

PFMC Members: Please hear the cry for help from California in regards to the Pacific halibut allocations for 2015. AS per the Magnuson Stevens Act, and NOAA Technical Memo from 2012 on Fishery Allocations under the MSA... the allocation for California that is being proposed is neither "efficient" nor "fair" (the two guiding principles from NOAA's 2012 document).

An International Pacific Halibut Commission (IPHC) survey was completed off the coast of California in 2013, which revealed there were 100,000 pounds of "exploitable biomass" off the CA coast. Of the available 100,000 pounds off our coast- Californian's can only harvest 6,240 pounds (the rest is consumed by Oregon and Washington). California has had <1% of the total allocation for many decades... meanwhile Oregon and Washington have enjoyed 30 and 37% (respectively) of the total allocation. **THIS IS NOT FAIR!** California contributes lots of fish to the total allocation, but only gets 1% (and will only get a maximum of 3% in 2015 based on the three options being presented).

Fishery allocations are supposed to be "efficient" and "fair" as noted above as per the MSA. This 3% allocation is not fair in any way. The 3% allocation is completely arbitrary and capricious. The best available science (IPHC 2013 survey) indicates that there is 100,000 pounds of halibut available for harvest off California... but those fish will be harvested in Oregon and Washington instead.

California deserves an allocation that is at least 50% of the available biomass in our waters (~50,000 pounds). California is being robbed by Oregon and Washington.... and it appears that the CDFW is not listening to us during all of the meetings and phone calls we have had. Some quick calculations reveal the disparity, inequality, and total lack of "fairness" in this allocation. Whether you look at the number of pounds of halibut per person... pounds of halibut allocated per mile of coastline... pounds of halibut allocated per licensed angler.... California is only getting a fraction of what it should be getting. California brings lots of fish to the table... and its only fair that we get to harvest these fish, instead of other states.

PLEASE help rectify the arbitrary and capricious allocations being proposed for 2015. Please rely on the best available science (IPHC 2013 survey). Please adhere to the NOAA 2012 guidance for "fair" and "efficient" fishery allocations. Please consider a 50,000 pound allocation for our area (which still provides 50,000 pounds of allocation to the other stakeholders). Help bring California out from under the bus.

Thank you,
Matt Goldsworthy
1358 School Road
McKinleyville, CA 95519
(707) 357-1338 (cell)

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

From: Cookiemn58@GMail.com <cookiemn58@gmail.com>

Date: Wed, Sep 3, 2014 at 5:08 PM

Subject: Pacific Halibut Eureka California

To: pfmc.comments@noaa.gov

I respectfully ask to bring a 7% option up for consideration.

Thank you,

Michael Lublin

P.O. Box 6130

Eureka, Calif.

95502

707-498-8652

cookiemn58@gmail.com

From: Charlie Holthaus <cwhwts@suddenlinkmail.com>

Date: Wed, Sep 3, 2014 at 6:09 PM

Subject: Comments about CA Halibut Allocation

To: pfmc.comments@noaa.gov

Hi My name is Charlie Holthaus and I live in the Eureka, California area. After learning of the 2013 pacific halibut survey results conducted off the Northern California Coast it has become apparent that California's quota allocation is far less than our local fishery can support. I am writing you today to request that you consider increasing California's allocation to a level that is appropriate for the increased biomass that became available as a result of the 2013 survey results. I cannot understand that one year after learning that California has significantly more biomass than previously thought, the sport fishermen are facing drastic season reductions and closures. There are no biological reasonings to restrict our fishery any further at this point in time and the California anglers deserve a fair share of the harvest allocations. A 3% allocation for California is insulting. I urge you to increase the allocation to a level that fits with our harvest potential. Losing the month of August this year has caused significant economic hardship on many of our local businesses and personally has kept me from fishing the saltwater this past August.

