



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Marine Region
20 Lower Ragsdale Drive, Suite 100
Monterey, CA 93940
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



March 2, 2015

William Stelle
Regional Administrator
West Coast Region, NMFS
7600 Sand Point Way NE.
Seattle, WA 98115-0070

Subject: PACIFIC HALIBUT FISHERIES; CATCH SHARING PLAN

Dear Mr. William Stelle:

In response to your proposed rule dated February 3, 2015, the California Department of Fish and Wildlife (CDFW) provides these comments on the 2015 recreational fishing season for the California subarea as described in the Pacific Halibut Catch Sharing Plan (CSP). This year CDFW is recommending changes to the season structure consistent with our new inseason catch monitoring and management process to insure that the annual catch stays within the new California quota.

Background

Prior to 2015, the recreational Pacific halibut fishery in California has been managed using a fixed fishing season set in advance and the total catch was determined post-season; there was no inseason management to hold catches to the quota. Pacific halibut has become a popular target fishery off California and increasing angler effort has resulted in catches exceeding the subarea quota since 2008. At the November 2014 Pacific Fishery Management Council (PFMC) meeting, the PFMC recommended modifying the CSP so the California subarea allocation would be increased from one percent to four percent of the non-tribal allocation under the proposed rule. CDFW supports the proposed change to the CSP allocations as recommended by the PFMC.

Based on the 2015 Area 2A Total Allowable Catch (TAC) of 970,000 pounds, and the increased allocation for the California subarea, the new Pacific halibut quota for the California subarea will be 25,220 pounds. Because the catch in this area has been higher than 25,220 pounds in recent years, CDFW is recommending a shorter season for 2015 than for 2014. CDFW will also be tracking and monitoring catches inseason on a weekly basis in 2015 and will coordinate with the National Marine Fisheries Service (NMFS) on the need for closure of the fishery upon attainment of the quota.

Public Meeting and Input on California Season Dates

Following the International Pacific Halibut Commission's adoption of the 2A CSP, CDFW held a public meeting on February 4, 2015. The purpose of the meeting was to review preliminary catch estimates from the 2014 recreational fishery and to receive public input on potential season dates for the 2015 fishery in order to maximize opportunities within this newly established quota. The goal was to determine how to structure the 2015 season in a manner that would balance a variety of needs from various geographic areas and angling interests (i.e., Commercial Passenger Fishing Vessel [CPFV] operators and private anglers). Approximately 25 written and 22 verbal comments were received from the public meeting. Respondents included private anglers, fishing association groups, CPFV owners/operators, fish business representatives, and tribal interests. One fishing association group conducted an independent survey which resulted in approximately 89 responses, and the results were summarized and presented at the meeting. In addition, an online survey and email correspondence were also used to solicit further input.

CDFW used this input to help establish the final recommended season dates for 2015 with a goal of reaching but not exceeding the quota.

Recommended Season Dates

Although many factors drive fishing effort and catch, CDFW estimated catch expectations for 2015 assuming that the annual catch would continue to show a modest increase. The method involved determining the expected catch for each month based on averaging the two years with the highest catch in that month; the method is more fully described in the CDFW report¹ to the PFMC at its November 2014 meeting (herein, the November CDFW report). CDFW notes that catch projections cannot account for the unpredictability of fishing effort, changes in catch rates, availability of alternative targets, weather, effects of moving to a 'derby fishery' mentality off California, and other factors that may affect angler behavior and/or catch.

After considering public input and a need to balance competing interests along with CDFW's support for a season structure with fewer open and closed periods to aid enforcement and minimize confusion, CDFW proposes the following open fishing dates with a goal of providing as much opportunity throughout the season while ensuring all the quota is harvested.

¹ http://www.pcouncil.org/wp-content/uploads/G1b_Sup_CDFW_Rpt2_NOV2014BB.pdf

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May 1-May 15
June 1-June 15
July 1-July 15
Aug 1-Aug 15
Sept 1-October 31

The dates above would be open to fishing until the quota has been taken, or until October 31, whichever comes first, at which time the fishery will be closed for the remainder of the year.

Based on the approach presented in the November CDFW report, CDFW estimates catch in each of the proposed open periods as follows:

May 1- May 15: 1,817 pounds
June 1-15: 4,268 pounds
July 1-15: 7,880 pounds
August 1-15: 7,617 pounds
September 1- October 31: 5,692 pounds

Projected closure date: September 27 (i.e., the date on which CDFW estimates 25,220 pounds will be taken).

The above fixed season dates are not guaranteed days and the season could be closed early if it is projected catches will exceed the California quota.

The proposed season dates above amount to a closure of two full months during May through August, which is expected to spread the catch longer throughout the season. Also, while CDFW will no longer be managing with a fixed season, closing half of each month is expected to substantially reduce catch in each month compared to previous catches made with no closed periods.

CDFW also examined the proposed season dates considering alternate expectations of catch, i.e., using both higher and lower catch scenarios (Figure 1). The proposed season structure, including four lengthy closed periods, should provide opportunities to port areas and fishery interests in most months of the 2015 season if catches are reasonably in line with CDFW's projection.

