November 2014

We, the undersigned, representing all sectors of the Washington recreational Halibut fishery, are writing to share our concern regarding management of the California recreational subarea. For many years now our respective groups have been strictly managed to stay within the allocation that we have been assigned by the Pacific Council in accord with the Halibut Catch Sharing plan. Our seasons have shrunk from many weeks, and even months, to as few as 4 days in both the North Coast and South Coast regions. The Puget Sound fishery has been reduced to 8 days this year.

For years, virtually all of Halibut area 2A has been managed to stay within the boundaries of our quota. One benefit of this stringent in-season management in Washington and Oregon has been a quota that is up to 25% larger than the Scientific data in 2A dictates. The International Pacific Halibut Commission (IPHC) has rewarded strong managerial compliance with favorable consideration of our area's social, economic and cultural needs.

We are concerned that inaction by the California Department of Fish & Wildlife (CDFW) in staying within their assigned quota will ultimately lead to a reduction in the quota for all of 2A. In addition, should the quota substantially decline, that could trigger Tribal / non-tribal sharing issues. We all lose under those scenarios.

The solution to this problem is to bring California into compliance with current management practice beginning in 2015. Our view of the solution is as follows:

First, allocate California a reasonable percentage of the non-Tribal share of the Halibut in 2A. The non-Tribal allocation is 65% of the total. California was allocated 1% in 2014. That could be raised to 3 or 4% for 2015. Based on the 2014 2A TAC, that would provide 20-25,000 for a
recreational quota. That would certainly be reasonable considering the constraints we are all living with.

Second, provide the new percentage equally from the other 3 non-Tribal sectors. This spreads the pain over a large number of groups who have already participated in declines in fishing time in recent years.

Third, in our view, transferring quota to California must be contingent on CDFW complying to the catch sharing plan. CDFW has testified that it has no authority to manage in-season. If they can't manage in real time to close a fishery when a quota is reached then a season length should be set into regulation that gives strong assurance that the quota won't be exceeded. NOAA fisheries should have the authority to close the season when the pre-season set duration is reached. The State of Washington manages Puget Sound by a similar method and with a few exceptions has stayed within its quota. Season duration can be reduced or expanded in following years if post-season estimates show catches significantly more or less than the quota.

Finally, we are not willing to transfer Halibut quota to California that will be exceeded as it was in 2014 and previous years while at the same time paying for that with real-time managed fish. Additionally, we are not willing to lose quota in 2A overall due to a loss of trust by IPHC to manage properly.

We urge you to deal with this at the upcoming November Council meeting.

Respectfully Yours,

Westport Charterboat Association
POB 654
Westport, WA 98595
Steve Westrick, President

Puget Sound Anglers
24707 Florence Acres Road
Monroe, WA 98272
Ron Garner, President
Kevin Lanier, Coastal Vice President

Ilwaco Charter Association
P.O. Box 268
Ilwaco, WA 98624
Butch Smith, President

Columbia Pacific Anglers Association
2515 Kaufman Avenue
Vancouver, WA 98660
Steve Watrous, President

Excel Fishing Charters
P.O. Box 181
Neah Bay, WA 98357
Tom Burlingame, Owner
Neah Bay Halibut representative

Olympic Anglers Guide Services
212338 Highway 101
Port Angeles, WA 98363
Gary Grahn, Owner
Lapush Halibut representative
Re: 2014 Pacific Halibut Catch Sharing Plan

PFMC:

Thank you for the opportunity to comment. I support Alternative 3. This spreads the burden somewhat equally among existing user groups and allows the N. California sport share to increase a reasonable amount. As stated in the October 23, 2014 mailing from ODFW: "The CSP can be updated or modify (sic) annually through the Pacific Fishery Management Council (Council) two meeting process." This allows the PFMC to re-visit the allocation issue and make changes as necessary. As a second position, I would support Alternative 4 if Alternative 3 were to be eliminated from discussion.

I am a long-term commercial halibut fisherman in Area 2-A participating annually in the non-treaty directed commercial fishery for over 25 years. I also operate the Pacific Surveyor, the research vessel that has conducted the IPHC stock assessment survey for the past four years, including the work done off N. California for 2013 and 2014.

Thank you,
Alan Pazar
September 11, 2014

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

Re: Pacific Halibut Management in the California North Coast Region

Dear Chair Lowman

Thank you for the opportunity to comment on management of Pacific halibut in the northern California region. I am offering comments to the Pacific Fisheries Management Council (PFMC) on behalf of the Noyo Harbor District. We are commenting because of the extremely important role fisheries play for North Coast California economies and because of the importance of access to near shore ocean fisheries for our quality of life.

Local anglers, California Sea Grant, and Humboldt State University have provided data that shows our Pacific halibut have some of the best size at age of any West Coast stock. The International Pacific Halibut Commission (IPHC) also carried out studies in the same region in 2013 and they had similar findings.

The August 2014 closure of the North Coast we are currently enduring is scientifically unjustified and not based on sound the best available science. Our 6,000 pound quota was set at a time of low abundance and we need an increased allocation to reflect this new scientific information.

We ask that the PFMC extend the 2015 season from May 10 to October 1. We will be making similar request to the IPHC, because such access will not significantly impact fish available to more northern fisheries. Therefore, we should be able to continue to fish at current levels until reallocation of our catch share is formally revisited.

We look forward to working with you collaboratively to achieve wise and sustainable management of Pacific halibut.

Sincerely,

Kevin Michel
Noyo Harbor District
Secretary
PFMC
Re: CSP

I catch halibut incidental to salmon, in Oregon. I would like to be able to retain halibut over the entire troll season. Please don't shorten the halibut window for me any more than it is.

Dave Crane
Fly Lany Boy