Sincerely,

Charlie Holthaus

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From: Lonnie Dollarhide <flatwater3@yahoo.com>
Date: Wed, Sep 3, 2014 at 6:47 PM
Subject: North Coast Pacific Halibut
To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

My name is Lonnie Dollarhide, I'm a rec fishermen out of Humboldt Bay Eureka CA. I'm a Pacific Halibut fishermen and feel we should be allocated 7% of the allocation instead of the 3%. The last two surveys clearly shows there are more Halibut along the North coast than thought to be. We are not hurting the resources one bit, Were in a catch share program with OR/WA and no sharing on their part, were asking for 50,000 pounds, this is not unfeasible. No doubt this is a tough issue for all involved, were just asking for our fare share, thank you.

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

From: Tom Giusti <tgiust@icloud.com>
Date: Wed, Sep 3, 2014 at 7:44 PM
Subject: Halibut allocations
To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

I am writing to bring your attention to a troubling set of issues regarding the pacific halibut fishery in CA. I object to any further closures in CA for the 2015 year, I suggest that we lift the August closure in CA, and request consideration of an increased allocation for CA. The 2013 halibut survey done by the IPHC demonstrated that CA has 100,000 lbs of halibut biomass that can be harvested. Unfortunately for us, all but 6,000 lbs is reserved for WA and OR, who refuse to shift allocation to CA. This is strictly a political decision, with the best available science being ignored. Our 6,240 lbs is only 0.62% of the total 2A allocation of 960,000 lbs (=1% of the non-tribal allocation). The 2013 IPHC halibut survey showed 720,000 lbs for exploitable biomass of which CA contributes 13.8% of this amount. In addition, the IPHC is giving the 2A area an additional 240,000 lbs above this amount, and every ounce of that additional poundage is going to WA and OR and not CA where it belongs. This is not fair given what CA has brought to the table as a result of last year's halibut survey. I have a very strong feeling that the 2014 survey that has just been completed will find almost double last years' amount and CA will add even more exploitable biomass to the 2A table.

Here are some more numbers to think about:
2013 halibut survey results showed an average of:

CA - 126 lbs per station - or 30%
WA - 128 lbs per station - or 30%
OR - 166 lbs per station - or 40%

Current allocation:

CA Sport: 1.0%

WA Sport: 36.6%
OR Sport: 30.7%
Commercial: 31.7%

These numbers show that our allocation is way out of line with the policies, procedures, and practices that were developed as part of the MSA to ensure fair catch allocations. Our allocation is entirely arbitrary and capricious and obviously not based on the best available science (which is the 2013 survey data). Instead, the 2013 survey data is being used to increase/maintain OR/WA allocations. CA is essentially acting as a marine reserve to ensure OR/WA fisheries continue at the current rate. Based on the 2013 survey results, we should divide up the pie based on the available biomass in each state. Since OR and WA has more than an order of magnitude more sampling sites than CA does, I think it would be reasonable to use the "average lbs/station" metric. This logic would provide a scientific-based allocation and would allow 30% of the 2015 fish go to WA, 30% of the fish to go to CA, and 40% of the fish to go to OR. The commercial allocation for each state can be carved off of each state's allocation.

Once again, I object to any further closures in CA for the 2015 year, I suggest that we lift the August closure in CA, and request consideration of an increased allocation for CA. I believe we are being treated unfairly. As it stands, we can only harvest 1% of the non-tribal allocation, even though we contribute 14% of the available biomass to the halibut fishery. This is unacceptable and is punitive to CA ports, anglers and Charter businesses. We are suffering a serious economic loss due to this action. This allocation is unprecedented considering the science available. We should be getting more allocation and time, not a loss of opportunity and economic loss. Please consider this logic at your next meeting and propose a more reasonable and science based alternative for the Commission to consider and vote on.

