

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

From: Dave Croonquist <dcroonquist@gmail.com>

Date: Sun, Apr 23, 2017 at 8:15 PM

Subject: 2018 Sport Fishing Halibut proposals for the June PFMC meeting

To: "Ames, Kelly" <kelly.ames@noaa.gov>, Ron Warren <Ron.Warren@dfw.wa.gov>, Jamie Goen <jamie@iphc.int>

Cc: Kevin Van De Wege <Kevin.VanDeWege@leg.wa.gov>, Brian Blake <Brian.Blake@leg.wa.gov>, Dean Takko <Dean.Takko@leg.wa.gov>, Jim Walsh <Jim.Walsh@leg.wa.gov>, Mike Chapman <Mike.Chapman@leg.wa.gov>, Steve Tharinger <Steve.Tharinger@leg.wa.gov>, Katie.R.Allen@mail.house.gov, Bob Aunspach <bobaunspach@hotmail.com>, Bryan Bukovnik <bucksnort49@msn.com>, Chad Mitts <mitts1971@gmail.com>, Cherie Kidd <ckidd@cityofpa.us>, Colleen McAleer <colleenm@portofpa.com>, David Croonquist <dcroonquist@gmail.com>, Jack Gray <jackg@olympen.com>, Jerry Ludke <jerryl@portofpa.com>, Jerry Wright <jerryleightwright@yahoo.com>, Ken Townsend <btgs1@q.com>, Lee Whetham <lwhetham@cityofpa.us>, Mark Thomas <Markthomas@q.com>, Michael Carman <mcarman@peninsuladailynews.com>, Norm Metzler <olympic9@msn.com>, Ralph Burba <orcaenterprises@hotmail.com>, Robert Beausoleil <robter@olympen.com>, Rod Anderson <elk@wavecable.com>, Steve Tucker <steve@portofpt.com>, commissioners@co.clallam.wa.us, WA Wildlife Commission <commission@dfw.wa.gov>

Ms. Ames, Mr. Warren, and Ms. Goen et al,

Attached are two proposals being submitted on behalf of anglers, businesses, and local government agencies addressing concerns and ideas about the halibut fishery in Washington waters with potential implications for the entire area managed by the IPHC through the NPFMC, PFMC, and DFO-Canada. The halibut sport fleet is a major contributor to the coastal economies from Alaska to Northern California and needs to have a new look at how it is managed.

One request is for returning the full share of halibut lbs that are taken off the recreational quota under the 2A Catch Share Plan to the Washington halibut sport fleet. Since 2002, the "incidental catch" by the sablefish fleet with a couple of low TAC years has been coming off the WA sport fleet allocation - this year it was 70,000 lbs. This is in-line with the proposal submitted by WDFW last fall addressing the return of the sport share to the sport fleet.

The second request is for the establishment of a season for halibut fishing with a daily bag limit of one fish, two fish in possession in the field and a six fish annual bag limit. The steadily declining days available for halibut fishing in WA waters and to some extent OR and California has created a derby mentality that forces folks to fish on designated days with little regard for sea and weather conditions. This puts property and lives of anglers and First Responders, including the USCG, at risk. The reduction in days is also having a severe economic impact on businesses around Puget Sound and the Olympic Peninsula. Anglers spend millions of dollars every year that benefit many businesses and ancillary activities. A different look at how the halibut sport fleet is managed would have positive effects for everyone.

Also attached are resolutions from the City of Port Angeles, Port of Port Angeles, Clallam County Commissioners, and the Port of Port Townsend in support of the concept.

We look forward to working with you to establish a better and safer halibut season structure for 2018 and beyond.

Thank you.

Dave Croonquist on behalf of: Olympic Peninsula Salmon and Halibut Coalition, Puget Sound Anglers, Coastal Conservation Association, halibut anglers, and various businesses

### **Proposal 1**

We would like to request that the 2A Catch Share Plan be amended at the June PFMC session on Pacific Halibut Management by removing the wording “...(except as provided in section (e)(3) of this plan)...” in section (f) SPORT FISHERIES (1) (i), (ii), (iii), and (iv). This would provide the Washington sport fishing halibut fleet with its full share of halibut as found in section (b) ALLOCATIONS which gives 35.6% of the non-Indian TAC to the Washington sport fishery. At the same time, (e) (3) of the 2A CSP should be removed or amended to permit some percentage of the commercial harvest TAC to be rolled over for “incidental catch” in the sablefish fishery north of Point Chehalis.

This request is in-line with supplemental WDFW report E.1.a submitted to the PFMC in November, 2016 concerning the incidental catch of halibut in the sablefish fishery N. of Point Chehalis:

*“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.”*

The return of the sablefish shares to the recreational fleet allocation as stated in (b) of the 2A CSP would add time on the water to our 2018 fishery and, if the TAC stays up, more fishing time in future years. We understand that the TAC can fluctuate. We can live with the lean times, but would enjoy the good times that a higher share will provide us and have a positive impact on communities businesses.

With the 2017 TAC for 2A at 1.33 million pounds, the non-Indian commercial share increased by 37,915 lbs over the 2016 allocation 265,402 lbs. Using the 2A plan for the non-Indian commercial allocations, this would leave 20,314 lbs available for the “incidental catch” by the sablefish fleet while still allowing for increases for the primary halibut fishery and the incidental take during the salmon troll fishery.

Thank you for your consideration.  
Dave Croonquist

## Proposal 2

### A CHANGE IS NEEDED IN THE SPORT HALIBUT FISHERY MANAGEMENT PROTOCOLS

The International Pacific Halibut Commission (IPHC) sets harvest poundage quotas for the halibut fishery conducted by tribal, non-tribal commercial, and sport fishers in the waters off the US and Canadian coasts. These quotas are then applied through appropriate US and Canadian federal agencies to the states and British Columbia. It is time to take a strong look at re-structuring the halibut fishery to reflect the importance of the recreational fishery to the coastal economies in the US and British Columbia.

Recreational halibut anglers, including non-residents, are a critical component in the coastal economies of the US and British Columbia. They spend tens of millions of dollars that support many businesses from motels and gas stations to restaurants, grocery stores, bait dealers, and tackle shops. The continuing decline in halibut fishing opportunities is causing severe economic impacts to coastal communities particularly in Catch Share Plan Area 2A (Washington, Oregon, N. California). Assigned fishing dates have created a derby mentality that can and will force people to go fishing when they shouldn't be on the water. Lives and property have been lost and first responders, including the US Coast Guard, are put at risk when called out for search and rescue activities. We think the sport fishery should be managed on the number of fish landed within a season structure that allows the sport angler to pick the days and weather conditions that allow for a safe fishery. By limiting the number of fish that can be taken and possessed in the field and with an annual limit that would mirror the current Canadian and Oregon bag and possession limits, we feel that the IPHC, Federal, and state agencies can get a better handle on total harvest numbers rather than trying to estimate the pounds landed.

The Pacific Halibut Convention, between the United States and Canada was developed to administer the commercial fisheries for halibut between the two countries. The relatively recent growth of the sport fishing interest in halibut necessitates a change in how the sport fleet harvest is administered and that separates the sport harvest from the commercial, Alaska subsistence, and tribal/First Nation fleets. While we understand that the IPHC can't set domestic rules for the US and Canadian fishers, we do feel that that the IPHC could address our concerns within the scope of the under Article III, Section 2 (a), (b), and (c):

*2. The Contracting Parties agree that for the purpose of developing the stocks of halibut of the Northern Pacific Ocean and Bering Sea to levels which will permit the maximum sustained yield from that fishery and for maintaining the stocks at those levels, the International Pacific Halibut Commission, with the approval of the President of the United States of America and of the Governor General in Council of Canada, may, after investigation has indicated such action to be necessary, in respect of the nationals and inhabitants and fishing vessels and boats of the United States of America and of Canada, and in respect of halibut:*

*(a) divide the Convention waters into areas;*

*(b) establish one or more open or closed seasons, as to each area;*

*(c) limit the size of the fish and the quantity of the catch to be taken from each area within any season during which fishing is allowed;*

By declaring the Pacific Coast of both countries as one sport fishing area, establish one season – February 1 to December 31, and an annual bag limit of six fish. It is recommended that the daily limit be one fish per day and two fish in possession in the field (the fish would have to be taken to the permanent residence of the angler) before any additional fish, up to the six fish limit, could be taken. The sport harvest would be measured by fish landed and not pounds landed.

The Olympic Peninsula Salmon and Halibut Coalition and affiliated individuals and groups request that the Washington Dept. of Fish and Wildlife present and support our proposal as outlined below to the International Pacific Halibut Commission and the Pacific Fisheries Management Council for implementation in the 2018 sport halibut season for WA waters and possibly AK, BC, OR and CA waters.

