



Humboldt Area Saltwater Anglers, Inc.

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February 12, 2015

California Department of Fish and Wildlife
Caroline McKnight, Environmental Scientist
20 Lower Ragsdale Drive, Suite 100
Monterey, CA 93940

RE: Pacific Halibut Season Structure Recommendation for 2015

Dear Ms. McKnight:

The Humboldt Area Saltwater Anglers, Inc. (HASA) is a northern California sportfishing organization with over 200 members representing saltwater anglers since 2008. We have been actively engaged in saltwater sportfish management over the years, with the goal of providing a long-term sustainable Pacific halibut fishery for our membership. Since the salmon closure of 2008, Pacific halibut has been an increasingly important sportfish for our members; however, recent management requirements, beginning with the August block closure in 2014, have reduced sportfishing opportunities for our members, and will again reduce Pacific halibut fishing opportunities in 2015.

As you know, despite the increased PFMC Catch Share Plan allocation to California in 2015, we will be required to limit harvest to avoid exceeding this allocation, which will require further reductions in our 2015 Pacific halibut season. Based on our experience with the 2014 season structure (August block closure) and information gained from economic studies funded by HASA and CDFW, we have conducted a survey to better understand saltwater anglers' preferences for a 2015 season structure. The survey results and subsequent discussions highlighted the following preferences:

- Having fishing opportunities throughout the season, particularly early and late in the season when salmon fishing opportunities may be limited;
- Having fishing opportunities during the primary tourist season (June, July and August) to economically benefit local ports, local and traveling recreational anglers, and charter boats;
- Having at least two of the three major holidays open to support greater sportfishing opportunity and the economic benefits to the region;
- Having a fair distribution of opportunity to catch Pacific halibut (no favoritism to any group).
- Ensure that the 2015 season structure and season management fully utilizes the 2015 allocation of 25,220 lbs (reduce risk of "leaving fish on the table").

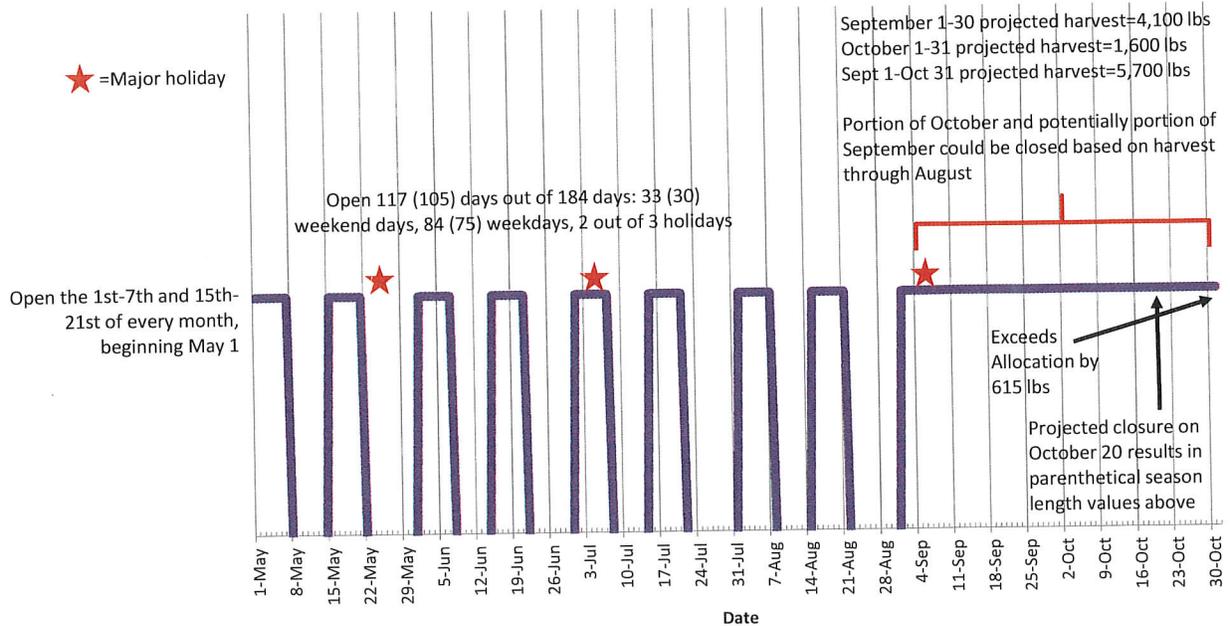
In addition to the above sportfishing criteria, we also considered CDFW needs and requirements for 2015 season structure (which could be more flexible in future years):