Tom Giusti
Eureka, CA

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

From: Marc Schmidt <coastlinecharters@gmail.com>
Date: Wed, Sep 3, 2014 at 8:53 PM
Subject: K. Pacific Halibut Management - comments on CA allocation
To: pfmc.comments@noaa.gov

Council Member,

I am a charter boat operator in Eureka, CA that is dramatically affected by your decision and vote for the upcoming year regulations. I, as well as every biologist, client, and angler in CA that I have talked with concerning this topic feel the proposed CA pacific halibut allocations are way off the mark. We the anglers in CA that the regulations affect thought were going into 2015 lawmaking process using the best available science. That is the 2013 longline survey that showed we have 100k lbs of halibut available and included in the 2A regions quota. This is however being completely ignored despite very healthy populations sampled off our coast. We are confident that this years (2014) data will show an even greater number of lbs on the same

stations from last year and more lbs will be found in new station locations that were added this year.

CA DFW has worked in closed sessions with the other state reps and has no indication of using angler input in crafting a reasonable science based season. We would like to see a halfway reasonable season for CA and the reimplementation of August as it is a very large economic burden to many businesses in northern CA. A reasonable allocation would be 7% which should be about 50k lbs which would be supported by fishing no more than half of the available halibut off the CA coast.

The proposed season options are not scientifically based and are arbitrary and capricious. Please consider a 7% allocation for CA if and when it is brought up by a CA council representative as a proposal to go forward in the process.

Respectfully,

Marc Schmidt
Coastline Charters

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

From: Dave Parker <Dave@parkerpacificinc.com>

Date: Wed, Sep 3, 2014 at 9:02 PM

Subject: California sport halibut allocation

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

My name is Dave Parker. I own and operate two salmon trollers Katy J and the Kathy Ann. I also own and operate with my daughter Kona Pacific a fish buying entity. It has come to my attention that California has requested allocation be taken from sport and commercial interests in 2A . I would think that making the overall quota larger by surveying the grounds California is fishing on is a viable solution. I am strongly opposed to any allocation being taken from the commercial TAC.

Sincerely,

Dave Parker

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

From: Caleb Pedersen <caleb@harvesterscatch.com>

Date: Wed, Sep 3, 2014 at 11:43 PM

Subject: Opposed to further increases of Halibut Fishery in CA without further investigation

To: pfmc.comments@noaa.gov

Hi,

As commercial fishermen, we count on our halibut harvest to account for a significant portion of our sales. While we understand the desire in California to increase the harvest limits, we cannot support a transfer of catch limit in this manner. Instead we would ask that California perform a study and investigate the number of halibut in their waters and verify whether or not their fishery could support a harvest increase.

Thank you for your consideration.

Kind Regards,
Jeff & Caleb Pedersen
F/V Harvester

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From: cindyto <cindyto@q.com>

Date: Thu, Sep 4, 2014 at 7:04 AM

Subject: K.1.b tr-istate report

To: pfmc.comments@noaa.gov

Madame Chair and Council members

I do not feel that it is fair to move halibut quota from the commercial side to the sport side. I feel that the SAS and GAP should have been consulted before bring this forward.

Thank you
Jim Olson
Washington troll SAS member

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

From: Steve Wilson <jamesislandfish@gmail.com>

Date: Wed, Sep 3, 2014 at 8:04 PM

Subject: Halibut sport allocation

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

Cc: "Mike.Burner@noaa.gov" <Mike.Burner@noaa.gov>

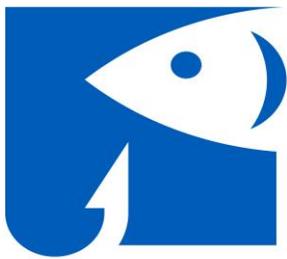
My name is Steve Wilson and I own and operate the Washington commercial salmon troller Deep Threat. I also own the company James Island Fish through which I market my own catch.

I am against the position that a California sport halibut quota be shared by both sport and commercial interests. I think that any changes in regional sport halibut opportunities be made within the sport halibut allocation.

During the March and April 2014 PFMC meetings, the SAS had several discussions about increasing commercial halibut harvest opportunities for Oregon and California and I believe this was done within the commercial side by adjusting catch limits and ratios. The same discussions should occur in the sport fishing side.

