

From: **zarn zarney** <zarn101@hotmail.com>
Date: Sun, Oct 1, 2017 at 11:46 PM
Subject: Responses to the ODFW Public meetings on 2018 Recreational Pacific Halibut Fisheries
To: "pfmt.comments@noaa.gov" <pfmt.comments@noaa.gov>, "Lynn.Mattes@state.or.us" <Lynn.Mattes@state.or.us>

Council Members.

Thank you for your expert work, accomplishments and diligence in managing our ocean resources.

As you well know it is almost time to review and implement policy relating to 2018 Recreational Pacific Halibut Fisheries. Please forward this message to all appropriate, related management resources for review.

In Oregon the ODFW is considering a proposal to split the Central Coast Sub Area (CCSA) into two distinct areas. The split, as currently delineated to the public, would originate in Florence, Oregon. Such a split would directly favor a very small area and sport angler base within the Southern portion of the current CCSA. An area that already possesses robust natural ocean resources and ocean access when compared to the Northern portion of the current CCSA.

Rationale for the split was offered to the public within the recent ODFW meeting minutes of which can be viewed on the ODFW website. The ODFW public meetings were held recently with poignant discussion that continues within a broad cross section of the sport angling community voicing opposition to the proposed split to the current CCSA in Florence . Some of the direct discussion can be viewed directly on the IFISH website within the forum "Salty Dogs" under the thread "ODFW Public meetings on 2018 Recreational Pacific Halibut Fisheries". I will attach copies of my input offered regarding the proposed split for your review.

Reviewing the attached documents an/or the exact content posted on the IFISH thread will provide the rationale why the only proposal currently on the table should be shelved for 2018 and possibly beyond. The current proposal should be shelved until such time it can be appropriately vetted with corresponding scientific, oceanographic and species catch data. That data should then be delineated directly to the public in a timely manner for review prior to any decision on this matter. To date all that has been offered to public in support off the CCSA split

in Florence is a one sentence explanation based simply upon a small, individualist group voicing a regional "complaint".

I hope you can and will take a few moment to review the attached documents in detail and compare that to the rationale offered within the ODFW meeting minutes. If for some reason the the attachments provided here are blocked I can resend them or mail them directly. Please advise. Otherwise the exact content on the attachments can be viewed at IFISH under the IFISH headings I have provided.

I appreciate to your time in review and look forward to addressing any questions and receiving your comment on this important matter.

Thank You for all you do to the benefit of all ocean species and all anglers that ply our waters.

Best Regards.

Joseph E. Ponas

Vancouver, WA

I exclusively support Oregon Fisheries.

ATTACHMENT #1

09/30/17

To all concerned fishery managers:

I, as well as many other vessel operators and anglers that ply the waters of the current CCSA... STRONGLY OPPOSE... the proposal to split the Central Oregon Coast Subarea into two smaller subareas, north and south of the Florence north jetty. Below, I offer rational which supports this position and provides an alternative CCSA split including supporting rational relating to such a split. Please provide this document for direct hands on review to any related odfw staff, pfmc manager. Please also enter this document into all meeting minutes and the permanent public record as it relates the 2018 and beyond Halibut AND Ground Fish management and seasonal changes.

The best I as can determine... the only rational currently offered for the CCSA (Central Coast Subarea) split at florence is... Since 2003 anglers from the coos bay/bandon area

"complained" they were getting shorted on their ability to fish halibut primarily due to weather conditions inhibiting their access. Time of year or season was not referenced directly. Nor was it delineated the general breakdown of angler/corporate groups driving the Florence split... Commercial, processors, exporters, sport anglers or a combination of each? Rather than "this is the way it is folks"... approach it is extremely important the ODFW to inform the general and angling public aware of all the facts behind what is the actual driving force well before the ODFW proceeds further with this matter. I do not believe the appropriate due diligence has been applied in this matter. Please make all facts and supporting rationale that has guided this proposal available to the general public ASAP. It would appear the ODFW's review of this matter has not yet considered the needs relating to in other portions of the CCSA, specifically its Northern portion.

That old adage seems to apply in this case "the squeaky wheel gets the grease". After 14 years... of complaining someone at the ODFW finally listened...? Or is it a matter of regional economics or something else altogether that has not been stated to the public? How did regional economics and general commerce factor into this? Rather than reviewing what many believe is a single, self-serving complaint then acting upon that, when one reviews the CCSA as a whole it becomes readily apparent what area within the current CCSA is in need of remediation. It is not the southern portion.