1. Fixed annual bag/possession limit of six fish per year per person.
2. Field possession limit of one fish per day and two in possession in the field.
3. Season – February 1 to December 31.



RESOLUTION 28, 2017

A RESOLUTION IN SUPPORT OF THE RECREATIONAL FISHING INDUSTRY  
AS VITALLY IMPORTANT TO THE ECONOMIC HEALTH AND  
WELL-BEING OF CLALLAM COUNTY

THE BOARD OF CLALLAM COUNTY COMMISSIONERS finds as follows:

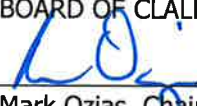
1. The Board of Commissioners acknowledges that the Washington Department of Fish and Wildlife currently sets halibut seasons using poundage quotas set by the International Pacific Halibut Commission and approved by the Pacific Fishery Management Council; and
2. The halibut fishing season has dwindled from a 70 day season in 2006 to 12 days in 2014, 11 days in 2015, eight days in 2016 and now only three non-consecutive days in 2017; and
3. We have substantiated dramatic economic losses to local businesses in the motel, food, fuel, tackle and other businesses as well as the impact of the cancellation of the annual halibut derby, which is a significant tourist draw; and
4. A three day season is unsafe as lives and property have been and may be lost when someone makes a wrong decision to go out in bad weather because that is the only time they can legally fish during the year;

NOW, THEREFORE, BE IT RESOLVED that the Board of Clallam County Commissioners intends to seek restoration of business activity as well as increased safety for the recreational fishing community by requesting the following regulations starting with the 2018 recreational halibut fishing season:

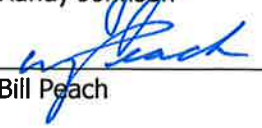
1. Fixed annual bag/possession limit of six (6) fish per a person per year
2. No poundage limit on an individual fish
3. Limit of one (1) fish per day and two (2) in possession
4. Season – second Saturday in March through the third Saturday in October (to track the Pacific Fishery Management Council's (PPFMS) ocean bottom fish fishery dates)

PASSED AND ADOPTED this twenty-eighth day of February 2017

BOARD OF CLALLAM COUNTY COMMISSIONERS

  
Mark Ozias, Chair

  
Randy Johnson

  
Bill Peach

ATTEST:



Loni Gores, Clerk of the Board

File A22.169  
F32.19

RESOLUTION NO. 05-17

A RESOLUTION of the City Council of the City of Port Angeles, Washington, in support of the recreational fishing industry as vitally important to the economic health and well-being of the City of Port Angeles, and Clallam and Jefferson Counties.

WHEREAS, the City of Port Angeles acknowledges that the Washington Department of Fish and Wildlife currently sets halibut seasons using poundage quotas set by the International Pacific Halibut Commission and approved by the Pacific Fishery Management Council; and

WHEREAS, the halibut fishing season has dwindled from a 70 day season in 2006 to 12 days in 2014, 11 days in 2015, eight days in 2016 and now only three non-consecutive days in 2017; and

WHEREAS, we have substantiated dramatic economic losses to local businesses in the motel, food, fuel, tackle and other businesses as well as the impact of the cancellation of the annual halibut derby, which is a significant tourist draw; and

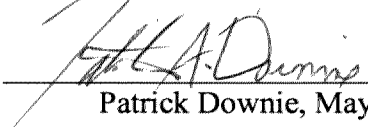
WHEREAS, a three day season is unsafe as lives and property have been and may be lost when someone makes a wrong decision to go out in bad weather because that is the only time they can legally fish during the year.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Port Angeles intends to seek restoration of business activity as well as increased safety for the recreational fishing community by requesting the following regulations starting with the 2018 recreational halibut fishing season:

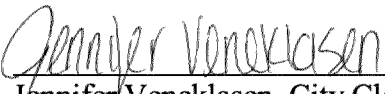
- 1) Fixed annual bag/possession limit of six (6) fish per person per year
- 2) No poundage limit on an individual fish
- 3) Limit of one (1) fish per day and two (2) in possession
- 4) Season - second Saturday in March through the third Saturday in October (to track the

Pacific Fishery Management Council's (PPFMS) ocean bottom fish fishery dates)

PASSED by the City Council of the City of Port Angeles at a regular meeting of said Council held on the 7<sup>th</sup> day of February, 2017.

  
Patrick Downie, Mayor

ATTEST:

  
Jennifer Veneklasen, City Clerk

APPROVED AS TO FORM:

  
William E. Bloor, City Attorney



# Port of Port Angeles

*Port Angeles, Washington*

## Commissioners' Resolution No. \_\_\_\_\_

17-1147

A RESOLUTION IN SUPPORT OF THE RECREATIONAL FISHING INDUSTRY AS VITALLY IMPORTANT TO THE ECONOMIC HEALTH AND WELL-BEING OF CLALLAM COUNTY

WHEREAS the Port of Port Angeles acknowledges that the Washington Department of Fish and Wildlife currently sets halibut seasons using poundage quotas set by the International Pacific Halibut Commission and approved by the Pacific Fishery Management Council; and

WHEREAS the halibut fishing season has dwindled from a 70 day season in 2006 to 12 days in 2014, 11 days in 2015, eight days in 2016 and now only three non-consecutive days in 2017; and

WHEREAS, we have substantiated dramatic economic losses to local businesses in the motel, food, fuel, tackle and other businesses as well as the impact of the cancellation of the annual halibut derby, which is a significant tourist draw; and

WHEREAS, a three day season is unsafe as lives and property have been and may be lost when someone makes a wrong decision to go out in bad weather because that is the only time they can legally fish during the year;


NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners of the Port of Port Angeles intends to seek restoration of business activity as well as increased safety for the recreational fishing community by requesting the following regulations starting with the 2018 recreational halibut fishing season:


- 1) Fixed annual bag/possession limit of six (6) fish per person per year
- 2) No poundage limit on an individual fish
- 3) Limit of one (1) fish per day and two (2) in possession
- 4) Season - second Saturday in March through the third Saturday in October (to track the Pacific Fishery Management Council's (PPFMS) ocean bottom fish fishery dates)

ADOPTED by the Board of Commissioners of the Port of Port Angeles at a regular meeting thereof held on the 21st day of February, 2017.

PORT OF PORT ANGELES  
PORT COMMISSION

  
Colleen McAleer, President

  
Connie Beauvais, Vice President

  
Steven Burke, Secretary



## RESOLUTION NO. 651-17

**A RESOLUTION OF THE PORT OF PORT TOWNSEND IN SUPPORT OF THE RECREATIONAL FISHING INDUSTRY AS VITALLY IMPORTANT TO THE ECONOMIC HEALTH AND WELL-BEING OF THE PORT OF PORT TOWNSEND, THE CITY OF PORT TOWNSEND, AND JEFFERSON AND CLALLAM COUNTIES.**

**WHEREAS**, the Port of Port Townsend acknowledges that the Washington Department of Fish and Wildlife currently sets halibut seasons using poundage quotas set by the International Pacific Halibut Commission and approved by the Pacific Fishery Management Council, and;

**WHEREAS**, the halibut fishing season has dwindled from a seventy day season in 2006, to twelve days in 2014, eleven days in 2015, eight days in 2016 and now only three non-consecutive days in 2017; and

**WHEREAS**, we have substantiated dramatic economic losses to local businesses in the motel, food, fuel, tackle and other businesses as well as the impact of the cancelation of the annual halibut derby, which was a significant tourist draw; and

**WHEREAS**, a three day season is unsafe as lives and property have been, and may be lost when someone makes a wrong decision to go out in bad weather because that is the only time they can legally fish during the year.

**NOW, THEREFORE BE IT HEREBY RESOLVED** that the Port Commission of the Port of Port Townsend intends to seek restoration of business activity as well as increased safety for the recreational fishing community by requesting the following regulations starting with the 2018 recreational halibut fishing season:

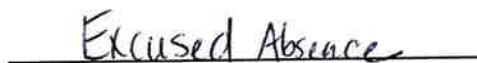
- 1) Fixed annual bag/possession limit of six (6) fish per person, per year
- 2) No poundage limit on an individual fish
- 3) Limit of one (1) fish per day and two (2) in possession
- 4) Season – second Saturday in March through the third Saturday in October (to track the Pacific Fishery Management Council's (PPFMS) ocean bottom fish fishery dates)

**ADOPTED this 8th day of March 2017, by the Commission of the Port of Port Townsend** and duly authenticated in open session by the signatures of the Commissioners voting in favor thereof and the Seal of the Commission duly affixed.