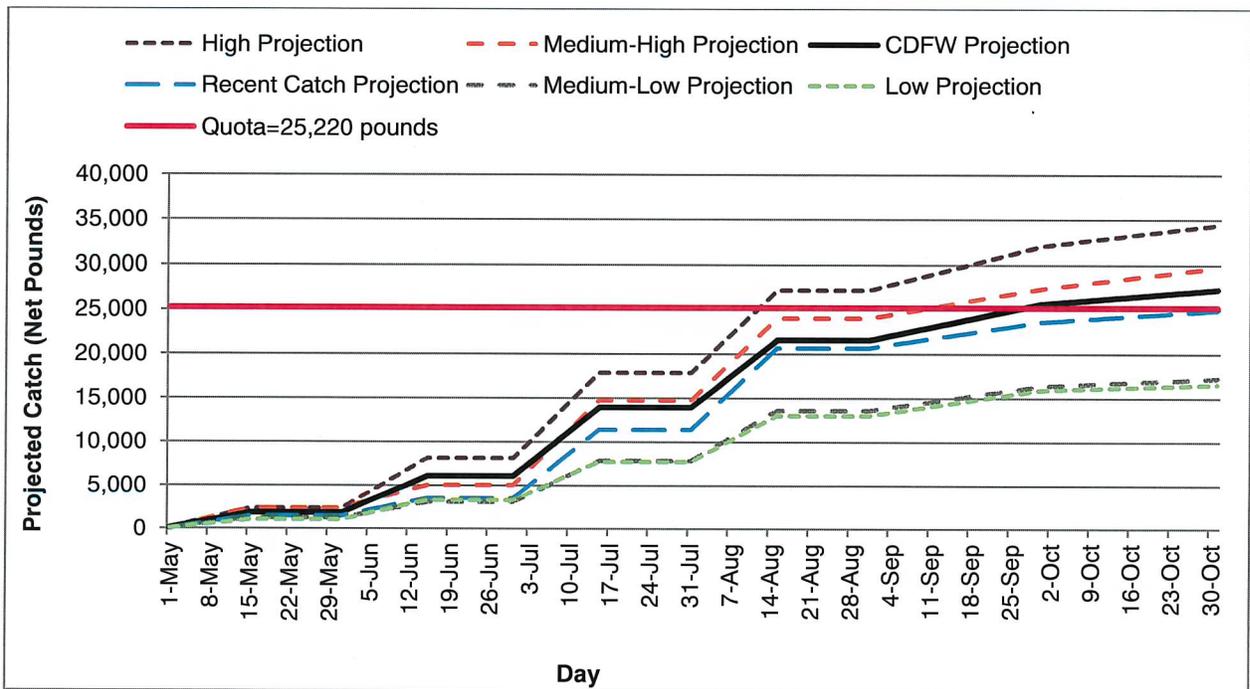


Figure 1. Cumulative projected catch for CDFW proposed season structure using six base catch scenarios. The high projection uses the highest catch in each month from 2008-2014; the medium-high projection uses the highest catch in each month from 2010-2014; the CDFW projection uses the average of the two highest catches in each month from 2008-2014; the recent catch projection averages the catches for each month from 2013 and 2014; the medium-low projection uses the average monthly catches from 2010-2014; and the low projection uses the average monthly catches from 2008-2014. Data used for the recent catch, medium-low, and low projection scenarios do not include August 2014 catch data because the fishery was closed. Data from the California Recreational Fishery Survey and CDFW.

Inseason Monitoring, NOAA Coordination and Closure Process

CDFW has a robust recreational sampling program which will monitor the fishery throughout the season and collect information on angler catch and effort to generate monthly catch estimates. Pacific halibut project staff will also make weekly preliminary estimates of catch based on the relationship between sampled fish and previous catch estimates, as described in the November CDFW report.

CDFW expects that inseason consultation with NMFS will occur weekly, similar to the process used by the states of Oregon and Washington to monitor their fisheries and determine closure dates. In these discussions, the agencies may also consider expected weather, constituent input on expected effort, and available information on past participation for the specific time of the year as necessary. In addition to the use of

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the NMFS hotline, CDFW will also post weekly catch estimates and closure notification to its website in a manner similar to the Oregon Department of Fish and Wildlife, and similar to the catch reporting CDFW currently utilizes for yelloweye rockfish.

If you have any questions or need additional information, please contact Ms. Deb Wilson-Vandenberg, CDFW Pacific halibut staff, at (831) 649-2892 or Deb.Wilson-Vandenberg@wildlife.ca.gov.

Sincerely,

A handwritten signature in red ink, appearing to read 'Marcia Yaremko', is written over the word 'Sincerely,'.

Marci Yaremko, State-Federal Fisheries Program Manager
California Department of Fish and Wildlife
Marcia.Yaremko@wildlife.ca.gov

ec:

Craig Shuman, Marine Region Regional Manager
California Department of Fish and Wildlife
Craig.Shuman@wildlife.ca.gov

Deb Wilson-Vandenberg, Senior Environmental Scientist Supervisor
California Department of Fish and Wildlife
Deb.Wilson-Vandenberg@wildlife.ca.gov