- Cannot exceed 25,220 lb allocation, and once the season is closed, it does not reopen;
- Must be simple for public understanding and CDFW enforcement;
- Preferred to be compatible with existing CRFS sampling to get most accurate weekly and monthly harvest rate estimates.

Based on the survey results, close coordination with CDFW harvest management and California Recreational Sport Fishing (CRSF) sampling staff, discussion during the February 4th CDFW public meeting in Eureka, and discussion during our February 5th HASA General Membership meeting, HASA provides the following recommendations for 2015 season structure. Each option uses the same “conservatively high” monthly harvest estimates used by CDFW, and each option slightly exceeds the 25,220 lb allocation to 1) reduce risk of leaving fish on the table if actual 2015 harvest rates are lower than the monthly harvest rates assumed by CDFW, and 2) enable the season to be closed early in October (and September if needed) if actual 2015 harvest rates are equal to or higher than the monthly harvest rates assumed by CDFW.

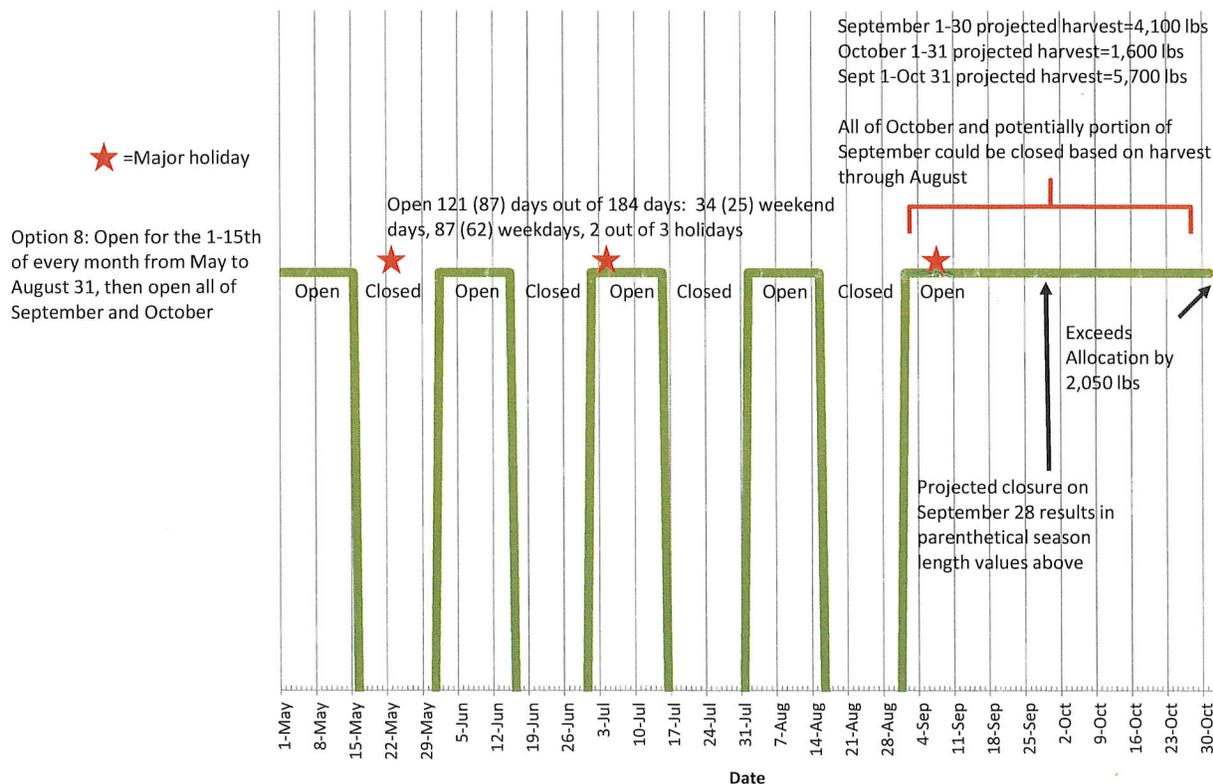
Preferred HASA Recommended option:

