



# Alaska Longline

## FISHERMEN'S ASSOCIATION

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Dr. Bruce Leaman  
Director  
International Pacific Halibut Commission  
PO Box 95009  
Seattle, WA 98145-2009

Re: 2008 IPHC halibut catch limits

Dear Dr. Leaman,

I am submitting these comments on behalf of the Alaska Longline Fishermen's Association (ALFA). ALFA is a non-profit association of independent commercial longline vessel owners and crewmembers who are committed to continuing the sustainable harvest of marine fisheries while supporting healthy ecosystems and strong coastal communities.

Last year ALFA's membership supported the IPHC staff recommendations for the coastwide model and the 2008 catch limits with the understanding that the issue of survey catchability would be further evaluated. ALFA also firmly supported efforts by the IPHC to control halibut charter harvest. As discussed below, both issues continue to be of concern and utmost importance to our membership.

### Coastwide Model and Survey Catchability

ALFA appreciates the IPHC's efforts to address questions related to the coastwide model in general and survey catchability in particular. Our membership also appreciates the work that went into the September workshop. Much of this work was directed at analysis of possible factors that can affect catchability such as hook availability, station depth distribution as a proportion of bottom area, and grounds competition with commercial vessels (using existing data). Some of these analyses have yielded correction factors and others have proved inconclusive. We request the IPHC prioritize research to experimentally determine, once and for all, if survey catchability is indeed constant across all areas. This is a fundamental premise that must be definitively established if the survey is to be used to apportion the overall catch limit between IPHC areas. Until that question is answered, we respectfully request the Commission consider whether it is appropriate to increase catch limits in any area, particularly during this time of declining coastwide stocks and further declines in area CPUE.

### Halibut Charter Management

Also of critical importance to our membership is effective management of the halibut charter industry in 2C. Without effective controls on charter harvest, halibut stocks will

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be further eroded and the setline fleet will be further penalized despite the fleet's exemplary efforts to make conservation the first priority of halibut management. Under the proposed 2009 catch limits, the 2C charter harvest is not to exceed the 788,000 pound GHL established by the 2003 GHL Final Rule. Last year the 2C charter catch was estimated at 200% of the sector's GHL – this with a GHL of 931,000 pounds. The Commission has publically recognized that charter catch overages are delaying the rebuilding of the Area 2C resource. The resource and socioeconomic costs of delaying rebuilding in 2C are unacceptable, causing irreparably harm to setline quota share holders as well as subsistence and personal use fishermen.

ALFA requests that the Commissioners implement management measures in area 2C to hold the charter industry to the 788,000 pound GHL. Such action is consistent with the Halibut Act mandate to conserve the halibut resource and to hold sectors to domestic management targets. ALFA members note that the National Marine Fisheries Service's (NMFS) recently published Proposed Rule (limiting 2C charter clients to one halibut per day), even if it is implemented in time for the 2009 charter fishery, will be inadequate to hold catches to the 2009 GHL. ALFA endorses the proposal submitted by the Halibut Coalition requesting that IPHC staff provide the public and the Commissioners at the Annual meeting with an evaluation of management actions that would effectively control 2C charter harvest to the 788,000 pound GHL.

In summary, ALFA members recognize the continued coastwide decline and the need to conserve stocks to ensure rebuilding. We have concerns about raising quotas in any areas under these conditions. ALFA members recognize that both commercial sectors—setline and charter—must share in the burden of conservation and urge the IPHC to take action to ensure the 2C 2009 halibut charter GHL is not exceeded. ALFA members would prefer greater long-term stability in the assessment and management approach and have unresolved concerns about the current apportionment method. Suggestions for researching constant catchability and other considerations were discussed with Dr. Leaman at a public meeting in Sitka this past October. ALFA requests that the Commissioner's support funding to investigate these issues so that research may commence in 2009.

Thank you for consideration of our recommendations. ALFA representatives will attend the Annual meeting to participate in the management process. Please feel free to contact us for any additional information.

Sincerely,

Linda Behnken  
Executive Director