

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

From: **John Martin** <[hardcoresportfishing7@gmail.com](mailto:hardcoresportfishing7@gmail.com)>

Date: Sun, May 22, 2016 at 12:32 PM

Subject: Pacific Halibut

To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

To the PFMC,

I'm writing you request an increase to the California pacific halibut allocation. California has done everything that was ask of them by the PFMC so now is the time to increase our allocation so that it mirrors what we provide to the 2A area.

1. Surveys in California 2013 and 2014 increased 2A's allocation by approximately 14% (The Total Constant Exploitation Yield (TCEY increased from 2.1 % to 2.4 %). In 2015 a 2,056 square mile expansion in California increased the TCEY to 2.77%. Conservatively, CA has directly increased the 2A share of the TCEY allocation by over 20% annually, approximately 200,000 lbs. By comparison, the CA allocation was 25,220 in 2015 and is 29,640 lbs in 2016. CA requests to be allotted a more equitable share of the poundage that we are providing to the 2A area.
2. CDFW has implemented an in-season management plan to stay within our allocation in 2014 and that plan was used in 2015. California stayed within our allocation and will do so again this year, as they were asked to do.
3. We are asking for a more fair and equitable share of the 2A allocation.
4. I ask for a minimum increase of at least 8% so California with have an 12% of the non-tribal allocation in 2A as I believe it deserves.

John Martin  
Hardcore Sportfishing  
[707-696-3474](tel:707-696-3474)

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

From: **Cookiemn58@GMail.com** <[cookiemn58@gmail.com](mailto:cookiemn58@gmail.com)>

Date: Sun, May 22, 2016 at 7:43 AM

Subject: Pacific Halibut

To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

California has done everything that was ask of them by the PFMC so now is the time to increase our allocation so that it mirrors what we provide to the 2A area.

1. Surveys in California 2013 and 2014 increased 2A's allocation by approximately 14% (The Total Constant Exploitation Yield (TCEY increased from 2.1 % to 2.4 %). In 2015 a 2,056 square mile expansion in California increased the TCEY to 2.77%. Conservatively, CA has directly increased the 2A share of the TCEY allocation by over 20% annually, approximately 200,000 lbs. By comparison, the CA allocation was 25,220 in 2015 and is 29,640 lbs in 2016. CA requests to be allotted a more equitable share of the poundage that we are providing to the 2A area.

2. CDFW has implemented an in-season management plan to stay within our allocation in 2014 and that plan was used in 2015. California stayed within our allocation and will do so again this year.
3. We are asking for a more fair and equitable share of the 2A allocation.
4. Ask for a minimum increase of at least 4% to 8% so California will have an 8% to 12% of the non-tribal allocation in 2A.

Thank you,  
Michael Lublin  
P.O. Box 6130  
Eureka, California  
95502  
707-498-8652

----- Forwarded message -----  
From: **Bob Pagliuco** <[sheggyboy@aol.com](mailto:sheggyboy@aol.com)>  
Date: Sun, May 22, 2016 at 5:46 AM  
Subject: Pacific Halibut  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

To Whom it may concern,

I am writing to bring your attention to a troubling issue regarding the Pacific halibut fishery in CA. Surveys in California 2013 and 2014 increased 2A's allocation by approximately 14% (The Total Constant Exploitation Yield (TCEY) increased from 2.1 % to 2.4 %). In 2015 a 2,056 square mile expansion in California increased the TCEY to 2.77%. Conservatively, CA has directly increased the 2A share of the TCEY allocation by over 20% annually, approximately 200,000 lbs. By comparison, the CA allocation was 25,220 in 2015 and is 29,640 lbs in 2016. CA provides 14% of the biomass, but only gets 4% of the catch. This is strictly a political decision, with the best available science being ignored. CA requests to be allotted a more equitable share of the poundage that we are providing to the 2A area.

CDFW has implemented an in-season management plan to stay within our allocation in 2014 and that plan was used in 2015. California stayed within our allocation and will do so again this year. We have done everything that has been asked of us by the IPHC, NMFS and CA DFG. Based on what CA provides to the halibut allocation totals and our current management, we are asking for a more fair and equitable share of the 2A allocation based on what we have been bringing to the table in regards to biomass. I am writing to request a minimum of 8% increase in exploitable biomass so California will have 12% of the non-tribal allocation in 2A.

Thanks you,

Bob Pagliuco

----- Forwarded message -----  
From: **tsarver222** <[tsarver222@gmail.com](mailto:tsarver222@gmail.com)>

Date: Sat, May 21, 2016 at 7:32 PM  
Subject: Pacific Halibut  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

California has done everything that the PFMC has asked. We deservedly ask for an 8% increase in allocation.

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

From: **longfish** <[longfish@humboldt1.com](mailto:longfish@humboldt1.com)>  
Date: Wed, May 25, 2016 at 8:11 AM  
Subject: Pacific Halibut Catch Share Plan (CSP) Allocation Scoping  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

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

RE: Pacific Halibut Catch Share Plan (CSP) Allocation Scoping

Dear Chair Lowman and Council Members:

I am writing to urge you to give California its fair share of Pacific halibut. I know you have heard all the numbers around the percentage of fish we contribute verses the percentage we can take. I know California was late to the table when the catch sharing plan was hammered out. I know any increase will come from some other entity's share. But I want to point out that our area in Northern California encompasses only 130 miles of coastline with four fishing ports, Shelter Cove, Humboldt Bay (Eureka), Trinidad, and Crescent City. The total population of the region is only around 160,000. We have lost much of our economic base with the decline in the timber industry and commercial fishing. We do not have any other industry that creates good jobs. We are working to enhance and expand tourism and recreational opportunities. This is the obvious direction to take to improve our economy. The Pacific halibut catch is an important piece of that endeavor. We need an allocation that enables us to fish for Pacific halibut from May through October. With that, we can market our region as a recreational fishing destination and attract more tourism that will create jobs and benefit a wide variety of local businesses. I sincerely hope you can find a way to make this happen.

Thank you for the important work you do,

Casey Allen  
4344 Dubeault Rd  
Bayside, Ca. 95524  
[707-845-9234](tel:707-845-9234)  
Member of Humboldt Area Saltwater Anglers

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

From: **Matthew House** <[mattrhouse@gmail.com](mailto:mattrhouse@gmail.com)>

Date: Tue, May 24, 2016 at 2:53 PM  
Subject: Pacific halibut  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

I am writing to express my concern about the allocation of Pacific halibut for California anglers. The 2A area has expanded substantially but we have not seen a proportionally increase in allocation. California should receive a more fair and equitable share of the 2A allocation. I request that we receive a 8% increase in allocation. CDFW has stepped up in the tracking and reporting of Pacific halibut to ensure that we do not exceed the allocation. Since they have demonstrated a successful process to do so, it is time to provide California with our fair share of the catch.

