

***ProFish-n-Sea Charters***

Zernia Enterprises, Inc.  
P.O. Box 693  
Seward, Alaska 99664  
(907) 224-5122

September 19, 2011

North Pacific Fisheries Management Council  
605 West 4<sup>th</sup> Ave, Suite 306  
Anchorage, AK 99501

Re: GOA Halibut PSC for Trawlers and Hook and Line Vessels

Dear Council Members:


I would like to take this opportunity to comment on the proposal to address the Prohibited Species (PSC) catch of halibut in the Gulf of Alaska (GOA) by trawlers and Hook and Line (HAL) vessels.

Due to a declining halibut biomass, directed IFQ halibut fishermen have taken substantial cuts to their quotas in the last few years. Charter halibut operators have seen the imposition of Charter Halibut Permits which cut their fleet by roughly 30%. These other sectors have taken substantial cuts to protect the halibut resource yet the PSC for Halibut in the GOA has remained unchanged since 1986. Trawls kill many very small halibut and the numbers of individual fish killed to achieve their PSC is astounding.

Please act now to protect our valuable halibut resource and reduce the PSC for trawlers and HAL vessels by 15%. This action needs to be followed up with 100% observer coverage on ALL trawl vessels that operate in Alaska, regardless of size.

Thank you for this opportunity to comment on this important issue.

Sincerely,

  
Steven R. Zernia  
President  
Zernia Enterprises, Inc.

Via Fax: 907 271-2817

(10/17/2011)

North Pacific Fishery Management  
605 West 4th Ave., Suite 308  
Anchorage, AK,99501-2252

Gentlemen : I'm writing you because of a very great concern that has caused me & my friends to avoid Alaska Sports Fishing for 2012 and beyond. I hope you will take in consideration my views as follows.

- 1 .I strongly support action to reduce Halibut bycatch.
- 2, As a Sports Fishermen I strongly support reduction in Halibut bycatch.
- 3.This council should reduce bycatch by the recommended 15% as a starter and continue to reduce ALL bycatch waste yearly.
- 4.Its time the council takes action and reduce bycatch without delay.
5. As a Sports Fishermen who has been organizing groups for the last 10 yrs., I have had enough.

I will not be gathering my friends for the 2012 fishing season and beyond ,due to your bycatch waste,size & bag limit of Halibut.

.The council need to address the bycatch of Halibut waste immediately by reduceing it by the 15% as recommended.

Thank you for time

L C Kammerer  
Sacramento ,Ca

**North Pacific Fishery Management Council****605 West 4th Avenue, Suite 306****Anchorage, AK 99501-2252****fax (907) 271-2817  
HALIBUT PSC BYCATCH****Members of the NPFMC:**

**I am an Alaskan salmon and halibut fisherman and depend upon these vital resources to make a living and contribute to the Alaska community. While the portion of the halibut population that is available for commercial harvest has declined dramatically over the past decade, the limit on halibut PSC bycatch in the Gulf of Alaska has not been changed since 1986. Fishery managers should ensure more equitable conservation measures across sectors by requiring the fisheries responsible for halibut bycatch to reduce the bycatch immediately. It is an intolerable waste of resources to have halibut that are designated by-catch returned to the water, many of them dead, while the legal commercial harvest steadily declines. I therefore strongly support MAXIMUM (15%) reductions, without delay, in halibut bycatch (halibut PSC) in the Gulf of Alaska. This inequity needs to be addressed immediately and halibut bycatch must be reduced NOW. In addition, I think the portion of the bycatch known to result in mortality should be paid for out of the profits of the trawl fishery and used to either support IPHC research or reduce the loss of IFQ holders due to biomass reductions.**



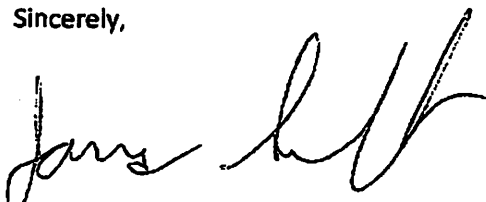
**Arthur Bloom  
PO Box 42  
Tenakee Springs, AK 99841**

Dear Members of the Council,

Please reduce the Gulf of Alaska halibut bycatch caps by 2012.

I have fished halibut off Alaska since 1971. Halibut fishermen have worked hard and been through some tough years to conserve and rebuild stocks. We have reduced bycatch of halibut through the IFQ program. We have reduced bycatch of rockfish by changing where and how we fish. We've reduced our gear loss and even brought in gear lost in previous years, all of which reduces our impact on the resource. In the last six years we've taken big reductions in our halibut quota to conserve stocks. Halibut stocks will not rebuild if other sectors don't conserve too. The halibut bycatch caps were set in 1978 and have never been reduced. The bycatch caps should be reduced by at least 15% in 2012 to protect the rebuilding potential of the halibut stocks and protect the future of the fishery.

Sincerely,



Jim Swift

North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Street  
Anchorage AK 99501

September 16, 2011

Dear Members of the Council,

I support lowering the Gulf of Alaska halibut prohibited species caps. My commercial halibut quotas in both 2C and 3A have been cut (by 76% and 44% over the past six years) to conserve stocks. The halibut bycatch caps were set in 1978 and have not been reduced. Because the growth rate of halibut has slowed, the rebuilding potential of the stock is in the little fish that are being killed as bycatch. The halibut resource is important to every coastal community in Alaska, where people depend on halibut for subsistence, sport, and commercial (charter and longline) harvest. Halibut stocks are in steep decline, and the decline will not stop unless all sectors share in conserving the resource. The bycatch caps should be reduced by at least 15% in 2012.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dick Curran', with a long horizontal flourish extending to the right.

Dick Curran

**GOA Halibut PSC Limits C-2**

**RECEIVED**  
SEP 19 2011

To: Chairman Olsen and NPFMC members,

My name is Peter Thompson and I live and fish out of Kodiak for over 31 years. As a Kodiak resident I have spent these years pursuing halibut while sport fishing, subsistence, commercial, and even chartering. Currently I own halibut IFQ and spend a good deal of time on the water in the Gulf of AK.

I am urging the council to ADOPT THE MAXIMUM (15%) REDUCTION in bycatch and hope that you will implement measures to monitor the bycatch of halibut that are verifiable and are a realistic portrayal of what is truly being discarded by the trawl fleet. I have testified numerous times to the NPFMC citing personal examples of longlining for halibut and having a trawler run over my gear or dragging his net on the bottom parallel to me while am hauling my gear back aboard. I always ask if there is an observer onboard and have yet to be told yes. Simply put....the trawler wouldn't be there next to me on the halibut rich grounds if he was being currently observed and therefore all of the dead halibut go back over without any accountability.

The decline of the halibut TACS and the struggles between the various user groups make it even more important, timely, and meaningful to stop this waste of 2,000 MT of Americas halibut resource in the GOA.

The fishermen in the directed halibut fisheries have been facing reductions in their harvest for years and it is time for the fisheries that cause halibut mortality to share in the burden of a declining exploitable biomass. This inequity needs to be addressed immediately and the bycatch of halibut needs to be reduced NOW!

Thank you,



Peter Thompson

9/14/2011

North Pacific Fishery  
Management Council

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SEP 19 2011

As An Alaska sportsman,  
I am disgusted by the  
enormous waste of our  
resource in this Great State  
by the Halibut and Salmon  
by Catch.

Please take immediate action  
to put an end to this  
nonsense and realize  
that with such a Diminishing  
Resource we can't afford  
to continue these Mistakes.

Steve Penley

1597 Saltwater Dr.

Homer AK 99603

North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252

September 16, 2011

**RECEIVED**  
SEP 19 2011

Re: Halibut Bycatch Reductions

Dear North Pacific Fishery Management Council:

As a stakeholder of the halibut resource by way of operating a charter business in Seward, Alaska, I strongly support reductions in halibut bycatch (halibut PSC) in the Gulf of Alaska. The Council should please reduce bycatch by the maximum amount being considered—15%. This reduction is still insufficient and further reductions to halibut bycatch levels should be made in the future.

It is time for the Council to take action and reduce the halibut bycatch limit for the Gulf of Alaska. Action should not be delayed for any reason. Fishermen who participate in directed halibut fisheries have been facing reductions in their harvest for years—yet the fisheries that cause mortality to halibut as a waste have continued to operate under the same limits since 1989.

The exploitable biomass—the portion of the halibut population that is available for harvest—has declined by 50% over the past decade. The catch limit for the commercial halibut fishery in 2C, 3A and 3B has been reduced by over 50% from 2002-2011, and the daily catch limits for the charter sector in 2C has been reduced from 2 fish of any size to 1 fish less than 37”.

New proposals for the charter sector in 3A could also reduce bag limits and impose size limitations. This inequity needs to be addressed immediately and halibut bycatch must be reduced NOW.

Sincerely,



Townsend A. Tatterson IV

Pacific Fishing

P.O. Box 2875

Seward, AK 99664



DEAR COUNCIL:

RECEIVED

SEP 19 2011

200 YEARS FROM NOW, HUMANS  
WILL LOOK AT "BY-CATCH" WITH THE SAME  
REPULSION THAT WE EXPERIENCE WHEN  
WE CONSIDER THAT THE FINEST PHYSICIANS USED  
TO USE LEECHES AND DRIED DOG FECES TO  
CURE SERIOUS AILMENTS.