**ATTEST:**

  
Stephen R. Tucker, Secretary

  
Peter W. Hanke, President

  
Brad A. Clinefelter, Vice President

**APPROVED AS TO FORM:**

  
Port Attorney, Goodstein Law Group



**RECEIVED**

APR 24 2017

**PFMC**

April 25, 2017

Pacific Fishery Management Council  
7700 N.E. Ambassador Place, Suite 101  
Portland, OR 97220-1384

Gentlemen:

My name is Otto Bogen. I currently own the F/V Vigorous out of Seattle. My son, Gary Bogen, operates the vessel. The vessel employs five (5) crew that fish in the sablefish tiered fishery off the coast of Washington.

This fishery accounts for about twenty percent of the vessel's and crew's income. It is a very important part of our overall fishing operations. I am very concerned that the Pacific Council may change the allocation of halibut north of Point Chehalis. Our vessel and crew operate in this area and make deliveries into Bellingham Cold Storage. The ability to retain the halibut when fishing sablefish in this area is very important to the profitability of our vessel operations as well as earnings to our crew.

I would remind the Council that we used to be able to target halibut off of Washington. We lost that right about 15 years ago and as a compromise we were told when the halibut resource was robust, we would have a bycatch allowance with our sablefish deliveries. To reopen and allocate away this compromise will not change our interaction with the halibut resource when we fish for sablefish. The ability to retain halibut is important in offsetting our expenses and helps reduce the overall mortality of halibut. I ask the Council not to change the Catch Share Program for halibut.

Sincerely,

A handwritten signature in black ink, appearing to read "Otto Bogen", written in a cursive style.

Otto Bogen  
F/V Vigorous and crew

From: **matthew vogel** <vogel-m@hotmail.com>

Date: Mon, Apr 24, 2017 at 10:29 PM

Subject: 2018 Sport Fishing Halibut proposals for the June PFMC meeting

To: "dcroonquist@gmail.com" <dcroonquist@gmail.com>, "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>, "commission@dfw.wa.gov" <commission@dfw.wa.gov>, "regproposal@iphc.int" <regproposal@iphc.int>, "kelly.ames@noaa.gov" [kelly.ames@noaa.gov](mailto:kelly.ames@noaa.gov)

For the first time in years I feel like someone at the WDFW is listening to those it serves.

We've been begging for bag limits on halibut while watching our resource torn from the land like our buffalo, whales, sage grouse, beaver, and so many more species. The behavior of your predecessors has been an embarrassment to even the uneducated among us.... And yet, today I feel like someone is willing to accept the responsibility the role entails. I feel hopefully to have respect for those at the top of WDFW.

To those behind having a season limit, for the sake of preserving the species and not just to create more rules, I would like to thank you for seeking the right choice despite opposition. Nothing in America is a given. We've been gifted something very precious and we have a responsibility to protect what is left.

Just because someone in the land-locked midwest wants the luxury of eating fresh seafood doesn't mean we have to turn away generations to come. Past generations are lamenting, current generations are begging and future generations are judging.

It would be a great tragedy to see America become what Russia did to its sturgeon and Africa's to the Rhino, China to the Elephant. Please don't make this decision lightly. MANY are watching.

Thank you for considering what is a very important step. I am an average Washington-raised Gen Y who is very saddened to not be going to the coast to partake in a family halibut tradition this year. We have all given up hope on this season, but we haven't given up hope on the WDFW. Please make the right choice.

Respectfully,  
One of many

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

Subject: Fwd: 2018 Sport Fishing Halibut proposals for the June PFMC meeting

From: Stephen Vogel <[stephenvogel5@gmail.com](mailto:stephenvogel5@gmail.com)>

To: [vogel-m@hotmail.com](mailto:vogel-m@hotmail.com), Kevin Vogel

<[vogel\\_512@hotmail.com](mailto:vogel_512@hotmail.com)>, [dmseaton@hotmail.com](mailto:dmseaton@hotmail.com), [kris\\_vogel@yahoo.com](mailto:kris_vogel@yahoo.com)

CC:

Sent from my iPhone

Begin forwarded message:

From: Dave Croonquist <[dcroonquist@gmail.com](mailto:dcroonquist@gmail.com)><<mailto:dcroonquist@gmail.com>>>

Date: April 23, 2017 at 8:46:35 PM PDT

To: undisclosed-recipients::

Subject: Fwd: 2018 Sport Fishing Halibut proposals for the June PFMC meeting

Good evening, all

First of all, my apologies in advance to those of you who are on one or more of my routing lists and who will see this message two or more times.

The following message concerning the sport halibut season in Washington waters was sent out this evening to the WDFW, IPHC, and PFMC and others so that the topic will be on the PFMC calendar for their June meeting in Spokane, Washington. If you want to make comments on the proposals, the first deadline for the PFMC process is May 11 at 5:00 p.m. Comments should be sent to: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)<<mailto:pfmc.comments@noaa.gov>>

Comments received by the PFMC after May 11 but by May 31 at 5:00 p.m. will be included in the supplemental materials distributed to the Council.

You might also want to cc the following agencies:

Washington Dept. of Fish and Wildlife Assistant Director

(Fisheries) [Ron.Warren@dfw.wa.gov](mailto:Ron.Warren@dfw.wa.gov)<<mailto:Ron.Warren@dfw.wa.gov>> WDFW

Commission [commission@dfw.wa.gov](mailto:commission@dfw.wa.gov)<<mailto:commission@dfw.wa.gov>>

International Pacific Halibut Commission [regproposal@iphc.int](mailto:regproposal@iphc.int)<<mailto:regproposal@iphc.int>>

Pacific Fisheries Management Council - Halibut Ms. Kelly

Ames [kelly.ames@noaa.gov](mailto:kelly.ames@noaa.gov)<<mailto:kelly.ames@noaa.gov>>

I'm hopeful that we might see additional support from other states and British Columbia.

Thanks for your continuing support for a better halibut season.

Dave Croonquist/Olympic Peninsula Salmon and Halibut Coalition

\*\*\*\*\*

Ms. Ames, Mr. Warren, and Ms. Goen et al,

Attached are two proposals being submitted on behalf of anglers, businesses, and local government agencies addressing concerns and ideas about the halibut fishery in Washington waters with potential implications for the entire area managed by the IPHC through the NPFMC, PFMC, and DFO-Canada. The halibut sport fleet is a major contributor to the coastal economies from Alaska to Northern California and needs to have a new look at how it is managed.

One request is for returning the full share of halibut lbs that are taken off the recreational quota under the 2A Catch Share Plan to the Washington halibut sport fleet. Since 2002, the "incidental catch" by the sablefish fleet with a couple of low TAC years has been coming off the WA sport fleet allocation - this year it was 70,000 lbs. This is in-line with the proposal submitted by WDFW last fall addressing the return of the sport share to the sport fleet.

The second request is for the establishment of a season for halibut fishing with a daily bag limit of one fish, two fish in possession in the field and a six fish annual bag limit. The steadily declining days available for halibut fishing in WA waters and to some extent OR and California has created a derby mentality that forces folks to fish on designated days with little regard for sea and weather conditions. This puts property and lives of anglers and First Responders, including the USCG, at risk. The reduction in days is also having a severe economic impact on businesses around Puget Sound and the Olympic Peninsula. Anglers spend millions of dollars every year that benefit many businesses and ancillary activities. A different look at how the halibut sport fleet is managed would have positive effects for everyone.

Also attached are resolutions from the City of Port Angeles, Port of Port Angeles, Clallam County Commissioners, and the Port of Port Townsend in support of the concept.

We look forward to working with you to establish a better and safer halibut season structure for 2018 and beyond.

Thank you.

Dave Croonquist on behalf of: Olympic Peninsula Salmon and Halibut Coalition, Puget Sound Anglers, Coastal Conservation Association, halibut anglers, and various businesses

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MAY 01 2017

PFMC

April 26, 2017

Pacific Fishery Management Council  
7700 N.E. Ambassador Place, Suite 101  
Portland, OR 97220-1384

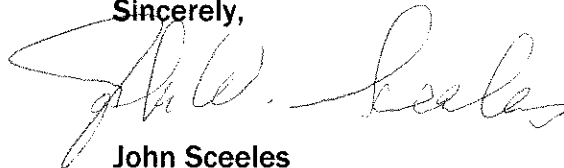
Gentlemen:

My name is John Sceeles. I currently own the F/V Trinket out of Seattle. My son, Steve, operates the vessel. The vessel employs three (3) crew that fish in the sablefish tiered fishery off the coast of Washington.