Thank you for your consideration.

-Matt House

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

From: **Tom peters** <[tpete@reninet.com](mailto:tpete@reninet.com)>  
Date: Mon, May 23, 2016 at 7:00 PM  
Subject: Pacific halibut allocation  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)  
Cc: Humboldt Area Saltwater Anglers <[hasa6191@gmail.com](mailto:hasa6191@gmail.com)>  
May 23, 2016

221 Dollison St.  
Eureka, CA 95501  
[tpete@reninet.com](mailto:tpete@reninet.com)

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

Re: Pacific Halibut catch share allocation Scoping.

Dear Chairman Lowman and Council Members:

I am a retired commercial salmon fisherman who still enjoys sport fishing in Northern California. Over the last number of years, the availability of salmon and concurrently, the length of the sportfishing season in our area has varied widely.

As a result, more fishermen have targeted pacific Halibut. At first, Pacific halibut were thought to be rare, an incidental catch, at best. But once fishermen started learning how to catch them, it became quickly obvious that there were a surprisingly large number of fish available.

At that time California had been allotted only 1% of the Area 2A sport catch (CA, OR, & WA). With increased effort and improved techniques, the sport fishery quickly exceeded that 1%. When this started to become a pattern, the IPC decided to include California in its annual stock assessment efforts.

To its surprise, the results showed that a large number of fish were in this area, easily enough to support additional effort and catch. One number I read suggested that the area could provide as much as 100,000 pounds to the sport fishery with no problem.

The way the system is now set up, in order for Northern California to get more poundage (a larger % of the Area 2A allocation) it had to take some away from Oregon and Washington. Mathematically this should not be the case since these are “new fish” not previously considered in setting quotas.

After tough negotiations, California finally received a 4% share, even though its resource could support much more. Oregon and Washington were understandably reluctant to give up any more of their shares.

Based on the IHPC longline sampling, California should either have its own quota, independent from the northern numbers, or it should receive a percentage of the total Area quota commensurate with its newfound contribution. That would make California’s share somewhere between 10 and 20% of the new ‘enhanced’ coastwide total.

If California’s quota remained at 4% but its contribution to the total fish available was significantly larger, the northern areas’ quotas would expand even though they don’t have the ‘extra’ fish to catch. Their increase would be at the expense of the California fishery.

The Pacific Halibut fishery has become a crucial part of our local sport fishing economy. It has kept charter boats fishing and working when salmon seasons have been closed. This has been even more critical this year with the long closure of the Dungeness crab fishery due to Domoic acid poisoning.

This year we get two weeks of halibut fishing followed by two weeks of salmon, then two weeks of halibut, etc. At this rate, even with the 4% share, it is unlikely we will be able to fish halibut after mid-July.

I would like the Council to consider a 10% quota share for California after adding in its contribution to the stock total. That should be enough to provide a long season which will support the economy and provide a fishery when other seasons are closed. The addition of California’s actual available tonnage available to the quota will insure that northern areas still can catch the same number of fish, even though their percentage may change. The increase in our Northern California catch will come from our actual Northern California stocks, as it should be.

It should also be noted that there are no other fisheries, commercial or Native, competing for Halibut shares in our area.

The Pacific Halibut sport fishery has become vital to the charter and private fishing fleet of Crescent City, Trinidad, Eureka, and Shelter Cove and all of the economic activity associated with it. It is a crucial ‘infill’ fishery as salmon becomes more uncertain during the drought.

I ask you to consider a more fair allocation of approximately 10% of the total Area sport quota or a similar number developed from the tested California stocks.

Thank you for your consideration

Tom Peters

REEL STEEL SPORTFISHING  
6934 Seaview Dr  
Eureka, CA 95503

May 23, 2016

PPMC  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220-1384

RE: Pacific Halibut California Quota Share

Dear Chair Lowman & Council Members,  
My name is Tim Klassen. My wife Sherry and I own Reel Steel Sportfishing, a fishing charter business in Eureka, California.

Pacific Halibut fishing is an important component of our business. Even more so when salmon numbers are low such as this year. We enjoyed a six month halibut season until California put in place controls to stay within their quota share. That reduced our season to one third of its previous length. This has created hardships for my business as well as others that depend on a six month halibut season. I believe that California needs and deserves a larger quota share of Pacific Halibut. Thank you for the opportunity to comment on this important issue and for your efforts to protect the resource that we depend on.

Sincerely,

Tim Klassen

From: **Cliff Hart** <[cliffhart76@gmail.com](mailto:cliffhart76@gmail.com)>  
Date: Mon, May 23, 2016 at 2:27 PM  
Subject: Halibut comment - California - increase the allocation request  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

I urge you to increase our allocation of Pacific Halibut to a more fair and equitable share of the 2A allocation in California. California has done everything that was ask of them by the PFMC so now is the time to increase our allocation so that it mirrors what we provide to the 2A area.

Surveys in California 2013 and 2014 increased 2A's allocation by approximately 14% (The Total Constant Exploitation Yield (TCEY increased from 2.1 % to 2.4 %). In 2015 a 2,056 square mile expansion in California increased the TCEY to 2.77%. Conservatively, CA has directly increased the 2A share of the TCEY allocation by over 20% annually, approximately 200,000 lbs. By comparison, the CA allocation was 25,220 in 2015 and is 29,640 lbs in 2016. CA requests to be allotted a more equitable share of the poundage that we are providing to the 2A area. I request that **at least 6%** of the quota be assigned to California.

CDFW has implemented an in-season management plan to stay within our allocation in 2014 and that plan was used in 2015. California stayed within our allocation and will do so again this year.