Now... if anyone from the ODFW, PFMC, and those in the Coos Bay or Bandon that support this proposal want to fish a full season out of say Garibaldi for example to use as a direct comparison, be my guest and welcome, please do. I believe it will be realized quickly, should anyone take up that challenge, just how good annual, general ocean access and angling for halibut, ground fish and other species is out of the ports of Coos Bay and Bandon.. when compared the northern portion off the current CCSA and launching out of the port of Garibaldi. I also firmly believe that any sub area split needs to also take into consideration available structure, habitat and distance to the ground fish fishing grounds as a subset. Angling for these species as a whole is related and intertwined to a large degree.

IMHO, along with the current split consideration at Florence at least one other CCSA split should also be acknowledged and stand right alongside it for equal consideration. It is time to also consider an equally, if not more viable split originating on or around the 45/20 line north to approx. the 46/00. Otherwise, the Florence split proposal should be shelved immediately without further consideration in 2018 and beyond by the ODFW. Shelved until such a time reasonable, viable input is gathered and delineated on at least one other split proposal and it too is included for a consideration. There is only one "option" currently on the table now. And I and many others agree and believe it amounts simply to a local resource grab.

The current rationale offered for CCSA Florence split was offered simply as a "complaint"? If that is really the only rationale given for the split proposal it makes for a very weak platform, lends itself to local bias as it attempts to stand without reasonable basis. From the information formally delineated and what has been gathered in opposition to date currently... the proposed split has not been appropriately studied over the long term and there is no supporting research offered or presented for public review that explains and supports the proposal in its current iteration. Until that is done appropriately NO ACTION SHOULD BE TAKEN by the ODFW. I am taken by surprised the recommendation as put forth received the attention of and has been now molded vigorously into a proposal for the fisheries managers to approve..? Is the angling/general public really getting the whole story here?

The proposed Florence split, when directly compared to the northern portion of the CCSA, allows for the application of additional local influence within an area that already has some of the most robust annual ocean access along with some of the richest, robust, overall ocean resources within the state of Oregon. With this being the only consideration on the table, NO real or viable choice is being offered to the public AND a broad cross section of customers of the ODFW.

Instead, a CCSA split at or around the 45/20 stands out righteously. It is easily identifiable and defensible above and beyond the split proposed for the Florence split. This is critical to understand, especially, when one considers actual ocean access along with the vast differences in structure, habitat and distance to the fishing grounds between the proposed Florence split and the area above the 45/20 line. I believe to assist in the overall greater good of the resources available there is greater need to place a split above the 45/20 line. Now add in a broader, more applicable approach. When looking at ANY proposed split... it should be considered in terms of opening up a wider diversification of regional/coastal resources and commerce to the benefit of overall coastal prosperity. In the southern portion of the current CCSA there stands already strong ocean resource based economic enterprises.

I believe the Florence proposal only serves as a local resource grab an attempt to further augment an area that is already rich with resources and reasonable bar/ocean conditions the majority of the year. At the same time I believe the proposed split serves to further diminish future business advancement and recreation opportunity the northern portion of the CCSA. I am surprised the governance within the ODFW has gone along with this proposal and business leadership and community leaders in all communities North of the 45/20 line, including the only viable port in the Northern portion of the CCSA, Garibaldi, are not all over sequestering the current CCSA split proposal.

Within the northern portion of the CCSA resides a mostly underutilized port with unique distinction. Anglers plying this port (the ONLY viable port located above the 45/20 line in the CCSA) can only access the halibut grounds via the 2nd. MOST DANGEROUS BAR ON THE WEST COAST. Below is one related article on this subject. There are many other related stories regarding the gross, inherent dangers of the bar that services this port. I believe this situation factors significantly in the consideration of/if and where any split in the CCSA should take place...

http://www.oregonlive.com/pacific-no...ven_years.html

Apparent, at least to me, the failure to study or effect a reasonable repair/replacement of the Garibaldi jetty needs to be considered as a major determining factor regarding any proposed split within the current CCSA. I am no expert on jetty design. I do believe the Garibaldi jetty system was poorly designed and implemented. I also consider the recent North jetty retrofit simply a band aid approach.

The current design and general failure of the Garibaldi jetty system properly service the Port severely limits the ability to utilize the natural ocean resources available. Even when considering these resources generally reside several miles North and South of the jetty tips. I believe from inaction most future, economic, corporate expansion/relocation, growth of recreational opportunities and general public safety are jeopardized. The path to sharing ocean resource wealth is multi-faceted. To greatly assist to this end a split in CCSA should be proposed and implemented at or around the 45/20 line. The question becomes... Will the ODFW simply rubber stamp a proposal based upon a self-serving complaint from an area that already has robust attributes or will the ODFW step up and assist in development of another

proposal for Northern portion of the current CCSA... This is an area in the greatest immediate need and long term remediation? It is time to share this wealth not consolidate it further.

