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From: **Christopher Nelson** <cfnelson@outlook.com>

Date: Mon, May 15, 2017 at 1:24 PM

Subject: Halibut Bag Limits

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>

Halibut managers:

Quick note from a longtime fisherman re: the proposal to introduce an annual bag limit for recreational halibut on the Pacific coast, thereby moving away from "derby" style openers. I am all for it. I work M-F so miss 2/3 of the openers. The 1/3 that fall on a weekend are often a total bust for me, because either:

(a) the weekend opener happens after a tribal longlining opener, or so late the season that the halibut have moved out of the areas I mostly fish (in Puget Sound, MA 9 and the eastern part of 6); or

(b) it happens on a day when the weather is miserable or forces me (the boat owner) to make a lose-lose decision (cancel long-held plans to fish with family (who are often traveling to be with me), or take on the risk and discomfort to fish the 3-4 foot wind waves)?

(oh, and this year the "guaranteed" weekend halibut opener for Puget Sound fell on the same day as the spot shrimp opener!)

In the last ten years, 95% of my halibut trips have been disappointments because of either (a) or (b).

It doesn't have to be like this. There is a better way. Please take it and introduce annual bag limits, with smaller daily and in possession limits! Recreational fisherman would be better off (and safer), and businesses and communities would be better off (and richer).

I am neither a scientist nor an economist, but you don't have to be either to realize that the pros/cons are overwhelmingly in favor of moving to an annual bag limit.

Thank you for considering my comment.

Chris Nelson
2064842763

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From: **Randle Carr** <drcarr@oakharbordentistry.com>

Date: Thu, May 18, 2017 at 2:53 PM

Subject: Not a form letter- Sport Halibut Fisheries

To: "Ms. Kelly Ames" kelly.ames@noaa.gov

Dear Ms. Ames,

Quit encouraging risk taking and dangerous behavior by forcing recreational crews to push their limits in bad weather just because they can only fish once per year. Why not make us purchase two halibut TAGS, and open the fishery for three months? This way a guy doesn't need to try to get out on one of the two weekends, one of which certainly has horrible tides and the other one has a Pineapple Express, and could simply fish and WDFW could check tags. ?????

Recreational guys (and their supporters like hotels and bait shops, etc...) are getting HOSED by the current regulations. This year the season was open for two weekends, 6 days, and it followed two weeks of commercial and another two weeks of tribal long lining. WDFW considers the number of FREE Halibut Catch Record Cards (300,000) and multiplies by random ramp boat checks to estimate our quota. I saw three halibut from my network of fishing friends during this last season. There's no way... NO WAY that this is any fun for the recreational guys.

Recreational halibut anglers are a critical component to the coastal economies of the US and British Columbia. They spend tens of millions of dollars supporting many types of businesses from motels and gas stations to restaurants, grocery stores, bait dealers, and tackle shops. The continued decline in halibut fishing opportunity has caused negative economic impacts to coastal communities.

There are management protocols that could be adopted to help mitigate some of these economic losses and in turn enhance halibut fishing opportunity. Enhanced halibut fishing opportunity will also result in a safer fishery as anglers are not being forced to brave perilous marine conditions to participate in what has become an extremely limited season. I would ask that the IPHC consider these changes:

- * Designate the Pacific Coast of both countries as one sport fishing area;
- * Establish one season - February 1 to December 31;
- * Set an annual bag limit of six fish with a one fish daily limit and two fish field possession limit.

With the same season and annual limit applied to both US and Canadian sport halibut anglers there should be little, if any, concern about the IPHC being involved in domestic regulation development.

Lastly, I would request that any incidental halibut catch from the Sablefish fishery be taken from the commercial allocation and returned to the recreational fishery where it belongs. If the recreational community had access to its full share in 2017, it would have resulted in a total increase of 93,662 pounds, adding more time on the water and positively impacting our local communities and businesses.