Thanks,

Cliff Hart  
[707-845-4106](tel:707-845-4106)

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

From: **Stan Brandenburg** <[stan.brandenburg@gmail.com](mailto:stan.brandenburg@gmail.com)>  
Date: Wed, May 25, 2016 at 2:56 PM  
Subject: Pacific Halibut allocation  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

Please increase our 2A allocation for the following reasons:

1. Surveys in California 2013 and 2014 increased 2A's allocation by approximately 14% (The Total Constant Exploitation Yield (TCEY increased from 2.1 % to 2.4 %). In 2015 a 2,056 square mile expansion in California increased the TCEY to 2.77%. Conservatively, CA has directly increased the 2A share of the TCEY allocation by over 20% annually, approximately 200,000 lbs. By comparison, the CA allocation was 25,220 in 2015 and is 29,640 lbs in 2016. CA requests to be allotted a more equitable share of the poundage that we are providing to the 2A area.
2. CDFW has implemented an in-season management plan to stay within our allocation in 2014 and that plan was used in 2015. California stayed within our allocation and will do so again this year.
3. We are asking for a more affair and equitable share of the 2A allocation.
4. Please give us a minimum increase of at least 4% to 8% so California with have an 8% to 12% of the non-tribal allocation in 2A.

Sincerely,  
Stan Brandenburg

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

RE: Pacific Halibut Catch Share Plan (CSP) Allocation Scoping  
Dear Chair Lowman and Council Members:

Main points:

1. Express appreciation for the opportunity to provide input on the Pacific Halibut Catch Share Plan (CSP) scoping for 2016 for Area 2A (Oregon, Washington, California)
2. Express importance of Pacific halibut to California anglers, particularly in light of drought-related impact to salmon opportunities
3. Given a) the new information indicating substantial northern California shelf contribution to exploitable Pacific halibut (likely increased exploitable yield for Area 2A by 20%) , b) the importance of Pacific halibut to California recreational anglers, c) the importance economic contribution of Pacific halibut anglers to northern California coastal communities, and d) the recent rigorous implementation of California in season harvest management to not exceed the Catch Share Plan allocation, the Catch Share Plan allocation should be refined to provide a fairer and more equitable share of the Pacific halibut fishery to California recreational anglers.
4. Could be specific to a request for a reallocation for 2017 (e.g., 6% or 10% or ???), but at minimum, should say that the Catch Share Plan allocation for California should be increased above the current 4%

Jan Zeiters  
HASA member, Eureka Calif

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

From: **Frank Galusha (GMAIL)** <[frankgalusha2@gmail.com](mailto:frankgalusha2@gmail.com)>  
Date: Thu, May 26, 2016 at 7:40 AM  
Subject: Pacific Halibut Allocation for California  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

Dear Commission:

Please increase the allocation for this species in 2017 for California. Everyone has tried to do as you have asked, including our DFW and many individual fishermen who understand the importance of careful management of this wonderful and highly important species. It would be very helpful to the fishing-reliant businesses and anglers if the allocation for California better reflected this, including the State of California's contribution to stocks of Pacific Halibut, especially for our North Coast Region. The area of habitat for these great fish is vast in this area and those fishing for Pacific Halibut can only reach a tiny portion and even that is often unavailable



to our small-boat-based anglers because of high winds, currents, tides, bar crossings, distances that must be traveled and shortened seasons. Last year the season closed before we could even find a weather window that would allow many of us to fish. It would only be fair if we could be allotted more poundage so that fishing at least extends a bit longer in the year. While I do not understand all the terminology I think it boils down to the fact that we are being given far less that we should be. An increase of 4 to 8% would be more equitable according to the leaders of Humboldt Area Saltwater Anglers, a group that is very conservation-minded. If you can provide a bit more I am all law-abiding anglers will do possible to not exceed any quota that is assigned. Thank you for your consideration.

Frank Galusha, Saltwater Angler  
3304 Shasta Dam Blvd. Spc. 113  
Shasta Lake, CA 96019

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

From: **gw** <[gw@colusanet.com](mailto:gw@colusanet.com)>  
Date: Thu, May 26, 2016 at 8:03 AM  
Subject: Pacific halibut public comment  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

Please consider the following points when discussing the Pacific halibut take and share plan at your upcoming meeting. I do not feel those of us here in California are being allowed to take our fair share.

1. Surveys in California 2013 and 2014 increased 2A's allocation by approximately 14% (The Total Constant Exploitation Yield (TCEY increased from 2.1 % to 2.4 %). In 2015 a 2,056 square mile expansion in California increased the TCEY to 2.77%. Conservatively, CA has directly increased the 2A share of the TCEY allocation by over 20% annually, approximately 200,000 lbs. By comparison, the CA allocation was 25,220 in 2015 and is 29,640 lbs in 2016. CA requests to be allotted a more equitable share of the poundage that we are providing to the 2A area.
2. CDFW has implemented an in-season management plan to stay within our allocation in 2014 and that plan was used in 2015. California stayed within our allocation and will do so again this year.
3. I am asking for a more affair and equitable share of the 2A allocation.
4. I would like to see least 4% up to 8% so California with have an 8% to 12% of the non-tribal allocation in 2A.

Thank you

Garth Williams

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

From: **Marc Schmidt** <[coastlinecharters@gmail.com](mailto:coastlinecharters@gmail.com)>  
Date: Thu, May 26, 2016 at 10:24 AM  
Subject: Pacific Halibut Sport Sector Allocation Increase for CA  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

Councilmembers,

I run a charter boat out of Eureka and PH is what makes the phone ring more than anything else every year. It has been tough the last 2 years with our now limited season to stay busy through the season. The PH fishery here is what sets us apart from other ports in northern CA. CA has more than significantly increased the overall harvest with new survey sites and proves that we have a strong and viable Pacific Halibut (PH) fishery in our state.

I respectfully request you vote to up the CA sport allocation to 12-15% or 100K lbs minimum annually of the total non tribal 2A allocation. OR and WA are fishing on the backs of CA fish and likely over harvesting their PH fishery. It is time to allow for a fair and equitable share of PH to go to CA anglers as required by the MSA. CA has complied with the requests of the PFMC as others have continued to overharvest their allocation. It is time to allow CA to get back to our historic season and bring back our opportunities to be the top destination for CA anglers to get their shot at catching a PH when it works for their vacation schedules.