- From May 1-August 31, open the 1st through the 7th and 15th through the 21st of each month
- Open every day from September 1-October 31
- Closed once forecasted total harvest exceeds the 25,220 lb allocation in the Catch Share Plan



Secondary HASA Recommended option:

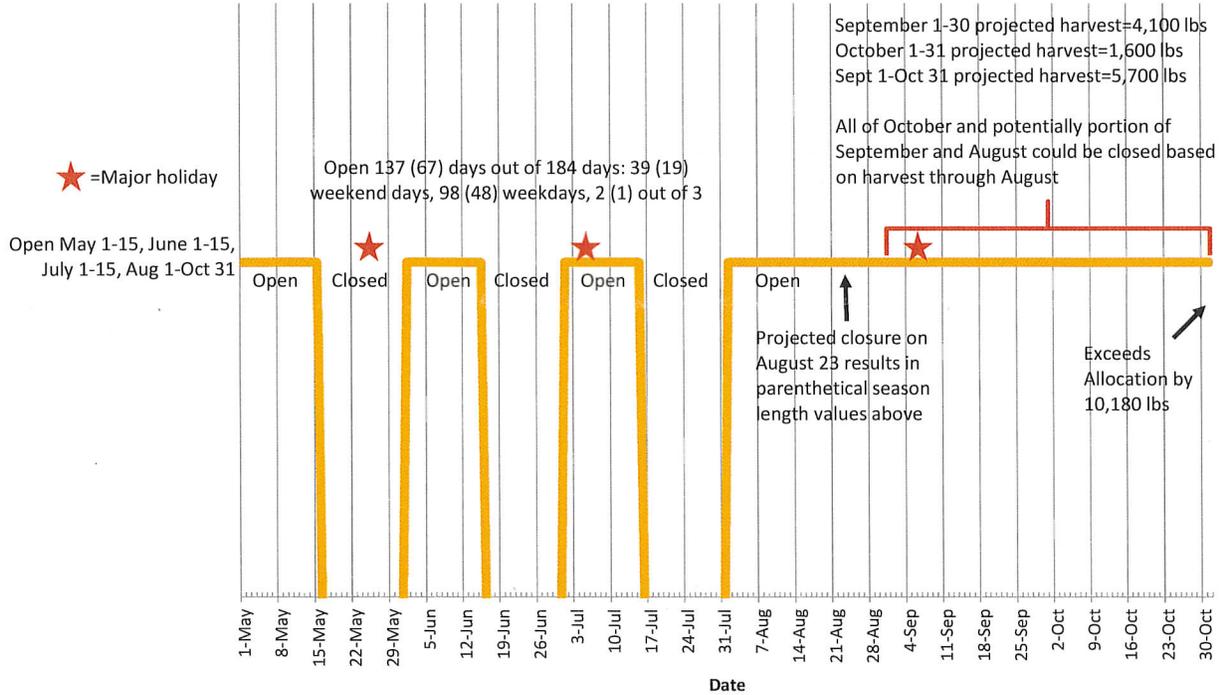
- From May 1-August 31, open the 1st through the 15th of each month
- Open every day from September 1-October 31
- Closed once forecasted total harvest exceeds the 25,220 lb allocation in the Catch Share Plan



