

24 May 2016

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

RECEIVED

JUN 1 2016

Re: halibut sport-catch allocation

Dear Chairperson and other council members:

PFMC

Thank you for the opportunity to provide input on the Pacific Halibut Catch Share Plan for Area 2A.

As salmon and rockfish seasons fluctuate from year-to-year Pacific Halibut has become a more consistent and important component of the Northern California sport catch. Fortunately the fishery off California appears to be recovering from commercial over-fishing in previous decades, and can now support a consistent sport fishery. In light of that it seems foolish to stick to harvest limits which were established when there were effectively no Pacific Halibut available off the California coast, and no California representative present to negotiate on our behalf. We very much appreciate the fact the most recent data available has permitted our quota to be raised from about 6,000 pounds to nearly 30,000 pounds. It's my understanding that by factoring in the fish available off the California coast the overall catch permitted has been increased. However, it seems like a strange application of science to interpret the results to mean the increased abundance of fish off California means that exploitation offshore of Washington and/or Oregon should be increased. It seems to me that a more reasonable long-term solution is to evaluate the exploitable biomass by region and/or state, and use that to set local catch limits. Those state-wide catch limits can then be adjusted rationally and fairly to match the Area 2A quota. By that measure I believe that California's catch share could likely be 50,000 pounds or more, and still provide a very satisfactory safety margin.

As you proceed with your negotiations among the various regional exploitation requests, please keep in mind the increasing economic importance of this fishery for the coastal communities of Northern California, and don't let yourselves be locked into an outdated Catch Share Plan.



Larry De Ridder
4886 Walnut Drive
Eureka, CA 95503

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From: rossntaylor <rossntaylor@sbcglobal.net>

Date: Tue, Jun 14, 2016 at 8:01 AM

Subject: CA Halibut allocation

To: pfmc.comments@noaa.gov

I am to express my opinion about the importance of the Pacific halibut fishery in northern California. It has become a very important sport fishery to our region, especially with decreased rockfish and salmon opportunities. The halibut stocks appear healthy and can probably support more harvest. I would like to see our allocation increase from the current 4% to maybe 6 to 10% as well as continental monitoring. Also My Thanks To The Commission.

Ross Taylor

1254 Quail Run Court

McKinleyville CA 95519

[707-839-9451](tel:707-839-9451)

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From: Dan and Karen Diemer <dkdiemer@gmail.com>

Date: Tue, Jun 14, 2016 at 8:49 AM

Subject: Pacific Halibut

To: pfmc.comments@noaa.gov

I 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. I request that the PFMC approves scoping of the CSP allocation, and consider CSP allocation alternatives that have California allocations that range from 8% to 12% of Area 2A 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.

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 8% to 12% minimum, 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. I am asking for a more fair and equitable share of the 2A allocation and a return to the May 1 to October 31 Pacific Halibut fishing season.

Thank you for your consideration,
Dan Diemer
HASA Member.

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From: Pamlyn Millsap <minnowpaws@suddenlink.net>
Date: Tue, Jun 14, 2016 at 8:52 AM
Subject: Halibut Catch
To: 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:

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). Pacific halibut is really important to California anglers, particularly in light of drought-related impact to salmon opportunities. Please increase our area's allocation to at least 8%. Thank you for considering this request. Our area has been hard hit by having to follow the larger area's mandates. Thank you again for considering our request!

Sincerely,
Pamlyn Millsap
(MinnowPaws)
[\(707\) 599-7593](tel:(707)599-7593)

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From: Theodore Bliss <theodorebliss@me.com>

Date: Tue, Jun 14, 2016 at 9:16 AM

Subject: Humboldt Halibut

To: pfmc.comments@noaa.gov

Please allot a higher halibut quota weight for the eureka area. The rockfish weights and salmon seasons are assigned according to zone, so the halibut should be treated similarly.

Also, don't split the salmon and halibut season. It's difficult enough to get out on the water for nice weather days and not being able to target multiple species on nice days is a huge deterrent from going at all.

It seems that rockfish are managed well, keep up the great work.

Thank you,
Theodore Bliss

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

From: <rbtrtdnlfr@netscape.net>

Date: Tue, Jun 14, 2016 at 10:11 AM

Subject: Pacific Halibut CSP

To: pfmc.comments@noaa.gov

Thank you for the opportunity to provide input on the Pacific Halibut Catch Share Plan (CSP) 2016 scoping for area 2A. The California Pacific halibut fishery is very important to recreational fisher people and charter boats in California, especially in light of reduced opportunities for Pacific salmon. Providing adequate opportunities for a diverse number of species helps to reduce the focus on any one species or management group (e.g., rockfish) when fishing opportunities for one or more other species are restricted. Additionally, the economic impact of the Pacific halibut fishery helps maintain fishing dependent businesses when fishing for salmon is poor or restricted due to unfavorable ocean and freshwater conditions that affect survival.