This fishery accounts for about twenty percent of the vessel's and crew's income. It is a very important part of our overall fishing operations. I am very concerned that the Pacific Council may change the allocation of halibut north of Point Chehalis. Our vessel and crew operate in this area and make deliveries into Bellingham Cold Storage. The ability to retain the halibut when fishing sablefish in this area is very important to the profitability of our vessel operations as well as earnings to our crew.

I would remind the Council that we used to be able to target halibut off of Washington. We lost that right about 15 years ago and as a compromise we were told when the halibut resource was robust, we would have a bycatch allowance with our sablefish deliveries. To reopen and allocate away this compromise will not change our interaction with the halibut resource when we fish for sablefish. The ability to retain halibut is important in offsetting our expenses and helps reduce the overall mortality of halibut. I ask the Council not to change the Catch Share Program for halibut.

Sincerely,

A handwritten signature in black ink, appearing to read "John Sceeles", written over a horizontal line.

John Sceeles  
F/V Trinket and crew



**FISHING VESSEL OWNERS' ASSOCIATION  
INCORPORATED**

**RECEIVED**

4005 20TH AVE. W., ROOM 232  
SEATTLE, WASHINGTON 98199-1290  
PHONE (206) 284-4720 • FAX (206) 283-3341

MAY 01 2017

SINCE 1914

**PPMC**

April 25, 2017

Mr. Herb Pollard, Chairman  
Pacific Fishery Management Council  
7700 N.E. Ambassador Place, Suite 101  
Portland, OR 97220-1384

RE: **Halibut Catch Share Program**

Dear Chairman Pollard:

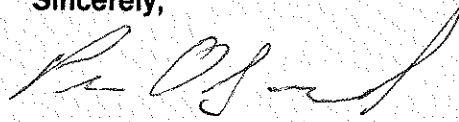
This letter is sent to the Pacific Fishery Management Council on behalf of the members of the Fishing Vessel Owners' Association regarding the importance of the halibut allocated to the sablefish fishery north of Point Chehalis. The FVOA represents 97 fishing families that operation vessels from Fort Bragg, California to the waters of the Bering Sea. Our members operate 42 tier sablefish permits.

The following FVOA vessels currently targeted sablefish in the tiered sablefish fishery and have participated in the fishery north of Point Chehalis (F/V Alrita, Augustine, Evening Star (Astoria), Evening Star (Poulsbo), Keltie, Major, Northern Prince, St. John II, Vigorous, Woniya, Larry Thevik, Ballard, Blackhawk, Castaway, Pacific Hustler, New Oregon, Sea Valley II, and Trinket.) These vessels' and their crews' delivery of sablefish and halibut north of Point Chehalis contribute significantly to the communities and processing infrastructure in the Pacific Northwest. The ability to deliver the halibut with a blackcod trip helps offset much of the trip expenses for the crew and vessels that operate north of Point Chehalis.

The Pacific Northwest has also seen several shoreside processing facility in the Puget Sound area close due to lack of fish supplies. The ability to market the halibut allows for a more profitable outcome for the processors as well as for the fishermen. Due to the extreme demand for access to halibut, our vessels and crews lost their usual and customary fishing operations to commercially target halibut off of Washington. Only in times when the halibut resource is sufficiently robust do we get our opportunity to access halibut. To reallocate this resource away from the commercial fishery after developing a

compromise action that allows a modest participation would be unfair public policy. The current Catch Share Plan allocates the resource in the Washington area and our members would be economically injured if there was a reallocation of the halibut associated with the sablefish fishery north of Point Chehalis. We therefore oppose any reallocation of the halibut resource at this time.

Sincerely,

A handwritten signature in black ink, appearing to read 'Per Odegaard', written in a cursive style.

Per Odegaard  
President

RDA:cb

**Deep Sea  
Fishermen's  
Union  
of the Pacific**

5215 Ballard Avenue N.W.  
Seattle, WA 98107

Phone: (206) 783-2922



Fax: (206) 783-5811

[www.dfsu.org](http://www.dfsu.org)



Established 1912

**RECEIVED**

MAY 01 2017

**PFMC**

April 28, 2017

Mr. Herb Pollard, Chairman  
Pacific Fishery Management Council  
7700 N.E. Ambassador Place, Suite 101  
Portland, Oregon 97220-1348

RE: Halibut Catch Share Program

Dear Chairman Pollard:

I am writing on behalf of the Deep Sea Fishermen's Union of the Pacific located in Seattle Washington. We are not only the oldest, but also the sole, fishing union in the United States. We continue to advocate for fair wages, safe working conditions for our members and sustainable fixed-gear Pacific and North Pacific Fisheries.

Several of our union represented fishing vessels target sablefish in the tiered sable fishery and have participated in the fishery north of Point Chehalis. We find the recently submitted halibut proposal requesting revisions to the Pacific Fishery Management Council's Halibut Catch Sharing Plan to remove the incidental halibut allowance for the primary sablefish fishery north of Point Chehalis to be entirely untenable. Furthermore, we consider it bad public policy and bad faith to reallocate this vital resource away from working people in times of abundance, particularly after previously developing a compromise around recreational fishing.

Our union stands for the continuation of sustainable and safe fishing practices, the reduction of waste whenever practicable and the expansion of family wage jobs in the Pacific and North Pacific Fisheries. We respectfully cannot support this proposed action and we, along with our affiliated maritime unions, will actively resist any erosion to our member's traditional and longstanding fishing rights.

Sincerely,

James J. Johnson  
Executive Director  
Deep Sea Fishermen's Union of the Pacific  
Washington State Maritime Trades, AFL-CIO



# St. John Fisheries

8620 139th Avenue SE  
Snohomish, Washington 98290

RECEIVED

MAY 03 2017

PFMC

April 25, 2017

Mr. Herb Pollard, Chairman  
Pacific Fishery Management Council  
7700 N.E. Ambassador Place, Suite 101  
Portland, OR 97220-1384

Dear Chairman Pollard:

Our family owns the F/V St. John II. I am writing on behalf of the vessel and its' crew regarding the upcoming discussion on your Catch Share Program for halibut. We request the Council not change the current allocation that allows the vessels to retain halibut while fishing for sablefish north of Point Chehalis.

Our vessel participates in the sablefish tiered fishery from central Oregon to Neah Bay. We have a crew of six (6) and we deliver into Westport and Bellingham when fishing north of the Columbia River. At one time our vessel was allowed to target halibut off of Washington. Due to a reallocation of fishing privileges about 15 years ago, a compromise was approved by the PFMC which allows us to retain halibut when fishing sablefish north of Point Chehalis. This is important to our crews and to the operations of the vessel. We are only allowed this retention when the halibut resource is sufficiently robust. At times, when the halibut resource has been low, we haven't had a catch allocation.

On behalf of our family operations and our crew, I ask that you not change the current Catch Share allocation that allows our halibut retention when fishing sablefish north of Point Chehalis.

Sincerely,

Gary Olsen  
St. John II

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

From: **Ron Hayes** <ron@redfernconsultants.com>

Date: Mon, May 8, 2017 at 8:05 AM

Subject: Halibut season change proposal

To: pfmc.comments@noaa.gov

Cc: Ron.Warren@dfw.wa.gov, Commission@dfw.wa.gov, regproposal@iphc.int,  
kelly.ames@noaa.gov

To: The International Pacific Halibut Commission,

I support the attached proposal from the Olympic Peninsula Salmon and Halibut Coalition and request a change in how the sport halibut fishery is managed.

This halibut resolution which is supported by the East Jefferson Chapter of Puget Sound Anglers is necessary to help local recreational fishermen on the Olympic Peninsula fish for Halibut without the potential loss of life and property. The Halibut season should be based on a specific number of fish per angler during the Spring & Summer. Don't pick 3 days where the weather and current can be extremely dangerous and call that a fishing season. Our local communities here on the North Olympic Peninsula depend on fishing as a key economic driver for tourism, food & fuel sales and purchases in our local stores for fishing tackle and bait. The perception for us locals is that the big multi-billion-dollar commercial fishing industry wants to keep all the Halibut for themselves. Those of us who fish for pleasure and to also put food on the table want to be able to pass on our fishing traditions to the next generation. We are frustrated by the state of Washington which has ignored our concerns for years. I belong to the local chapter of Puget Sound Anglers. Many of our members regularly attend the public government meetings on the Halibut seasons and Salmon seasons to educate ourselves and to submit our comments and recommendations, but nothing happens. Each year we have fewer and fewer days on the water to fish and the state gives more and more of the Halibut to the commercial fishing industry. This is not fair. Our only hope is asking help directly from the IPHC, PFMC and other international organizations.