A detailed analysis, comparing to the Southern portion of the current CCSA to the North, the vast differences between both areas is clear. From the distribution of the natural attributes (structure/habitat, etc.), other ocean resources to the condition of the man-made structures constructed supporting both areas within CCSA there is substantial differences. These differences are substantially relevant in the overall decision making process. With that, I believe the needs of the North portion of the CCSA trump the needs of the South with respect to the representation of the current Florence split proposal.

In a public message and I posted on several fishing forums I offered the following... "Please consider the positions offered above when completing your odfw survey. Additionally If you oppose or question the current CCSA split proposal let the odfw know ASAP... and why... in writing and voice mail. It is up to you to not be railroaded into something you do not believe is reasonable. IMHO, I believe the CCSA Florence split proposal currently on the table does not represent the greater voice of the angling community or the majority of customers of the odfw, Further, this proposal is wholly unacceptable as it is currently represented".

You can choose to include/exclude the following additional as rational for splitting the CCSA at the 45/20 (approx.) I believe it is important to include the following in any discussion regarding if and where to split up the current CCSA.

I believe Port of Garibaldi as well as the northern portion of the CCSA, of which there are precious few ocean access areas, has been the subject of general neglect by state, fisheries folks and federal agencies. The anglers, processors, shipping concerns that utilize now or wish to utilize these waters and/or do business in Garibaldi have and will suffer disproportionately from what I and many others consider... gross neglect. I believe ANY CCSA split proposal should take into consideration more than just simply angler access, seasons and species catch limits. Any CCSA split should take into direct consideration the future and building associated regional attributes and the review of all aspects that directly influence/affect a given sub area. IMHO, this would include (beyond structure, habitat, distance to the fishing grounds) repair/replacement and consistent dredging of any jetty system implemented to limits overall ocean/port access for all concerned entities. When compared, the vast differences between the North and South CCSA inform us directly what area is in the greatest need for sub area remediation.

The decades old design/failure of the jetty system servicing Garibaldi is largely responsible for producing consistently hazardous bar, continuous, un/under-managed shoaling conditions (which now boarder on extreme) and vastly reduce viable ocean access. The end result of this has been the under-utilization/capitalization of the closest viable port to Oregon's largest metro area. Along with lack of potential future corporate investment in infrastructure and direct business there is an overall unwillingness for many sport anglers (especially so for those sport vessels under 30') and new commercial enterprises or advancement of future ocean commercial endeavors to utilize or base their operations out of Garibaldi. The current design/failure of the jetty system servicing Garibaldi serves to severely limit most future and reasonable economic, corporate expansion/relocation and recreational growth in this area.

I appreciate the opportunity to submit an opposition stance to any proposed split in the southern portion of the current CCSA, including Florence. I believe the supporting rational and the viable alternative split offered within this document is robust, relevant. In

comparison to the proposal currently being considered the content within this document represents the overall greater good of a broad cross section of odfw customers.

Respectfully,

Joseph E. Ponas

ATTACHMENT #2

Re: ODFW Public meetings on 2018 Recreational Pacific Halibut Fisheries

The odfw is now considering a proposal for subarea split at florence. It is doing so with rationale that many believe is based on weak, highly opinionated, much localized input. The rationale currently being utilized to substantiate this proposal lacks real data input and is without formal study by the requesting parties or the odfw.

Reviewing the proposal with the rationale presented it could be and probably should be argued it really amounts to a locally dominated resource grab. Additionally, there has been no other consideration for what is taking place in the balance of the sub area, especially North of the 45/20 line. Based upon this premise at least one additional split proposal should reviewed before the florence proposal is locked in. Until such time the florence split, as currently represented... should be either rejected immediately, based upon the absence of ANY real data presented to support the complaint OR at the very least a NO ACTION STANCE should be taken by the odfw on ANY SSCA modification for 2018.

Without the presentation of real and formal data there is little to back up the current complaint. Please bring what you have to the public table coos bay/bandon anglers and odfw.... Based upon the on one sentence explanation offered within odfw document...the complaint was enough for the odfw to push the complaint forward and briskly mold it into a viable proposal? Is this how fisheries the management business really is or should be conducted?

