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Re: "Preliminary Alternatives for Incidental Catch Retention of Pacific Halibut in the Limited Entry and Open Access Fixed Gear Sablefish Fisheries"

Dear Council Members/NMFS,

This letter is in response to the recent PFMC recommendation to NMFS to limit the preliminary alternatives for incidental retention of halibut to the LE Fixed Gear Sector. We object to this recommendation by the council as it denies the benefits of incidental retention to the Open Access Sector and is inequitable to historical participants in the 2A halibut fishery who do not hold a LE Fixed Gear Permit. It also does not address the bigger issue which is the "derby" fishery that Open Access and LE Fixed Gear fisherman are forced to fish in area 2A.

Myself and the others that have signed this letter all actively participated in the 2A halibut derby fishery in the past and present and have faced the grim realities that this outdated, "derby" fishery execution model, has imposed upon us and continues to do so. Currently under the 2A Catch Sharing plan to participate in the derby fishery we are forced to fish on a one or two day opener in unsafe weather conditions, crowded fishing grounds, and we flood the market with halibut for a few short days. An incidental fishery option would give an alternative option to Open Access Fixed Gear fisherman who don't want to participate in the directed/or incidental troll fishery.

We ask the council and NMFS to consider incidental retention of halibut in the OA Fixed Gear Fishery Fleet to historical participants in the 2A halibut fishery. It would allow us to retain halibut on days that are safe to fish, provide the local market with fish throughout the summer, and will give an alternative to fisherman who do not want to go line up boat to boat to fish on the small halibut grounds off our southern coast line.

The reality is that execution of the 2A Halibut Fishery "derby" is the real problem that needs addressing. While we ask to be included in the incidental retention of halibut catch share plan, we believe this an inadequate solution to the ongoing problem that a derby fishery creates. In the future we would like the NMFS and the PFMC to come up with a plan that would issue IFQ to individual fisherman with historical participation in the fishery. The move to catch shares would benefit the fisherman, consumer, and end the unsafe race for fish.

In conclusion we ask that any alternatives NMFS creates in the near future regarding the retention of incidental halibut include Open Access fisherman who have been historical 2A halibut fishery participants, and consider ending the unsafe "derby" halibut fishery in 2A.

Sincerely,  
John Blanchard F/V Bess Chet  
Stanley Jones F/V Agnes C