PLEASE TAKE STEPS NOW TO REDUCE  
THIS DESTRUCTIVE PRACTICE, AND TO PROMOTE  
HEALTHIER, MORE SUSTAINABLE FISHING REGS,  
AND MORE ACCURATELY TARGETED METHODS.

THANKS FOR CONSIDERING

MY OPINION:

GARTY

GARTLY CURTIS  
P.O. BOX 244  
WILMEDI AK 99603

HOMER RESIDENT.  
907-299-1943  
LADY- D-112 0-11

From: Michael Hopley <rufishn@comcast.net>  
Subject:  
Date: September 15, 2011 5:41:37 PM GMT-08:00

RECEIVED  
SEP 19 2011



North Pacific Fishery Management Council  
605 West 4th Avenue, Suite 306  
Anchorage, Alaska 99501-2252

Dear Sirs,

I am writing you today as a stakeholder in the halibut resource. I have owned and operated a halibut fishing charter business, Alaskan Adventure Charters for the past 21 years on the Kenai Peninsula. Most of the my halibut fishing has been out of Deep Creek and Homer, Alaska.

I strongly support reductions in the halibut bycatch (halibut PSC) in the Gulf of Alaska.

The Council should reduce bycatch by the maximum amount being considered - 15%. This reduction is still insufficient and further reductions to halibut bycatch levels should be made in the future.

It is time for the Council to take action and reduce the halibut bycatch limit for the Gulf of Alaska. Action should not be delayed for any reason.

Fishermen who participate in the directed halibut fisheries have been facing reduction in their harvest for years - yet the fisheries that cause mortality to halibut as a waste have continued to operate under the same limits since 1989.

The exploitable biomass - the portion of the halibut population that is available for harvest - has declined by 50% over the past decade.

The cath limit for the commercial halibut fishery in 2C, 3A and 3B has been reduced by over 505 from 2002-2011, and the daily catch limits for the charter sector in 2C has been reduced from 2 fish of any size to 1 fish less than 37", New proposals for the charter sector in 3A could also reduce bag limits and impose size limitations.

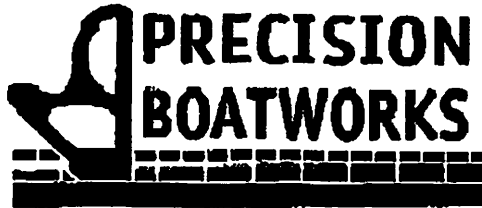
This inequity needs to be addressed immediately and halibut bycatch must be reduced NOW.

Thank you for your time in this matter.

Sincerely,

Mike Hopley  
Alaskan Adventure Charters  
P.O. Box 4273  
Soldotna, Alaskan 99669  
(907) 262-7773 - Home Phone

222 Smith Street  
P.O. Box 1971  
Sitka, Alaska  
99835-1971



Phone: 907-747-3660  
Cell: 907-738-3661  
Fax: 907-747-4661  
precisionboat@gmail.com

September 15, 2011

North Pacific Fishery Management Council  
805 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252

Re: Halibut bycatch

Dear Council members:

Precision Boatworks is a boat repair shop in Sitka. The business provides a livelihood for eight Sitka families. We depend on the halibut longline fleet of the Gulf of Alaska for a large portion of our business. Therefore, as the owner I am very interested in the health of the halibut stock. I support the reduction of the halibut P.S.C. bycatch by the maximum amount being considered by the Council-fifteen percent. I feel this reduction is not enough to bring the limit up to date, and the Council must consider further reductions in the near future. There is no scientific basis for reducing the allowable catch for the directed fisheries, but leaving the wasted bycatch mortality unchanged for years.

Thanks for your consideration.

Michael Litman

***Captain Jack's Seafood Locker***

Zernia Enterprises, Inc.  
P.O. Box 693  
Seward, Alaska 99664  
(907) 224-5122

September 19, 2011

North Pacific Fisheries Management Council  
605 West 4<sup>th</sup> Ave, Suite 306  
Anchorage, AK 99501

Re: GOA Halibut PSC for Trawlers and Hook and Line Vessels

Dear Council Members:


I would like to take this opportunity to comment on the proposal to address the Prohibited Species (PSC) catch of halibut in the Gulf of Alaska (GOA) by trawlers and Hook and Line (HAL) vessels.

Due to a declining halibut biomass, directed IFQ halibut fishermen have taken substantial cuts to their quotas in the last few years. Charter halibut operators have seen the imposition of Charter Halibut Permits which cut their fleet by roughly 30%. These other sectors have taken substantial cuts to protect the halibut resource yet the PSC for Halibut in the GOA has remained unchanged since 1986. Trawls kill many very small halibut and the numbers of individual fish killed to achieve their PSC is astounding.

Please act now to protect our valuable halibut resource and reduce the PSC for trawlers and HAL vessels by 15%. This action needs to be followed up with 100% observer coverage on ALL trawl vessels that operate in Alaska, regardless of size.

Thank you for this opportunity to comment on this important issue.

Sincerely,



Ellen J. Zernia  
Zernia Enterprises, Inc.

907 271-2817



North Pacific Fishery Management Council  
605 West 4th Avenue, Suite 306  
Anchorage, AK 99501-2252

To Whom it May Concern;

We strongly support reductions in halibut bycatch (halibut PSC) in the Gulf of Alaska. The Council should reduce bycatch by the maximum amount being considered. This reduction is still insufficient and further reductions to halibut bycatch levels should be made in the future.

The wasting of our halibut resources is devastating to the state of Alaska. We are a family owned lodge and rely on the salmon and halibut for our livelihood.

Thank you for your consideration.

Richard Andersen  
King of Kings Guide Service and Lodge  
Anchor Point, AK

(907) 567-3667  
(907) 567-3607 Fax  
[www.kingofkingslodge.com](http://www.kingofkingslodge.com)

**KING of KINGS**  
*Guide Service and Lodge*

24715 Sterling Highway  
Anchor Point, AK 99556-9701  
[kings@ptialaska.net](mailto:kings@ptialaska.net)

Martin Spargo  
dba: Alaska Coastal Explorer

4251 Dimond Way  
Wasilla, AK 99654

North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252

Re: Halibut PSC; Gulf of Alaska

Dear Council Members,

Thank you for this forum to express my views and opinions regarding the trawl halibut by catch issues. I am a shareholder in both the commercial and charter halibut fisheries as an IFQ and CHP owner. I operate from Seward, AK (Area 3A). I have commercial fished since 1975, and owned and operated a charter fishing business since 1999.

I applaud the Council for taking up this contentious issue and as currently presented endorse the maximum reduction on the table (15%). My regard is less punitive and more an approach to shared sacrifice of the resource. The council is fairly well acquainted with the reductions and restrictions placed on both the charter and commercial halibut fisheries in recent years. It only seems logical that the 'other' main exploiter of halibut should come under the same level of scrutiny. Having said that, consider:

- The possibility exists that you will revisit the charter halibut CSP and GAF proposal.
- If the charter fleet is sanctioned for up to a 50% slash in halibut take then apply the same standard to the trawl fleet. If 15% is sanctioned for the trawl fleet, apply that standard to the charter fleet.
- imagine the screams you would hear from the trawl sector if you offered to reduce their halibut by-catch numbers by 1/2, and then allow them to lease back from the commercial halibut fleet an allowance. This is precisely what is being directed toward the charter sector.

This will most likely be an acrimonious fight and to that end I wish you well as a group and thank you in advance for your time and consideration to all you have before you.

Best regards,



Martin Spargo

# POLAR STAR, INC.

P.O. Box 2843, Kodiak, AK. 99615 907-486-5258

September 20, 2011

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

RE: Agenda item C-2b, Initial review of GOA halibut PSC limit reductions

Dear Mr. Olson,

I support the council taking immediate action to reduce halibut PSC limits in the Gulf of Alaska. In particular, I urge the council to select Alternative 2, options 1c and 2c as the preferred preliminary alternative at this meeting.

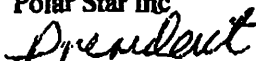
I own and operate two fishing vessels, the 58-foot *Polar Star* and the 56-foot *Miss Lori*, both of which participate in the commercial halibut IFQ fishery in the Gulf of Alaska and the BSAI. The commercial halibut IFQ sector has seen a 50% reduction in catch limits in the GOA in the past decade. These reductions are the result of a steep decline in the halibut exploitable biomass. The IPHC scientific staff is greatly concerned about the overall health of the halibut stock (see section 3.2 in the analysis). Yet, the trawl and hook-and-line sectors have the same PSC limits (2300 mt total) that they have had since 1986. I would agree that this situation is unfair to the IFQ sector. Both the IFQ sector and the sectors that utilize halibut PSC are using a common resource. If there is a precipitous decline in that resource, why is it that only the IFQ sector sees a concomitant precipitous decline in catch limits? I believe that the trawl and HAL sectors should also face a reduction in halibut usage. As a matter of fact, I believe that the reduction should be significantly more than the 15% options that are currently in the analysis. This analysis is comprehensive and clearly shows that a reduction in halibut PSC limits for the GOA is justified. Therefore, as a matter of fairness and out of concern for the health of our halibut resource, I urge the council to select a preferred preliminary alternative at this meeting and take final action to reduce the halibut PSC limits at the December meeting.