New information collected over the last few years in northern California indicates an increase in the available exploitable yield for Area 2A of up to 20%. California's current share of that exploitable yield is only 4%. California has recently implemented a rigorous in-season management plan to assist in ensuring harvest allocations are not exceeded. Additionally, graduate students and others are conducting research on Pacific halibut to provide additional information regarding age and reproductive physiology of Pacific halibut caught in the California fishery. These actions will assist with managing the Pacific halibut fishery using the best available science and ensure the California Pacific halibut fishery will not adversely affect the overall U.S. Pacific halibut fishery. As such, I request that the CSP allocation for California be fairly and equitably increased above the current 4% to 10%, which is approximately half of the northern California contribution (20%) to the exploitable yield. This allocation is expected to have no adverse effect on Pacific halibut populations or catch rates and is reasonably

conservative and based on the best available science. Thank you for giving full consideration of this request.

Sincerely,
Dan Free
320 Fernwood Lane
Kneeland, CA 95549

WESTPORT CHARTERBOAT ASSOCIATION
P.O. Box 546 Westport, WA 98595

June 14, 2016

To: Pacific Fishery Management Council
Dorothy Lowman, Chair

From: Westport Charterboat Association
Mark Cedergreen

Re: Halibut allocation in IPHC Area 2A

Dear Chair Lowman and Council members,

IPHC Area 2A (Washington, Oregon, and Northern California) is the southernmost Halibut management area in the range of North Pacific Halibut. On average, about 2-3% of the entire annual biomass estimate is determined to reside in Area 2A. 2A is sub-divided into ~ 10 allocation units by state (recreational and commercial) and tribal gear groups. The 2A total allowable catch (TAC) has fluctuated between 800,000 lbs and 1.6 million lbs over the past 20-25 years. The current year's 2A TAC is 1.14 million lbs. Suffice it to say that 2A fisheries are fully subscribed and, with the exception of California, every gear-group could easily utilize 2-5 times as much poundage as they currently harvest.

Pacific Halibut biomass in 2A is distributed much more densely in the north than in the south. IPHC setline surveys verify this. Recreational fisheries in Washington and Oregon are extremely popular. Due to increasing biomass density and effort, the seasons are short and getting shorter every year. Washington area fisheries this season were 8, 5, 4, and 19 days in Puget Sound, Neah Bay/Lapush, Westport, and the Columbia River area respectively; and catches were very low on a few of those days due to inclement weather. Washington recreational CPUE ranged from 0.70 to 0.97 in 2016, with a Washington coast average of around 0.85 on a 1 halibut limit.

Two years ago the Pacific Council raised California's allocation from 1% to 4% of the non-Tribal share of Halibut. This came at the expense of Washington and Oregon fisheries and was generally supported by other gear groups as a reasonable share. In 2015 California caught ~ 25,000 lbs. This catch occurred over a period of 57 days. That's ~ 440 lbs per day. At an average

weight of ~ 20 lbs, the catch over the entire California fishing area amounted to only around 22 fish per day. That compares to season lengths of 4-19 days in Washington and average catch's in the 4 areas ranging from 600 lbs to 22,000 lbs per day in very short seasons.

California currently has the longest season of any area in 2A. The primary reason for that is a very low density of biomass in the southernmost area of the North Pacific Halibut range. Opening the Catch sharing plan to allocate more halibut to California will come at the expense of other areas and is inconsistent with biomass distribution. There are no other sources for additional harvest. Short seasons will become shorter in the north while the longest season will become even longer in the south. That makes no sense at all.

We went through a bitter allocation battle in the early 1990's to establish the sharing formula for 2A. Aside from the reallocation to California two years ago, most of the harvesters have no desire to open up old wounds and get into another battle. If we open the CSP to one area there will be other areas also wanting more. Actually, considering IPHC data there are very solid biological reasons to increase fisheries in the north as opposed to the south. Whose fishery would such a change come from?

I urge the Council to leave the allocation of Halibut in 2A as is.

