

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

From: **Tony Pettis** <tpettis@hotmail.com>

Date: Fri, Aug 11, 2017 at 11:31 AM

Subject: Public Comment on Halibut Management

To: "pfmtc.comments@noaa.gov" <pfmtc.comments@noaa.gov>

My name is Tony Pettis. I own and operate the F/V Heidi Sue and I have participated in the directed commercial halibut fishery in area 2A for the last 20 years or so. I am writing to provide my opinion on possible management alternatives that were outlined in a meeting hosted by ODF&W in Newport, OR on August 3rd.

I believe the first option that should be seriously considered is to continue with the current 10 hour derby structure. Although this management structure isn't perfect, it may be difficult to come up with a "fair" way to reallocate the fishery. The best thing about the current structure is that everyone has a chance to compete for the resource. The single biggest improvement you could make to this structure would be to allow us to fish inside the 100 fathom curve. This would greatly alleviate overcrowding issues and I believe we would have very little impact on Yellow Eye Rockfish.

The biggest problems I see with the current derby structure are timing conflicts with other fisheries and marketing issues. If management structure were to change, I believe that the only way to address these problems and fairly allocate the fishery would be to move to an Alaska style IFQ system. Quota would need to be allocated based on past catch history so that boats would be able to continue to participate in the fishery as they have in the past.

I see significant problems with the two other options outlined at the ODF&W meeting. Extending the season to a week or month long would only serve to severely reduce quotas while still creating conflict with other fisheries that a boat might wish to participate in. Allocating the halibut quota to be caught incidentally with sablefish would only serve to give the halibut fishery to sablefish fisherman, many of whom have never halibut fished. Many of us who depend on halibut as part of our yearly income would be forced to pay a lease to sablefish permit owners to access the halibut we have been fishing for decades. Boats with halibut IFQ's would still be able to bring in halibut while black cod fishing if reducing bycatch is the concern.

I also have a big problem with the idea of transferring 3.5% of area 2A halibut to the California halibut fishery. First of all, ocean conditions have been unusual in recent years, and there is nothing to say that the halibut will remain in that area in the future. The biggest problem I have with the proposal is that all of the quota is taken from the directed commercial fishery which makes a 3.5% reallocation result in a very significant 11% reduction in the commercial quota. The commercial quota has already been whittled down to an unfairly low percentage of the overall 2A quota and should not be lowered any more! Any transfer of quota should come out of the sport quota!

Thank you for your time and consideration.
Tony Pettis