Thank you for your consideration.

Sincerely yours,

  
Patrick J. Pikus

Polar Star Inc

  
President

## **GOA Halibut PSC Limits C-2**

**To: Chairman Olsen and NPFMC members,**

**My name is Rebecca Nelson and I have lived in Kodiak for 18 years. During that time I have spent many days' subsistence, sport, and commercial fishing. Currently I own a Bristol Bay salmon permit and also participate in the IFQ halibut fishery as an IFQ holder.**

**Lately the various user groups have been at odds over a declining exploitable biomass and the reductions in their harvests. It has come to my attention that some of the fisheries that have large amounts of halibut mortality have continued to operate under the same limits since 1989. I feel that it is only fair for all user groups to share in the conservation burden of this great resource.**

**It is time for the NPFMC to take action and reduce this amount of wasted halibut by the user groups that have such a large negative impact on our halibut. I am urging the NPFMC to adopt the maximum (15%) reduction in halibut PSC and to look at further reductions in the future.**

**Thank you,**

*Rebecca Nelson 9/17/2011*

**Rebecca Nelson**

**PO Box 3086**

**Kodiak, AK 99615**



19 September 2011

VIA FAX 907-271-2817

North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252

Dear Council Members,

I am a 57-year resident of Alaska, and have been a commercial fisherman since 1964 with the exception of five years of military service. I began Halibut longlining in 1982 in Area 2C.

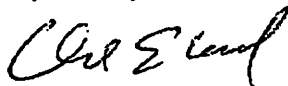
The investment that I made in Area 2C quota shares after the implementation of the Individual Fishing Quota (IFQ) program by the Council, has since been totally wiped out by reductions in the Halibut quota because of conservation concerns.

The only sector involved in harvesting Halibut that was traditionally expected to conserve the Halibut resource has been Halibut longliners. Recently, the sport/charter sector has also faced catch reductions for conservation reasons.

There is absolutely no reason, and no excuse for the trawl fishery to continue wasting Halibut under its current bycatch limit, especially as the Halibut biomass has decreased by 50% over the past decade, and Area 2C IFQ holders have faced reductions of approximately 78% over the past five years.

The Council should immediately reduce the trawl bycatch by the entire 15% that is being considered. Furthermore, with the stress that the Halibut biomass is under, as well as the hardships imposed on both Halibut longliners and sport charter businesses and clients through catch reductions, I believe the proposed 15% reduction in trawl bycatch is not enough, and further reductions should be imposed.

Respectfully,



Charles E. "Ed" Wood  
FV Talon  
P.O. Box 383  
Petersburg, AK 99833-0383  
907-772-3480

**North Pacific Fisheries Management Council**

**My name is Peter Longrich I am a halibut fisherman,I am only 35 years old I have invested heavily in IFQ's. Fishing is my livelihood I live and work in Alaska and I employ Alaskans. I strongly support a reduction in the allowable halibut bycatch for the trawl fleet. I also support enforcement of the halibut bycatch limit. Every dragger deckhand that I have talked to has told me that the trawl fleet easily catches more than twice the halibut that they are actually legally allowed, due to the ineffective observer program . So reducing the halibut bycatch limit 15% would be a great start. We also really need a way to enforce the rules already in place, since the draggers have been killing more halibut than they are allowed for decades with no consequence. The draggers need strong incentive to do the right thing. The way it is now the more halibut the draggers kill when nobody's looking the better it is for them. The future is in your hands we must do better.**

**GOA Halibut PSC Limits C-2**

Chairman Olsen and NPFMC members,

My name is Hailey Thompson and I am 16 years old. I was born and raised in Kodiak and currently a junior at Kodiak High School. I have been working part time on our families fishing boat for a few years and also hold a salmon permit for Bristol Bay. Recently I have begun to longline halibut and am hoping to make that a bigger part of my fishing experience.

I am writing to urge the NPFMC to adopt the maximum (15%) reduction in halibut bycatch. With the recent decline in the fish catches there are a lot of different groups fighting for their share. It is sad that a small portion of the commercial fleet can waste such a large amount of halibut while trying to catch other species. Please send a message to the public that this waste is no longer acceptable and reduce the amount of halibut that are killed and thrown over.

Thank you,

*Hailey Thompson 9/19/11*

Hailey Thompson  
1512 Ismailov St  
Kodiak, AK 99615

Chris White  
953 Janish Dr.  
Sandpoint, ID 83864  
208-265-5742  
[chriswht50@gmail.com](mailto:chriswht50@gmail.com)

9/20/11

Dear NPFMC:

As a longtime halibut fisherman—but more importantly as a steward of our oceans—I strongly support reductions in the PSC bycatch of halibut and other species. The poor fishing practices of other fleets should not be put on our shoulders in the form of plummeting TACS. This bycatch issue is an embarrassing blight on our industry and should be addressed aggressively with significant reductions.

Thanks for your consideration.



September 20, 2011

North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252

RECEIVED  
SEP 20 2011

**Re: Agenda Item C-2 (b) GOA Halibut PSC**

Dear Chairman Olson and members of the Council,

The Alaska Marine Conservation Council (AMCC) appreciates the opportunity to comment on the issue of halibut PSC limits in the Gulf of Alaska (GOA). We commend the Council for prioritizing this important issue for action. Both directed halibut fishers and sport fishers have faced dramatic declines in their catch limits, with correspondingly severe economic impacts. Yet PSC limits have remained unchanged for decades. The time is now for the Council to remedy this inequity and take action to reduce halibut PSC limits in the GOA. To that end, we urge the Council to adopt a preliminary preferred alternative at this meeting to enable the Council to take final action on this agenda item in December 2011.

**We recommend the Council adopts Alternative 2: GOA Halibut PSC limit reduction with the following options as a PPA:**

**Option 1: Reduce the halibut PSC limit for HAL by c) 15%**

**Option 2: Reduce the halibut PSC limit for trawl gear by c) 15%.**

Over the last decade, the exploitable biomass of halibut declined by 50% in the Gulf of Alaska regulatory areas 2C, 3A and 3B. While commercial and recreational fishermen have experienced dramatic cuts in their harvests, the limits on halibut bycatch in the Gulf of Alaska have not been changed since 1989 for the trawl fishery (with the exception of the rockfish program) and 1996 for fixed gear fisheries. For halibut bycatch to remain a fixed amount while directed commercial fisheries and sport GHLL spiral in decline represents a serious inequity which justifies immediate action.

Bycatch of halibut in the GOA groundfish fisheries has a direct effect both on spawning biomass and yield for the commercial and sport fisheries. According to the International Pacific Halibut Commission (IPHC), each halibut caught as bycatch is a direct loss to the halibut spawning biomass which is key to determining commercial and sport limits and yield for the direct halibut fisheries. The IPHC estimates that each pound of bycatch results in lost yield ranging from .9 lbs to 1.1 lbs depending on the region. This means 1 pound of halibut caught as bycatch results in 1.5-1.7 lbs of lost spawning biomass.

Based on what we now know about halibut migration, bycatch of halibut in the groundfish fisheries has broad impacts, beyond effects in the immediate area in which halibut is caught as bycatch. Previous bycatch migration modeling indicated the impact of under-32 inch PSC mortality was largely confined to the area where the halibut were taken. However, a major tag and recapture program conducted from 2003-2009 indicates that halibut continue to migrate throughout their lives (IPHC bycatch report pg.1). The migration generally occurs as a west to east process that slows with size and age. This migratory pattern means that the out of area effects of U32 mortality are larger than previously reported. Current assumptions are based on improved data from the 2010 PIT tag study that indicate halibut continue to migrate throughout their lives. With improved data considering migration of older halibut, the out of area effects of U32 mortality are even larger than previously thought.

Bycatch poses numerous problems in the management of the halibut resource. According to the IPHC, that has primary management responsibility for Pacific halibut in the North Pacific:

The existing GOA Prohibited Species Cap (PSC) limits have been in place for trawl fisheries since 1986 and for fixed gear fisheries since 1996. The Commission staff believes that these limits were based on inadequate data, that monitoring of both historical and current bycatch mortality is similarly inadequate, and that the PSC limit for trawl fisheries should be reduced as a precautionary measure until the improved observer procedures are implemented, at which time the estimated bycatch mortality levels can be re-evaluated in the context of halibut stock dynamics. (pg 2-3 IPHC bycatch report compiled March 2011)

This issue has been raised at the Council for years. At this point the Council has adequate information in the initial review analysis to support moving forward with an immediate reduction in halibut PSC. This action should be viewed as a first step toward achieving additional halibut bycatch reductions as further management tools are explored and increased data from the restructured observer program becomes available. A 15% reduction may serve as an interim step in the years that it takes to gather data through the restructured program and explore management alternatives such as individual bycatch accountability.


In conclusion, because the halibut fishery is managed based on the biomass of the halibut stock, bycatch has a direct impact on all halibut fishers. While the limits were established to optimize groundfish harvest, the limits should not be viewed as a fixed amount allocated into perpetuity. Halibut IFQ limits have declined, charter halibut GHL and bag limits have declined and halibut are less available for subsistence users. The halibut fleet and sport fleet have born the burden of all mitigation measures to date and it is time for the burden to be shared by the fleets catching halibut as bycatch. Halibut used and discarded as bycatch has resulted in direct loss of available fish to other user groups.