To review, the complaint, as presented within the recent odfw document... The coos bay/bandon anglers complained (since 2003) that "newport" gets the lions share, so to speak, of the catch. Yes "newport" probably dominates in that respect across the entire CCSA. Newport constantly has a larger sport angling base. It has miles of robust, close in and mid-range habitat and fishable structure (similar to the ocean area outside coos bay & bandon)... modernized, reasonably managed port facilities and a jetty system with a design/construction attributes that does actual function well. However, we have yet to see ANY real data sets that back up and supports the basis of the complaint. Yet this was acceptable for the fisheries managers at the odfw to move forward?

As stated in another post here on this matter...when you review this on a much larger, overall perspective... within the entire Southern portion of the current CCSA ocean resources including habitat and structure are quite robust across the board. There is abundant, consistent ocean access most of the year out of all southern ports and vastly better overall sport angling opportunity when compared to the Northern portion of the CCSA. If you don't believe that you are invited to fish an entire season exclusively out of the ocean access areas North of the 45/20. Enjoy...!

There are several questions that every sport angler, business owner, charter vessel operator, etc. that accesses the ocean areas north of the 45/20 line should be asking themselves and of others.

As a sport angler, business owner, charter vessel operator that accesses, plys, utilizes and/or depends on the ocean area north of the 45/20 line for angling, recreation and/or a livelihood... Do you believe Northern portion of the SSCA has different ocean attributes than the Southern portion? Why? Does this, should this, make a difference in the fisheries management within the SSCA?

Do you feel that the Northern portion of the current SSCA has been under/overlooked when it comes to appropriately balancing seasons, catch limits, angling, recreational opportunities or augmenting your business when compared to the Southern portion based upon ocean habitat, fishable structure and ocean access?

As someone that depends on the Northern portion of the SSCA, do you believe splitting the CCSA at Florence will enhance or diminish future opportunity in the Northern portion of the CCSA? Why?

If you spend the majority of your time and annual sport angling budget within or utilize the Northern portion of the CCSA do you currently support the proposed CCSA split in Florence? Why?

If you answered NO to the last question let your thoughts be known to the odfw ASAP... You may use this and/or post # 13 as a supporting document.

The alternative to the Florence split now recommended stands to serve the greater good. It would apply greater diversity across a wide cross section of sport anglers and businesses that reside in and utilize the Northern portion within the current CCSA.

If you have not done so already, I urge you to please take a few minutes to read post #13 on this subject and contact the odfw with your stance on this matter.

I have emailed and called several coastal businesses and those community in a leadership position residing above the 45/20 line, the cca and other interested parties alerting them to this situation. I urge you to do the same. It will be interesting to see if and how they react. Copies of what I have posted here have also been forward to the pfmc for their review in case these comments happen to fall through the cracks locally. I also urge you to also contact the pfmc with your stance on this matter.

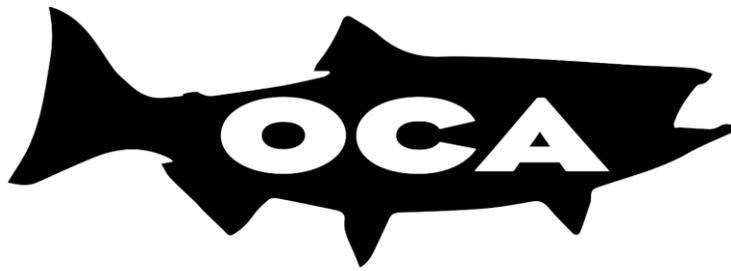
pfmc.comments@noaa.gov

From: **Steve Godin** <stevegodin@rconnects.com>
Date: Sun, Oct 15, 2017 at 7:21 PM
Subject: November Meeting Input to Briefing Book
To: pmmc.comments@noaa.gov

To whom it may concern,

I would like the attached documents to be included in the order attached to this email in the Pacific Fishery Management Council Briefing Book. If there any questions, please reply to this email.

Thanks for your assistance,
Steve Godin
Oregon Coast Anglers, President



Oregon Coast Anglers

PO Box 584
Reedsport, OR 9746
October 15, 2017

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

Dear Pacific Fishery Management Council Members,

I am concerned about the potential split of the Central Coast Area for Recreational Halibut Fishing for 2018. I am in favor of the split, but not of the ODF&W quota alternatives 1a, 1b and 1c. These alternatives do nothing more than continue the status quo. The majority of Halibut are caught by Newport anglers, the Spring and particularly the Summer Halibut Seasons are terminated early as a result.

