

Subject: [Fwd: CR Sub-Area Halibut Quota Comments]
From: PFMC Comments <pfmc.comments@noaa.gov>
Date: Tue, 31 Aug 2004 08:24:06 -0700
To: Chuck Tracy <Chuck.Tracy@noaa.gov>
CC: John Coon <John.Coon@noaa.gov>

----- Original Message -----

Subject: CR Sub-Area Halibut Quota Comments
Date: Mon, 30 Aug 2004 21:21:37 -0700
From: Dean Ferguson <ciferguson37733@charter.net>
Reply-To: Dean Ferguson <ciferguson37733@charter.net>
To: <Don.Bodenmiller@hmsc.orst.edu>
CC: <Yeehafishing@aol.com>, "Wenger, Dick \ (WAU\)"
<Dick.Wenger@gapac.com>, "Troy Kotek"
<captiannocents@peoplepc.com>, "T Merriman" <tmer@masco.net>,
"Steve Kotaniemi" <cedarcan@pacifier.com>, "Roger White"
<white_rb@msn.com>, <rickj@clatskanie.com>, "Ray Davis"
<raydavis@crpud.net>, "Pitch Pocket" <pitchpocket@hotmail.com>,
<MBEATTIE12@aol.com>, <MAVERICKMAXCAT@aol.com>, "Jill
Comfert" <jcomfert@hotmail.com>, "Jim Crotts"
<crottsj@ml.linnbenton.edu>, "Debbie Schmidt" <schmitz@charter.net>,
<front_office@psmfc.org>, <heather@iphc.washington.edu>,
<cal@iphc.washington.edu>, <pfmc.comments@noaa.gov>

Don,

I am an active sport fisherman in the Columbia River Halibut sub-area. While I am unable to attend the Halibut meeting tonight in Newport, I would like to express my disappointment this year at the early closing of the season in the CR area. Allocation in the CR area in 2002 was 6.7%, 3.9% in 2003, and 5.2% of the total Oregon allocation. In the 2A Halibut area, the CR area amounts to less than 1% of the total allocation. I would like to add the following to the public comment on the Halibut allocation:

1) The IPHC is to be complimented on the sustainability of the fishery. Many other fisheries nationwide have pointed to the IPHC as a model for their efforts.
2) I would like to see Section 25, page 9238, Feb 27, 2004 Federal Register (Flexible Inseason Management Provisions in Area 2A) to be extended to include re-allocation of un-harvested quota available into the Columbia River area. Current verbiage allows for re-allocation out of the CR area, but no verbiage exists to reallocate un-harvested halibut INTO the CR area. I would propose adding the following amendment to the current regulations:

- Section 25. Flexible Inseason Management Provisions in Area 2A:
 - (e) If any of the sport fishery subareas are not projected to utilize their respective quotas by the current season end (e.g. central/south Oregon spring Halibut

season), these quota are to be re-allocated equally amongst other sub-area.

This would require the dropping of provisions 25.1.a and 25.1.b. Again, the current provisions allow for moving the quota OUT of the CR sub-area, but there are no provisions of moving un-harvested halibut INTO the CR sub-area.

Note that provisions in Section 25 (d) are somewhat incompatible and contradictory to the current practice of "rolling" un-harvested spring halibut quota into the summer halibut quota for the central/south Oregon sub-area.

3) The 7 day a week openings in the CR sub-area should be continued due to the unreliability of the weather in this area.

Thanks for the allowing me the opportunity to provide my thoughts on the Columbia River Halibut fishery. If needed, I can provide petition signatures supporting these items. This is a critical fishery to the local economy and I believe the current practice of rolling un-caught quotas to future periods (73,395 # remained un-caught in the central/southern Oregon region was rolled forward to the summer quota) does not maximize the economic return on this valuable resource. For the current year, there is significant risk that the entire quota will not be caught which will mean economic loss to the local communities.

Thanks again for this opportunity to provide input!

Sincerely

Dean Ferguson
37733 Highway 30
Astoria, OR 97103
503-325-8474