We urge the Council to move forward in meeting the obligations of National Standard 9 of the MSA to reduce bycatch by selecting a PPA of a 15% reduction of halibut bycatch for the trawl and hook and line fleets.

Thank you for your continued efforts on this issue.

Sincerely,

  
Theresa Peterson  
Kodiak Outreach Coordinator  
Alaska Marine Conservation Council

September 20, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501

**RECEIVED**  
SEP 20 2011

**Re: Agenda Item C-2(b) GOA Halibut PSC limits**

Dear Mr. Olson and Council members:

I believe the halibut by-catch by trawlers in the Gulf of Alaska is excessive and the major reason for diminishing halibut numbers overall.

Please reduce the by-catch allowance immediately.

Thanks,

Jerry Foster  
36238 Bradford Rd.  
Sterline, AK 99672



September 20, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501

**RECEIVED**  
SEP 20 2011

**Re: Agenda Item C-2(b) GOA Halibut PSC limits**

Dear Mr. Olson and Council members:

As a commercial fisherman in Southeast Alaska for the last 27 years, I am writing to express grave concerns about the halibut bycatch issue. As an IFQ fisherman, I've watched my quota for halibut get cut back 80% over a few years and have fellow fishermen friend's livelihoods being severely threatened from the same predicament.

Wasteful fishing practices are at the center of this issue-- especially in light of the fact that over 5 million pounds were allotted as bycatch to the trawl fleet back in 1986, and a great deal has changed since then. IPHC estimates of the biomass have fluctuated significantly -- especially in regards to the biomass estimates as they relate to the directed setline and guided sport catch of halibut. Halibut are highly migratory within arbitrarily assigned boundaries, and as a consequence, our management strategies must reflect these realities.

Commercial setline fishermen targeting halibut have gone into debt to catch fish they are no longer allowed to land. Charter fisheries have been significantly restricted as well The halibut biomass has gone through some highly volatile swings in population. It is well-past time that the trawl bycatch be significantly lowered to reflect these on-going realities.

These concerns are primarily about waste. When otherwise valuable halibut are thrown over the side dead, there are many coastal communities depending upon that wasted halibut resource which suffer immensely.

I recommend the trawler halibut bycatch be reduced by at *least* half of the 1986 levels to reflect these present realities.

Sincerely,  
David Beebe, F/V JerryO  
P.O. Box 148  
Petersburg Alaska  
99833

19 September 2011

VIA FAX 907-271-2817

North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252

**RECEIVED**

SEP 20 2011

Dear Council Members,

I am a 57-year resident of Alaska, and have been a commercial fisherman since 1964 with the exception of five years of military service. I began Halibut longlining in 1982 in Area 2C.

The investment that I made in Area 2C quota shares after the implementation of the Individual Fishing Quota (IFQ) program by the Council, has since been totally wiped out by reductions in the Halibut quota because of conservation concerns.

The only sector involved in harvesting Halibut that was traditionally expected to conserve the Halibut resource has been Halibut longliners. Recently, the sport/charter sector has also faced catch reductions for conservation reasons.

There is absolutely no reason, and no excuse for the trawl fishery to continue wasting Halibut under its current bycatch limit, especially as the Halibut biomass has decreased by 50% over the past decade, and Area 2C IFQ holders have faced reductions of approximately 78% over the past five years.

The Council should immediately reduce the trawl bycatch by the entire 15% that is being considered. Furthermore, with the stress that the Halibut biomass is under, as well as the hardships imposed on both Halibut longliners and sport charter businesses and clients through catch reductions, I believe the proposed 15% reduction in trawl bycatch is not enough, and further reductions should be imposed.

Respectfully,

Charles E. "Ed" Wood  
F/V Talon  
P.O. Box 383  
Petersburg, AK 99833-0383  
907-772-3480

September 20, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501

**RECEIVED**

SEP 20 2011

**Re: Agenda Item C-2(b) GOA Halibut PSC limits**

Dear Mr. Olson and Council members:

Commercial and recreational fishermen have experienced dramatic cuts in their harvests the limit on halibut PSC bycatch in the Gulf of Alaska has not been changed since 1986. This is not responsible protection of this shared species. This inequity needs to be addressed immediately. Fishery managers can—and should—ensure more equitable conservation measures across sectors by requiring the fisheries responsible for halibut bycatch to face reductions just as the directed halibut fisheries have. Please work to reduce the PSC bycatch limit.

Sincerely,

Jeff Robinson  
PO Box 633  
Petersburg AK 99833

September 20, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501

**RECEIVED**  
SEP 20 2011

**Re: Agenda Item C-2(b) GOA Halibut PSC limits**

Dear Mr. Olson and Council members:

I think that it is totally ridiculous that the Gulf of Alaska draggers haven't had any reduction in their halibut prohibited species catch of about 5 million pounds and that has not been changed since 1986. Both the commercial long line fleet and the charter fleet have seen huge reductions in the last few years. I believe that the draggers should also receive reductions in their prohibited species catch of halibut.

Thank You,

Ivan Stonorov

Eric Olson, Chair

September 19, 2011

NPFMC 605 W.4<sup>th</sup> Ave. Anchorage, Ak. 99501

Re: Agenda item # C2 (B) on GOA Halibut Bycatch

**RECEIVED**  
SEP 20 2011

Chairman Olsen and Council Members,

My name is Leigh Gorman Thomet. I've been a Kodiak resident for 21 years and have participated in the commercial fishing industry for 29 years. My letter is to urge basic negotiations in reducing the halibut bycatch by the Trawl Fleet.

While I believe that a 20% reduction in the Prohibitive Species Cap will give a better leg up to meet the conservation and equitable needs of the fishery, I understand the 15% reduction on the Council's agenda is a decent place to start and, by all means, it needs to start now. The PSC percentage should be left on the Council's table for future reexamination as data comes in.

The directed halibut fisheries have been subjected to the range of 50% reductions (73% in Southeast Alaska) while the Trawl Fleet hasn't lost any skin in the game since 1986. The trawl fleets allotted 2000 mt or over 4 million pounds is astounding! And so many of those fish are undersized. Those numbers are obtained from the current, broken observer program with only 30% coverage. It is flabbergasting to me that this atrocity has lingered since 1986. Seriously? And now we need to write letters, spend time and money to fly to Dutch harbor to give a pathetic 3 minutes of testimony and to shmooze with Council Members on the sidelines on behalf of saving our halibut resource to keep it sustainable and equitable? Good God! The longline fleets allowable bycatch is 300mt. That's a 1700mt difference!

Some arguments against reductions are to wait for the observer program to be revamped. Realistically, that data will take years. Too often policy trumps common sense and politics can be so value free. The trawl fleet doesn't seem to want to give an inch. If nothing is done then you as a board have failed in the preservation of our amazing halibut stocks. As a board, it is your job to have a backbone and make sure that our halibut stocks are viable in 10, 20 to 50 years from now. Do not crumble to the pressures of bureaucracy! Like ourselves, our children deserve to fish clean, healthy stocks and feed the populations of the future. Make that happen.

All the best with your decision making.

Leigh Gorman Thomet

September 20, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501

**RECEIVED**  
SEP 20 2011

**Re: Agenda Item C-2(b) GOA Halibut PSC limits**

Dear Mr. Olson and Council members:

I understand you are seeking input on current bycatch limits for halibut in the Pacific N fishery. I consider the current limits to be excessive. The current limits were developed almost 30 years ago when the bycatch technology was much, much poorer than it is today. Considering the adverse impacts on both sport fishing charter fishermen as well as those on the commercial halibut fishermen, this bycatch limit is unconscionable. I would strongly recommend you cut it by 50% at the very least. I hope this input is helpful. If you have questions concerning it, please feel free to contact me. While I am not currently involved in either the commercial or sports fishing industry for this species, I did have commercial experience several decades ago and am still concerned about maintaining sustainable fisheries.

Thank you for your attention.

Neil Koeniger

September 20, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501

**RECEIVED**  
SEP 20 2011

**Re: Agenda Item C-2(b) GOA Halibut PSC limits**

Dear Mr. Olson and Council members:

My vote is for bycatch reduction. My family and I have fished lower Cook Inlet for years. We are seeing smaller fish as the years go on. Taking 5 million pounds out of the gulf year after year has really hurt our breeding stocks. Vote to reduce bycatch numbers.

Thanks for reading this.

Pat Reiland

September 20, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501

**RECEIVED**

SEP 20 2011

**Re: Agenda Item C-2(b) GOA Halibut PSC limits**

Dear Mr. Olson and Council members:

The North Pacific Fishery Management Council has been negligent in allowing 5 million pounds of trawl caught by catch over the last 25 years. The proposed 5% to 15% reduction is nothing more than a slight slap on the wrist, no doubt, to make the sport fishery feel that commercial trawlers are also being asked to contribute to the conservation effort. I think the Council should do a lot better than that before asking the charter sport fishery to cut back as we have had to do in SE Alaska and as is being proposed in Cook Inlet.