Thank you,

Ron Hayes – East Jefferson Chapter of Puget Sound Anglers

P.O. Box 157, Port Townsend, WA 98368

[\(360\) 390-8296](tel:3603908296)

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

From: **Lee Whetham** <Lwhetham@cityofpa.us>

Date: Mon, May 8, 2017 at 9:13 AM

Subject: Fw: Request for support

To: "pmfc.comments@noaa.gov" <pmfc.comments@noaa.gov>, Ron Warren  
<Ron.Warren@dfw.wa.gov>, "Commission (DFW)" <COMMISSION@dfw.wa.gov>,  
"regproposal@iphc.int" <regproposal@iphc.int>, "kelly.ames@noaa.gov"  
<kelly.ames@noaa.gov>

Cc: Dave Croonquist <dcroonquist@gmail.com>, "Mike.Chapman@leg.wa.gov"

<Mike.Chapman@leg.wa.gov>, "Kevin Van De Wege (kevin.vandewege@leg.wa.gov)"  
<kevin.vandewege@leg.wa.gov>, "Steve.Tharinger@leg.wa.gov"  
<Steve.Tharinger@leg.wa.gov>, "bobaunspach@hotmail.com" <bobaunspach@hotmail.com>,  
Bryan Bukovnik <bucksnort49@msn.com>, Chad Mitts <mitts1971@gmail.com>, Cherie Kidd  
<Ckidd@cityofpa.us>, "colleenm@portofpa.com" <colleenm@portofpa.com>, Jack Gray  
<jackg@olypen.com>, Jerry Ludke <jerryl@portofpa.com>, "jerryleewright@yahoo.com"  
<jerryleewright@yahoo.com>, Ken Townsend <btgs1@q.com>, Mark Thomas  
<Markthomas@q.com>, Norm Metzler <olympic9@msn.com>, Ralph Burba  
<orcaenterprises@hotmail.com>, Robert Beausoleil <robter@olypen.com>, Rod Anderson  
<elk@wavecable.com>, "bpeach@co.clallam.wa.us" <bpeach@co.clallam.wa.us>, Clyde  
Wilkerson <walkabout443@gmail.com>

All,

Attached is my concerns of halibut fishery. I am working locally on the Olympic Peninsula to bring attention to the needs of our recreational fishing community & small business owners. From bait/tackle sales to hotels to food & fuel needs. This fishery represents a large economic interest to everyone.

Of particular interest to me is the oversight committees that serve the various advisory boards in the management of the halibut fishery. From everything I've heard, they appear to be mainly made up of individuals from the commercial fishery industry. What can I do about this ? is there someone I should further contact with my concerns ?

It's time to act on these requests for the benefit of the recreational fishermen, the small coastal communities of the state of Washington depend on these " fish " dollars.

Sincerely, Lee Whetham

K. Lee Whetham  
City Council, Position 2  
City of Port Angeles  
Port Angeles, Wash.  
[Lwhetham@cityofpa.us](mailto:Lwhetham@cityofpa.us)

#### A CHANGE IS NEEDED IN THE SPORT HALIBUT FISHERY MANAGEMENT PROTOCOLS

The Pacific Halibut Convention was developed to administer the commercial fisheries for halibut between the United States and Canada. We believe the sport fleet halibut fishery can be managed separately from the commercial, Alaska subsistence, and tribal/First Nation fisheries. The International Pacific Halibut Commission (IPHC) currently sets harvest poundage quotas for the various halibut fisheries in the waters off the US and Canadian coasts. These quotas are then applied through appropriate US and Canadian federal agencies to the states and British Columbia.



We believe that it is time to re-structure the sport halibut fishery to be managed on numbers of fish landed, not estimated pounds landed.

Recreational halibut anglers are a critical component in the coastal economies of the US and British Columbia. They spend tens of millions of dollars which support many businesses from motels and gas stations to restaurants, grocery stores, bait dealers, and tackle shops. The continuing decline in halibut fishing opportunities is causing severe economic impacts to coastal communities particularly in Catch Share Plan Area 2A (Washington, Oregon, N. California).

Assigned fishing dates have created a derby mentality, forcing anglers to go fishing when they shouldn't be on the water. Lives and property have been lost, and first responders including the US Coast Guard are put at risk when called out for search and rescue activities. Having an extended season would allow the sport angler to pick the days and sea/weather conditions for a safer fishery.

We believe the sport fishery can be better managed by limiting the number of fish that can be taken and possessed in the field and establishing an annual limit within a season structure. With more timely surveys and requiring a halibut specific catch record process, the Federal and state agencies can get a better handle on total harvest and provide more accurate harvest data to the IPHC. We feel that that the IPHC can best address our concerns within the scope of the Convention under Article III, Section 2 (a), (b), and (c) below.

*2. The Contracting Parties agree that for the purpose of developing the stocks of halibut of the Northern Pacific Ocean and Bering Sea to levels which will permit the maximum sustained yield from that fishery and for maintaining the stocks at those levels, the International Pacific Halibut Commission, with the approval of the President of the United States of America and of the Governor General in Council of Canada, may, after investigation has indicated such action to be necessary, in respect of the nationals and inhabitants and fishing vessels and boats of the United States of America and of Canada, and in respect of halibut:*

*(a) divide the Convention waters into areas;*

*(b) establish one or more open or closed seasons, as to each area;*

*(c) limit the size of the fish and the quantity of the catch to be taken from each area within any season during which fishing is allowed;*

We would like to have the IPHC designate the Pacific Coast of both countries as one sport fishing area; establish one season – February 1 to December 31; and set an annual bag limit of six fish. With the same season and annual limit applied to both US and Canadian sport halibut anglers the concern about the IPHC being involved in domestic regulation development shouldn't be a problem. We would recommend that the daily limit be one fish and the field possession limit be two fish.

The Olympic Peninsula Salmon and Halibut Coalition and affiliated individuals and groups request that the Washington Department of Fish and Wildlife support our proposal to the International Pacific Halibut Commission, the Pacific Fisheries Management Council, and the North Pacific Fisheries Management Council for implementation in the 2018 sport halibut season. The coastal communities would realize significant economic benefits from a longer season, and anglers could

plan their vacations within the season structure and know that the sea and weather conditions could be safer. We look forward to the upcoming meetings and are hopeful that 2018 will see the sport fleet halibut fishery greatly expanded.

The Pacific Fisheries Management Council which oversees ocean fisheries for Washington, Oregon, Idaho, and California will be discussing new regulation proposals at their June, 2017 meeting in Spokane, Washington. This proposal has already been submitted by the Coalition. Any comments on this proposal should be sent to [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov) and it is suggested that your comments also be cc'd to the following agencies:

1. Washington Department of Fish and Wildlife Assistant Director (Fisheries) [Ron.Warren@dfw.wa.gov](mailto:Ron.Warren@dfw.wa.gov) and the WDFW Commission [commission@dfw.wa.gov](mailto:commission@dfw.wa.gov)
2. International Pacific Halibut Commission [regproposal@iphc.int](mailto:regproposal@iphc.int)
3. Pacific Fisheries Management Council – Halibut Manager Ms. Kelly Ames [kelly.ames@noaa.gov](mailto:kelly.ames@noaa.gov)

Public comments on the proposal received **BY 5:00 pm (Pacific), Thursday, May 11, 2017**, will be mailed to Council members and appropriate advisory bodies prior to the June meeting. This is known as the *Advance Briefing Book Deadline*.

Public comment materials received at the Council office after the May 11, 5:00 pm deadline, **but BY 5:00 pm (Pacific), Wednesday, May 31, 2017** will be included in the supplemental materials distributed to the Council on the first day of the June meeting. This is known as the *Supplemental*

*Public Comment Deadline*.

We thank you for your support.

For the Olympic Peninsula Salmon and Halibut Coalition, Port Angeles Salmon Club, Puget Sound Anglers, Coastal Conservation Association, City of Port Angeles, Port of Port Angeles, Clallam County Commissioners, Port of Port Townsend, halibut anglers, and coastal businesses with direct and indirect links to the sport fishing community.

Dave Croonquist

Sequim, WA

[dcroonquist@gmail.com](mailto:dcroonquist@gmail.com)

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

From: **Ward** <[glassguy@olypen.com](mailto:glassguy@olypen.com)>

Date: Mon, May 8, 2017 at 6:12 AM

Subject: FW: Recreational Halibut Harvest

To: [kelly.ames@noaa.gov](mailto:kelly.ames@noaa.gov)

Ms. Ames

It is high time the powers that be recognize the recreational halibut fishery as an important part of the overall resource. We (recreational fishers) have been “the last dog to the feed bowl” for far too long. See below:

## A CHANGE IS NEEDED IN THE SPORT HALIBUT FISHERY MANAGEMENT PROTOCOLS

The Pacific Halibut Convention was developed to administer the commercial fisheries for halibut between the United States and Canada. We believe the sport fleet halibut fishery can be managed separately from the commercial, Alaska subsistence, and tribal/First Nation fisheries. The International Pacific Halibut Commission (IPHC) currently sets harvest poundage quotas for the various halibut fisheries in the waters off the US and Canadian coasts. These quotas are then applied through appropriate US and Canadian federal agencies to the states and British Columbia. We believe that it is time to re-structure the sport halibut fishery to be managed on numbers of fish landed, not estimated pounds landed.