Sincerely,

Marc Schmidt  
Coastline Charters  
Eureka, CA

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

From: **pcfwwra** <[pcfwwra@reninet.com](mailto:pcfwwra@reninet.com)>

Date: Thu, May 26, 2016 at 12:47 PM

Subject: 2017 Pacific Halibut Allocation

To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

Hello there at the PFMC,

I would like to take this opportunity to comment on future allocation of Pacific halibut for the west coast. **Specifically, I would like to ask the PFMC to allow for an minimum increase of at least 4% to 8% starting in 2017, providing California with 8% to 12% of the non-tribal allocation in area 2A.**

As surveys since 2013 have shown that California is providing a higher biomass of halibut in the 2A are than was previously estimated. Having fished both as a sport and commercial hook and line fisherman along the Northern California coastline for over thirty-five years, this is hardly surprising. In my observations, the restrictions implemented in the groundfish fishery, especially the trawl fishery's required observer program, are contributing to the increase of the halibut stock in the area. Having witnessed the unregulated development of the "roller net" trawl fishing equipment in the early 80's, and the resulting massive harvest increase in areas previously somewhat protected as refugia for future stock recruitment, we've been through the worst of stock decline. While halibut were not legally allowed to be retained in the trawl fishery, I can assure you that a lot of tons of halibut were retained, regardless of the rules in place. Current management has been successful at rebuilding a number of our groundfish stocks, and that certainly is the case with Pacific halibut. Kudos to the PFMC.

As the CA Department of Fish and Wildlife has demonstrated in 2015, it can successfully maintain harvest within the allocation with an in-season management plan based on real-time sampling.

Giving California a more equitable allocation of halibut, with the assurance it will stay within it is only fair and defensible management. The economic benefit to the local communities would be significant, especially as salmon seasons are likely to be restricted due to the extended drought and unfavorable ocean conditions for salmon, so please take that into consideration. Thank you for your consideration.

Sincerely,

Mitch Farro  
P.O. Box 291  
Trinidad, CA 95570

May 25, 2016

Public Comment:

RE: Agenda Item E.1. Scoping of P. halibut Catch Sharing Plan allocation changes

Dear Ms. Dorothy M. Lowman, Council Chair,

Recreational Marine Anglers in California are asking the Council to increase the non-tribal allocation of P. halibut to the California region. The current 4% of non-tribal allocation is out dated, insufficient and inequitable. The surveys by the IPHC in 2013, 2014 and the area expansion of over 2,000 square nautical miles in California in 2015, clearly demonstrate the inequality and unfairness to the California anglers of the current allocation.

Council Management Goal #3 states: Achieve maximum biological yield...and promote recreational fishing opportunities. The two surveys by the IPHC demonstrate that CA has approximately 100,000 pounds of exploitable biomass; that was 14% of the 2A survey portion at that time. CA anglers are only allocated 2.5% of this amount, the rest being harvested by Oregon and Washington anglers.

Management Utilization Objective 11: “Strives to reduce ...wastage of fish.” The recreational fishing has the least wastage of all the sectors fishing for P. halibut. Longline wastage is 16%, trawl is in excess of 50% while recreational is only about 1-2% of wastage.

Social Factor Objective #13: “When conservations actions are necessary to protect a stock or stock assemblage, attempt to develop management measures that will affect users **equitably**.”

Social Factor Objective #16: “Avoid unnecessary adverse impacts on small communities.”

Social Factor Objective #17: “Consider the importance of groundfish resources to fishing communities, provide for the sustained participation of fishing communities, and minimize adverse economic impacts on fishing communities to the extent practicable.”

National Standard 2 states that conservation and management measures **shall** be based on the best scientific information available.

National Standard 4 states that conservation and management measures **shall not discriminate** between residents of different states. If it becomes necessary to allocate or assign fishing privileges among various US fisherman, 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 and excessive share of such privilege. The proposed measure **will not discriminate between resident of different states.**”

NS 8 speaks to the importance of fishery resources to fishing communities and to minimize the economic impacts to fishing communities.

NS 9 conservation and management measures shall, to the extent practicable, (A) minimize bycatch and (B) to the extent bycatch cannot be avoided, minimize the mortality of such bycatch.

In the fall of 2014, the GAP proposed an increase of the CA allocation from 1% to 4% of the non-tribal allocation. This was directly related to the science data observed in the surveys of 2013. The proposed increase was recognized to be an interim step toward a more fair allocation with two concerns in mind: (1) that CDFW implement an In-Season Management Protocol that demonstrated CDFW could control the fishery and (2) that P. halibut not be stranded in the CA area. Additional allocation would be considered if the management methods were deemed to be successful. In 2015, the fishery was shut down by August 12 and our total harvest was slightly below the allowed poundage of 25,220 lbs. We are now asking that our allocation be increased since we have met all the objectives proposed by the GAP and the Council action in 2014.

In fact, the two surveys completed by IPHC demonstrated that the CA area contributes 100,000 pounds of exploitable biomass. The expansion of 2,000 square nautical miles in 2015 was an additional increase in the 2A overall area by 10.9%. Clearly, CA conservatively contributes 20% or more of the 2A allocation. The 2A zone has increased from 2.1% to 2.77% of the Fishery Constant Exploitation Yield from the IPHC. This increase is a direct result of the CA surveys and area expansion, and yet CA is only allocated only a 2.5% share of that 2016 poundage allocation of 1.14 M pounds this year. We respectfully request this obvious inequality be corrected by Council Action.

#### **Conclusion:**

**National Standards 4 is specific that conservation and management measures shall not discriminate between residents of different states. Further, conservation and management measures are to be based on the best available science.** We acknowledge that until the surveys were conducted in 2013/14, and the In-Season Management Protocol was implemented by CDFW, it was prudent for the Council to be cautious on too rapid a change to the CSP. However, now the science clearly demonstrates that our current allocation is inequitable and needs to be corrected. The CA fishery, both sports anglers and Charter Vessels, are being severely constrained by the inadequate allowance of share. We are requesting an 8 to 10% allocation range of the non-tribal fishery be considered by the GAP and Council. That amount is still only 50% of the exploitable biomass determined to be in our area. By comparison, 8% would amount to 59,280 lbs and 10% would be 74,100 lbs using the 2016 allocation of 1.14 M lbs. The actual weights for 2017 will vary based upon IPHC allocation determined at the January, 2017 Annual Meeting of the IPHC. We respectfully request the Council amend the Catch Sharing Plan for the 2017 year.

Respectfully,

Tom Marking, GAP, CA Sports Representative

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

From: **Yoshi Uemura** <[maguro4u@gmail.com](mailto:maguro4u@gmail.com)>  
Date: Thu, May 26, 2016 at 3:20 PM  
Subject: 2017 Pacific Halibut Allocation for California.  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

PFMC:

Please consider increasing the Pacific Halibut allocation. Recent surveys have shown an increase in the population of Pacific Halibut in California. Those surveys have allowed for an increased allocation for the 2A area. California needs to have a fair portion of that 2 A allocation since California is adding significantly to the Total Constant Exploitation Yield of the A2 area. Since the 2A yield has increased by 14 % from California's numbers, I think it only fair that we should get a fair amount of that increase. I urge at least a conservative 7 % increase in the California allocation. The total non-tribal allocation around 10%. This increase is more in line with what California contributes to the total 2A numbers.

