeholders to have larger allocations. Its only fair that California has access to 1/3 of the fish off of our coast,

rather than other stakeholders having more fish to catch in areas that cannot support it. Metrics (such as size at age) in other areas are not nearly as favorable as California, which suggests that using California volume to support fishing in other areas is not sustainable and clearly not a good management practice. The IPHC survey in 2013 is the best available science and concluded there is/was 100,000 pounds of exploitable biomass off of California. Alternative 5 would allocate 31,000 pounds (less than 1/3 of the available 100,000lb biomass) to California and represents the most efficient and fair alternative available.

There is only one Alternative that effectively manages the fishery, is consistent with the Magnuson Stevens Act, comports with the catch share policy from NMFS, and relies on the best available science. That is Alternative 5. As representatives on the Council and stewards of our resources, is it up to you make the correct decision to best manage our fisheries. The best available science is very clear that Alternative 5 makes the most sense. Please support Alternative 5.

Thank you,

Seth Naman
PO Box 141
Blue Lake, CA 95525
swnaman@gmail.com

----- Forwarded message -----

From: Marc Schmidt <coastlinecharters@gmail.com>
Date: Thu, Oct 16, 2014 at 3:50 PM
Subject: Pacific Halibut alternative public comment
To: pfmc.comments@noaa.gov

Council members,

First off, thank you for your time and consideration to our fisheries issues as it applies to CA sport anglers. I am writing in support of Alternative 5 and status quo limit for Pacific Halibut (PH) regulations for 2015. As a charter boat owner/operator in Eureka, CA, your decisions will greatly affect my livelihood. Your science based and common sense vote is appreciated by CA sport anglers, businesses, and their families.

The facts have been reiterated time and time again and everyone agrees CA sport anglers are getting an unequitable and arbitrary share of allocation. Even the presented alternatives still fall short of what is if fair and equitable and are not based on the best available science as required by the MSA. The best available science shows we have 14% of the available PH biomass off our coast and we only receive less than 1% of the quota. Even if we get the 5% allocation in Alternative 5 we still are providing the 2A area with fish that are artificially floating seasons to our north. I understand the inter and intra season migrations of these fish but I feel that fishing seasons based on fish from a much different location of the 2A area will reduce biomass in the northern portion faster than can be supported in the long term. As one of very few people that

really have an on the water feel of the population in our area, I know you will see even more fish available from our area from the 2014 survey results. Please make a sound science based decision and vote for Alternative 5 with the status quo limit for 2015 and then you can see next year how the decision was a good one.

Thanks you for your consideration,

Marc Schmidt
Coastline Charters
Eureka, CA

----- Forwarded message -----
From: John Lanz <jrlanz@att.net>
Date: Thu, Oct 16, 2014 at 3:53 PM
Subject: Halibut season California 2015
To: pfmc.comments@noaa.gov

PFMC Council:

Thank you for working to manage our West Coast fisheries. I know it can be a difficult and complicated task and I certainly appreciate all of your efforts. I am writing in regards to Pacific halibut management and catch share allocations for the 2015 season. I appreciate the effort that went into creating 5 alternatives this season, which appears to be an effort to create a more fair and efficient catch share allocation for all stakeholders. As you know, the 2013 IPHC survey off the California coast revealed that there is over 100,000 pounds of exploitable biomass in California waters. Key metrics (such as size at age) are also very favorable off of the California Coast. This data suggests that there are a number of fish available off of California, and it also suggests that the general fitness of individual fish has not diminished despite the volume being harvested in past years. The data is clear: the fishery has been resilient to past effort and can clearly support continued harvest at intensities similar to the past. The IPHC survey completed in 2013 clearly supports this.

While I appreciate the effort to develop additional alternatives to work towards a more fair and efficient allocation, the five alternatives fail to create a fair or efficient allocation for California. Alternative 5 would provide California with the highest allocation (5%), but this is merely 1/3 of the available biomass off of our coast. California brings a significant volume contribution to the table and enables other stakeholders to have larger allocations. Its only fair that California has access to 1/3 of the fish off of our coast, rather than other stakeholders having more fish to catch in areas that cannot support it. Metrics (such as size at age) in other areas are not nearly as favorable as California, which suggests that using California volume to support fishing in other areas is not sustainable and clearly not a good management practice. The IPHC survey in 2013 is the best available science and concluded there is/was 100,000 pounds of exploitable biomass off of California. Alternative 5 would allocate 31,000 pounds (less than 1/3 of the available 100,000# biomass) to California and represents the most efficient and fair alternative available.