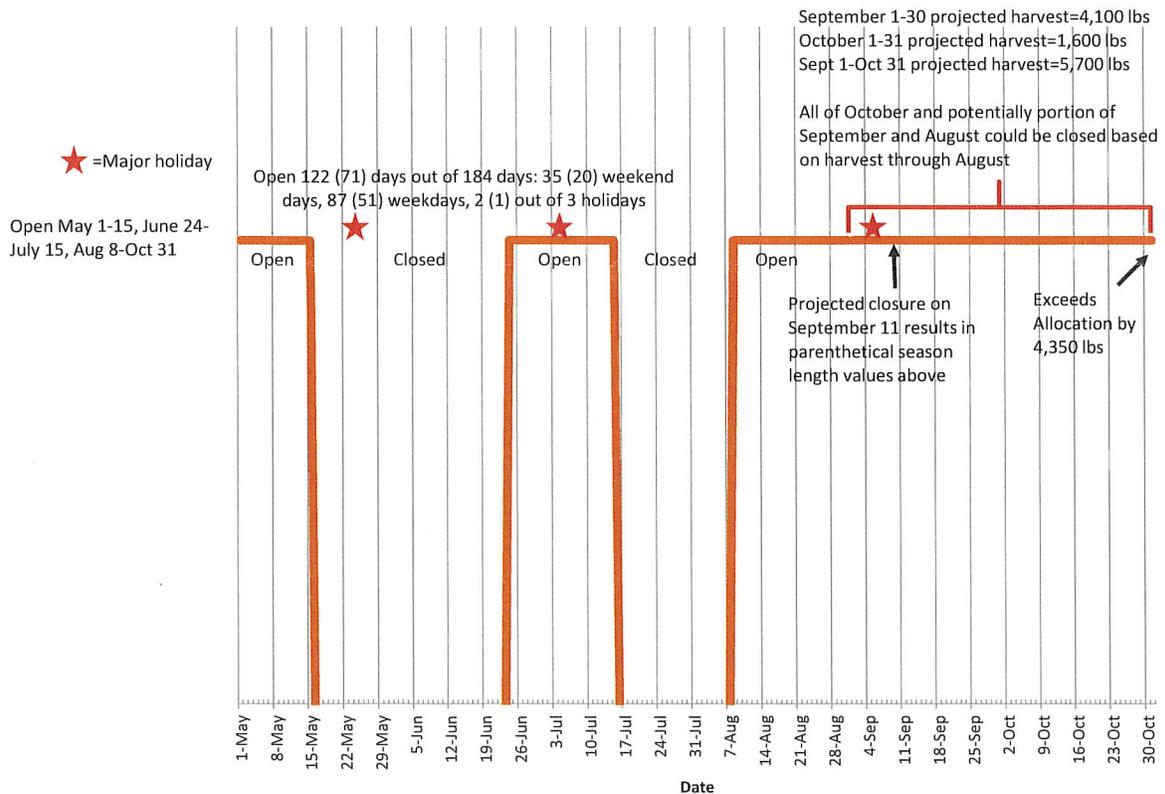
HASA also understands that our preferred option recommendations may cause some challenges to the CRSF sampling protocol, and may require some additional effort and/or resources to refine the sampling methodology to accurately estimate Pacific halibut catch in 2015. Given the importance of Pacific halibut sportfishing to our membership and the local economy, HASA requests that, if needed, additional resources be allocated to the CRFS program to: 1) refine the sampling strategy to specifically accommodate the recommended season structure, and 2) reduce the time needed to provide monthly catch estimates. Our current understanding is that there may be as much as a 4-6 week turnaround time to generate refined monthly harvest estimates. This overly long turnaround time will require CDFW to rely on less accurate harvest estimates at the latter half of the season, which will increase the risk of leaving fish on the table or exceeding our 25,220 lb allocation.

On February 7, you distributed two draft season structure options (labeled Compromise A and Compromise B, illustrated below) and requested additional input. We have analyzed these options in a consistent manner with our recommended options above, and compared to the prioritization criteria obtained from our extensive surveys of membership, local anglers, and local businesses.