Recreational halibut anglers are a critical component in the coastal economies of the US and British Columbia. They spend tens of millions of dollars which support many businesses from motels and gas stations to restaurants, grocery stores, bait dealers, and tackle shops. The continuing decline in halibut fishing opportunities is causing severe economic impacts to coastal communities particularly in Catch Share Plan Area 2A (Washington, Oregon, N. California).

Assigned fishing dates have created a derby mentality, forcing anglers to go fishing when they shouldn't be on the water. Lives and property have been lost, and first responders including the US Coast Guard are put at risk when called out for search and rescue activities. Having an extended season would allow the sport angler to pick the days and sea/weather conditions for a safer fishery.

We believe the sport fishery can be better managed by limiting the number of fish that can be taken and possessed in the field and establishing an annual limit within a season structure. With more timely surveys and requiring a halibut specific catch record process, the Federal and state agencies can get a better handle on total harvest and provide more accurate harvest data to the IPHC.

We feel that that the IPHC can best address our concerns within the scope of the Convention under Article III, Section 2 (a), (b), and (c) below.

*2. The Contracting Parties agree that for the purpose of developing the stocks of halibut of the Northern Pacific Ocean and Bering Sea to levels which will permit the maximum sustained yield from that fishery and for maintaining the stocks at those levels, the International Pacific Halibut Commission, with the approval of the President of the United States of America and of the Governor General in Council of Canada, may, after investigation has indicated such action to be necessary, in respect of the nationals and inhabitants and fishing vessels and boats of the United States of America and of Canada, and in respect of halibut:*

*(a) divide the Convention waters into areas;*

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We would like to have the IPHC designate the Pacific Coast of both countries as one sport fishing area; establish one season – February 1 to December 31; and set an annual bag limit of six fish. With the same season and annual limit applied to both US and Canadian sport halibut anglers

the concern about the IPHC being involved in domestic regulation development shouldn't be a problem. We would recommend that the daily limit be one fish and the field possession limit be two fish.

The Olympic Peninsula Salmon and Halibut Coalition and affiliated individuals and groups request that the Washington Department of Fish and Wildlife support our proposal to the International Pacific Halibut Commission, the Pacific Fisheries Management Council, and the North Pacific Fisheries Management Council for implementation in the 2018 sport halibut season. The coastal communities would realize significant economic benefits from a longer season, and anglers could plan their vacations within the season structure and know that the sea and weather conditions could be safer. We look forward to the upcoming meetings and are hopeful that 2018 will see the sport fleet halibut fishery greatly expanded.

Ward S. Dunscomb  
Past President  
Port Angeles Salmon Club  
P.O. Box 836

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

From: <Phishathome@aol.com>

Date: Mon, May 8, 2017 at 9:18 AM

Subject: Sport halibut changes

To: [kelly.ames@noaa.gov](mailto:kelly.ames@noaa.gov)

Sirs, These ideas would go along way to implement a better method of allocating halibut in our state. The present plan just does not work.

Recreational halibut anglers are a critical component in the coastal economies of the US and British Columbia. They spend tens of millions of dollars which support many businesses from motels and gas stations to restaurants, grocery stores, bait dealers, and tackle shops. The continuing decline in halibut fishing opportunities is causing severe economic impacts to coastal communities particularly in Catch Share Plan Area 2A (Washington, Oregon, N. California).

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Ron Williams  
Kingston, WA

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

From: **Michael Corbin** <mjc@smart-service.com>

Date: Mon, May 8, 2017 at 12:43 PM

Subject: Comment on Sport Halibut Fishery

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

Cc: "Ron.Warren@dfw.wa.gov" <Ron.Warren@dfw.wa.gov>, "commission@dfw.wa.gov" <commission@dfw.wa.gov>, "regproposal@iphc.int" <regproposal@iphc.int>,

"kelly.ames@noaa.gov" <kelly.ames@noaa.gov>

**To whom it may concern,**

**I would like to voice my support as an avid sportsfisherman as well as a small business owner for the proposal outlined below set forth by the Pacific Halibut Convention.**

The Pacific Halibut Convention was developed to administer the commercial fisheries for halibut between the United States and Canada. We believe the sport fleet halibut fishery can be managed separately from the commercial, Alaska subsistence, and tribal/First Nation fisheries. The International Pacific Halibut Commission (IPHC) currently sets harvest poundage quotas for the various halibut fisheries in the waters off the US and Canadian coasts. These quotas are then applied through appropriate US and Canadian federal agencies to the states and British Columbia. We believe that it is time to re-structure the sport halibut fishery to be managed on numbers of fish landed, not estimated pounds landed.

Recreational halibut anglers are a critical component in the coastal economies of the US and British Columbia. They spend tens of millions of dollars which support many businesses from motels and gas stations to restaurants, grocery stores, bait dealers, and tackle shops. The continuing decline in halibut fishing opportunities is causing severe economic impacts to coastal communities particularly in Catch Share Plan Area 2A (Washington, Oregon, N. California). Assigned fishing dates have created a derby mentality, forcing anglers to go fishing when they shouldn't be on the water. Lives and property have been lost, and first responders including the US Coast Guard are put at risk when called out for search and rescue activities. Having an extended season would allow the sport angler to pick the days and sea/weather conditions for a safer fishery.

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shouldn't be a problem. We would recommend that the daily limit be one fish and the field possession limit be two fish.

The Olympic Peninsula Salmon and Halibut Coalition and affiliated individuals and groups request that the Washington Department of Fish and Wildlife support our proposal to the International Pacific Halibut Commission, the Pacific Fisheries Management Council, and the North Pacific Fisheries Management Council for implementation in the 2018 sport halibut season. The coastal communities would realize significant economic benefits from a longer season, and anglers could plan their vacations within the season structure and know that the sea and weather conditions could be safer. We look forward to the upcoming meetings and are hopeful that 2018 will see the sport fleet halibut fishery greatly expanded.

The Pacific Fisheries Management Council which oversees ocean fisheries for Washington, Oregon, Idaho, and California will be discussing new regulation proposals at their June, 2017 meeting in Spokane, Washington. This proposal has already been submitted by the Coalition.

**I encourage you to adopt the above proposal.**

Sincerely,

Mike Corbin  
15727 68th Ave W  
Edmonds, Wa 98026  
[206-718-9921](tel:206-718-9921)

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

From: **Richard Bumgarner** <richard.bumgarner@gmail.com>

Date: Mon, May 8, 2017 at 10:54 AM

Subject: I support sensible change in SPORT HALIBUT FISHERY MANAGEMENT PROTOCOLS

To: pfmc.comments@noaa.gov

Cc: Ron.Warren@dfw.wa.gov, commission@dfw.wa.gov, regproposal@iphc.int, kelly.ames@noaa.gov, Representative Derek Kilmer <wa06dkima@mail.house.gov>, "Senator Maria Cantwell (imailagent)" <maria\_cantwell@cantwell.senate.gov>, patty\_murray@murray.ssenate.gov

Dear Sirs

The problems and changes outlined below make good common sense. Please consider them seriously and make the needed changes for our safety, for the economic benefits that can be preserved and for sustainable preservation of the fishery. There really can be no ethical, sensible reasons why these changes cannot be made promptly and with determination to implement them forthwith.

The Washington State authorities bear a particular responsibility to facilitate the needed changes in the state rules... no delay or obfuscation should be tolerable. The current situation is dangerous,

foolish and far from the common-good interests of the citizens of Washington. Basic fairness, safety and conservation principles demand action by NOAA and WDFW.

Your attention and sensible support is expected.