At this point in time, ODF&W has not announced the alternatives that will be presented at the November PFMC Meeting. I would like my comments to be published in the meeting Briefing Book, therefore I make the following request for the Oregon Coast Anglers, south coast businesses and south coast anglers, establish the Oregon South Central Halibut Area with **at least a 12%** share of the Central Coast Area quota. This quota to be adjustable based on results over a reasonable time period.

There was a great turnout of south coast anglers and concerned business owners (80 – 90 attendees) at the ODF&W Public Input Meeting in North Bend on September 26th. I presented an alternative to the three ODF&W Alternatives that is based on the last ten years of angling effort. Ten years of ODF&W Estimated Catch in the proposed South Central Area averaged, yields a higher Halibut quota than the ODF&W Alternatives. Those ten years include the good, the bad and the ugly regarding Halibut angling from Florence to Bandon. Ten years also captures changes in ocean conditions, angling effort and technology and equipment improvements. My proposal also included a method for adjusting the quota based on the last year's results. After my presentation, not one attendee offered support for the ODF&W Alternatives.

I have met with most of the tackle shop owners from Florence to Bandon to discuss the proposed split of the Central Coast Halibut Area. I have also met with Oregon State Representative Caddie McKeown and Oregon State Senator Arnie Roblan. There have been no disinters in these discussions. The South Central Halibut Area with **12% or more quota**, is a step in the right direction for South Coast Anglers.

A split similar to what is proposed was tried back in 1995. It failed, after five years south coast anglers requested that the Central Coast Halibut Area become one. The reason for the failure was not enough quota! South Coast Halibut anglers fishing seasons terminated early, cutting short fishing opportunity.

I have attached the supporting documents presented at the ODF&W Public Input Meeting in North Bend, Oregon. The request for a 12% quota for the South Central Halibut Area is far below what south coast anglers could catch. In the ten year catch results, 16% or better was achieved a number of years during the Spring Season.

Therefore, I request that the PFMC allow for the Central Halibut Area split, South of the North Jetty of Florence to Humbug Mountain with a 12% or better quota with the ability to adjust the quota based on results.

Sincerely yours,

Steve Godin

Oregon Coast Anglers, President

Tel: 541-255-3383



Split the Central Coast Recreational Halibut Area

OCA wants a fair share of Oregon Coast Halibut Quotas for South Coast Anglers.

Assessment of ODF&W Alternatives – Not enough years of data for fair result

1a and 1b use 2011 – 2016 Average Landings for allocation estimate in pounds

1a and 1b use 2012 – 2017 to project days open based on 2017 quota

1a and 1b include three worst years of South Coast Catch Estimate Data

1c not what was presented at PFMC meeting (9.8%)

Alternatives 1a – 1c perpetuate the Status Quo with no means of adjustment

In the spirit of the Magnuson - Stevens Act, this is not the Best Science.

Recommend that ODF&W use Catch Estimate Data for last ten years

Rational:

Last ten years represents a broad representation of changing ocean conditions, technology innovation, equipment improvement and angler effort.

The last ten years includes the good, the bad and the ugly.

*Near Shore Quota should be counted back to and include 2012, prior to that year only two ports in checking data. In 2020 ODF&W would have ten years of Catch Estimates.

**Fish Checking to include Ports in Florence, Winchester Bay, Charleston and Bandon.

Recommend that ODF&W implement a means of quota adjustment.

If quota used before season end, take average Catch Estimate for days fished and multiply by remaining days in season, add result to Catch Estimate and use for establishing new quota based on the ten year average.

Based on the last ten years of Catch Estimates for Florence, Winchester Bay, Charleston and Bandon the Recreational Halibut South Central Quotas should be:

Spring Season: 12.8 %, Summer Season: 9.3%, *Near Shore Season: 10.5%

*Near Shore based on six years of Catch Estimates and 2017 not finished.

ODF&W Estimated Halibut Catch Rates, Central Coast

Spring Season

Year	Newport Landed lbs	%	Florence – Bandon Landed lbs	%	Landed Pounds	Days Open
2017	105,752	73	23,340	16	145,634	18
2016	102,060	77	15,864	12	132,097	14
2015	75,573	69	7,629	7	109,163	12
2014	72,573	68	6,923	6	106,783	12
2013	94,244	65	9,356	6	145,167	14
2012	64,237	58	12,048	11	111,269	17
2011	75,773	66	17,927	16	114,752	15
2010	76,147	68	18,830	17	112,500	14
2009	84,524	69	19,183	16	122,402	18
2008*	71,318	60	25,162	21	119,656	24