Thank you for considering these requests.
Sincerely,

Randle Carr
14363 Road Runner Ln
Burlington, WA 98233
drcarr@oakharbordentistry.com

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

From: **Denny Clawson** <denny.clawson@gmail.com>
Date: Mon, May 22, 2017 at 2:08 PM
Subject: PLEASE SUPPORT Agenda G.1.c
To: pfmc.comments@noaa.gov
Cc: Ron.Warren@dfw.wa.gov, commission@dfw.wa.gov, regproposal@iphc.int, kelly.ames@noaa.gov

To the IPHC and PFMC governing bodies,

I am a long time sportsman spending much of my time in the field and on the water. I'M NOT FISHING FOR HALIBUT IN 2017. Reason: The halibut season is too short, too congested and too dangerous. The congestion alone at boat ramps is enough to make a bad day out of what should be an enjoyable day on the water fishing. My decision is no doubt painful financially to all the small businesses who depend on my visits and thousands of others like myself who visit the Olympic peninsula. I have talked to many people who share my sentiment. Unlike many who just give it up in disgust I have chosen to pursue the issue in hopes positive changes can be made in the upcoming meeting of the IPHC and PFMC.

I am also in favor of a separate halibut tag and fees that would be returned to WDFW at the end of the season. Such a change would not only provide a revenue source to WDFW, but would also correctly quantify the effects of the sport fishery on the resource.

Again, PLEASE SUPPORT Agenda G.1.c

Best regards,
Denny Clawson
Sent from my iPad

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

From: **Randy Lato** <randy@allwaysfishing.com>
Date: Tue, May 23, 2017 at 6:51 AM
Subject: You nailed it
To: Dear PFMC Representative <pfmc.comments@noaa.gov>

Dear PFMC Representative,
I am a charter owner and do think you, the state, have finally come up with a program that works.

I oppose the longer season with an annual limit. This will be too hard to enforce and the fish will take a major hit with poaching.

Thanks
Randy Lato
All Ways Fishing

Sincerely,

Randy Lato
124 Elk Corner Rd
Forks, WA 98331
randy@allwaysfishing.com

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

From: <LewisBoyd@aol.com>
Date: Wed, May 31, 2017 at 9:00 AM
Subject: Open halibut comment period ending 5 31 2017
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, Michelle.Culver@dfw.wa.gov, jim.unsworth@dfw.wa.gov

Thank you for taking open comments regarding the Washington State sport angler 2A halibut tragedy.

Why take an allocation from the sport fishery in Washington State and give to the commercial fishery when the halibut season is already open only several days per year in Puget Sound for sport anglers? The sport fishery needs more than just a token 2-4 days open per year to catch halibut.

http://www.iphc.int/meetings/2016am/bb/12_04_02_WDFWAnnualHalibutReport_2015.pdf

Incidental Halibut Catch in the 2015 Sablefish Fishery North of Point Chehalis, WA

The 2A Halibut Catch Sharing Plan provides for incidental landings of halibut in the primary longline sablefish fishery north of Pt. Chehalis, Washington, in years when the Area 2A TAC is greater than 900,000 lbs. The primary directed sablefish fishery north of Point Chehalis will be allocated the Washington sport allocation that is in excess of 214,110 lb, provided a minimum of 10,000 pounds is available. The amount of halibut allowed in the directed sablefish fishery is capped at 70,000 lbs; any remaining allocation is transferred back to the Washington recreational fishery and divided among the sub areas according to the methodology described in the Plan...

Our 2A halibut plight sounds characteristic of what is happening in other parts of the eight council areas---this one regarding the East Coast red snapper sport fishery.

“NOAA Fisheries continued its continued march to completely shutting down the recreational red snapper fishery in federal waters with its announcement that the recreational season for red snapper

will begin on June 1 and last just three days in 2017. While the recreational season is being decreased from 9 days in 2016 to just three this year, it was also announced that the season for the charter/for-hire sector is being lengthened to 49 days while the commercial sector continues to enjoy year-round access to their privately held red snapper shares.

The 2017 season for private recreational anglers is the shortest on record and at least one U.S. Senator wasted no time voicing his displeasure at the never-ending downward spiral of recreational fishing access under NOAA Fisheries.”

Sound familiar?

This is heading down the wrong path considering that the Washington State sport direct halibut fishery allocation is only a mere 2% of what is allowed for Alaskan by-catch incidental waste coming from commercial fisheries not even targeting halibut.

