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September 30, 2014

North Pacific Fishery Management Council
604 W 4th Ave, Suite 306
Anchorage, AK 99501

RE: D2, Charter Halibut Common Pool Discussion Paper

Dear Council Members,

The Petersburg Vessel Owners Association (PVOA) is a diverse group of commercial fishermen that participate in a variety of fisheries throughout the North Pacific. PVOA appreciates the opportunity to comment on the Discussion Paper on the CATCH proposal for a Recreational Quota Entity in the commercial Halibut IFQ program. PVOA concurs with the comments submitted by the Halibut Coalition, of which PVOA is a member. As such, we will keep our comments at a general level and not elaborate on those specific comments and concerns.

PVOA opposes moving the CATCH proposal forward for regulatory review at this time. Given that 2014 is the first year of halibut charter management under the Halibut Catch Sharing Plan (CSP) and provisions of the Guided Angler Fish (GAF) program, we believe it is presently premature and inappropriate to initiate additional actions that would result in major changes to halibut charter management. Any major changes in the CSP or implementation of the CATCH program should only be considered if at some future time specific implementation problems with the CSP and GAF programs are clearly identified. The CSP and GAF programs need to be allowed to run their course and mature before we really know if and when changes are warranted or even appropriate. If at some future date The Council determines that structural changes in the CSP/GAF programs are indeed justified and specific problems that the CATCH plan may correct are identified, then all stakeholders need to be convened for a full discussion and consideration of a full range of alternatives and options for compensated re-allocation, such as IFQ's, common pool or adjustments to the current CSP that allows quota shares to be purchased, not just leased.

Also given the current NPFMC staff shortage and other more pressing issues on the Council's schedule, we also feel that the expenditure of staff time and funding on this issue would be a poor utilization of resources at this juncture.

Thank you for your consideration of our comments. If you have any questions, please do not hesitate to contact us.

Sincerely,



Brian Lynch
Executive Director