Sincerely,  
Richard Bumgarner  
1272 Marine Drive  
Sequim, Washington 98382

Begin forwarded message:

**From:** SquidPro Tackle's Halibut Fishing Chronicles <[comment-reply@wordpress.com](mailto:comment-reply@wordpress.com)>  
**Subject:** [New post] A CHANGE IS NEEDED IN THE SPORT HALIBUT FISHERY MANAGEMENT PROTOCOLS  
**Date:** May 7, 2017 at 9:58:53 PM PDT  
**To:** [richardbumgarner@gmail.com](mailto:richardbumgarner@gmail.com)  
**Reply-To:** SquidPro Tackle's Halibut Fishing Chronicles  
<[comment+ewnuy0ux8d7e1qqtkeqh4t6@comment.wordpress.com](mailto:comment+ewnuy0ux8d7e1qqtkeqh4t6@comment.wordpress.com)>

Respond to this post by replying above this line

New post on **SquidPro Tackle's Halibut Fishing Chronicles**

### [A CHANGE IS NEEDED IN THE SPORT HALIBUT FISHERY MANAGEMENT PROTOCOLS](#)

by [John L. Beath](#)

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Any comments on this proposal should be sent to [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov) and it is suggested that your comments also be cc'd to the following agencies:

- Washington Department of Fish and Wildlife Assistant Director (Fisheries) [Ron.Warren@dfw.wa.gov](mailto:Ron.Warren@dfw.wa.gov) and the WDFW Commission [commission@dfw.wa.gov](mailto:commission@dfw.wa.gov)
- International Pacific Halibut Commission [regproposal@iphc.int](mailto:regproposal@iphc.int)
- Pacific Fisheries Management Council – Halibut Manager Ms. Kelly Ames [kelly.ames@noaa.gov](mailto:kelly.ames@noaa.gov)

Public comments on the proposal received **BY 5:00 pm (Pacific), Thursday, May 11, 2017**, will be mailed to Council members and appropriate advisory bodies prior to the June meeting. This is known as the *Advance Briefing Book Deadline*.

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We thank you for your support.

For the Olympic Peninsula Salmon and Halibut Coalition, Port Angeles Salmon Club, Puget Sound Anglers, Coastal Conservation Association, City of Port Angeles, Port of Port Angeles, Clallam County Commissioners, Port of Port Townsend, halibut anglers, and coastal businesses with direct and indirect links to the sport fishing community.

Dave Croonquist

Sequim, WA

[dcroonquist@gmail.com](mailto:dcroonquist@gmail.com)

**John L. Beath** | May 7, 2017 at 8:58 pm | Categories: [Puget Sound Halibut Fishing](#), [Uncategorized](#), [Washington Halibut Fishing](#), [Washington Halibut Regs](#) | URL: <http://wp.me/pZe1I-is>

Port Angeles, WA. 98362

[glassguy@olypen.com](mailto:glassguy@olypen.com)

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

From: **Ed Wickersham** <patyn@comcast.net>

Date: Tue, May 9, 2017 at 9:01 AM

Subject: Halibut season change proposal

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

Cc: Ron.Warren@dfw.wa.gov, commission@dfw.wa.gov, regproposal@iphc.int, kelly.ames@noaa.gov

Pacific Fisheries Management Council Members,

I have attached a proposal that has already been submitted to the IPHC, PFMC, and WDFW. I understand initial action could be taken at the June PFMC meeting in Spokane if there was to be a change for the 2018 halibut fishery.

In addition to this request, I would also suggest that the Council consider the 2A catch share plan be amended to return the current share of the sport halibut harvest allocation back from the sablefish fleet. The recreational sector needs to get their full halibut quota back from the sablefish *incidental harvest allotment*. This year, the sablefish fleet got 70,000 lbs. that would have extended our season by some period of time. We got an extra 23,000 lbs. this year. We would have had an extra 93,000 lb.

It is imperative that members of the IPHC and PFMC understand that on the west coast of the lower 48 the halibut industry is not centered in the commercial sector any longer rather it is the recreational sector that can generate millions of extra dollars if given an adequate allocation, and predictable season structure. Every halibut you allow to be taken in a commercial fishery that could be taken in a recreational fishery costs our coastal communities hundreds of dollars in lost economic benefits which amounts to millions of dollars in lost revenue. It is time the Council recognizes the value of recreational fisheries.

My thanks for your efforts on behalf of our fisheries,

Ed Wickersham  
18000 NW 31<sup>st</sup> Ave.  
Ridgefield, WA 98642  
[patyn@comcast.net](mailto:patyn@comcast.net)

#### A CHANGE IS NEEDED IN THE SPORT HALIBUT FISHERY MANAGEMENT PROTOCOLS

The Pacific Halibut Convention was developed to administer the commercial fisheries for halibut between the United States and Canada. We believe the sport fleet halibut fishery can be managed separately from the commercial, Alaska subsistence, and tribal/First Nation fisheries. The International Pacific Halibut Commission (IPHC) currently sets harvest poundage quotas for the various halibut fisheries in the waters off the US and Canadian coasts. These quotas are then applied through appropriate US and Canadian federal agencies to the states and British Columbia. We believe that it is time to re-structure the sport halibut fishery to be managed on numbers of fish landed, not estimated pounds landed.

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I would urge the council to give this proposal careful consideration.

Sincerely,  
Ed Wickersham  
Ridgefield, WA

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

From: **John Warrick** <jwwarrick007@gmail.com>

Date: Tue, May 9, 2017 at 9:54 AM

Subject: Halibut Sport Fishing Season Proposal

To: pfmc.comments@noaa.gov

Cc: Ron.Warren@dfw.wa.gov, commission@dfw.wa.gov, regproposal@iphc.int,



Kelly.ames@noaa.gov, Dave Croonquist <dcroonquist@gmail.com>

Good Morning,

As a proud resident of Washington State, I am also a dedicated sports fisherman. In the past 10 years I, along with many of my friends, find ourselves facing increasingly reduced fishing opportunities for iconic Northwest species such as King and Silver Salmon and Pacific Halibut.

I strongly support the proposal developed by the Olympic Peninsula Salmon and Halibut Coalition, the Port Angeles Salmon Club, the Puget Sound Anglers, the Coastal Conservation Association, and others, to create an extended Halibut Season with an annual, not to exceed, six fish limit.

The current system of pre-determined fishing days leads to a derby style mentality, creating chaos at launching facilities throughout Puget Sound, cities along the Strait of Juan de Fuca like Sequim and Port Angeles, and at launch facilities at La Push and Neah Bay. If weather and sea state are unfavorable, then only the largest, most elaborate, and well equipped boats are able to get out to fish. Or, if conditions are truly marginal, then no one fishes.

I called the Quileute Marina before this year's Halibut season opener to inquire about facilities. I was told by Marina Staff that on opening day if I wasn't in line with my boat by 0200, I would probably have difficulty getting the boat launched before daybreak due to the wait times for the single ramp facility. So, I opted out.

Instead, on May 4, opening day, I drove my wife to Seattle from Port Angeles for a medical appointment. On the return trip that afternoon, between the Hood Canal and Sequim, I counted 38 sport fishing boats headed east, returning from halibut fishing. Similarly, Saturday, May 6, I arrived at John Wayne Marina mid morning for shrimping and every single parking space was full with pickups and boat trailers jammed in side by side. This was Day 2 of the Halibut season.

Last year, 2016, I purchased a \$40 annual, launch/parking permit for the Port Angeles Boathaven. I also rented a boat berth for all of May for another \$150. On opening day, I could not find a parking spot in the parking lot. Trucks and boat trailers lined Marine Drive in both directions. So I parked a quarter of a mile away toward the paper mill and walked back to my boat. Upon my return after fishing, I was greeted with a \$35 parking ticket from the City of Port Angeles because I had not seen a No Parking sign in the early morning darkness.

These anecdotes illustrate the unnecessary complications, inconveniences, and personal expense endured by anglers trying to negotiate the current system defining the Halibut fishing season in Washington.

With the pre-determined fishing days, Anglers are forced to drive hundreds of miles towing their boats, only to then confront safety-related decisions about weather and sea state, all for a single day of fishing! Others living along the Strait, have given up on fishing in Washington waters and have purchased Canadian fishing licenses, and now "regularly commute" to fish in British Columbia.

Please objectively consider the proposal to create an extended Halibut fishing season with an annual, not to exceed catch limit. It makes sense, reduces the derby mentality chaos, promotes safe boating and fishing, and it reduces the demand on emergency services such as the US Coast Guard. And, it gives sports anglers who have purchased licenses, equipment, fuel, lodging, etc, a fair and equitable chance to do what they love, namely, to go fishing when it's convenient, safe, and enjoyable.

Sincerely,

John Warrick  
1912 Gasman Rd.  
Port Angeles, WA 98362

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

From: <LewisBoyd@aol.com>

Date: Wed, May 10, 2017 at 10:02 AM

Subject: Halibut comments

To: pfmc.comments@noaa.gov

Cc: kirk.pearson@leg.wa.gov, regproposal@iphc.int, kelly.ames@noaa.gov,

Ron.Warren@dfw.wa.gov, commission@dfw.wa.gov

May 10, 2017

In the BSAI there appears to be a by-catch reduction from current 4,426 mt to 3,515 mt for the new PSC limit representing a 21% decrease in by-catch waste according to link below.