Thank You,

Glen Van Valin



September 20, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501

**RECEIVED**  
SEP 20 2011

**Re: Agenda Item C-2(b) GOA Halibut PSC limits**

Dear Mr. Olson and Council members:

Trawlers should be banned in Alaskan waters. The damage they do the bottom habitat takes many years to recover thus killing immature fish, shrimp and crab it is not worth the amount of food they harvest. I am limited as to the number of fish I am allowed to keep and they should not be allowed to keep any of their bycatch .

Jan Nelson  
Skagway

September 20, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501

**RECEIVED**  
SEP 20 2011

**Re: Agenda Item C-2(b) GOA Halibut PSC limits**

Dear Mr. Olson and Council members:

Please address the bycatch issue of the trawl/drag fleet not only in the Gulf of Alaska but the entire state of Alaska. I believe the technology exists to avoid the by-catch of not only halibut but of salmon as well. Perhaps you should look at some of the regulations that are in place in the Canadian fisheries. There should not have to be sacrifices made by commercial or sport fisherman in their fisheries when by-catch can be avoided, even if it costs a few extra dollars.

Thank you,

Clayton Smith

September 15, 2011

North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252

Mike Ameal  
5 Mantenida  
Coto de Caza, CA 92679

Upcoming Bycatch Decision

**RECEIVED**  
SEP 20 2011

Dear Sir,

Please consider greatly reducing the allowable Halibut bycatch by the fish/trawl industry in the Gulf of Alaska. The burden should be shouldered by the industry itself, I believe, to safeguard the fishery for us and for future generations. Please reduce the bycatch by the maximum amount being considered at this time...15%. This reduction, while insufficient, will help in the short term. Further reductions to halibut bycatch levels should also be considered in the future based upon data available at that time.

I grew up in the Midwest hunting and fishing, lived in Alaska for a summer with Ray McNutt and his family on the Kenai in 1965, when I was 15, and learned from him about the importance of preserving our game and fisheries.

You are in a unique position to make the changes needed to insure not just for a surviving but for a thriving species of halibut and other fishes under your purview.

Your thoughtful decision on this issue is greatly appreciated!

If you have any questions please address them to my mobile phone at 949-233-2686 or email: [mikeameel@aol.com](mailto:mikeameel@aol.com)

Thanks again!

Best regards,



Mike Ameal

Gustavus, Alaska  
Sept. 16, 2011

North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Ave, Suite 302  
Anchorage, AK 99501-2252

**RECEIVED**  
SEP 20 2011

Dear Council Members:

The North Pacific Fishery Management Council needs to begin reducing the halibut Prohibited Species Cap (PSC). Exploitable biomass for the directed fisheries has declined steeply for the last five years, by 50% Alaska-wide and by over 70% in Southeast Alaska, where I live. This has required painful cuts in the commercial and guided charter fisheries, and considerable conflict between user groups. It is a mistake both biologically and socially to exempt fisheries that take a huge amount of halibut as bycatch from sharing in the necessary catch reductions.

As the IPHC indicated in its March 2011 paper, trawl fisheries probably take substantially more halibut in the Gulf of Alaska than is recorded. This is another reason for cutting the permitted by-catch. It is not a reason to wait many years until a broader observer program is in place and new data from that program finally comes in.

In addition to the mostly young halibut brought up in trawls, many uncounted ones are almost certainly killed or damaged when run over by that gear, and the bottom habitat that they need is negatively affected.

The commercial fleet is not allowed to take under 32" halibut, but it is those smaller sizes that are most taken as trawl bycatch. The under-32" fish are the basis for future rebuilding of the halibut stock.

The trawl fleet has shown that it can fish more selectively and reduce bycatch by adjusting where and when they fish. Even if it could not do this, it is a dubious business to sacrifice the rebuilding of halibut stocks for the sake of catching such as arrowtooth flounder.

For fairness, both the trawl and the cod longline PSC should be reduced. The reduction should be far more than the 15% under consideration. That reduction should be considered as only the first step, with more to follow.

Yours truly,

Judy Brakel Box 94, Gustavus, AK 99826 e-mail [judybrakel@gmail.com](mailto:judybrakel@gmail.com)

September 20, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501

**RECEIVED**  
SEP 20 2011

**Re: Agenda Item C-2(b) GOA Halibut PSC limits**

Dear Mr. Olson and Council members:

I am writing to encourage you to take measures to reduce halibut bycatch by the maximum amount allowed, during your next meeting. I am very concerned about the waste of this precious resource that is taking place in the Gulf of Alaska, primarily by trawl fisheries. Too many people in too many communities in Alaska depend on healthy halibut stocks to allow this resource to be wasted or abused.

Sincerely,  
Greg Demers  
Homer

**Mr Eric Olson, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252  
By fax: (907) 271-2817**

**RE: Halibut PSC in the Gulf of Alaska**

Dear Chairman Olson,

It is my understanding that the North Pacific Fishery Management Council will take up the issue of halibut bycatch in October and will take final action in December. Due to my fishing schedule, I will be unable to attend either meeting. Currently there is a halibut PSC bycatch limit of 2,300 metric tons (mt) in the GOA, or just over 5 million pounds. I understand that the Council is considering a range of PSC reductions from 5-15% for the trawl and fixed gear fleets in the Gulf of Alaska. I support these actions.

I fish nearly year round in Alaska where commercial fishing is the main economic driver of the coastal economy. I own and operate the F/V Tradition, a 58 foot vessel ported out of Kodiak. I fish for halibut in the Gulf of Alaska in area 3A with me and my four long-time crewmembers onboard. Although we have lost the ability to harvest over 40% of those pounds because of cuts in the quota in recent years, that quota is still a huge portion of my income and the income that goes to my crew, their family, my family, and my business.

Thank you for your time and attention to this important matter and your dedication to sustainable fisheries management.

Sincerely,

**Blake Painter  
Owner and Operator  
F/V Tradition  
90534 Rip Christinsen Rd  
Astoria, OR 97103**

September 20, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 W. Fourth Avenue, Suite 306  
Anchorage, AK 99501-2252

Dr. Jim Balsiger, Regional Administrator  
NOAA Fisheries, Alaska Region  
709 West Ninth Street  
Juneau, AK 99802-1668

Re: Agenda item C-2b  
Gulf of Alaska halibut bycatch

Dear Chairman Olson, Dr. Balsiger, and Council Members:

The North Pacific Fishery Management Council (NPFMC) must take action to reduce the overall amount of halibut—more than 5 million pounds of mostly young fish—wasted each year as bycatch by the Gulf of Alaska federal groundfish fisheries. We urge you to select the preliminary preferred alternative identified in the Environmental Assessment that would reduce the halibut prohibited species cap by at least 15%.

The Pacific halibut (*Hippoglossus stenlopiis*) is an awe-inspiring fish and an important part of the ocean ecosystem. Growing to over 400 pounds, it is one of the largest fishes in the world that is not a shark and like sharks, Pacific halibut occupy a position near the top of the food chain. Pacific halibut are highly valued as an important source of food for Alaskan coastal communities, and halibut support valuable commercial, sport, and charter fisheries. In this way, the Pacific halibut population is fully allocated, if not over-allocated, to various user groups.

The NPFMC demonstrated leadership and foresight over 30 years ago when it designated halibut as “prohibited species.” This action and the similar designations for salmon, herring, and crab, did much to save those species from initially falling by the wayside of the industrial groundfish fisheries. The first halibut bycatch caps allocated to the trawl fleets were low. In 1979, the halibut bycatch cap for the domestic trawl fisheries was a seasonal allocation of 81 mt halibut bycatch cap. However, in 1984, the NPFMC greatly relaxed this trawl cap, increasing the limit to 1038 mt of halibut. By 1986, the NPFMC further increased the cap to an annual bycatch allocation of 2000 mt. There has been no meaningful reduction in the halibut cap since then. As a result, trawl fisheries targeting low value fish are subsidized by being authorized to waste halibut as bycatch.

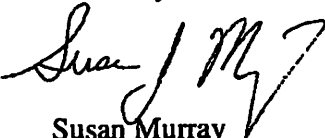
The initial review draft of the EA/RIR/IRFA for this action needs some improvement and clarity. It is incorrect to state that the status quo removal of 2000 mt of halibut has no economic impact on halibut users (for example on page 94 of the document). Analyses in the document itself show that reduction in halibut bycatch will likely result in increases of halibut spawning biomass and halibut fisheries yields. In other words, reducing the amount of halibut killed as bycatch will increase the amount of halibut in the ecosystem and available to other users.

Mr. Eric Olson, NPFMC  
Dr. Jim Balsiger, NOAA Fisheries  
September 20, 2011  
Page 2 of 2

Ultimately, the NPFMC halibut bycatch cap that reduces bycatch and takes into account the status of the Pacific halibut population would be most desirable. The Gulf of Alaska Groundfish Plan team made a similar recommendation at its meeting in September. A more biologically and ecologically-based bycatch cap that addresses spatial concerns and is responsive to trends in the halibut population is laudable. The wealth of data and top-notch stock assessment for Pacific halibut makes this feasible.

In the short term, we urge the Council to reduce the halibut prohibited species cap in the Gulf of Alaska by at least 15%. In a trailing amendment, we strongly encourage the Council to develop a discussion paper on ways to implement a bycatch cap that reduces bycatch and is responsive to spatial concerns and trends in the halibut population. Similarly, the halibut prohibited species cap in the Bering Sea/Aleutian Islands needs to be reduced and must be put on an expedited NPFMC timeline for action. We look forward to working with you on this issue.