*only year sizable quota remained in Spring Season (25%)

Ten Year Totals

822,201 lbs	67.4%	156,262 lbs	12.8%	1,219,423 lbs	158 Days
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Halibut poundage caught per day

5,204 lbs	989 lbs
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Alternative 1a: 16 days X 989 = 15,824 lbs vs 13,654 lbs Proposed (2,170 lbs below ten year estimates)

Summer Season

Year	Newport Landed lbs	%	Florence – Bandon Landed lbs	%	Landed Pounds	Days Open
2017	52,406	82	5,335	8	63,547	8
2016	31,359	82	3,394	9	38,423	14
2015	32,688	79	2,255	5	41,210	14
2014	35,134	83	2,211	5	42,542	4
2013	17,151	63	2,663	10	27,069	2
2012	32,004	75	2,605	6	42,853	4
2011	24,682	80	1,602	5	30,807	2
2010	24,253	80	2,416	8	30,140	2
2009	41,534	79	7,429	14	52,330	3
2008	69,629	74	13,280	14	93,618	25

*Newport shut the Summer Season early 6 out of 10 years.

Ten Year Totals

360,840 lbs	78 %	43,190	9.3 %	462,539 lbs	78 Days
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Halibut Poundage caught per day

4,626 lbs	554 lbs
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Alternative 1a: 12 days X 554 = 6,648 lbs vs 5,418 lbs Proposed (1,230 lbs below ten year estimate)

Nearshore

Year	Newport Landed lbs	%	Florence – Bandon Landed lbs	%	Landed Pounds	Days Open
2017*	15,652	51	4,667	15	30,820	77
2016	14,830	46	5,797	18	32,132	154
2015	13,721	56	2,352	10	24,584	123
2014	2,157	13	1,159	7	16,125	105
2013**	8,612	39	269	1	22,249	56
2012***	22,994	61	2,983	8	37,413	119

2011 Only Charleston and Bandon Reported (2011 – 2008)

*Season still open

**2013 didn't include Florence

***2012 didn't include Florence, but added Port Orford

Six Year Totals

77,966 lbs 47.7% 17,227 lbs **10.5%** 163,323 lbs 634 Days

Halibut poundage caught per day

122.97 lbs 27.17 lbs

Alternative 1a: 111 X 27.17 = 3,016 lbs vs 2,601 lbs Proposed (415 lbs below six year estimates)

From: **Jonathan Sawin** <jonathansawin@gmail.com>
Date: Thu, Oct 19, 2017 at 6:43 AM
Subject: Public Comment Halibut 2018
To: pmmc.comments@noaa.gov

Hi,
Attached is the public comment for agenda item E1: Final Annual Regulation and 2A Catch Sharing Plan Changes, from the Westport Charterboat Association.

Thank you,
Jonathan Sawin

WESTPORT CHARTERBOAT ASSOCIATION

P. O. BOX 654 • WESTPORT, WASHINGTON 98595

October 18, 2017

Mr. Phil Anderson, Chairman
Pacific Fisheries Management Council
7700 NE Ambassador Place, Suite 110
Portland, Oregon 97220

Subject: 2018 Westport Recreational Halibut Season

Dear Chairman Anderson and Council Members:

The Westport charter boat fleet has been facing difficult economic times recently with low number of anglers in all aspects of our industry due to very low salmon numbers, a decrease in the rockfish bag limit from ten to seven, and a tough albacore tuna season. The recreational halibut fishery, while short, has become even more important economically to our charter boat fleet, to our community, and to the businesses that depend on recreational anglers.

The season setting process is very difficult in Washington due to the competing needs and number of areas along the coast and Puget Sound combined with the very limited supply of halibut. Over the years, we have voiced our areas of concern with WDFW and the council and worked together with them and representatives from other areas to develop a well-structured halibut season. We would like to thank both WDFW and the council for listening to our concerns and considering them in the halibut season setting process.

The Westport Charterboat Association supports the season structure that WDFW will be proposing to the Council. While it is not perfect from a Westport perspective, it represents a fair balance of the needs across the areas in Washington and includes a series of compromises that were made by

representatives from all areas at the WDFW public meeting that took place October 12, 2017 in Montesano, Washington.