There is only one Alternative that effectively manages the fishery, is consistent with the Magnuson Stevens Act, comports with the catch share policy from NMFS, and relies on the best available science. That Alternative is Alternative 5. Please support Alternative 5. As representatives on the Council and stewards of our resources, is it up to you make the correct decision to best manage our fisheries. The best available science is very clear about which alternative makes the most sense. I hope you make the right choice.

John Lanz
790 Eucalyptus Rd.
McKinleyville Ca. 95519

----- Forwarded message -----
From: <rbtrtdnlfr@netscape.net>
Date: Thu, Oct 16, 2014 at 11:15 AM
Subject: Pacific Halibut 2015
To: pfmc.comments@noaa.gov

Hello PFMC Council:

Thank you for working to manage our West Coast fisheries. I know it can be a difficult and complicated task and I certainly appreciate all of your efforts. I am writing in regards to Pacific halibut management and catch share allocations for the 2015 season. I appreciate the effort that went into creating 5 alternatives this season, which appears to be an effort to create a more fair and efficient catch share allocation for all stakeholders. As you know, the 2013 IPHC survey off the California coast revealed that there is over 100,000 pounds of exploitable biomass in California waters. Key metrics (such as size at age) are also very favorable off of the California Coast. This data suggests that there are a number of fish available off of California, and it also suggests that the general fitness of individual fish has not diminished despite the volume being harvested in past years. The data is clear: the fishery has been resilient to past effort and can clearly support continued harvest at intensities similar to the past. The IPHC survey completed in 2013 clearly supports this.

While I appreciate the effort to develop additional alternatives to work towards a more fair and efficient allocation, the five alternatives fail to create a fair or efficient allocation for California. Alternative 5 would provide California with the highest allocation (5%), but this is merely 1/3 of the available biomass off of our coast. California brings a significant volume contribution to the table and enables other stakeholders to have larger allocations. Its only fair that California has access to 1/3 of the fish off of our coast, rather than other stakeholders having more fish to catch in areas that cannot support it. Metrics (such as size at age) in other areas are not nearly as favorable as California, which suggests that using California volume to support fishing in other areas is not sustainable and clearly not a good management practice. The IPHC survey in 2013 is the best available science and concluded there is/was 100,000 pounds of exploitable biomass off of California. Alternative 5 would allocate 31,000 pounds (less than 1/3 of the available 100,000# biomass) to California and represents the most efficient and fair alternative available.

There is only one Alternative that effectively manages the fishery, is consistent with the Magnuson Stevens Act, comports with the catch share policy from NMFS, and relies on the best available science. That Alternative is Alternative 5. Please support Alternative 5. As representatives on the Council and stewards of our resources, is it up to you make the correct decision to best manage our fisheries. The best available science is very clear about which alternative makes the most sense. I hope you make the right choice.

Thank you,

Daniel Free
320 Fernwood Lane
Kneeland, CA 95549

----- Forwarded message -----

From: Matt Goldsworthy <goldsworthy.matthew@gmail.com>

Date: Thu, Oct 16, 2014 at 10:24 AM

Subject: Pacific Halibut 2015

To: pfmc.comments@noaa.gov

Hello PFMC Council:

Thank you for working to manage our West Coast fisheries. I know it can be a difficult and complicated task and I certainly appreciate all of your efforts. I am writing in regards to Pacific halibut management and catch share allocations for the 2015 season. I appreciate the effort that went into creating 5 alternatives this season, which appears to be an effort to create a more fair and efficient catch share allocation for all stakeholders. As you know, the 2013 IPHC survey off the California coast revealed that there is over 100,000 pounds of exploitable biomass in California waters. Key metrics (such as size at age) are also very favorable off of the California Coast. This data suggests that there are a number of fish available off of California, and it also suggests that the general fitness of individual fish has not diminished despite the volume being harvested in past years. The data is clear: the fishery has been resilient to past effort and can clearly support continued harvest at intensities similar to the past. The IPHC survey completed in 2013 clearly supports this.

