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December 15, 2008

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

Dear Dr. Leaman,

On behalf of the Halibut Coalition's 350 individual members and member groups, we submit the following comments on the 2009 catch limits for area 2C.

The Halibut Coalition is deeply concerned about the current stock levels estimated for the Eastern Gulf of Alaska area. If the staff recommended catch limits are adopted for 2009, the setline fishery in area 2C will experience a 58% drop in their quota in just 3 years time. The 2C quota will be the lowest it has been in nearly 3 decades and the percent drop in quota is unprecedented. In order to see halibut stocks recover and increases occur in the Eastern Gulf population, all sectors must be managed to their targets.

The setline fishery has supported the Commission's conservation and rebuilding efforts at great costs to our businesses. Our expectation is that in the long run we will benefit by seeing the halibut stocks rebound in the Eastern Gulf. However, the charter industry has continually exceeded their quotas over the past 5 years and has not been supportive of the conservation efforts being made to recover the stocks. Your letter to the North Pacific Fishery Management Council dated September 19, 2008 states clearly that the Commission recognizes charter catch overages are delaying the rebuilding of the Area 2C resource. This negatively affects all users including subsistence and personal use fishermen in coastal Southeast Alaska.

The Halibut Coalition requests that the Conference Board recommend and the IPHC Commissioners adopt a charter catch limit for 2009 in area 2C of 788,000 pounds and implement management measures to hold that sector to this limit. The Coalition membership believes that to do otherwise will compromise further the health of the halibut resource during this time of critically low abundance in the Eastern Gulf.

Alaska Longline Fishermen's Association • Cordova District Fishermen • Deep Sea Fishermen's Union •
Fishing Vessel Owners Association • Halibut Association of North America • Kachemak Bay Fisheries
Association • North Pacific Fisheries Association • Petersburg Vessel Owners Association • Sea Food
Producers Cooperative • Southeast Alaska Fishermen's Alliance • United Cook Inlet Driftnetters Association
• United Fishermen's Marketing Association • United Southeast Alaska Gillnetters Association

In 2001 the North Pacific Fishery Management Council adopted domestic harvest targets for the charter sector in area 2C. These targets, or Guideline Harvest Levels, were established in the Federal Register in 2003 as “a pre-season estimate of acceptable annual harvests for the guided recreational halibut fishery in Commission areas 2C and 3A”. In April, 2006 the Council reaffirmed its commitment to these targets through a unanimous vote and in 2007 a final rule was published to implement a one fish bag limit. Last year a charter industry group sued the federal government and the management measures were not implemented. The National Marine Fisheries Service is in the process of publishing a final rule for the 2009 fishery that would limit the charter sector to a one fish daily bag limit as part of management measures to hold their catch to their GHL. However, given the timing of the rulemaking and the change in federal administration, it is possible that this rule making will not be complete in time for the 2009 charter fishery. Further, given the new stock assessment and the resultant CEY, the charter fishery GHL has stepped down to 788,000 pounds from the 931,000 pound level in place last year. The Halibut Coalition realizes that adhering to the 2009 GHL will impose hardship on the charter industry but notes that their reduction in quota either year-to-year or in total since 2005 does not approach the decline experienced by the setline fishery.

The Halibut Coalition submitted a proposal for consideration by the Commission requesting that the Commission establish a one halibut daily bag limit for guided angler clients in area 2C. This proposal was submitted prior to the announcement of the Catch Limit Recommendations. There has been and remains serious doubt that implementing the one-fish-per-day limit by itself could constrain the 2009 charter catch to 931,000 pounds. Given the nearly historic low level of halibut stock in the Eastern Gulf and the reduced GHL, we now believe that additional management measures are necessary to hold the charter sector to the 788,000 pound limit in 2C. Possible regulations could include a shortened season length, a size limit, or an annual limit in addition to the reduced daily bag limit. In addition, the Coalition urges the Commission to require, beginning in 2009, implementation of a charter catch accounting system that will provide accurate estimates of annual charter catch by the conclusion of each season. Without question, timely catch reporting should be a standard feature for all significant fisheries. In particular, the current status of halibut in the Eastern Gulf and the lack of a track record for managing the charter fishery successfully to its established limits call for accurate post-season data that inform the development of necessary and reasonable fishery regulations for the following year.

The Coalition supports setting charter catch limits consistent with the domestic targets established in the Federal Register. These catch levels are consistent with the targets established by the Council and are an acceptable pre-season estimate of charter harvest when implemented in concert with charter harvest controls. Simply stated, at these low catch limits the setline fishery in 2C cannot afford to have any more quota eroded by overages in the charter industry.

The Coalition maintains that by adopting management measures to control charter harvest to established GHLS and in using catch estimates consistent with the GHLS the Commission is fulfilling their conservation and management mandates and is supporting Council intent.

Thank you for consideration of our recommendations. Please feel free to contact us for any additional information.

Sincerely,

Jev Shelton
Steering Committee

Copy: Governor Sarah Palin (ATTN: Ms Cora Crome)
Senator Ted Stevens
Senator Lisa Murkowski
Congressman Don Young
Chairman Eric Olson, North Pacific Fishery Management Council