Thank you for your time and the opportunity to comment.

Sincerely, Steve Wilson



Humboldt Area Saltwater Anglers Inc.

P.O. Box 6191, Eureka, CA 95502

Email: hasa6191@gmail.com

FEIN #61-1575751

September 3, 2014

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

RE: Pacific Halibut, Agenda Item K.1

Dear Chair Lowman and Council Members:

The Humboldt Area Saltwater Anglers, Inc. (HASA) previously submitted public comment on August 11, 2014, but in light of the September 2014 Tri-State report, we would like to provide additional input. HASA has reviewed the results of the 2013 IPHC survey data for Area 2A and other recent studies of northern California Pacific Halibut, solicited and received input from HASA membership, and the HASA Board of Directors provides the following supplemental comments pertinent to the 2015 Alternatives:

1. California Pacific halibut allocation should be based on recent production estimates from California (>100,000 lbs based on the results of the 2013 IPHC Research Survey). Section 301(a)(4) of the Magnuson Stevens Act (MSA) states “*Conservation and management measures shall not discriminate between residents of different States. If it becomes necessary to allocate or assign fishing privileges among various United States fishermen, such allocation shall be (A) fair and equitable to all such fishermen; (B) reasonably calculated to promote conservation; and (C) carried out in such manner that no particular individual, corporation, or other entity acquires an excessive share of such privileges*”. While the increase from 6,400 lbs to 18,500 lbs is a step in the right direction, based on the 2013 IPHC survey data, all three alternatives are still an unequitable allocation to California sportfishers. As shown in the following table, California has approximately 2.5 times the licensed anglers as the other states, yet only receives 3-4% of what a Washington or Oregon angler is allowed.

State	% of non-tribal harvest	Allocation (pounds)	% of California to other states	2013 Fishing licenses	Proportion of California to other states	Pounds per license	% of California to other states
California	3%	18,500		1,600,054		0.0116	
Oregon	30.33%	185,700	9.96%	612,333	2.61X	0.3032	3.81%
Washington	36.33%	222,400	8.31%	651,222	2.46X	0.3416	3.38%
OR/WA commercial	30.32%	185,600	9.96%				

2. HASA has taken a leadership role on assessing the economic impacts of the August 2014 block closure, as well as financially supporting scientific studies to better inform fisheries managers on Pacific halibut production and population dynamics. The socio-economic impacts of the August 2014 block closure are substantial to HASA membership, other recreational sportfishers, and businesses on the north coast of California.
3. Consistent with Section 301(a)(2) of the MSA, HASA supports a science-based approach to develop solutions that remedy this inequitable allocation, including using 2013 IPHC survey data and other scientific information on Pacific halibut production and population dynamics.
4. Based on the results of the 2013 IPHC survey and other scientific information available, HASA does not support additional halibut season restrictions. As shown in the above table, there is inequity in the allocation distribution, and future increases in allocation should reflect 30 – 50% as suggested in Alternative 2 Option B.

Therefore, HASA does not support any of the Tri-State report Alternatives for the above reasons. California is producing greater numbers of Pacific Halibut based on the 2013 IPHC surveys, and HASA would like to continue working with CDFW and PFMC in 2014/2015 to develop a more equitable, longer-term, science-based solution to Pacific halibut allocation.

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.



CITY OF EUREKA

531 K Street • Eureka, California 95501-1146 • (707) 441-4144
fax (707) 441-4138

CITY MANAGER

August 26, 2014

RECEIVED

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

SEP 3 2014

PFMC

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 City of Eureka. 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 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,

Greg Sparks, City Manager

cc; Jack Crider, Harbor District
Lisa Shikany, City of Eureka, Principal/Environmental Planner
City Mayor/ Council, City of Eureka



RECEIVED
City of Trinidad

August 26, 2014

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

SEP 3 2014

PFMC

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 City of Trinidad. 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 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,

Julie Fulkerson, Mayor
City of Trinidad