While I appreciate the effort to develop additional alternatives to work towards a more fair and efficient allocation, the five alternatives fail to create a fair or efficient allocation for California. Alternative 5 would provide California with the highest allocation (5%), but this is merely 1/3 of the available biomass off of our coast. California brings a significant volume contribution to the table and enables other stakeholders to have larger allocations. Its only fair that California has access to 1/3 of the fish off of our coast, rather than other stakeholders having more fish to catch in areas that cannot support it. Metrics (such as size at age) in other areas are not nearly as favorable as California, which suggests that using California volume to support fishing in other areas is not sustainable and clearly not a good management practice. The IPHC survey in 2013 is the best available science and concluded there is/was 100,000 pounds of exploitable biomass off of California. Alternative 5 would allocate 31,000 pounds (less than 1/3 of the

available 100,000# biomass) to California and represents the most efficient and fair alternative available.

There is only one Alternative that effectively manages the fishery, is consistent with the Magnuson Stevens Act, comports with the catch share policy from NMFS, and relies on the best available science. That Alternative is Alternative 5. Please support Alternative 5. As representatives on the Council and stewards of our resources, is it up to you make the correct decision to best manage our fisheries. The best available science is very clear about which alternative makes the most sense. I hope you make the right choice.

Thank you,
Matt Goldsworthy
1358 School Road
McKinleyville, CA 95519

----- Forwarded message -----
From: Bob Pagliuco <sheggyboy@aol.com>
Date: Fri, Oct 17, 2014 at 7:08 AM
Subject: Pacific Halibut 2015
To: pfmc.comments@noaa.gov

Hello PFMC Council:

I am writing in regards to Pacific halibut management and catch share allocations for the 2015 season. I appreciate the effort that went into creating 5 alternatives this season, which appears to be an effort to create a more fair and efficient catch share allocation for all stakeholders. The IPHC survey in 2013 is the best available science we have and concluded there was 100,000 pounds of exploitable biomass off of California in 2013. Although the 2014 survey results have not been analyzed, I am guessing CA's numbers have either stayed the same or have increased. Alternative 5 would allocate 31,000 pounds (less than 1/3 of the available 100,000# biomass in 2013) to California and represents the most efficient and fair alternative available. I support alternative 5 and hope you will too.

Thanks,
Bob Pagliuco

----- Forwarded message -----

From: Jim Yarnall <jimyarnall@gmail.com>

Date: Thu, Oct 16, 2014 at 7:30 PM

Subject: Agenda Item G.1 Pacific Halibut

To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

October 16, 2014

Madame Chair and Council Members,

I am a recreational angler from Eureka, CA who fishes for Pacific halibut in northern California. I am advocating that you increase California's share of the 2A quota by supporting Alternative 5 or at least Alternative 4 for the 2015 season.

The IPHC 2013 survey data clearly demonstrate that California waters support a significant halibut population contributing 100,000# to the 2A allocation. While not perfect, the survey represents the "best available science" for resource allocation. If you aren't going to use the best science, then you are simply allocating the 2A quota based upon politics and past practices. This does not meet the letter or intent of the Magnuson Stevens Act calling for the fair and equitable resource distribution.

Alternative 5 or 4 is a step in the correct direction while we await the survey data from 2014. I recommend that you implement Alternative 5 or at least 4 and revisit this resource allocation issue in 2015. Thank you for your consideration.

Sincerely,
Jim Yarnall
6308 Eggert Road
Eureka, CA 95503
[707-443-2496](tel:707-443-2496)

----- Forwarded message -----

From: Tom Giusti <tgiust@icloud.com>

Date: Mon, Oct 13, 2014 at 5:51 PM

Subject: Halibut

To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

Agenda Item G.1 , I vote on supporting Alternative 4, which will increase our halibut quota to 4%. I am submitting public Agenda ItemG.1 , and vote to supporting Alternative 4, which will increase our halibut quota to 4%.

Tom Giusti
Eureka, CA

----- Forwarded message -----

From: mike beck <unclemikefishon@gmail.com>

Date: Wed, Oct 15, 2014 at 9:19 AM

Subject: Halibut

To: pfmc.comments@noaa.gov

Dear sirs, with the news of the biomass and our location, ocean conditions etc. Please increase our lot to 4% and eliminate any closures on halibut. Thank you, Mike Beck , Humboldt co. Ca.