We have been closely regulated in recent years by CF&W to effectively stay within our harvest allocation. CDF&W plans to keep doing so and we the recreational fishers are on board with their regulatory plans to help keep staying within our allocation.

Thank you for considering this request.

Yoshi Uemura, Recreational California Fisher.  
1703 Margaret Lane  
Arcata, CA 95521

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

From: **Jim Yarnall** <[jimyarnall@gmail.com](mailto:jimyarnall@gmail.com)>  
Date: Wed, May 25, 2016 at 11:30 AM  
Subject: Pacific Halibut  
To: "[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)" <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>

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

RE: Pacific Halibut Catch Share Plan (CSP) Allocation Scoping

Dear Chair Lowman and Council Members:

I am writing to express thanks for examining the catch sharing plan for Pacific halibut within Area 2A and its relative distribution between the stakeholders in WA, OR and CA. Pacific halibut within California is a trophy species and represents a significant economic benefit to the coastal communities within northwestern California.

Within California the recent halibut surveys conducted in 2013 and 2014 demonstrate that California makes a significant contribution to the total 2A allowable catch and as a result the total allowable catch within Area 2A has increased. California's current allocation is 4% of the non tribal allowable catch, representing 29,640# for 2016. California contributes much more than this. It is only equitable that during the reallocation that California's allocation be increased to represent a number that more fairly represents its contribution to Area 2A.

I understand that Pacific halibut is a very important fishery in OR and WA for commercial, recreational and tribal anglers and I do not wish to create harm to their fisheries. Now however is the correct time to increase California's allocation due to the overall increase in the Area 2A allocation. California should receive additional allocation while the overall Area 2A allocation is increasing such that fisheries within OR and WA are not adversely impacted.

California Department of Fish and Wildlife has implemented new monitoring systems to accurately monitor the annual catch and have been effective in not exceeding their allocation.

I sincerely encourage the Council to closely examine the catch sharing plan and make the equitable but difficult choice to increase California's allocation to more accurately match its contribution. An additional increase of 4 - 8% would seem equitable.

Thank you for your consideration.

Jim Yarnall  
Recreational angler, Eureka, CA

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

From: **John Lanz** <jrlanz@att.net>  
Date: Tue, May 24, 2016 at 5:38 PM  
Subject: Pacific Halibut  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

California has done everything that was ask of them by the PFMC so now is the time to increase our allocation so that it mirrors what we provide to the 2A area.

1. Surveys in California 2013 and 2014 increased 2A's allocation by approximately 14% (The Total Constant Exploitation Yield (TCEY increased from 2.1 % to 2.4 %). In 2015 a 2,056 square mile expansion in California increased the TCEY to 2.77%. Conservatively, CA has directly increased the 2A share of the TCEY allocation by over 20% annually, approximately 200,000 lbs. By comparison, the CA allocation was 25,220 in 2015 and is 29,640 lbs in 2016. CA requests to be allotted a more equitable share of the poundage that we are providing to the 2A area.
2. CDFW has implemented an in-season management plan to stay within our allocation in 2014 and that plan was used in 2015. California stayed within our allocation and will do so again this year.
3. We are asking for a more affair and equitable share of the 2A allocation.
4. Ask for a minimum increase of at least 4% to 8% so California with have an 8% to 12% of the non-tribal allocation in 2A.

Please help California get it's fair share of Pacific Halibut!

Thank you

John Lanz  
790 Eucalyptus Rd.  
McKinleyville Ca. 95519

From: **J. Pike** <[redink@charter.net](mailto:redink@charter.net)>  
Date: Tue, May 24, 2016 at 9:47 AM  
Subject: Pacific Halibut  
To: [pmmc.comments@noaa.gov](mailto:pmmc.comments@noaa.gov)

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

RE: Pacific Halibut Catch Share Plan (CSP) Allocation Scoping

Dear Chair Lowman and Council Members:

California has done everything that was ask of them by the PFMC so now is the time to increase our allocation so that it mirrors what we provide to the 2A area.

1. Surveys in California 2013 and 2014 increased 2A's allocation by approximately 14% (The Total Constant Exploitation Yield (TCEY increased from 2.1 % to 2.4 %). In 2015 a 2,056 square mile expansion in California increased the TCEY to 2.77%. Conservatively, CA has directly increased the 2A share of the TCEY allocation by over 20% annually, approximately 200,000 lbs. By comparison, the CA allocation was 25,220 in 2015 and is 29,640 lbs in 2016. CA requests to be allotted a more equitable share of the poundage that we are providing to the 2A area.
2. CDFW has implemented an in-season management plan to stay within our allocation in 2014 and that plan was used in 2015. California stayed within our allocation and will do so again this year.
3. We are asking for a more affair and equitable share of the 2A allocation.
4. We ask for a minimum increase of at least 4% to 8% so California with have an 8% to 12% of the non-tribal allocation in 2A.

Thank you,

Jeremy Pike  
4329 Pintail Dr.  
Redding, CA 96001  
[530-515-6736](tel:530-515-6736)

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

From: **Lonnie Dollarhide** <[flatwater3@yahoo.com](mailto:flatwater3@yahoo.com)>  
Date: Mon, May 23, 2016 at 6:01 PM

Subject: Pacific Halibut

To: "[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)" <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>

My name is Lonnie Dollarhide a recreational angler out of Eureka Humboldt Bay. I would like to see an increase of 4 percent next year for our allocation. The fisheries along the north coast seems to be very stable for the 4 percent increase. Were looking for more time on the water to try and catch pacific halibut and try and get us into the fall, thank you.

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

From: **Pat Corey** <[pat.corey@mchalesign.com](mailto:pat.corey@mchalesign.com)>

Date: Mon, May 23, 2016 at 1:27 PM

Subject: Pacific Halibut

To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

To: PFMC

I am writing today to urge you to increase our allocation of Pacific Halibut in the 2A area of California.

California has done everything that was ask of them by the PFMC so now is the time to increase our allocation so that it mirrors what we provide to the 2A area.

