

Good morning, Mr. Chair, PFMC members

My name is Dave Croonquist. I live in Sequim, Washington. I am here on behalf of hundreds of halibut anglers, various city and county governments, and many small businesses.

I want to expand on our letter of support for the 2018 sport halibut season structure.

We mentioned the Scoping Exercise E.1 – Attachment 3. While it appears to be designed to address commercial issues, we would like to suggest that you and the NPFMC, working with the IPHC, can use the exercise as basis to take a different look at how the sport halibut fishery is administered in US waters.

In particular, we would direct you to 16 USC 773 (c) Regional Fishery Management Council involvement where portions read that the council:

*“...may develop regulations governing the United States portion of Convention waters...”*

and

*“...If it becomes necessary to allocate or assign halibut fishing privileges among various United States fishermen, such allocation shall be fair and equitable to all such fishermen...”*

The Magnuson-Stevens Act lists 10 Conservation and Management measures, four of which give you the latitude to work with the sport fishing communities of the West Coast states to affect changes in our halibut season structure:

Number 3 reads: *Manage individual stocks as a unit throughout their range, to the extent practicable; interrelated stocks shall be managed as a unit or in close coordination.*

Number 4 reads: *Not discriminate between residents of different states; any allocation of privileges must be fair and equitable.*

Number 8 reads: *Take into account the importance of fishery resources to fishing communities to provide for the sustained participation of, and minimize adverse impacts to, such communities (consistent with conservation requirements).*

And Number 10 reads: *Promote safety of human life at sea.*

We think it is time to move the sport fishery away from a directed quota fishery. With a daily bag limit, a field possession limit, an annual limit and more timely catch reporting, we could have a better season structure that puts the sport fleet on the water when sea conditions are safer. We would also be building a more stable economic base for our coastal communities.

The IPHC will be a critical component in any changes to the sport halibut fishery. I mentioned working with the NPFMC earlier. We need to look to how the Alaska sport halibut fishery is managed. The Alaska charter fleet had a quota of approximately 2.8 million lbs in 2016. What we find interesting is that the IPHC doesn't set a quota for the private/non-charter halibut angler in Alaskan waters. The IPHC only tracks their total removals for catch accounting and stock assessment and in 2016, the Alaskan private fleet an estimated 2.8 million lbs of halibut. If Alaska doesn't have quota, is it fair and equitable to assign a quota to the 2A sport fleet?

There are lots of questions to be answered. The challenges ahead of us are many and varied. The sport fishing communities in 2A are willing to work with you to achieve a better distribution of opportunities for halibut sport fishing in US waters. When can we start?

Thank you.