Oregon South Coast Fishermen
P. O. Box 2709 • Brookings, OR 97415

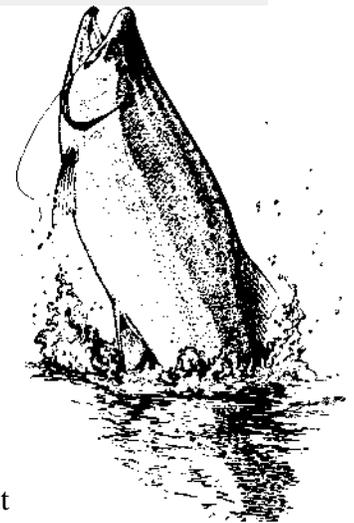
June 14, 2016

Pacific Fisheries Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

RE: Agenda Item E.1

Chair Lowman,

We are providing comment on agenda item E.1, Scoping of Pacific Halibut Catch Sharing Plan Allocation Changes. The Oregon South Coast Fishermen (OSCF) were involved with the development of the 2014 Halibut Catch Share Plan that established the South of Humboldt subarea. At that time, we proposed the creation of the Oregon portion of the subarea and requested a subarea quota for the Oregon portion. We also supported the development of a California subarea with a quota. In 2015 we commented on the increase in allocation for California and the requirement for accurate and timely accounting of landed fish. While generally supportive of the increase, we were concerned that California had an expectation of removing poundage quotas from Oregon and Washington recreational fishing areas as opposed to being given a portion of any addition quota allocated to the entire 2A catch area. We also understood that quotas for both subareas would remain fixed percentages for several years to evaluate long term harvest patterns and the reliability of California's real time creel



effort. We do not support any change to existing allocation percentage at this time. We supported a longer term evaluation of the 2015 allocation to help smooth any anomalies that might occur. This year has produced such an anomaly off of Brookings. Because of the late start to the Dungeness crab fishery this year and an apparently robust market for crab, we have large tracts of ocean inside 50 fathoms that are covered with strings of commercial crab pots, ropes and buoys. While we support the commercial crab fishing industry, the presence of large fields of pots has eliminated drifting for halibut and substantially curtailed halibut fishing effort from the Port of Brookings. This is the first year we have experienced this situation. Net result of this situation may be reduced halibut landings during the early part of the season. This situation is precisely why we asked for a longer term evaluation of quota allocations.

It is our understanding that halibut are not sedentary and that “resident” halibut are generally in a transition from juvenile life stages to breeding age redistribution back to northern latitudes. Halibut distribution also appears to be changing as evidenced by recently increasing numbers in southern Oregon and California.

California fishermen seems to imply that they have a stable, resident population of halibut to be harvested irrespective of interactions with other areas. We disagree. We feel it would be premature to change allocations based on short term survey results, particularly given the dynamic changes that are being observed in the ocean all along the Pacific coast.

We also remain concerned about California’s ability to accurately collect landing information about recreational halibut harvest. Several of our members travel the 25 miles south to Crescent City to fish for halibut and avoid the crab pot problem. They usually go in a group of three or four boats. In three trips this year, they have yet to encounter anybody checking landed fish. They have caught multiple halibut on each trip. They have fished on both weekdays and weekend days. In addition, California has no seasonal, individual limit on halibut nor do they have any type mandatory report card required. We are concerned, despite California Fish and Wildlife assurances, that halibut harvest remains under-reported.

That California fishermen are having to deal with a reduced number of open fishing days for halibut is not unique to California. Most Oregon fishermen deal with fishing day reductions to stay within quota and provide broader opportunity for the recreational fleet. We are prepared to do the same if we are regularly successful in catching our allocated quota.

In summary, we are requesting that the Council not change the current percentages of allocation of the 2A TAC to provide more pounds to the California recreational quota if that additional quota will be taken from either Oregon or Washington recreational or commercial allocations.

Sincerely,

Richard Heap, President

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

From: Phil Gravier <pgravier@willitsonline.com>
Date: Tue, Jun 14, 2016 at 11:50 AM
Subject: Pacific Halibut catch share plan allocation
To: pfmc.comments@noaa.gov

Hello,

Thank you for the opportunity to provide feedback on the Pacific Halibut Catch Share Plan Allocation, and us recreational anglers in California would like a more equitable share of the quota (at least 6%). Halibut is very important economically to our area, particularly in light of drought-related impact to salmon opportunities.

Thank you for considering this request.

Sincerely,

Phil Gravier
Laytonville, CA

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From: Dan Cox <crabby2@suddenlink.net>
Date: Tue, Jun 14, 2016 at 2:45 PM
Subject: Halibut
To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

Dear sirs I am in favor of increasing the halibut quota in the Trinidad area !

Thanks , Dan Cox Fv Express

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

From: Jeff Mostovoy <jjmostovoy@icloud.com>
Date: Tue, Jun 14, 2016 at 3:10 PM
Subject: Pacific Halibut Catch Share plan (CSP)
To: pfmc.comments@noaa.gov

Dear Chair Lowman and council members:

The Pacific Halibut fishery off of the Northern California Coast has become an important fishery. California has had a reduction in salmon fishing opportunities due to the last three years of drought conditions. This alone has made the Pacific Halibut fishery very important to North Coast fishermen and our local economy. Currently, our allocation is barely 15 percent of the volume that California waters contribute to area 2A's allowable catch. The other 85 percent of the biomass from California waters is harvested by other areas. 100,000 pounds of Pacific Halibut is about half of the amount that California waters provide for the area 2A allowable catch. This seems like a more fair allocation for California than the 29,640 pounds we get in

2016. California has done everything that we ask of them by the PMFC so please now is the time to increase our allocation.