The management structure that we support includes:

- A Thursday, Friday, Sunday opening for the Columbia River (no Saturday)
- The Status Quo allocation of quota pounds between areas contained in the Catch Sharing Plan
- Lowering the maximum cap on the allocation of quota pounds in the Sablefish fishery from 70,000 pounds to 50,000 pounds, and redistributing the remaining halibut to the Washington recreational subareas
- The first five fishing days as follows:
 - Day 1 – Friday, May 11
 - Day 2 – Sunday, May 13
 - Day 3 – Friday, May 25
 - Day 4 – Sunday May 27
 - Day 5 – Thursday June 7
- The need for an annual bag limit

Additionally, the Westport Charterboat Association would like to encourage the council to adopt an annual bag limit of two halibut per person as opposed to a higher annual bag limit of five or six. In 2017 Westport had four days of directed fishing and in 2016 Westport had three days of directed fishing. Adopting an annual bag limit that is greater than the number of fishing days in Westport is not beneficial to our area in any way.

Our Association believes that adopting an annual bag limit of two halibut has the potential of lengthening the season and, most importantly, has the added benefit of giving access of the halibut fishery to a greater number of individuals. Every little bit makes a difference with our short season.

Thank you for considering our thoughts as you work on developing the best halibut fishery possible.

Sincerely,
Jonathan Sawin
President Westport Charterboat Association

From: **Holly Clark** <hcla.forks@forkswashington.org>
Date: Thu, Sep 28, 2017 at 9:52 AM
Subject: Halibut Quota Allocation
To: "pmmc.comments@noaa.gov" <pmmc.comments@noaa.gov>, "commission@dfw.wa.gov" <commission@dfw.wa.gov>
Cc: Rod Fleck <rod.forks@forkswashington.org>, Audrey Grafstrom <audreyg@forkswashington.org>

Holly Clark
Administrative Assistant
City Of Forks
500 E. Division St.
Forks, WA 98331
[360-374-5412 ext. 236](tel:360-374-5412)
hcla.forks@forkswashington.org

Disclaimer: This e-mail may be considered subject to the Public Records Act and may be disclosed to a third-party requestor per the Washington State Public Records Act (RCW 42.56).



500 East Division Street • Forks, Washington 98331-8618

(360) 374-5412 • Fax: (360) 374-9430 • Web: www.forkswashington.org

FROM:

City of Forks
500 E. Division St.
Forks, WA 98331
360-374-5412 ext. _____
FAX 360-374-9430

TO:

Name: CAROL ANDERSON // Director

~~FAX~~ cc: Michelle Caluce

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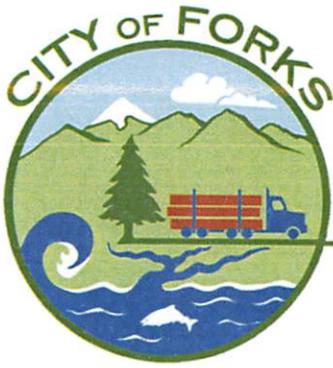
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500 E. Division St. • Forks, Washington 98331-8618

(360) 374-5412 • Fax: (360) 374-9430 • TTY: (360) 374-2696
forkswashington.org

26 Sep 2017

Chairman Phil Anderson
Pacific Fisheries Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Director Jim Unsworth
Washington Dept. of Fish and Wildlife
PO Box 43200
Olympia, WA 98504-3200

pfmc.comments@noaa.gov

commission@dfw.wa.gov

RE: Support of the Retention of the Status Quo Quota Management by WDFW as part of the Pacific Halibut Catch Sharing Plan for 2018

Gentlemen,

The City of Forks wants to voice its significant concerns regarding the proposed Pacific Halibut Catch Sharing Plan (Halibut Season) for 2018 that is currently being considered by the Pacific Fisheries Management Council (PFMC) based upon the motion and recommendation of the Washington Department of Fish and Wildlife (WDFW). As we understand the proposal subject to public comment, WDFW has proposed the following changes to the Pacific Halibut Catch Sharing Plan:

For the Washington recreational fishery, retain the current statewide season structure (i.e., manage the north coast, south coast, and Puget Sound subareas under a common season) with either:

- A. Status Quo Quota Management: Each subarea receives and is managed to achieve, but not exceed, its own separate allocation

Or

- B. Shared Quota Management: The south coast, north coast, and Puget Sound subarea quotas are pooled and managed under a shared quota to provide a minimum of four days for an initial statewide season. Following that initial statewide season, the remaining shared quota would be distributed among the subareas using status quo allocation formulas.

