

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: D-2(b) GOA Halibut PSC

NAME (PLEASE PRINT)		TESTIFYING ON BEHALF OF:
1	PETE WEDIN	myself
2	Buck LAUKITIS	NPFA HoweR
3	Kenny Down	Freezen Longline Coalition
4	Forrest Braden	southeast Alaska Guides Organization
5	Sam B. B. B.	myself
6	Lori Swanson	GFF
7	Bob Krueger	AWTA
8	Susan Robinson	Fishermen's Finest
9	Todd Hoppe	UPFA
10	Charles Clement	SELF
11	Julianne Curry	PROA
12	Linda Behnken	ALFA
13	Dustin D'Amico	Young's Fisheries
14	Julie Bann	ALDB
15	Jim Hubbard	KRUZOF FISHERIES/SELF
16	Heather McEnty	Private Seafood Venture
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.



Alaska Longline

FISHERMEN'S ASSOCIATION

Post Office Box 1229 / Sitka, Alaska 99835 907-747-3400 / FAX 907-747-3462

March 22, 2011

Chairman Olson
North Pacific Fishery Management Council
605 West 4th Street, Ste. 306
Anchorage, AK 99501-2252

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MAR 22 2011

Dear Chairman Olson,

On behalf of the Alaska Longline Fishermen's Association (ALFA), I am writing to urge you to initiate an amendment to reduce halibut bycatch Prohibited Species Catch (PSC) caps in the Gulf of Alaska.

The halibut resource is of central importance to our membership and to the coastal communities in which our members reside. Our members have a long history of dependence on the halibut resource, and have worked hard to ensure the long-term sustainability of the halibut fishery. Over the past decade halibut stocks have been in decline, and catch limits in the directed halibut fishery have been reduced accordingly. Area 2C has faced the most dramatic reductions, with catch limits slashed by 72% since 2003, but catch limits are also dropping in Areas 3A and 3B. Many of our members hold quota in all these areas and are struggling to survive these staggering quota reductions.

ALFA members, along with other directed halibut fishermen, are anxiously waiting for the biomass of undersized halibut that is currently in the Bering Sea and western Gulf to grow to harvestable size and rebuild stocks. As the Council is aware, the growth rate of halibut has declined to half of what it was 20 years ago. Since trawl halibut bycatch is primarily immature fish, these schools of small halibut are extremely vulnerable to trawl bycatch and vulnerable for longer than they were when the halibut bycatch caps were set. In other words, while directed halibut fishermen conserve and wait for these small fish to grow, trawl bycatch may be undermining the rebuilding potential of the stock. Our members have accepted conservation reductions to promote rebuilding; we cannot accept conservation reductions that fail to rebuild stocks because bycatch in other fisheries is allowed to undermine rebuilding efforts. ALFA members believe a review of Gulf of Alaska PSC caps is overdue and that the Council's goal must be to significantly reduce halibut bycatch levels in both the Bering Sea and the Gulf.

Finally, I would remind the Council that bycatch reduction is central to both State and federal fisheries policy, and its importance has only been heightened by reauthorization of that policy (e.g., the Sustainable Fisheries Act). Despite these clear directives, both salmon and halibut bycatch in the trawl fisheries has remained at unacceptably high levels for the past two decades. ALFA appreciates the Council's current attention to chum and Chinook salmon bycatch, and urges that equal attention be directed to reducing halibut bycatch. At the April meeting we urge the Council to initiate an amendment to reduce Gulf of Alaska halibut bycatch and chart a clear path to timely action and implementation.

Thank you for your time and attention.

Sincerely,



Linda Behnken
(Director, ALFA)

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MAR 22 2011

3-20-11

North Pacific Fisheries Management Council

Dear Chairman Olson,

I am writing to voice my concern with the Gulf of Alaska Prohibited species caps for Halibut.

I am a skiff fisherman with halibut quota in area 2C. I have fished for over 30 years in Southeast Alaska and have invested in D class halibut quota. My concern is with the mortality of juvenile Halibut as bycatch in other targeted species in the Gulf. It is believed these halibut are migrating eastward as they mature and become part of the biomass in areas 3A, 2C, and southward.

I would like the council to review the caps for halibut bycatch as I believe they are too high. Keeping the halibut stocks healthy is very important to the fishing economy of Southeast Alaska. It is important to me to be able to count on a sustainable fishery in the halibut stocks. Please consider reviewing the Gulf of Alaska prohibited species caps in the council process.

Thank you,

Terry Perenich

Terry Perenovich

Sitka

Polar Star, Inc.

Patrick J. Pikus, President
P.O. Box 2843 Kodiak, AK 99615
907-486-5258 pikus@acsalaska.net

March 22, 2011

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MAR 22 2011

Eric Olson, Chair
North Pacific Fishery Management Council
605 W. 4th Ave. Suite 306
Anchorage, AK 99501

RE: Agenda item D-2b, Discussion paper on halibut PSC limits.

Dear Chair Olson:

I own and operate the 58-foot F/V Polar Star and the 56-foot F/V Miss Lori, both of which participate in the Halibut IFQ fishery in the Gulf of Alaska and west to area 4B. Given the great concern over the halibut stocks and the current freefall in the halibut catch limits, I believe that it is time for the council to initiate an action to analyze lowering the halibut PSC limits in the Gulf of Alaska.

I am greatly concerned about the health of the halibut stocks. The 2011 catch limits for 3A and 3b are down 28% and 24% from last year, respectively, and area 3A is down 45% from its recent high in 2007. The IPHC at its 2011 annual meeting changed from a "slow up, fast down" catch limit policy to a "slow up, full down" policy in an effort to arrest this decline in the halibut stocks, which has resulted in the drastic cuts for 2011. Yet, the trawl fishery continues to utilize the same 2000 mt of halibut PSC they have had since 1989, when the commercial halibut catch was much higher than it is now. Trawl PSC bycatch in 2011 will be over 20% of what is allocated for areas 3A and 3B combined. Imagine that. The equivalent of one-fifth of what will be landed this year in the commercial halibut fishery in the Gulf will be wasted as PSC. This is unacceptable. Also, I believe that the actual bycatch mortality of halibut in the non-pelagic trawl fisheries is significantly higher than is reported.

Over the past two years the IPHC research staff has developed an analysis that shows the long-term effects of trawl bycatch on yield and spawning biomass. Because the majority of trawl PSC is under-32 inch (U32) halibut there are significant downstream impacts on yield and spawning biomass. Basically, because that 2000 mt represents a large number of small halibut rather than a smaller number of larger halibut, the downstream effects of that bycatch are magnified. For the halibut stocks to recover, we need more of those little halibut to recruit into the spawning and exploitable biomasses.

For these reasons, I believe that it is time to look at lowering the halibut PSC limits in the GOA. The amendment 80 fleet in the Bering sea has undergone a stair-step reduction in halibut PSC in their sector. I see no reason why we shouldn't also lower halibut PSC here in the Gulf.

Thank you for your consideration.

Sincerely,



Patrick J. Pikus
Polar Star, Inc.