----- Forwarded message -----

From: Dan Cox <crabby2@suddenlink.net>

Date: Thu, Oct 16, 2014 at 7:24 PM

Subject: Halibut

To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

Sent from my iPhone. I've lived in trinidad for 62 years fished commercial crab and salmon for 45 yrs know this ocean better than most , never seen as many halibut and lings in all my life !! For u to take august was crazy the amount of halibut calif is givin is an insult to our state period! Makes me mad as he'll ! Somebody stand up and fight for what's right for once! Give us in calif a fair share thanks Dan cox fv express trinidad calif

----- Forwarded message -----

From: Trever Parker <taparker76@gmail.com>

Date: Fri, Oct 17, 2014 at 3:00 PM

Subject: Pacific halibut allocation for northern CA

To: pfmc.comments@noaa.gov

Cc: caroline.mcknight@wildlife.ca.gov

To whom it may concern,

Halibut fishing is extremely important to me and the greater sport fishing community of northern California. Because halibut often take more time and effort to catch, being able to fish for halibut allows me substantial time on the water while only catching a few fish. This has a substantial benefit to my own quality of life and provides a great economic benefit to the area, with relatively little impact on the resource. In addition, the scientific survey by the IPhC in 2013 showed there was 720,000 lbs for exploitable biomass, of which northern California contributes 13.8% of this amount, or approximately 100,000 lbs. Therefore, I would like to express my support and preference for Alternative 5 for the 2015 allocation.

Though I prefer Alternative 5, I would also be willing to support the Alternative 4 allocation combined with more appropriate harvest management to meet the Alternative 4 allocation, provided future allocations continue to be refined in the coming years. Implementing harvest management to meet the Alternative 4 allocation, based on the 2008-2014 average harvest rate, would slightly reduce the duration of a 2015 closure, and accordingly reduce the socio-economic impacts on northern California recreational sportfishers and businesses. In terms of any necessary closure, I would support the shortest duration possible, even if that means it is within

or near the peak of the season. This is because the number of available days to be on the water is very important to me; weather often keeps small sportfishing boats off the water, particularly for halibut.

I support a reasonable balance between fishing opportunities and regulations to provide a long-term sustainable Pacific Halibut fishery for northern California. Historic allocations have been unreasonably low, emphasized by the 2013 IPHC Research Survey and other recent information. Likewise, regulatory management has made some progress lowering harvest towards PFMC allocations, yet based on recent data showing higher California production, there still remains substantial distance from a fair and equitable Pacific Halibut allocation in California. Many of the revised Alternatives developed for consideration at the November 2014 PFMC meeting make good progress towards a more fair and equitable harvest for California as required by the Magnuson Stevens Act.

In conclusion, I appreciate the more equitable Alternatives being considered by the PFMC in November, and I support and prefer Alternative 5. I would be willing to support the Alternative 4 allocation with commensurate harvest management to meet that allocation as an interim step in the development of a more fair, equitable and science-based distribution of Pacific Halibut harvest and management in the future.

Sincerely,
Trever Parker
Arcata, CA

----- Forwarded message -----
From: Jeff Mostovoy <jjmostovoy@icloud.com>
Date: Fri, Oct 17, 2014 at 10:11 PM
Subject: PMFC Halibut Allocation (2015)
To: pfmc.comments@noaa.gov

10/16/14
PMFC Halibut Allocation (2015)

Dear PMFC,

I recently sent an email to the PMFC in regards to California's pacific halibut allocations for 2015. After researching and reviewing all of the alternatives, it seems to me that alternative 5, although not in any way reasonable, is the only one that makes sense at this time.

I want to emphasize that this alternative only gives California 5% (one third based on the 2013 harvest survey data). This means that Oregon and Washington are receiving two thirds of our halibut from California waters. We have already noticed the negative effects on charter boats, hotels, restaurants, and more by the August closure. It has to be noted that politics should not guide the decisions of California's fishing industry. Scientifically sound data should be the backbone of your decisions.

Every year, more and more restrictions on our fishing privileges are implemented. I am only advocating for fairness and for the PFMC to give California the largest allocation possible from the evidence of scientific research that has been conducted.