Sincerely,



Susan Murray  
Senior Director, Pacific  
Oceana



#### 4.6.3.6.6 Suboption 2: Maintaining Sideboard Limits at Current Levels

This suboption would allow the sectors operating under sideboard limits to maintain their historic sideboard amounts, in metric tons, under any option that reduces the overall trawl halibut PSC limit. An analysis of the status quo and options to reduce the sideboard limits was provided in Section 4.6.3.6.5. The impacts of reducing sideboard limits on the sideboarded fleets are provided in that section. The analysis in this section of the document will focus on impacts to the vessels using trawl gear that are protected by sideboard limits.

The method used to reduce the sideboard limits in Section 4.6.3.6.5 was to maintain the current percentages of the annual or seasonal halibut PSC limit that are currently in regulation. Applying those percentages to a reduced halibut PSC limit will reduce the sideboards at the same rate as the overall halibut PSC limit. This suboption will reduce the overall halibut PSC limit by the same amounts, for each of the three primary options, presented in that section. However, the sideboard limits would be set, by regulation, in metric tons. Any change in the overall trawl halibut PSC limit would not alter the amount of halibut PSC that could be used by the sideboard fisheries.

Maintaining the sideboard limits at the current metric tonnage, would reduce the amount of halibut PSC available to trawl vessels in general, while allowing fleets operating under sideboard limits to access the same tonnage (or a greater percentage of the total limit). Because less halibut PSC is available for use in excess of the sideboard limits, this change is likely to lead to increased competition among all trawl sectors for the available halibut PSC, when the overall halibut PSC limit is anticipated to be a constraint.

Halibut PSC sideboards were developed at different times using different methodologies to calculate the sideboard amount. The halibut PSC sideboard limits for non-exempt AFA CVs in the GOA are based on the aggregate retained groundfish catch by non-exempt AFA CVs in each PSC target category from 1995 through 1997 divided by the retained catch of all vessels in that fishery from 1995 through 1997 (§ 679.64(b)(4)). That calculation yielded a ratio (or percentage if multiplied by 100) that is multiplied by the seasonal PSC limit for the deep-water and shallow-water complex to calculate the sideboard limits. A summary of the current non-exempt AFA catcher vessel sideboard limits are presented in Table 4-96. The ratios that are currently in regulation and the metric tonnage amount that would replace the ratio are provided in the table.

**Table 4-96 Non-exempt AFA catcher vessel halibut PSC sideboard limits**

| Season | Dates                         | Complex       | Ratio          | Metric Tons |
|--------|-------------------------------|---------------|----------------|-------------|
| 1      | January 20 to April 1         | Shallow-water | 0.34 (of 450)  | 153         |
|        |                               | Deep-water    | 0.07 (of 100)  | 7           |
| 2      | April 1 to July 1             | Shallow-water | 0.34 (of 100)  | 34          |
|        |                               | Deep-water    | 0.07 (of 300)  | 21          |
| 3      | July 1 to September 1         | Shallow-water | 0.34 (of 200)  | 68          |
|        |                               | Deep-water    | 0.07 (of 200)  | 14          |
| 4      | September 1 to October 1      | Shallow-water | 0.34 (of 150)  | 51          |
|        |                               | Deep-water    | 0.07 (of 0)    | 0           |
| 5      | October 1 through December 31 | Both          | 0.205 (of 300) | 62          |

The rockfish program includes halibut PSC sideboards to limit the ability of participants eligible for the rockfish program to harvest an excessive amount of the PSC limit available during July in fisheries other than the Central GOA rockfish fisheries. The rockfish program provides certain

economic advantages to harvesters, who could use this advantage to increase their participation in other fisheries, thus possibly adversely affecting participants in other fisheries. The proposed halibut sideboard limits the total amount of halibut mortality used by catcher processors in the deep-water complex to historic levels. The sideboard measures are in effect only during the month of July (see Table 4-97). The current 2.50 percent of the 2,000 mt limit would be replaced by the 50 mt sideboard limit in regulations.

**Table 4-97 Rockfish program halibut PSC sideboard limits in effect during the month of July**

| Sector | Shallow-water complex halibut PSC sideboard ratio (percent) | Deep-water complex halibut PSC sideboard ratio (percent) | Annual halibut mortality limit (mt) | Annual shallow-water complex halibut PSC sideboard limit (mt) | Annual deep-water complex halibut PSC sideboard limit (mt) |
|--------|---|--|-------------------------------------|---|--|
| C/P    | 0   | 2.50   | 2,000                               | 0   | 50   |

The PSC sideboard limits for Amendment 80 program vessels in the GOA are based on the historic use of halibut PSC by Amendment 80 program vessels in each PSC target category from 1998 through 2004. These values are slightly lower than the average historic use to accommodate two factors: Allocation of halibut PSC Cooperative Quotas (CQs) under the Central GOA rockfish program and the exemption of the F/V Golden Fleece from this restriction (§ 679.92(b)(2)). Table 4-98 lists the final 2011 halibut PSC limits for Amendment 80 program vessels. The ratios listed in the table would be replaced in regulation by the metric tons listed in the right column, if this suboption were implemented.

**Table 4-98 Amendment 80 halibut PSC sideboard limits**

| Season | Dates                         | Complex       | Ratio  | Metric Tons |
|--------|-------------------------------|---------------|--------|-------------|
| 1      | January 20 to April 1         | Shallow-water | 0.0048 | 10          |
|        |                               | Deep-water    | 0.0115 | 23          |
| 2      | April 1 to July 1             | Shallow-water | 0.0189 | 38          |
|        |                               | Deep-water    | 0.1072 | 214         |
| 3      | July 1 to September 1         | Shallow-water | 0.0146 | 29          |
|        |                               | Deep-water    | 0.0521 | 104         |
| 4      | September 1 to October 1      | Shallow-water | 0.0074 | 15          |
|        |                               | Deep-water    | 0.0014 | 3           |
| 5      | October 1 through December 31 | Shallow-water | 0.0227 | 45          |
|        |                               | Deep-water    | 0.0371 | 74          |

Note: All ratios are multiplied by the current 2,000 mt limit to determine sideboard amount (mt)

Reducing the overall PSC limit by 5 percent (Option 1), 10 percent (Option 2), or 15 percent (Option 3) and keeping the sideboard amounts the same reduces the difference between the overall seasonal halibut PSC limits and the cumulative sideboard limits. The estimated differences are shown in Table 4-99. It should be noted that only the non-exempt AFA CV sideboard amounts and the Amendment 80 sideboard amounts were deducted from the overall limit, when the difference was calculated. Rockfish catcher processor sideboards were excluded

**Table 4-99 Comparison of halibut PSC amounts in excess of sideboard limits when sideboard percentage and metric tonnage amounts are maintained**

|   | Total allowance |             | <u>1st season</u><br>January 20 to April 1 |             | <u>2nd season</u><br>April 1 to July 1 |             | <u>3rd season*</u><br>July 1 to September 1 |             | <u>4th season</u><br>September 1 to October 1 |             | <u>5th season</u><br>October 1 through<br>December 31 |             |      |
|---|-----------------|-------------|--|-------------|--|-------------|---|-------------|---|-------------|---|-------------|------|
|   | Maintaining     | Maintaining | Maintaining                                | Maintaining | Maintaining                            | Maintaining | Maintaining                                 | Maintaining | Maintaining                                   | Maintaining | Maintaining   | Maintaining |      |
|   | %               | mt          | %  | mt          | %                                      | mt          | %   | mt          | %   | mt          | %   | mt          |      |
| <b><u>Deep-water complex</u></b>                |                 |             |  |             |  |             |   |             |   |             |   |             |      |
| Status quo halibut PSC limit                    | 184             | 184         | 70   | 70          | 65                                     | 65          | 49  | 49          | 0   | 0           |   |             |      |
| Option 1 - 5 % reduction                        | 175             | 155         | 67   | 65          | 62                                     | 50          | 47  | 40          | 0   | 0           |   | NA          |      |
| Option 2 - 10% reduction                        | 166             | 126         | 63   | 60          | 59                                     | 35          | 44  | 31          | 0   | 0           |   |             |      |
| Option 3 - 15% reduction                        | 157             | 97          | 60   | 55          | 55                                     | 20          | 42  | 22          | 0   | 0           |   |             |      |
| <b><u>Shallow-water complex</u></b>             |                 |             |  |             |  |             |   |             |   |             |   |             |      |
| Status quo halibut PSC limit                    | 506             | 506         | 287  | 287         | 28                                     | 28          | 107   | 107         | 84  | 84          |   |             |      |
| Option 1 - 5 % reduction                        | 481             | 461         | 273  | 265         | 27                                     | 23          | 101   | 97          | 80  | 77          |   | NA          |      |
| Option 2 - 10% reduction                        | 455             | 416         | 258  | 242         | 25                                     | 18          | 96  | 87          | 76  | 69          |   |             |      |
| Option 3 - 15% reduction                        | 430             | 371         | 244  | 220         | 24                                     | 13          | 91  | 77          | 72  | 62          |   |             |      |
| <b><u>Undesignated</u></b>                      |                 |             |  |             |  |             |   |             |   |             |   |             |      |
| Status quo halibut PSC limit                    | 119             | 119         |  |             |  |             |   |             |   |             |   | 119         | 119  |
| Option 1 - 5 % reduction                        | 113             | 104         |  |             |  |             |   |             |   |             |   | 113         | 104  |
| Option 2 - 10% reduction                        | 107             | 89          |  |             |  |             |   |             |   |             |   | 107         | 89   |
| Option 3 - 15% reduction                        | 101             | 74          |  |             |  |             | NA  |             |   |             |   | 101         | 74   |
| <b><u>Suboption 1 - all from 5th season</u></b> |                 |             |  |             |  |             |   |             |   |             |   |             |      |
| Option 1 - 5 % reduction                        | 68              | 19          |  |             |  |             |   |             |   |             |   | 68          | 19   |
| Option 2 - 10% reduction                        | 17              | -81         |  |             |  |             |   |             |   |             |   | 17          | -81  |
| Option 3 - 15% reduction                        | -35             | -181        |  |             |  |             |   |             |   |             |   | -35         | -181 |