1. Surveys in California 2013 and 2014 increased 2A's allocation by approximately 14% (The Total Constant Exploitation Yield (TCEY increased from 2.1 % to 2.4 %). In 2015 a 2,056 square mile expansion in California increased the TCEY to 2.77%. Conservatively, CA has directly increased the 2A share of the TCEY allocation by over 20% annually, approximately 200,000 lbs. By comparison, the CA allocation was 25,220 in 2015 and is 29,640 lbs in 2016. CA requests to be allotted a more equitable share of the poundage that we are providing to the 2A area.
2. CDFW has implemented an in-season management plan to stay within our allocation in 2014 and that plan was used in 2015. California stayed within our allocation and will do so again this year.
3. We are asking for a more affair and equitable share of the 2A allocation.
4. Ask for a minimum increase of at least 4% to 8% so California with have an 8% to 12% of the non-tribal allocation in 2A.

Thank You

Pat Corey  
Redding, CA 96002  
[530-223-2030](tel:530-223-2030)  
[530-223-2060](tel:530-223-2060) fax

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

From: **Pete Marino** <[mpmcpete@att.net](mailto:mpmcpete@att.net)>

Date: Mon, May 23, 2016 at 11:45 AM



Subject: Pacific Halibut  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

To: PFMC Members

California has done everything that was ask of them by the PFMC so now is the time to increase our allocation so that it mirrors what we provide to the 2A area.

1. Surveys in California 2013 and 2014 increased 2A's allocation by approximately 14% (The Total Constant Exploitation Yield (TCEY increased from 2.1 % to 2.4 %). In 2015 a 2,056 square mile expansion in California increased the TCEY to 2.77%. Conservatively, CA has directly increased the 2A share of the TCEY allocation by over 20% annually, approximately 200,000 lbs. By comparison, the CA allocation was 25,220 in 2015 and is 29,640 lbs. in 2016. CA requests to be allotted a more equitable share of the poundage that we are providing to the 2A area.
2. CDFW has implemented an in-season management plan to stay within our allocation in 2014 and that plan was used in 2015. California stayed within our allocation and will do so again this year.
3. We are asking for a more affair and equitable share of the 2A allocation.
4. Ask for a minimum increase of at least 4% to 8% so California with have an 8% to 12% of the non-tribal allocation in 2A.

Respectfully;

Pete Marino  
Vacaville, California 95688

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

From: **Joe Cerami** <[joe@ceramibrowning.com](mailto:joe@ceramibrowning.com)>  
Date: Mon, May 23, 2016 at 10:45 AM  
Subject: Pacific Halibut  
To: "[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)" <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>  
Cc: "[hasa6191@gmail.com](mailto:hasa6191@gmail.com)" <[hasa6191@gmail.com](mailto:hasa6191@gmail.com)>

To: PFMC

I am writing today to urge you to increase our allocation of Pacific Halibut in the 2A area of California.

1. California has done everything that was ask of them by the PFMC so now is the time to increase our allocation so that it mirrors what we provide to the 2A area.  
Surveys in California 2013 and 2014 increased 2A's allocation by approximately 14% (The Total Constant Exploitation Yield (TCEY increased from 2.1 % to 2.4 %). In 2015 a 2,056 square mile expansion in California increased the TCEY to 2.77%. Conservatively, CA has directly increased the 2A share of the TCEY allocation by over 20% annually, approximately 200,000 lbs. By comparison, the CA allocation was 25,220 in 2015 and is 29,640 lbs in 2016. CA requests to be allotted a more equitable share of the poundage that we are providing to the 2A area.

2. CDFW has implemented an in-season management plan to stay within our allocation in 2014 and that plan was used in 2015. California stayed within our allocation and will do so again this year.
3. We are asking for a more fair and equitable share of the 2A allocation.
4. Ask for a minimum increase of at least 4% to 8% so California will have an 8% to 12% of the non-tribal allocation in 2A.

Thanks,

Joe Cerami  
Office (530) 222-2345  
Fax (530) 222-8663  
[joe@ceramibrowning.com](mailto:joe@ceramibrowning.com)

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

From: **Trevor Lucas** <[trevorl00@yahoo.com](mailto:trevorl00@yahoo.com)>  
Date: Wed, May 25, 2016 at 1:20 PM  
Subject: Pacific Halibut  
To: "[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)" <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>

Dear PFMC Commission

Being an avid ocean halibut fisherman out of Eureka, CA, I have great interest in seeing our recreational opportunities expanded when we have implemented all rec harvest tasks and limits that were asked of us in 2015 by the PFMC. It is now your time to help increase our allocation so that it mirrors what we provided to the 2A area. Surveys in California 2013/14 increased 2A's allocation by approximately 14% from 2.1 % to 2.4 %. In 2015 a 2,056 square mile expansion in California increased the TCEY to 2.77%. Conservatively, CA has directly increased the 2A share of the TCEY allocation by over 20% annually, approximately 200,000 lbs. By comparison, the CA allocation was 25,220 in 2015 and is 29,640 lbs in 2016. CA requests to be allotted a more equitable share of the poundage that we are providing to the 2A area. The CDFW has implemented an in-season management plan to stay within our allocation in 2014 and that plan was used in 2015. We Californian anglers remained within our allocation limits and will do so again this year. We are asking for a more fair and equitable share of the 2A allocation for Pacific halibut and would like to see a minimum increase of at least 4% to 8% so Californian anglers will have 8% to 12% of the non-tribal allocation in 2A.

Thank you your time and consideration,

Trevor L.

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

From: **PhatDawg@gmail.com** <[phatdawg@gmail.com](mailto:phatdawg@gmail.com)>  
Date: Wed, May 25, 2016 at 1:05 PM  
Subject: Pacific Halibut  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

Surveys in California 2013 and 2014 increased 2A's allocation by approximately 14% (The Total Constant Exploitation Yield (TCEY increased from 2.1 % to 2.4 %). In 2015 a 2,056 square mile

expansion in California increased the TCEY to 2.77%. Conservatively, CA has directly increased the 2A share of the TCEY allocation by over 20% annually, approximately 200,000 lbs. By comparison, the CA allocation was 25,220 in 2015 and is 29,640 lbs in 2016. CA requests to be allotted a more equitable share of the poundage that we are providing to the 2A area. CDFW has implemented an in-season management plan to stay within our allocation in 2014 and that plan was used in 2015. California stayed within our allocation and will do so again this year. We are asking for a more fair and equitable share of the 2A allocation. Please increase at least 4% to 8% so California will have an 8% to 12% of the non-tribal allocation in 2A.

From: **Chris Ghidinelli** <[giddy169@gmail.com](mailto:giddy169@gmail.com)>

Date: Wed, May 25, 2016 at 12:59 PM

Subject: Pacific Halibut

To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

To Whom it may concern,

We in California have done everything that was asked of us by the PFMC so now is the time to increase our allocation so that it mirrors what we provide to the 2A area.