Jeffery J. Mostovoy

----- Forwarded message -----

From: Lonnie Dollarhide <flatwater3@yahoo.com>
Date: Mon, Oct 13, 2014 at 4:25 PM
Subject: Pacific Halibut
To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

My name is Lonnie Dollarhide, I'm an ocean sports fishermen out of Eureka CA. and a member of the Humboldt Area Salt Water Anglers. I'm a Pacific Halibut angler. I feel we are getting cheated on our allocation for next year. We deserve more poundage , example , Brookings Oregon meet their allocation and were given more poundage to finish off the 2014 season. Were in a catch share program but their is no sharing with CA. I just find it so unfair the sports guys in Oregon and Washington get way more poundage than Ca. This is a hard one for all involved, thanks.

----- Forwarded message -----

From: Tim <reelsteel@humboldt1.com>
Date: Sun, Oct 19, 2014 at 7:01 PM
Subject: Pacific Halibut
To: pfmc.comments@noaa.gov

My name is Tim Klassen. My wife Sherry and I own Reel Steel Sportfishing, a Eureka Ca based fishing charter business. Pacific Halibut fishing is an important part of our business. It is important for us to have a full fishing season. I support the proposal that gives us the most fishing days. I hope that California can have an appropriate allocation based on the best available science. I hope that California's allocation can be increased without having to "take" fish from other sectors. Tim Klassen Reel Steel Sportfishing [707-499-4925](tel:707-499-4925)

----- Forwarded message -----

From: **plapotre@plarchitect.com** <plapotre@plarchitect.com>
Date: Fri, Oct 17, 2014 at 8:45 AM
Subject: Halibut allocation 2015
To: "Kelly.Ames@noaa.gov" <Kelly.Ames@noaa.gov>

Dear Mrs. Ames

I write in support of Alternative #5 for Area 2A.

I am a sport fisherman out of Eureka and I have witnessed a very healthy Pacific Halibut fishery ever since I started fishing for them. I am not very well versed on the history of the fishery and how it relates to Oregon quotas but I am aware of Oregon's over harvesting. Her on the North

Coast this has not been the case. For us to be put in the same bag with Oregon is penalizing us for doing things right while others don't.

I realize that Alternative #5 may not be PFMC preferred alternate and that Alternative #4 may be more achievable as a selection. I want you to know that I will respect the rules regardless of the decision and Alternative #4 will be acceptable to me as long as we move in the direction of developing ways to come up with a dependable counting system that would reflect the true population in our area.

In any event I am in full support of the HASA representatives decisions and appreciate their and you time on this matter.

Thank you,

Philippe Lapotre - Architect
PLA

2725 Myrtle Avenue, Suite "C"
Eureka, CA. 95501
Ph: (707) 442-8867
Fax: (707) 442-8867

plapotre@plarchitect.com
www.plarchitect.com
"Print Only When Necessary"



Created to enhance and protect an economically viable Washington salmon troll fishery.

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

re: Agenda Item G.1 Halibut Catch Share Plan

Dear Chairwoman Lowman and members of the Council,

The Coastal Trollers Association represents commercial salmon trollers in the North of Cape Falcon salmon catch area. We are writing in support of the status quo option for the allocation of Pacific Halibut in the Catch Share Plan as detailed in the PFMC Blog, September, 2014. We also support the intent of the season dates and inseason action alternatives but believe the language can more clearly state that the objective of the regulation is to manage the California recreational halibut fishery within the Catch Share Plan quotas as opposed to implying the fishery may have up to 15 or 30 days with inseason adjustments.

California Department of Fish and Wildlife has failed, and failed miserably, to manage the sport halibut fishery within the CSP. The solution CDFW proposes is reallocation of halibut quota from other users, not to regulate within the current allocation. The PFMC should not even contemplate approval of any reallocation under these circumstances. The Council should consider the lesson other fisheries would take from a re-allocation of halibut under these circumstances: break the law, overfish, and the Council will give you some one else's fish if you promise to never break the law again. Our members rely on the Council making rational, lawful decisions for conservation of our fishery. Re-allocation of halibut would severely erode our confidence in this Council's decisions and make our participation into a constant battle for allocation of resources rather than the search of common solutions to achieving conservation needs of the resource. CTA only supports the status quo alternative.

Agenda Item K.1.b ,Supplemental CDFW Report, September 2014 states that CDFW heard from the public that there is a high expectation that the IPHC survey data would lead to an increased allocation of 2A halibut to California. The Council should consider the detail on the interpretation of this survey that do not support the California public testimony, including the following issues.