Thank you for your consideration,

Lewis Boyd

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

From: <bucklj@comcast.net>

Date: Wed, May 31, 2017 at 12:55 PM

Subject: Pacific Halibut Management and 2A Catch Share Plan Comments

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

Cc: "Warren, Ron" <Ron.Warren@dfw.wa.gov>, regproposal@iphc.int, kelly ames <kelly.ames@noaa.gov>, "Bucklin, Joye" <bucklj@comcast.net>

Ms. Kelly Ames:

Please ensure that the following comments are included for consideration during the upcoming IPHC meeting.

The Olympic Peninsula Salmon and Halibut Coalition (OPSHC) has submitted recommendations to the IPHC, NOAA, and WDFW all with the intent of affecting changes in the Pacific Coast halibut fishery management protocols. As a lifelong (70) third generation Washingtonian I fully support those recommendations. I will go further and opine that what is truly needed is a huge paradigm shift recognizing the value of sport fisheries both as an economic generator and recreational activity and the need to maintain and improve sport fishing opportunities in general and for halibut specifically.

Those OPSHC recommendations include having the IPHC designate the Pacific Coast of both countries (U.S. and Canada) 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. The OPSHC also recommended that the daily limit be one fish and the field possession limit be two fish.

It was also recommended 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.

Again, I fully support those recommendations and urge NOAA, PFMC, IPHC and WDFW to embrace the need for significant changes to the halibut fishery and that the greatest benefit will be achieved via a consolidated regulatory approach.

Thank you for your consideration.

(Signed)

Laurence A. Bucklin
5002 86th. Ave. Ct. W.
University Place WA 98467

As of the supplemental public comment deadline (05/31/2017; 5 pm), we received 357 of the same or similar content-related comments at the Council office.

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

From: **Frank Baker, Jr.** <bakerfaz@msn.com>
Date: Thu, May 18, 2017 at 12:57 PM
Subject: Requested Changes to Sport Halibut Fisheries
To: "Ms. Kelly Ames" kelly.ames@noaa.gov

Dear Ms. Ames,

Recreational halibut anglers are a critical component to the coastal economies of the US and British Columbia. They spend tens of millions of dollars supporting many types of businesses from motels and gas stations to restaurants, grocery stores, bait dealers, and tackle shops. The continued decline in halibut fishing opportunity has caused negative economic impacts to coastal communities.

There are management protocols that could be adopted to help mitigate some of these economic losses and in turn enhance halibut fishing opportunity. Enhanced halibut fishing opportunity will also result in a safer fishery as anglers are not being forced to brave perilous marine conditions to participate in what has become an extremely limited season. I would ask that the IPHC consider these changes:

- * Designate the Pacific Coast of both countries as one sport fishing area;
- * Establish one season - February 1 to December 31;
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With the same season and annual limit applied to both US and Canadian sport halibut anglers there should be little, if any, concern about the IPHC being involved in domestic regulation development.

Lastly, I would request that any incidental halibut catch from the Sablefish fishery be taken from the commercial allocation and returned to the recreational fishery where it belongs. If the recreational community had access to its full share in 2017, it would have resulted in a total increase of 93,662 pounds, adding more time on the water and positively impacting our local communities and businesses.

Thank you for considering these requests.

Sincerely,

Jim Birrell
808 NW 116th St
Seattle, WA 98177
carkeekfish@comcast.net

May 31, 2017

Ron Warren
Assistant Director, Washington Division of Fish and Wildlife
WDFW Commission
Washington Division of Fish and Wildlife
International Pacific Halibut Commission
Ms. Kelly Ames
Halibut Manager, Pacific Fisheries Management Council

Re: Halibut fishery management comments

Dear Halibut fishery management:

I am a fisherman from Sequim, Washington. I enjoy pursuing halibut in the Strait of Juan de Fuca when given the opportunity. The halibut season setting process and the distribution of available harvest is confusing at best in how it is determined. More often it is irritating and a source of much disappointment. We see and hear our neighbors to the north in Canada fishing for halibut long before and after our meager season begins and ends. They can choose a nice day with friendly tides and combine the trip during rockfish and salmon season. This is what we are asking for. A dependable season of duration that we can pass up on unfavorable conditions and still have an opportunity to fish for halibut. We don't catch that many halibut at present but someone always determines that the quota is brought in and the season ends.

I like the idea of an annual limit and a dependable, reasonable season duration of more than a day here and a day there.