The City would advocate strongly for the Option A with some caveats. Currently, Subarea 2A receives a significant portion (~45% ±) of the State's halibut allocation. A common season can have benefits in that it allows anglers to access halibut at various points along the Washington Coast. Subsequent days could continue to be used across the WDFW areas until such point as one area has "fished out" its quota. That area could then be closed, and the City would argue that the other areas would remain open in the statewide shared season until those other WDFW areas had "fished out" their quotas. Permitting a

reallocation of the WDFW Puget Sound region’s allocation to the WDFW South Coast region effectively transfers both opportunity and catch from Point Roberts to Cape Discovery.

However, WDFW’s North Coast has a much harsher weather pattern and history than other parts of the coast that could result in one or all of the four days allocated for this initial season being lost. While the Proposed Option B would then allow subsequent fishing, the allocation for WDFW’s North Coast would be greatly reduced by the catch made by anglers elsewhere in the state.

For example, assume that there is a storm that creates rough seas predominately in the Vancouver Island area. Two of the initial four days are lost to WDFW’S North Coast anglers. Of the 240,000 pounds allocated statewide, 100,000 pounds are caught during this shared Option B four day season. Under the proposal, any additional fishing dates offered would then take the 140,000 pounds available and allocate that by traditional subarea allocations.

Presuming a 240,000# Statewide Sports Allocation		Traditional Allocation	Option B Allocation Hypothetical – 100k# caught, 140K# reallocated
Puget Sound	26.6%	63,840	3,724
North Coast	47.4%	113,760	66,360
South Coast	20.6%	49,440	28,840
Columbia River	5%	12,000	7,000
Total	99.6	240,000	

In this situation, it is possible that in the first four days of such a shared season, areas outside of the North Coast well exceed their historic catch levels and allocations, then obtain even more poundage allocated to them in the subsequent portions of the statewide season. In 2017, both the South Coast and the Columbia River exceeded their quota allocation 21.4% and 9.4% respectfully.¹ Under Proposed Option B, there could be an even more egregious over harvest in the Southern portion of the State. It should be noted, that the proposed motion is rather unclear as to whether the Columbia River allocations, not just days as noted in item 4 in the Culver-Lincoln motion, would be based upon the traditional formula allocation on different days. Meaning that in the hypothetical above, there would be no additional poundage allocated after the initial four day season in/on the PS, NC, and SC.

Also somewhat problematic with Proposed Option B is that there has been a lack of an economic analysis for the adverse impacts that could arise to the communities, tribal and non-tribal, within the Subarea 2A. Anglers utilize the ports of La Push and Neah Bay to access the halibut in this subarea. They purchase goods and services in the communities of Forks, La Push, Clallam Bay and Neah Bay. Changes from the well-established and understood Status Quo could have significant impacts to communities that are already struggling financially; and in the case of the tribal communities, ones that the PFMC as a federal entity has a trust obligation to protect.

¹ WDFW Table – 2017 Recreational Halibut Catch (lbs.) by Subarea

South Coast	Quota=50,307	Catch = 61,061	Remaining = -10,754
Columbia River	Quota=12,799	Catch = 14,014	Remaining = -1,215

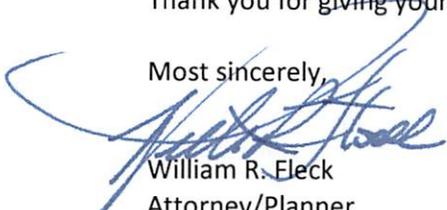
Also, Proposed Option B was not one of the options that was vetted and discussed by WDFW with the attendees at their August "Recreational Halibut Meeting." Materials obtained for those in attendance note that the statewide season proposal for 2018 looked at five, six mixed days, and six weekend day seasons. Yet, Proposed Option B not only takes a wait and see approach to the number of days following the first four days, it also remains silent on how subsequent fishing season days would be determined with the reallocated halibut quotas.

There is also some uncertainty as to whether with the proposed Item 4 in the Culver Lincoln motion the State has in effect set the "statewide season structure" in such a way as to cut off opportunities elsewhere if one of the WDFW regions meets or exceeds its quota. In 2017, there was an overfishing in WDFW's South Coast Region and in order to have any additional days of angling elsewhere, portions of the uncaught quota in other regions were shifted to the South Coast. We would suggest that regions fish until that point that their quotas have been met, or nearly met, and when that occurs, that region is closed for angling and other regions with available quota be considered open.

Finally, the City would strongly urge that the days for the statewide fishery be set as Thursday and Saturdays allowing for the maximum response from the fishing public to visit our coastal waters. It is believed that such an approach would increase overnight stays in our rural communities.

Thank you for giving your time and attention to these matters.

Most sincerely,



William R. Fleck
Attorney/Planner