1. Surveys in California 2013 and 2014 increased 2A's allocation by approximately 14% (The Total Constant Exploitation Yield (TCEY) increased from 2.1 % to 2.4 %). In 2015 a 2,056 square mile expansion in California increased the TCEY to 2.77%. Conservatively, CA has directly increased the 2A share of the TCEY allocation by over 20% annually, approximately 200,000 lbs. By comparison, the CA allocation was 25,220 in 2015 and is 29,640 lbs in 2016. CA requests to be allotted a more equitable share of the poundage that we are providing to the 2A area.
2. CDFW has implemented an in-season management plan to stay within our allocation in 2014 and that plan was used in 2015. California stayed within our allocation and will do so again this year.
3. We are asking for a more fair and equitable share of the 2A allocation.
4. Please give us an increase of at least 4% to 8% so California will have 8% to 12% of the non-tribal allocation in 2A.

Thanks,  
Chris Ghidinelli

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

From: **Matt Goldsworthy** <[goldsworthy.matthew@gmail.com](mailto:goldsworthy.matthew@gmail.com)>

Date: Wed, May 25, 2016 at 2:51 PM

Subject: Pacific Halibut

To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

Good Afternoon: My name is Matt Goldsworthy and I live in Northern California, where Pacific Halibut fishing opportunities are vital to our local economy and for ocean fishing opportunities in general. I own and operate a small online fishing tackle business which specializes in Pacific Halibut tackle, and the success of that business is highly dependent upon our allocation and annual quotas (as are most of the other locally based businesses dependent on recreational fisheries). We have been patient over the past few years even though the Area 2A surveys have indicated

significant contributions from California to the Area 2A total allowable catch (TAC). Of the approximately 200,000 pounds that California waters contribute to Area 2A's TAC, California has only been allocated a fraction (<15%) of that contribution.

The Magnuson Stevens Fishery Management and Conservation Act is rather clear that catch shares should be allocated in a fair and equitable manner. California's allocation has not been fair nor equitable given the discrepancy between the large volume contributions to Area 2A and relatively small allocation. The members of the PFMC must also recognize and consider issues of serial depletion, as biomass is being removed from areas where it does not exist (biomass surveyed in California is being harvested elsewhere). Anecdotal evidence supporting this possibility are clear in the recent work by Perkins 2015, clearly showing favorable metrics (size at age, etc) in California waters.

Please consider a fair and equitable allocation for California. California has demonstrated the ability to manage the fishery in-season to avoid exceeding the allocation. Based on the surveyed biomass and volume contributions from California waters, California should be allocated no less than 100,000-pounds (roughly half of the volume contributed to Area 2A). Please increase our allocation to 100,000-pounds.

Thank you,

Matt Goldsworthy  
McKinleyville, California

From: **RAM** <[mullscalls@yahoo.com](mailto:mullscalls@yahoo.com)>  
Date: Wed, May 25, 2016 at 8:33 PM  
Subject: Pacific Halibut  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

Please accept this as my comment regarding the PFMC allocation of Halibut within the 2A. As recreational angler close to the Oregon/California border, it has become apparent that an equitable division of resources is in the best interest of all parties. I would ask that the California distribution percentage more closely align with the contribution to the totality of the 2A resource. Thank you for your consideration.

Russ Mull

----- Forwarded message -----  
From: **Jim Moranda** <[jbmoranda@suddenlink.net](mailto:jbmoranda@suddenlink.net)>  
Date: Thu, May 26, 2016 at 11:05 AM  
Subject: Pacific Halibut  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

California has done everything that was asked by the PFMC, it is time to increase our allocation so that it mirrors what we provide to the 2A area.

CDFW has implemented an in-season management plan to stay within our allocation in 2014, that plan was used in 2015. California stayed within our allocation and will do so again in 2016.

We are asking for a more fair and equitable share of the 2A allocation with a minimum increase of at least 4% to 8%, so that California will have an 8% to 12% non-tribal allocation in area 2A.

James B. Moranda  
Sport Fisherman – Eureka CA

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

From: **Timothy Machado** <collym3@gmail.com>  
Date: Thu, May 26, 2016 at 3:05 PM  
Subject: Pacific Halibut  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

Council Members - Recent surveys in Area 2A have shown that the northern CA sector has a robust population of pacific halibut. It has been noted that this sector has been contributing far more to the fishery than it is getting in its harvest quota. To correct this unfair inequity, I believe that the 2A quota share of pacific halibut should be increased by 4-8%.

Respectfully,

Timothy Machado  
Crescent City, CA  
HASA member

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

From: **Bob Smith** <rrobsmith@att.net>  
Date: Thu, May 26, 2016 at 4:43 PM  
Subject: Pacific Halibut  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

Attn PFMC:

California has done everything that was ask of them by the PFMC so please consider increasing our allocation so that it mirrors what we provide to the 2A area.

1. Surveys in California 2013 and 2014 increased 2A's allocation by approximately 14% (The Total Constant Exploitation Yield (TCEY increased from 2.1 % to 2.4 %). In 2015 a 2,056 square mile expansion in California increased the TCEY to 2.77%. Conservatively, CA has directly increased the 2A share of the TCEY allocation by over 20% annually, approximately 200,000 lbs. By comparison, the CA allocation was 25,220 in 2015 and is 29,640 lbs in 2016. CA requests to be allotted a more equitable share of the poundage that we are providing to the 2A area.
2. CDFW has implemented an in-season management plan to stay within our allocation in 2014 and that plan was used in 2015. California stayed within our allocation and will do so again this year.
3. We are asking for a more affair and equitable share of the 2A allocation.
4. We are requesting a minimum increase of at least 4% to 8% so California with have an 8% to 12% of the non-tribal allocation in 2A.

Thank you very much

R. Robert Smith  
Humboldt Area Salt Water Anglers/Recreational Angler  
Yreka, California  
[rrobsmith@att.net](mailto:rrobsmith@att.net)

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

From: **Douglas Kaber** <[kaberlaw@yahoo.com](mailto:kaberlaw@yahoo.com)>  
Date: Thu, May 26, 2016 at 4:54 PM  
Subject: Pacific Halibut 2A area - California Allocation  
To: "[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)" <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>

To PFMC Council:

California has done everything that was ask of us by the PFMC, so now is the time to increase our allocation so that it mirrors what we provide to the 2A area.