I like the idea of designating the Pacific Coast as one sport fishing area. This would put us in the same position as Canada. I don't know why we are separated with such disparity between the two designations regarding limits and seasons.

I spend a lot of money chasing halibut and that generates a lot of revenue for the state and federal agencies charged with managing these fish. I don't get much of a return on that investment. All told I have put three fish in the freezer in the past nine years fishing almost every day of the seasons available during that time frame. My success rate is much better for the fish that have seasons where I can choose to fish on favorable days.

Thank you for considering my requests.

Sincerely,

Vic Burri
425 Hanley Way, Sequim, WA 98382
vicburri@wyoming.com 360-681-0356

May 31, 2017

To: Pacific Fisheries Management Council

PFMC Comments

Re: Commercial Halibut Management

My name is Mike Pettis and I have fished commercially for halibut in area 2-A for 37 years. During that time I participated in nearly every opening there was.

To begin with, in the early eighties there were 4 twelve day openings per year for the "handful" of commercial vessels that fished halibut, and the sport fishery for halibut was basically nonexistent.

When the collapse of the salmon fishery happened in the mid 80's, the interest in the halibut fishery increased for both sport and commercial. Commercial halibut seasons became shorter and shorter as interest increased, and portions of the quota were sliced off to feed the growing sport allocation.

In 1991, halibut vessels for the first time in 2-A were assigned poundage limits. These limits were based on the size of your vessel, not on your catch history. Smaller vessels with significant poundage histories in the halibut fishery were given trip limits half the size of larger vessels with no history at all.

Along the way the tribal Indians were given a share of the T.A.C., and it was once again taken from the directed commercial halibut fishery. Because the Indian fish were "sold", it was considered a commercial fishery.

I always wondered, if the Indians had bought charter boats and caught their fish with sport gear, would the recreational fleet have been solely responsible for providing the Indian fish? I think not! It never seemed fair to me that a treaty that was between the Indians and the entire United States would be funded with fish from only one sector of a fishery instead of coming off the T.A.C. before the catch sharing between sport and commercial.

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A few years before Alaska's halibut IQ program went into effect, the council put together a committee to formulate some proposals for a halibut and sablefish IQ system for area 2-A. Unfortunately, the chairman of this committee had no history in the halibut fishery. With little interest in halibut, the "chair" tabled discussion on halibut due to the "higher value of sablefish" to the area. No halibut plan was discussed and the sablefish plan failed as well.

Then the rockfish conservation area (RCA) came into play, eliminating numerous good commercial halibut "spots" and crowding the fleet into less and less area. Boats started showing up on the "grounds" one, two, three or more days ahead of the season, picking their "spots" or "lines" in order to have a manageable fishery. This worked well enough until some "less noble" individuals started ignoring the system.

So here we are today considering whether or not to go away from the 10 hour derby fishery. Here are my thoughts:

1. Despite the issues associated with the 10 hour commercial halibut fishery, I still believe that it provides the professional longliners the best access to the resource. We are able to set and retrieve significant amounts of quality gear in a timely fashion and are capable of catching and taking care of large amounts of fish in a short time.
2. One big improvement that could take place would be to relax the 100 fathom RCA line for halibut day only, This would let the boats spread out a bit. This seems reasonable since we now have a canary bycatch limit.
3. Other management methods would also have problems: for instance, individual quotas. This would be a difficult thing for initial allocation as some boats history have been held down due to the size of their boats, resulting in smaller catch quotas and histories. How far back do you go for history? Do you base individual quotas on the percentage of allowed trip limit caught? There are so many participants now that quota would be small no matter what.
4. A ratio fishery to sablefish catch: A. Halibut could be allocated to vessels that pot caught sablefish in the past and have caught no halibut.

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B. Fishers who lease cod permits could end up paying lease (on halibut that they have no lease on now) to pot cod permit owners who caught no halibut.

Whatever management plan the council goes ahead with, I hope you recognize the needs of the professional longliner in the halibut fishery and also recognize that we have already lost enough, No, too much of our fishery!

Thank you for considering my point of view.

A handwritten signature in cursive script that reads "Michael D. Pettis".

Michael Pettis

310 SE Yaquina View Drive, Newport, Oregon 97365

Phone 541-961-5162