<https://www.npfmc.org/bsai-halibut-bycatch/>

GOA Halibut By-catch “Currently, the GOA Groundfish harvest specifications annually establish a 2,000 mt halibut

Prohibited Species Catch (PSC) limit for trawl gear and a 300 mt halibut PSC limit for hook and line

gear.” According to the link below.

<https://www.npfmc.org/wp-content/PDFdocuments/halibut/GOAHalibutPSC112.pdf>

The Alaskan by-catch waste is a total of 5815 mt which equals 12,819,880.5 pounds of wasted halibut.

The reason I bring this up is for two reasons;

1) to show a comparison between Alaskan by-catch waste and the total 110.3 mt equaling 243,667 pounds of halibut allocated to Washington State recreational sport angler shown in link below. This would represent in a pie chart that the Washington state sport angler would get less than 2% of the total waste allowed of Alaskan halibut by-catch and this is before we even begin to talk about the direct halibut fishery.

<http://wdfw.wa.gov/fishing/creel/halibut/>

2) There is a program called SeaShare where in 2014 app. 59,000 lbs. of halibut is delivered to BSAI and GOA ports from a portion of halibut by-catch. This is a similar amount of poundage to the 2017 Puget Sound sport angler allocation of 64,962 pound of halibut.

[http://www.iphc.int/publications/rara/2015/RARA2015\\_19ProhibitedSpeciesDonation.pdf](http://www.iphc.int/publications/rara/2015/RARA2015_19ProhibitedSpeciesDonation.pdf)

Both of these poundage represents a drop in a bucket and both need major improvements in coming years.

Looking at the halibut stock assessment,

Stock assessment survey	Allocation (plus or minus from 2010)
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Area 2A increase 109%	+0.05
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Area 2B increase 3%	+0.15
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Area 2c-4 decrease -5% to-36%	These areas are all thrown together so we can't give specific values, but we know they are all (minus)
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Area 2C	-2.07
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Area 3A	-5.63
---------	-------

Area 3B	-2.38
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Area 4A	+0.08
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Area 4B	+0.02
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Area4CDE	+0.14
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The problem seen here is 2A (CA,OR, and WA) has a major increase in stock and gets little credit with smaller increase in allocation compared to 2B with slight increase and compared to 4A,4B, 4CDE with minus stock assessment from the prior year with 4 out of 5 areas with higher allocation increases than 2A. What is wrong with that picture?

Halibut experience two types of migration; a compensatory migration, in which juveniles move from shallow nursery grounds to deeper areas on the shelf which they inhabit as adults, and annual migrations of adults from the summer feeding grounds to winter spawning grounds. The compensatory migration happens after initial growth on the nursery grounds, around ages two or three This migration can take several years to complete, and is usually over once they find a summer feeding ground. Some halibut continue to migrate in subsequent years, moving to more eastward grounds. The longest migration on record was that of a fish tagged near Atka Island in the Aleutian Islands, which was recaptured at Coos Bay, Oregon, a distance of 2,500 mi (4,023 km). Once halibut become mature, they seasonally migrate in the fall from the shallower (100 to 600 foot!) waters of the continental shelf to the bottom edge of the continental slope - as deep as 2,000 feet.

The halibut resource is not unlimited as appearance would suggest. Improvements on halibut allocations and waste are needed in the coming years.

Thank you,

Lewis Boyd

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

**From:** Bob Jautz <[goldbug@sonic.net](mailto:goldbug@sonic.net)>  
**Date:** Tue, May 9, 2017 at 10:10 PM  
**Subject:** Fw: Halibut season change proposal  
**To:** [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

**From:** Ron Hayes  
**Sent:** Monday, May 08, 2017 7:21 AM  
**To:** undisclosed-recipients:  
**Subject:** FW: Halibut season change proposal

Hi everyone,

Below is a proposal to change the 2018 recreational halibut season that will be presented in June at the International Pacific Halibut Commission (IPHC) meeting in Spokane. As you know Dave Croonquist has been working tirelessly for years to save our recreational halibut season in Puget Sound. If you have a few minutes could you send an email [topfmc.comments@noaa.gov](mailto:topfmc.comments@noaa.gov) in support of this proposal. See attached.

Dave is a member of the East Jefferson Chapter and North Olympic Chapter of the Puget Sound Anglers. He deserves our support.  
Thanks,

Ron Hayes – East Jefferson Chapter of Puget Sound Anglers  
[\(360\) 390-8296](tel:3603908296)

**From:** Dave Croonquist [mailto:[dcroonquist@gmail.com](mailto:dcroonquist@gmail.com)]  
**Sent:** Sunday, May 7, 2017 9:30 PM  
**To:** undisclosed-recipients:  
**Subject:** Fwd: Halibut season change proposal

Good evening, all

Attached is a document requesting support by the WDFW for a proposal from the Olympic Peninsula Salmon and Halibut Coalition to the PFMC and IPHC requesting a change in how the sport halibut fishery is managed. If you would like to support the idea, links are provided to send emails to the appropriate agencies.

The proposal has already been submitted to the IPHC, PFMC, and WDFW. Initial action needs to be taken at the June PFMC meeting in Spokane if we hope to see a change for the 2018 halibut fishery.

In addition to this request, we have also requested the the 2A catch share plan be amended to return the current share of the sport halibut harvest allocation back from the sablefish fleet. If we don't get our season proposal, we need to get our full halibut quota back from the sablefish *incidental harvest allotment*. This year, the sablefish fleet got 70,000 lbs that would have extended our season by some period of time. We got an extra 23,000 lbs this year. We would have had an extra 93,000 lb.

Dave Croonquist

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2. International Pacific Halibut Commission [regproposal@iphc.int](mailto:regproposal@iphc.int)
3. Pacific Fisheries Management Council – Halibut Manager Ms. Kelly Ames [kelly.ames@noaa.gov](mailto:kelly.ames@noaa.gov)

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We thank you for your support.

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Dave Croonquist  
Sequim, WA  
[dcroonquist@gmail.com](mailto:dcroonquist@gmail.com)

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

From: **Troy McKelvey** <troy3@cablespeed.com>

Date: Wed, May 10, 2017 at 5:38 PM

Subject: A CHANGE IS NEEDED IN THE SPORT HALIBUT FISHERY MANAGEMENT PROTOCOLS

To: pfmc.comments@noaa.gov

Cc: Ron.Warren@dfw.wa.gov, commission@dfw.wa.gov, regproposal@iphc.int,

kelly.ames@noaa.gov

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Thank you,

Troy McKelvey

POB 2002, Port Townsend, WA. 98368

[360-643-0592](tel:360-643-0592)

PSA, CCA, PSRFEFOC, NOSC, Jefferson County MRC, LLTK

Pacific Marine Management Council  
7700 NE Ambassador Pl, Suite 101  
Portland, OR 97220-1384

Doug Morrisson  
F/V Tempo

Re: comments on Pacific Halibut IFQ s

Council Members,

I am a long-time commercial fisherman on the Oregon coast and have participated in nearly every major fishery for many years. The Pacific Halibut directed commercial fishery is one of the longest –term and most traditional fisheries on the west coast.

The ten-hour halibut derby has ruined this valuable and traditional fishery. Here's how:

- 1 The rewards of \$50,000 or more for larger boats have made the fishery extremely dangerous, especially with lesser experienced newer participants. Weather conditions are often ignored causing a "race to catch fish" with no regard to adverse weather conditions.
- 2 Ten –hour openers produce terrible quality fish. Newer participants do not know how to handle the volume of fish caught in such a short period of time. The fish have no time to chill in such a short period of time. Often fish are not dressed in a timely manner.
- 3 Potential rewards attract inexperienced participants resulting in gear conflicts and poor quality fish, increasing conflicts between fishermen and lowering fish quality.
- 4 Fish buyers are receiving a year's supply of halibut in a day, lowering the price for all.
- 5 The derby is expensive to enforce and demands nearly every available enforcement person from OSP, Coast Guard, NMFS and IPHC.
- 6 Many participants feel the need to "drift" ahead of openers as many as five or six days to get a good spot for the opening. There are not that many spots to fish and, with no chance to look around for new spots within the RCA overcrowding is inevitable.

I believe the directed commercial halibut fishery should go to an IFQ system like most other fisheries have. Window periods and qualification standards must be established along with a control date. Landings from the beginning of the ten-hour derby must be taken into account. Incidental sablefish catch should NOT be used as criteria to qualify for halibut IFQs.

Thank you for your consideration,

Doug Morrisson