Thanks, Jeff Mostovoy

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From: 5 Star Charters <info@5starcharters.com>
Date: Tue, Jun 14, 2016 at 4:21 PM
Subject: revised halibut catch share quota for Calif
To: pfmc.comments@noaa.gov
From Mark Lottis Five Star Charters Gold Beach

It has come to my attention that Calif now wants another adjustment in there favor of the quota. This has already been done in the past several years at the expense of Oregon's share when the line was re drawn at the Or Ca state line. As result we now have less fish to catch than in the past which impacts us and other business on the Southern Or coast. They were happy when they got what they did which was all of the southern quota at the time. That was a good way to handle the allocation then and continues now. No adjustment is needed. Thank You for consideration of this comment.

Mark Lottis

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

From: Nancy and Red Jioras <rednan1@suddenlink.net>
Date: Tue, Jun 14, 2016 at 4:46 PM
Subject: Pacific Halibut in Northern California
To: pfmc.comments@noaa.gov

It is hard to express the importance of Pacific Halibut to the economy of the northern California. Although pacific halibut were fished in this region during World War 2, the present fishing population only re-discovered them some 6 years ago. The halibut fishery now brings millions of dollars to our area in the form of recreational anglers who stay the summer to sample the resources our coast has to offer; and pacific halibut make up a large part of those activities. Since the north coast has lost a great deal of its land based industry, we must turn to the resources of the sea to generate a boost to our economy. Until 6 years ago, our pacific halibut fishery was ignored. In 2013 and again in 2014, the International Pacific Halibut Commission sampled the water of northern California with a resulting addition to the catchable biomass of 100,000 pound. Although California's catchable allotment was increased to 3% of the catchable biomass, it is not reflective of the amount of resource we have swimming off our coast as shown by the IPHC surveys. Please consider raising California's percentage allotment more in line with number of fish surveyed.

Richard Jioras
[707 839-2166](tel:7078392166)

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

From: steve finch <sfinchpw@gmail.com>

Date: Tue, Jun 14, 2016 at 5:36 PM

Subject: halibut season

To: pfmc.comments@noaa.gov

Thank you for the opportunity to provide feedback on the Pacific Halibut Catch Share Plan Allocation, and us recreational anglers in California would like a more equitable share of the quota (at least 6%). Halibut is very important economically to our area, particularly in light of drought-related impact to salmon opportunities.

Thank you for considering this request.

Sincerely,

Steve Finch

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

From: Seth Naman <swnaman@gmail.com>

Date: Tue, Jun 14, 2016 at 1:30 PM

Subject: Pacific Halibut Catch Share Plan Allocation

To: pfmc.comments@noaa.gov

Thank you for the opportunity to comment on the Pacific Halibut Catch Share Plan Allocation. Halibut is very important economically to our area, particularly in light of drought-related impact to salmon opportunities. From the port of Eureka, the vast majority of our nearshore habitat is dominated by sandy and muddy substrate. Sport recreational anglers and sport charter captains depend on halibut angling as rockfish opportunities are limited and require long distances of travel, nearly 20 miles. Additionally, PFMC halibut surveys in our area have conclusively shown a robust population with good habitat. For these reasons I urge you to give California a more equitable share of the quota, at least 6%.

Thank you.

Sincerely,

Seth Naman
PO Box 141
Blue Lake, CA. 95525

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

From: Deb H <msdebs7@yahoo.com>

Date: Tue, Jun 14, 2016 at 5:41 PM

Subject: RE: Pacific Halibut Catch Share Plan Allocation

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

Thank you for the opportunity to provide feedback on the Pacific Halibut Catch Share Plan Allocation, and us recreational anglers in California would like a more equitable share of the quota (at least 6%). Halibut is very important economically to our area, particularly in light of drought-related impact to salmon opportunities.

Thank you for considering this request.

Sincerely,

Debra Horton

From: Stephanie Freeman <mochamom71@gmail.com>

Date: Tue, Jun 14, 2016 at 7:31 PM

Subject: Pacific Halibut Catch Share Plan Allocation

To: pfmc.comments@noaa.gov

Thank you for the opportunity to provide feedback on the Pacific Halibut Catch Share Plan Allocation.

We recreational anglers in California would like a more equitable share of the quota (at least 6%). Halibut is very important economically to our area, particularly in light of drought-related impact to salmon opportunities.

Thank you for considering this request.

Sincerely,

Stephanie Freeman