All values are in metric tons

\*Excludes 191.4 metric tons rockfish program halibut PSC allowance and halibut PSC usage plus the 27.4 mt reduction.

because the majority<sup>1</sup> of this fleet is also under Amendment 80 sideboards. NOAA Fisheries accounts for halibut PSC sideboards in July by deducting the estimated amount taken from both the Amendment 80 sideboard limit and the Rockfish Program sideboard limit, if a vessel is operating under both sideboards. Therefore, if the difference shown in Table 4-99 included both, it would underestimate the amount of halibut PSC available to non-sideboarded fleet free of competition from the sideboarded fleets. However, since there are four Rockfish Program catcher processors that are not Amendment 80 vessels, their associated sideboard limit also was not included in the table. Since their associated sideboard limit should be included in the cumulative sideboard limit but could not be determined at this time, the table overestimates the amount of halibut PSC available to non-sideboarded fleets in excess of the sideboard limit.

Data in Table 4-99 is presented to indicate the amount of “protection” non-sideboarded trawl vessel owners have from the sideboard fleets. Columns labeled as “%” indicates the sideboard limits are calculated as a percentage of the annual or seasonal limit; columns labeled as “mt” indicates the sideboard limit are held constant in metric tons. Numbers provided in the table are the difference between the annual or seasonal halibut PSC limit and the cumulative non-exempt AFA catcher vessel sideboards and the Amendment 80 sideboards. Using the total allowance for the deep-water complex as an example, under the status quo, both methods result in an annual halibut PSC limit that is 184 mt greater than the cumulative sideboard amount (excluding the rockfish program limit). That 184 mt of halibut is only available to vessels that are not operating under sideboard limits. Because the overall limit is assumed to be 581 mt in the deep-water complex, it means that 397 mt are available for use by the sideboarded fleets. If the non-sideboarded fleet takes more than 184 mt of halibut PSC, at least one sideboard would not be binding, and some portion of the sideboarded fleet would have failed to use the full sideboard amount available to it. If the sideboarded fleets take 397 mt, they are required to stop fishing, and any additional halibut PSC that is available may be used only by the non-sideboarded vessels.

Under Option 1, maintaining the sideboard percentages would result in the non-sideboarded fleet having access to 175 mt of halibut PSC free of competition from the sideboarded sectors. Implementing Suboption 2 to maintain the sideboards in metric tons reduces amount available in excess of the sideboard limits to 155 mt. That means the amount of halibut PSC available only to vessels that are not sideboarded would be decreased by 20 mt. All the decreases in halibut PSC available only to non-sideboarded vessels (or halibut PSC in excess of the sideboard limits) are presented in Table 4-100.

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<sup>1</sup> A maximum of four vessels could be included in the rockfish program that are not fishing under the Amendment 80 sideboard limit. The actual difference will depend on whether any vessels opt out of the rockfish program.

**Table 4-100 Decrease in metric tons of halibut PSC available only to non-sideboarded vessels (or in excess of sideboard limits)**

|  | Total allowance  | 1st season<br>Jan 20 to Apr 1 | 2nd season<br>Apr 1 to Jul 1 | 3rd season*<br>Jul 1 to Sep 1 | 4th season<br>Sep 1 to Oct 1 | 5th season<br>Oct 1 through Dec 31 |
|--|------------------|-------------------------------|------------------------------|-------------------------------|------------------------------|------------------------------------|
| <b>Deep-water complex</b>                |                  |                               |                              |                               |                              |                                    |
| Status quo halibut PSC limit             | 0                | 0                             | 0                            | 0                             | 0                            |                                    |
| Option 1 - 5% reduction                  | 20               | 2                             | 12                           | 7                             | 0                            |                                    |
| Option 2 - 10% reduction                 | 40               | 3                             | 24                           | 13                            | 0                            |                                    |
| Option 3 - 15% reduction                 | 60               | 5                             | 35                           | 20                            | 0                            |                                    |
| <b>Shallow-water complex</b>             |                  |                               |                              |                               |                              |                                    |
| Status quo halibut PSC limit             | 0                | 0                             | 0                            | 0                             | 0                            |                                    |
| Option 1 - 5% reduction                  | 20               | 8                             | 4                            | 5                             | 3                            |                                    |
| Option 2 - 10% reduction                 | 39               | 16                            | 7                            | 9                             | 7                            |                                    |
| Option 3 - 15% reduction                 | 59               | 24                            | 11                           | 14                            | 10                           |                                    |
| <b>Undesignated</b>                      |                  |                               |                              |                               |                              |                                    |
| Status quo halibut PSC limit             | 0                |                               |                              |                               |                              | 0                                  |
| Option 1 - 5% reduction                  | 9                |                               |                              |                               |                              | 9                                  |
| Option 2 - 10% reduction                 | 18               |                               |                              |                               |                              | 18                                 |
| Option 3 - 15% reduction                 | 27               |                               |                              |                               |                              | 27                                 |
| <b>Suboption 1 - all from 5th season</b> |                  |                               |                              |                               |                              |                                    |
| Option 1 - 5% reduction                  | 49               |                               |                              | N/A                           |                              | 49                                 |
| Option 2 - 10% reduction                 | 98 <sup>^</sup>  |                               |                              |                               |                              | 98 <sup>^</sup>                    |
| Option 3 - 15% reduction                 | 146 <sup>^</sup> |                               |                              |                               |                              | 146 <sup>^</sup>                   |

<sup>^</sup> Indicates that the sideboard limits are greater than seasonal PSC limit

\* Third season reduced by rockfish program 191.4 mt CQ and 27.4 mt reduction

The sideboard analysis of Options 1 through 3 indicates that the shallow-water sideboard limits have not been a constraint historically. That analysis also concluded that reductions in sideboard limits are expected to have minimal impacts on the non-exempt AFA fleets, given the amount of halibut PSC they historically harvested. Assuming that the sideboarded vessels in the shallow-water complex would have not harvested their PSC limit under the options considered, maintaining the current sideboard tonnage limits is not expected to impact the non-sideboarded fleet. This assumes that the sideboarded vessels in the shallow-water complex do not modify their fishing patterns in a way that increases their PSC usage. Whether changes will occur cannot be predicted, but will likely depend on circumstances in the sideboard fisheries and other fishing opportunities. If sideboard fisheries have relatively large TACs, while other fisheries experience downturns in their TACs, it is possible that vessels that are not currently constrained by a sideboard limit would increase their effort up to that limit. For example, if the Pacific cod TAC continues to increase, that fishery attract additional effort from sideboarded fleets using more of their shallow-water halibut PSC limit, leaving less available to the other (primarily inshore) fleets.

The majority of the impacts of changing the sideboard limits are likely to occur in the deep-water complex. In 2010, 16 Amendment 80 catcher processors were reported to have targeted species in the deep-water complex. Two of the non-exempt AFA catcher vessels fished in the deep-water complex during the second season and one during the third. Therefore, 19 vessels operating under Amendment 80 or non-exempt AFA sideboards fished in the deep-water complex during 2010.

Amendment 80 vessels fished primarily during the third season (for rockfish). That season 14 of the 16 vessels fished. Four Amendment 80 vessels fished during the second season, two during the first and fifth seasons, and no vessels fished during the fourth season. A total of 17 trawl catcher processors were reported to have fished in the GOA during 2010. That means only one trawl catcher processor would have been outside the sideboard limits (was protected by sideboards). Three non-exempt AFA catcher vessels were reported to have fished for deep-water complex species, in 2010. A total of 25 catcher

vessels were reported to have targeted arrowtooth flounder. In other words, about 22 catcher vessels were harvesting outside the sideboards.

If the halibut PSC limits for deep-water complex are a constraint, the increased competition for the halibut PSC appears to be between the local GOA catcher vessel fleets and sideboarded fleets. That increased competition could result in decreased arrowtooth flounder and rex sole catches by vessels that are not subject to the sideboards, most of which operate out of Kodiak. If halibut PSC sideboard limits are established as fixed tonnages, and this level of competition persists, the effect would likely be a reduction in deep-water complex catches for this fleet.