There is only one data point for one year. Basing a decision on one data point is not science. Increasing the harvest of halibut in Northern California based on one year assessment is reckless.

The survey results have potential bias based on the conversion of CPUE to biomass used by IPHC. Surveys in other areas have been conducted during or after a commercial longline season. In northern California, there is no directed longline fisheries effort because of the area restrictions of the RCA. A high CPUE on an unfished stock can not be compared one to one with CPUE data from fished stocks. IPHC does not consider this in “Southern expansion of the Area 2A setline survey” by Raymond A. Webster, Claude Dykstra, and Tom Kong, 2013 RARA.

The CDFW report states that the public believes the increased percentage of halibut grounds, calculated by IPHC as 16% for Northern California, justifies an increase in quota for California. It is important to know how the survey data integrate with other data on halibut distribution when IPHC calculates biomass. The IPHC includes commercial setline CPUE with corrections for gear type, weight at age and age. IPHC also uses the average weight-length relationship, maturity schedule, aging bias and imprecision reflecting difficulties reading age from otoliths, and in the Bering Sea, NMFS trawl survey data. IPHC remarks that the strength of the estimate of biomass is the length of the time series of the data. For the newly surveyed area, there is no long time series of data nor commercial setline data to back up the survey.

The setline survey in Northern California had high variability. There were 4 sets with zero fish as well as sets with over 50 pounds and up to 109 pounds per skate. In subareas where there are commercial longline data, the survey data can be smoothed geographically as well as temporally (early to late season). Northern California lacks this data. California trollers do not appear to be landing many halibut in the incidental landing category. The sablefish longliners report very little halibut encounters (pers comm with Dan Platt of GAP). Dungeness crabbers report very little bycatch of halibut (pres comm Dave Bitts of the SAS) where as in the Salish Sea treaty crab fishers report surprising numbers of halibut in crab traps (testimony of unidentified Lummi tribal member at IPHC annual meeting). Basing an allocation decision on a single year of highly distributed survey sets where there were no additional data is not a safe, conservative plan and our association can only support status quo.

CTA has sent representatives to International Pacific Halibut Commission (IPHC) meetings to ask for the greatest possible quota for area 2A. Due to a strong, united voice from all 2A halibut stakeholders, the IPHC has granted area 2A quota in excess of the IPHC staff conservation recommendations. The alternatives in Agenda item G.1 threaten to disrupt the unity required to convince the IPHC that the halibut resource is valued and well cared for in 2A. CTA can not go to bat for the quota knowing that the PFMC may continue to re-allocate away from the commercial sector.

The IPHC has seen a similar situation of the sport charter boat sector overfishing its quota in areas 2C and 3A. In this case the IPHC recommended the Alaska Department of Fish and Game (ADFG) and NPFMC institute regulations to ensure the sector stay within its Guideline Harvest Level (GHL). (IPHC Blue Book staff recommendations, 2007) ADFG and NPFMC have taken regulatory action and the 2C and 3A sport fisheries are staying within their conservation guidelines (IPHC Annual Report, 2012)

Our organization obviously can not speak for the IPHC commissioners , never the less, the IPHC has been clear and consistent in their desire to see all users stay within its conservation recommendations. IPHC annually endorses the 2A CSP based the understanding that appropriate conservation measures should be implemented in order to keep area 2A within the IPHC set quota. While loss of this endorsement would not automatically affect PFMC fisheries, one can envision a scenario where lower 2A quotas follow the loss of

endorsement. Our organization urges PFMC to not even flirt with this potential outcome and instead insist Northern California stay within the current CSP.

Yellow Eye and Canary Rockfish are closely associated with halibut. Fisheries impacts on halibut need to have matching impacts on these two rockfish species. There is no mention of where the yellow eye and canary quota will come from as halibut are re-allocated. The Council needs to explain to itself and to stakeholders what the bycatch impacts of re-allocation are. Right now, it looks like the estimation of sport catch of yellow eye and canary rockfish in Northern California could be below actual harvest/mortality because of the halibut overfishing. Because of the connection to rockfish that is not fully analyzed in the CSP alternatives, our organization recommends the Council stay with the status quo alternative.