1. Surveys in California 2013 and 2014 increased 2A's allocation by approximately 14% (The Total Constant Exploitation Yield (TCEY increased from 2.1 % to 2.4 %). In 2015 a 2,056 square mile expansion in California increased the TCEY to 2.77%. Conservatively, CA has directly increased the 2A share of the TCEY allocation by over 20% annually, approximately 200,000 lbs. By comparison, the CA allocation was 25,220 in 2015 and is 29,640 lbs in 2016. CA deserves allocation of an equitable share of the poundage that we are providing to the 2A area.
2. CDFW has implemented an in-season management plan to stay within our allocation in 2014 and that plan was used in 2015. It will happen again this year.
3. We ask for at a minimum an increase of 4% to 8%, so that California with have an 8% to 12% of the non-tribal allocation in 2A.

Thank you for your consideration.

Douglas Kaber,  
Lost Coast Kayak Anglers  
730 7th Street, Suite E  
Eureka, CA 95501

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

From: <[robpbray@hotmail.com](mailto:robpbray@hotmail.com)>  
Date: Thu, May 26, 2016 at 11:46 PM  
Subject: Pacific Halibut Catch Share Plan (CSP) Scoping for 2017  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

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

RE: Pacific Halibut Catch Share Plan (CSP) Scoping for 2017

Dear Chair Lowman and Council Members:

California has done everything that was ask of them by the PFMC so now is the time to increase our allocation so that it mirrors what we provide to the 2A area. Surveys in California 2013 and 2014 increased 2A's allocation by approximately 14% (The Total Constant Exploitation Yield (TCEY increased from 2.1 % to 2.4 %). In 2015 a 2,056 square mile expansion in California increased the TCEY to 2.77%. Conservatively, CA has directly increased the 2A share of the TCEY allocation by over 20% annually, approximately 200,000 lbs. By comparison, the CA allocation was 25,220 in 2015 and is 29,640 lbs in 2016. CA requests to be allotted a more equitable share of the poundage that we are providing to the 2A area.

CDFW has implemented an in-season management plan to stay within our allocation in 2014 and that plan was used in 2015. California stayed within our allocation and will do so again this year. We are asking for a more affair and equitable share of the 2A allocation. I believe minimum increase of at least 4% to 8% is fair and equitable so that California will have an 8% to 12% of the non-tribal allocation in 2A.

Northern California fishermen acknowledge and appreciates the efforts that the PFMC and GAP, commercial fishermen, and the states of Oregon and Washington that have helped the transition towards a more fair and equitable distribution of the CSP over the past few years. Thank you for the opportunity to provide public input on this very important matter.

Sincerely,

Robert Bray  
Lost Coast Kayak Fishing Adventures  
Lostcoastkayakfishingadventures.com  
[robpbray@hotmail.com](mailto:robpbray@hotmail.com)

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

RE: Pacific Halibut Catch Share Plan (CSP) Allocation Scoping

Dear Chair Lowman and Council Members:

Thank you for the opportunity to provide input on the Pacific Halibut Catch Share Plan (CSP) scoping for 2016 for Area 2A (Oregon, Washington, California). 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. This becomes even more important when considering the impacts of drought, El Niño and climate change on salmon and rockfish populations. The seasons and bag limits for both salmon and rockfish have recently been reduced in northern California.

Conservatively, the California shelf contribution has directly increased the 2A share of the Total Constant Exploitation Yield allocation by over 20% annually, approximately 200,000 lbs. By comparison, the CA allocation was 25,220 in 2015 and is 29,640 lbs in 2016. In addition, recent rigorous implementation of in season harvest management in California has kept us from exceeding the CSP allocation. Given these facts and the importance of Pacific halibut to California recreational anglers, along with the important economic contribution of Pacific halibut anglers to northern California coastal communities, the CSP allocation should be refined to provide a fairer and more equitable share of the Pacific halibut fishery to California recreational anglers.

Because California contributes more than 10% of the total exploitable biomass, the current CSP allocation for California should be commensurate with that amount, well above the current 4%. I support a more fair and equitable allocation for California of 10% in 2017.

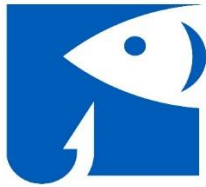
Thank you for considering these comments and for your support of California recreational halibut anglers.

Sincerely,



Trever Parker  
Arcata, CA 95521  
Home port: Trinidad, CA





# Humboldt Area Saltwater Anglers Inc.

P.O. Box 6191, Eureka, CA 95502

Email: [hasa6191@gmail.com](mailto:hasa6191@gmail.com)

FEIN #61-1575751

May 26, 2016

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

RE: Pacific Halibut Catch Share Plan (CSP) Scoping for 2017

Dear Chair Lowman and Council Members:

The Humboldt Area Saltwater Anglers, Inc. (HASA) appreciates the opportunity to provide input on the Scoping of Pacific Halibut Catch Share Plan (CSP) Allocation Changes (Agenda Item E1). HASA has over 300 members, and continues to support important science and economic studies to better inform Pacific halibut management in California. The Pacific halibut fishery off of the Northern California coast is an increasingly important component of our overall fishery resource. As we have endured three years of drought in California, the corresponding reduction in salmon fishing opportunities has increased the importance of the Pacific halibut fishery to our members and our local economy.

Based on the recent IPHC surveys in California, it is clear that California's contribution of Pacific halibut production to the Total Constant Exploitable Yield is greater than previously thought. Accordingly, the IPHC has recognized this contribution, and has increased Area 2A allocation in 2016 by 170,000 pounds, which has benefitted anglers in California, Oregon, and Washington in 2016. In addition, California continues to implement (and HASA supports) rigorous in-season harvest management to ensure that California harvest stays within our CSP allocation each year.

We support PFMC scoping of the CSP allocation, and respectfully request that the PFMC consider CSP alternatives that have California allocations in future years that are commensurate with the improved estimates of California's contribution of Area 2A Total Constant Exploitable Yield. We request that the PFMC approves scoping of the CSP allocation, and consider CSP allocation alternatives that have California allocations that range from 6% to 12% of Area 2A allocation. HASA acknowledges and appreciates the efforts that the PFMC and GAP, commercial fishermen, and the states of Oregon and Washington that have helped the transition towards a more fair and equitable distribution of the CSP over the past few years. Thank you for the opportunity to provide public input on this very important matter.

Sincerely,

Scott McBain,  
President, Humboldt Area Saltwater Anglers, Inc.