

From: **Dave Croonquist** <[dcroonquist@gmail.com](mailto:dcroonquist@gmail.com)>  
Date: Mon, Nov 6, 2017 at 10:58 AM  
Subject: 2018 PFMC Halibut comments  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

Good afternoon, all

Attached are general comments related to the upcoming halibut session scheduled for Nov. 16 in Cost Mesa, CA.

Dave Croonquist  
Sequim, WA

PFMC  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220-134

On behalf of the Port Angeles Salmon and Halibut Coalition, Puget Sound Anglers, Coastal Conservation Association and associated halibut anglers, we would like to take this opportunity to thank the PFMC for initiating the Scoping Exercise for the halibut fishery as outlined in Item E.1 - Attachment 3. We would support of a transition from the status quo fishery to a system that allows for a longer season structure and potential coverage for incidental take/retention. This might help preclude wastage in the 2A Catch Share Plan no-tribal commercial fishery, which can have a negative effect on the 2A overall harvest numbers.

What we don't see in the Scoping Exercise, however, is a direct mention of potential changes in the sport fishing regulations. The sport fishery is a driving component of the coastal economies of Washington, Oregon, and California. The sport halibut fishery is a critical part of the local economies as it usually occurs in the spring shoulder tourist season for the coastal businesses. We would encourage the PFMC to factor in the sport halibut fishery in the Scoping Exercise and we'd like to be involved in the process.

We would also suggest that the PFMC states (WA, OR, CA, and ID) work together to encourage the IPHC to take a separate look at the sport halibut fishery structure for the West Coast of the United States and Canada. A consistent season structure with a daily limit, a field possession limit, and an annual limit would have far reaching impacts on not only for the coastal economies of our two countries but would also allow for a safer fishery where anglers can choose the days they go out rather than having specific days dictated as being open for halibut fishing.

The WDFW proposal/report E.1.a is, as stated, a compromise between the various Washington areas. The biggest change going forward is a four fish annual limit – a first for WA waters. The one fish per day and, we're assuming, a two fish in possession in the field will let anglers have some flexibility in when and where they are going to fish. It still means though that we are

locked into specific days to fish. We're hopeful we'll have more than four days of fishing in 2018 and we'll have decent weather.

Dave Croonquist  
Sequim, WA

----- Forwarded message -----  
From: **Dave Croonquist** <[dcroonquist@gmail.com](mailto:dcroonquist@gmail.com)>  
Date: Mon, Nov 6, 2017 at 4:06 PM  
Subject: Re: 2018 PFMC Halibut comments  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

There's a typo in my submission. The last sentence in the first paragraph should read "...non-tribal. ...", not no-tribal.

I can send a corrected copy later this evening or early tomorrow morning.

Dave Croonquist

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----- Forwarded message -----  
From: **Jon Brenner** <[jon@ddrlaw.com](mailto:jon@ddrlaw.com)>  
Date: Mon, Nov 6, 2017 at 3:47 PM  
Subject: Sport Halibut Fishery  
To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)  
Cc: "Dennis D. Reynolds Law Office" <[dennis@ddrlaw.com](mailto:dennis@ddrlaw.com)>

Re Sport Halibut Fishery

Dear Councilmembers,

Please find attached comments.

Sincerely,

**Jon Brenner**  
Paralegal  
Dennis D. Reynolds Law Office  
200 Winslow Way West, #380  
Bainbridge Island, WA 98110  
(206) 780-6777, tel / (206) 780-6865, fax

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## Dennis D. Reynolds Law Office

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November 6, 2017

Via email (pfmc.comments@noaa.gov) only

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

Re: Sport Halibut Fishery

Dear Pacific Fishery Management Councilmembers:

My Law Firm represents a coalition of local businesses and non-Indian sport fishermen located on the Northern Olympic Peninsula (NOPC). Members of the NOPC have provided specific comment.

By way of introduction, for 10 years I was counsel for the Washington State Department of Fish and Wildlife. Then, as a private attorney, I helped support in Alaska, Oregon, and Washington the growth of various commercial fisheries under the Magnuson-Stevens Conservation and Management Act adopted in 1976. After capitalization of the American Fleet and on-shore processors in the early 1990s, I aided creation of the Plaintiff Class in the Exxon oil spill damage action. For years, I routinely appeared before the NPFMC and the PFMC on allocation and conservation matters.

The NOPC advocates a management system that allows for a longer season structure and potential coverage for incidental take/retention. These goals would be implemented via a consistent season structure with a daily limit, a field possession limit, and an annual limit.

As you know, The Magnuson Act fosters long-term biological and economic sustainability of the nation's marine fisheries out to 200 nautical miles from shore. Key objectives of the Act are to:

- Prevent overfishing
- Rebuild overfished stocks
- Increase long-term economic and social benefits
- Ensure a safe and sustainable supply of seafood

The conservation and management measures (consistent with conservation) allow the Council to take into account the importance of fishery resources to fishing communities. The directive is to provide for the sustained anticipation of, and minimize adverse impacts to, coastal communities e.g. Port Angeles and the City of Forks. The measures also promote safety of

human life at sea and minimization of bycatch. To implement the measures, the Council has discretion to take into account and allow for variations among discrete fisheries, including control of the Sablefish commercial fishery halibut by-catch at the lower range of 10,000 pounds.

On June 1, 2015, the House of Representatives passed H.R. 1335, the Strengthening Fishing Communities and Increasing Flexibility in Fisheries Management Act. The bill was re-introduced this year. Related information, including the text of the bill and floor proceedings, is available on [Congress.gov](https://www.congress.gov/bill/114th-congress/house-bill/1335/all-info) <<https://www.congress.gov/bill/114th-congress/house-bill/1335/all-info>>, and more information on the amendments to the bill can be found on the [Rules Committee Website](http://rules.house.gov/bill/114/hr-1335): <<http://rules.house.gov/bill/114/hr-1335>>.

The NOPC believe the proposal will be enacted into law and its concepts can aid PFMC management of the sport halibut fishery at the represent time

Key provisions in H.R. 1335 of interest to the recreational halibut fishery include:

- Promoting a more transparent and science-based review of fishery allocations;
- Helping ensure that important fisheries are not closed unnecessarily by providing limited exceptions for annual catch limits;
- Improving the accuracy of fish stock information through greater involvement by the states and incorporating data collected by anglers themselves.

Thank you for your kind attention to these comments.

Very truly yours,

DENNIS D. REYNOLDS LAW OFFICE



Dennis D. Reynolds

cc: Fish Coalition Mailing List

DDR/jb