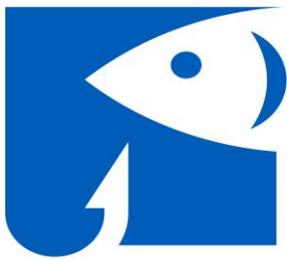
CTA notes that the Monterey Bay Aquarium Seafood Watch Guide recently upgraded many Pacific Rockfish species as “Best Choice” due mainly to the good management practices of the PFMC and the resulting recovery of many rockfish species. With the public eye on the Council, rewarding the mis-management of Pacific Halibut by CDFW would look out of character and arbitrary and capricious.

In conclusion, PFMC should not reward CDFW mis-managing Pacific Halibut but rather should insist that CDFW manage the fishery consistent with the conservation principles all other fisheries are held to. None of the Fisheries Management Plans allow overfishing. Indeed with Annual Catch Limits arduously developed for all Council managed species, no one overfishes on the Pacific Coast. Re-allocating Pacific Halibut to the California sport fishery to cover up CDFW mis-management and overfishing is wrong, sets an untenable precedent for other Council managed fisheries, and would unreasonably transfer the conservation burden to the consuming public who do not fish. Our organization strongly urges the Council to stay with the status quo for the Pacific Halibut Catch Share Plan.

Sincerely,

Jeremy Brown, President Coastal Trollers Association

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FEIN #61-1575751

October 19, 2014

Pacific Fishery Management Council
Dorothy Lowman, Chair
7700NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

RE: Pacific Halibut Alternatives for 2015

Dear Chair Lowman and Council Members:

The Humboldt Area Saltwater Anglers, Inc. (HASA) previously submitted public comment on August 11, 2014 and September 3, 2014 on the 2015 Pacific halibut allocation alternatives (Alternatives). We have reviewed the updated Alternatives, and based on our prior comments and subsequent input from HASA membership, HASA provides the following supplemental comments pertinent to the 2015 Alternatives:

1. Consistent with our mission statement, HASA supports a reasonable balance between fishing opportunities and regulations to provide a long-term sustainable Pacific halibut fishery for our membership. Historic allocations to California have been unreasonably low, emphasized by the 2013 IPHC Research Survey and other recent information. Regulatory management has made some progress lowering harvest towards PFMC allocations; however, albeit only one year of data, the 2013 IPHC Survey shows higher California production, and we anticipate similar results from the 2014 IPHC Survey. Therefore, there still remains substantial distance from a fair and equitable Pacific halibut allocation to California. Many of the revised Alternatives developed for consideration at the November 2014 PFMC meeting make good progress towards a more fair and equitable harvest for California as required by the Magnuson Stevens Act.
2. HASA supports continued refinement of a) Pacific halibut allocation to California, and b) regulation to meet that allocation, provided that the allocation is fair and equitable. As future IPHC Research Surveys and other scientific data better informs Pacific halibut productivity in California, we expect the allocation to continue evolving towards a more fair and equitable distribution of harvest.
3. While we would obviously prefer Alternative 5 for the 2015 allocation, we are willing to support the Alternative 4 allocation combined with more appropriate harvest management to meet the Alternative 4 allocation, provided future allocations continue to be refined in the coming years. As we mentioned in our September 2014 comments, the 2014 closure through the entirety of August has caused substantial socio-economic impacts to our recreational sport fishing community and the businesses they support. Implementing harvest management to meet the Alternative 4 allocation, based on the 2008-2014 average harvest rate, would slightly reduce the duration of a 2015 closure, and accordingly reduce the socio-economic impacts on our recreational sportfishers and local businesses.

In summary, HASA appreciates the more equitable Alternatives being considered by the PFMC in November. While we would prefer Alternative 5, we would be willing to support the Alternative 4 allocation with commensurate harvest management to meet that allocation as part of an evolution towards a more fair and equitable distribution of Pacific Halibut harvest. HASA would also like to continue working with CDFW and PFMC in 2014/2015 as more equitable, longer-term, science-based solutions are developed for Pacific halibut allocation and harvest management.

We appreciate the opportunity for providing public input on this very important matter, and do not hesitate to contact me at (707) 845-4106 if you would like any additional information.

Sincerely,

A handwritten signature in cursive script that reads "Cliff Hart".

Cliff Hart, President
Humboldt Area Saltwater Anglers, Inc.