

## WASHINGTON DEPARTMENT OF FISH AND WILDLIFE REPORT ON PROPOSED CHANGES TO THE CATCH SHARING PLAN AND 2017 ANNUAL REGULATIONS

The Washington Department of Fish and Wildlife (WDFW) would like to offer the following additional comments on the Pacific Fishery Management Council's (PFMC) Catch Sharing Plan (CSP) and regulations for 2017.

### **Washington Statewide Season Date**

As noted previously, WDFW met with recreational halibut anglers on September 1, and October 11, 2016, to discuss proposed changes to the CSP. We submitted our initial report for the briefing book; however, there have been subsequent discussions among stakeholders in an attempt to reach consensus on statewide season dates.

Based on the input we received from all subareas, WDFW recommends the Council adopt the following season dates for the South Coast, North Coast, and Puget Sound subareas for 2017:

Modified Option B: Thur, May 4  
Sat, May 6  
Thur, May 11

If sufficient quota remains, the seasons would continue as follows:

Sun, May 21 and/or Thur, May 25  
Thur, June 1 and/or Sun, June 4

This is consistent with the objectives we noted in September with the exception of the providing a minimum of two closed days between open days for the initial two days of the season, which we find acceptable.

We appreciate the desire for certainty in specifying the season dates up front, but also recognize the need for flexibility in responding to unanticipated factors, such as weather and fluctuations in effort. As one of our guiding principles, WDFW strives to provide a minimum of three days' notice when offering a harvest opportunity; therefore, if catch estimates are not available in time to provide sufficient notice to the public by the next specified date, then we would likely schedule the opener for a subsequent date.

### **Incidental Catch in the Sablefish Fishery N. of Point Chehalis**

In June, the Council began scoping potential changes to Pacific halibut allocations and requested information from the International Pacific Halibut Commission (IPHC) on the spatial distribution of the Pacific halibut exploitable biomass to assist their consideration of potential allocation changes. In preparation for future allocation discussions, WDFW would like to briefly recap the history of the incidental halibut allowance in the primary sablefish fishery north of Point Chehalis, and our thoughts relative to allocation changes to this sector in the future.

When the CSP was first developed in 1988, WDFW prioritized the Washington allocation to the recreational fishery north of Point Chehalis and the commercial directed was restricted to the area south of Point Chehalis. This was in part due to the fact that the CSP was developed during a period of very low Area 2A TACs (~500,000 lbs) when it was unlikely that both a commercial and recreational fishery could be accommodated. At the time, many commercial fishermen who had traditionally fished for halibut along Washington's northern coast felt this decision was unfair and, over the subsequent ten years, some of those vessels stopped fishing altogether and a couple of processing companies in Seattle and Bellingham closed their businesses.

In response, WDFW proposed shifting a portion of the Washington recreational allocation to provide for incidental retention in the primary sablefish fishery north of Point Chehalis in years when the Area 2A TAC is higher, which was approved by the Council and in 2001. Specifically, when the 2A TAC is greater than 900,000 pounds, the primary directed sablefish fishery north of Point Chehalis would be allocated the Washington sport allocation that is in excess of 214,110 pounds, provided a minimum of 10,000 pounds is available. This allocation structure was modified in 2002 to cap the amount for the sablefish fishery at 70,000 pounds.

The Area 2A TAC has accommodated incidental catch of halibut in the primary sablefish fishery in all years except 2010 and 2011 since changes to the CSP were implemented in 2001. During this same period, there has been a significant increase in effort in the Washington recreational fishery, resulting in early quota attainment and shortened seasons.

Therefore, as discussions on potential allocation changes move forward, WDFW would be interested in considering whether revisions to the sablefish incidental allocation were warranted. Further, given that the sablefish incidental allocation came from the Washington sport allocation, WDFW would expect that any changes to the sablefish incidental allocation would shift back to the Washington recreational fishery.