CDFW Compromise A



CDFW Compromise B



Option	Over harvest*	Open days	Open weekdays	Open weekend days	Open holidays
HASA Preferred Option (Open 1 st -7 th and 15 th -21 st from May 1 through August 31, then open September 1 through October 31)	615 lbs	117 (105)	84 (75)	33 (30)	2 (7/4, 9/7)
HASA Secondary Option (Open 1 st -15 th from May 1 through August 31, then open September 1 through October 31)	2,050 lbs	121 (87)	87 (62)	34 (25)	2 (7/4, 9/7)
CDFW Compromise A (May 1-15, June 1-15, July 1-15, Aug 1-Oct 31)	10,180 lbs	137 (67)	98 (48)	39 (19)	2 (7/4, 9/7**)
CDFW Compromise B (May 1-15, June 24- July 15, Aug 8-Oct 31)	4,350 lbs	122 (71)	87 (51)	35 (20)	2 (7/4, 9/7)

() parenthetical values reflect truncated end of season where projected harvest=25,220 lbs allocation, used to compare apples to apples between Options

* Used to provide some buffer to reduce risk of leaving fish on the table

**Holiday likely eliminated if projected harvest=actual harvest in 2015

Our results show that both HASA options provide many more days on the water for our constituents while better adhering to the harvest constraints in the 2015 Catch Sharing Plan. For example, the HASA preferred option provides over 50% more days on the water when using the predicted end of season dates (parenthetical values in table below), while having a more reasonable “overharvest” amount that is closer to the desired management value of zero. In addition, it better achieves HASA objectives of providing fair access to the fishery through the entire season, minimizing the economic impact of block closures on local ports and businesses, provides simple season structure for angler interpretation and CDFW enforcement, will have a much greater likelihood of providing fishing opportunities in September and October due to having a smaller “overharvest” amount (less likely to result in early season closure). For example, using the CDFW monthly harvest rates, the HASA preferred option would close on October 20 (105 open days), while the CDFW Compromise A would close on August 23 (only 67 open fishing days). The CDFW compromises will likely create a derby fishery in August that will result in closing of the season in August or early September, which would be harmful to the local charter boats. Our findings above are also corroborated by the comments provided by the Trinidad Rancheria, which continue to support the HASA preferred option over the CDFW Compromises for many of the reasons summarized above (Leslie Sanders email to you on February 11, 2015).

In addition, HASA has spent a considerable amount of resources and effort to better understand the socio-economic ramifications of various season structures, and have conducted rigorous surveys and membership meetings to solicit input from northern California Pacific halibut anglers and businesses supported by Pacific halibut anglers. We believe that the results of these surveys and feedback from the Trinidad Rancheria, combined with the comparative analysis of the different season structures shown in the table above, continues to support the HASA options as better meeting overall recreational and economic objectives. Therefore, we request that CDFW adopt one of the HASA options for the 2015 season structure for submitting to NOAA for

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consideration and adoption. If CDFW decides to adopt Compromise A, we request that it be modified to be similar to the HASA Secondary Option to have an additional 2-week closure in August in order to provide a higher likelihood of fishing opportunity in September or October. However, to reiterate, we continue to recommend the HASA Preferred Option be forwarded to NOAA for consideration and adoption.

Finally, HASA also supports the inclusion of harpoons as a legal method of landing Pacific halibut, as well as the regulation conformance with IPHC and federal regulations.

HASA appreciates the opportunity to provide input on the 2015 Pacific halibut season, and the efforts of CDFW in working with HASA to develop and refine our recommendation. We also look forward to future collaboration with CDFW to develop a longer-term solution to Pacific halibut allocation that will result in a fairer and more equitable allocation of this important resource to California anglers as required by the Magnuson-Stevens Act. Achieving this long-term goal will require consistent, coordinated, and collaborative teamwork between CDFW, HASA, local charters, ports, and businesses. Again, thank you for the opportunity to provide input on the 2015 Pacific halibut season structure, and do not hesitate to contact me at (707) 845-0101 if you would like any additional information or have any questions.

Sincerely,



Scott McBain, President
Humboldt Area Saltwater Anglers, Inc.

cc: Mr. Sonke Mastrup, Executive Director, California Fish and Game Commission
Mr. Charlton Bonham, Director, California Department of Fish and Wildlife