Each five percent reduction in the PSC limit will reduce the amount of halibut PSC in the deep-water complex, not protected by the sideboard limits, by 20 mt. Option 1 would decrease the unprotected deep-water complex halibut PSC from 175 mt to 155 mt. Quantifying how that change will affect the fleets is difficult. Increased competition for the available halibut will occur between and among the vessels operating with and without sideboard limits. Halibut PSC taken during the second season would have closed the fishery every year from 2003 through 2010. The fishery would have closed during the third and fourth seasons every year from 2003 through 2008. Option 3 would have closed the fishery every year from the second through fifth seasons. Increasing the competition by maintaining the current tonnage limits (and increasing the limit as a percentage of the total) could stimulate additional competition for the halibut PSC limit, increasing the pace of the fishery, when vessels tend to focus on arrowtooth flounder and rex sole.

When the entire reduction is applied to the fifth season (Suboption 1) and the sideboard limits are set as metric tons (Suboption 2), the sideboard limits offer little or no protection to the non-sideboarded fleet. If Option 2 or 3 is adopted the tonnage sideboard limit under this suboption would offer no protection during the fifth season, since the total PSC limit is less than the seasonal sideboard limit. Under Option 1, the cumulative sideboard limit is only 19 mt less than the overall limit, so it provides little protection for the non-sideboard fleet.

September 20, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501

**Re: Agenda Item C-2(b) GOA Halibut PSC limits**

Dear North Pacific Fisheries Management Council,

Our family has been commercial halibut fishing for 38 years and we are very concerned about the issue of halibut bycatch in the Gulf of Alaska. We have watched our commercial halibut quota nearly disappear while trying to support high school and college age kids. We invested in halibut quota share when the IFQ program was implemented and have been almost entirely dependent on halibut fishing. We have been unable to make up lost income with our other fisheries (troll salmon, herring spawn-on-kelp, minimal sablefish). We have accepted quota reductions for the sake of conservation because we are in this for the long haul, despite the frustration of watching overfishing in the charter industry. Much media attention is devoted to allocation battles between the commercial and charter sectors but nearly none to the equally important issue of bycatch.

It is unacceptable that the halibut PSC bycatch limit has not changed since 1989 when we have had to accept a 78% reduction in our 2C commercial halibut quota in six years! We strongly support reduced bycatch by the maximum amount being considered at this time with further reductions in the very near future. 15% is not nearly enough and it is imperative that bycatch reduction not be delayed for any reason. Allowing bycatch to continue at 1989 levels would be irresponsible considering the drastic reductions in halibut biomass statewide. Recent changes in IPHC models indicate there is still much not fully understood about the life cycle and migration patterns of halibut. Halibut conservation cannot be divided into 'areas'. Halibut waste in western Alaska affects halibut stocks statewide. Everyone needs to share in the conservation of this vital resource.

Thank you for your immediate attention to this problem.

Marty Remund and Laurie Mastrella, F/V Teasha  
Port Alexander, AK

Post Office Box 542 Petersburg, Alaska 99833



September 21, 2011

North Pacific Fisheries Management Council,

As an Alaska halibut fisherman for nearly three decades and more recently overnight charter vessel operator I have a strong interest in proper management of the North Pacific halibut stock resource.

First of all this is a public resource and commercial fisherman provide the means by which the majority of the U.S. public and others can procure this wonderful seafood. It is a public resource and access should be allowed for the public to recreationally harvest this specie as well. Commercial and recreational fisherman have been involved with conservation measures of the halibut stock but there is another 'consumer' of the North Pacific halibut resource that has not been involved with conservation; primarily trawl bycatch. This is not reasonable management. All user groups need to play an equal part in conservation and it is past time for the Council to address the halibut bycatch situation. Significant reduction in the allowed bycatch should be implemented now without delay. A 15% reduction in bycatch would fall far short of reasonable or significant and should be considerably more to bring the halibut bycatch in line with commercial halibut and guided sport user group efforts over the past couple of decades.

The Council should also encourage the State of Alaska to reduce the number of halibut charter operators in an effort to avoid a reduced catch limit and size in the guided sport fisheries that severely diminishes the value of those charters. The current one fish under 37 inch limit in area 2A and potential for further restriction in other areas is not reasonable or sustainable for the industry nor in the best interest for people wishing to use a guided service to catch halibut in Alaska.

I appreciate the Council's efforts toward respectable stewardship of this important public resource and your time to allow my concerns to be heard.

Sincerely,  
Dennis Rogers  
Petersburg, AK

[www.YachtAlaska.com](http://www.YachtAlaska.com)  
[info@YachtAlaska.com](mailto:info@YachtAlaska.com)

Toll Free: 888-772-8588  
Int'l: 1 + 907-772-4700  
Fax: 907-772-3127



September 20, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501

**Re: Agenda Item C-2(b) GOA Halibut PSC limits**

Dear Mr. Olson and Council members

As a private sportsfisherman and commercial charter fishing deckhand I am writing to request that you do several things regarding your halibut management:

- 1) Put an end to the dreadful waste of halibut bycatch from the Gulf of Alaska and Bering Sea trawl fisheries. It is inconceivable that you would reduce my potential for charter boat deckhand employment, limit my charter sportsfishing opportunities (I don't own my own boat) and impose further reductions on the commercial halibut longline fishery until you have dramatically reduced the trawl bycatch. I understand you are considering a 15% reduction in trawl bycatch as a maximum. That is not enough. I ask that you implement a 15% per year reduction for 4 consecutive years for a total reduction of 60%.
- 2) Impose a hard cap on the trawl fishery so that it will automatically shut down once the bycatch limit is reached.
- 3) Implement 100% observer AND 100% Video coverage for all vessels in fisheries that have the potential for halibut bycatch. I personally believe the bycatch numbers are deflated by less than forthright reporting and cherry picking trawl locations when observers are on board. I believe that with 100% observer and video coverage is mandatory to obtain accurate data to manage these fisheries.
- 4) Implement a 70% - 30% ratio between the commercial halibut longline - commercial charter fishing. This has been shown by peer reviewed research to maximize the economic benefit to the fishermen, local communities and the State of Alaska.

I understand you must use good science to determine the total allowable catch, but I think your current science is bunk without 100% observer AND video coverage of the trawl industry. By dramatically reducing the trawl fishery bycatch I believe there will be sufficient fish to satisfy both the halibut longline and charter fishing industries. I also understand that allocation should be determined by what provides the maximum economic benefit to the public, communities and the State. A 70% longline - 30% charter ration has been shown to do so.

Further, I don't believe that the halibut longliners are suffering financially right now. In fact, halibut IFQ's are selling for record prices.

Thank you for considering my concerns.  
Douglas A. Stephens  
11611 Trails End Road  
Anchorage, AK 99507

September 20, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501

**Re: Agenda Item C-2(b) GOA Halibut PSC limits**

Dear Mr. Olson and Council members:

**Halibut Conservation Should Be a Shared Responsibility**

No one likes one halibut a day and the 37 inch size limit, particularly the guided sport industry. But unless the Halibut Catch Sharing Plan now before the National Marine Fisheries Service (NMFS) is adopted this will become the norm for some time.

This is happening for three reasons. First the halibut resource is in a period of cyclical decline. But this is not enough to trigger the current restrictions. Overharvest is the other primary reason. Here in Southeast the charter fleet has exceeded its Guideline Harvest Level (GHL) every year by 22%-115% since the GHL went into effect in 2004. In the same time, the halibut resource has declined by 58% and the Southeast commercial harvest was cut by 78%. The reason the commercial harvest has declined so precipitously is that overfishing by the charter fleet is deducted from the subsequent year's commercial quota to protect the resource. This gets to the third reason why one halibut per day may be the norm – current NMFS regulations do not force the charter industry to stay within its quota thus forcing the International Pacific Halibut Commission to impose bag and size limits. The way around this is the Halibut Catch Sharing Plan now under public review.

Instead of placing a disproportionate share of the conservation burden on the commercial fleet, the Halibut Catch Sharing Plan would allow NMFS to strictly regulate the GHL to the charter fleet; prevent overfishing and share the burden of conservation. Although this seems eminently fair and reasonable, the charter industry would have you think differently. They are painting this as a fish grab by commercial fishermen

Yes, there is an allocation consequence when a sector whose has been overharvesting is now obligated to share in the conservation burden. This message comes through when the charter industry highlights a one year slice of the pie by correctly projecting a 31% reduction in Southeast charter harvest in 2011 if the Halibut Catch Sharing Plan went into effect this year. While they may be right in showing some reallocation pain in future years, it is not the least bit accurate to suggest that the Halibut Catch Sharing plan is allocation driven. Given the charter fleet's egregious record of overharvest this is a bit disingenuous.

Commercial fishermen, knowing all too well about the economic cost of sharing the burden of conservation, have even agreed to setting the Southeast allocation above the original 2004 Guideline Harvest Level given to the charter fleet. "The commercial sector didn't like giving up additional allocation for the third time, but we're willing to do it to reach a final settlement to put the issue to rest", notes Kathy Hansen with the Southeast Alaska Fishermen's Alliance.

Additionally the halibut plan includes a one-way option for charter operators to buy quota from commercial fishermen as a means to lessen the conservation pain and/or provide economic stability. Right now, the biologists are stumped as to why it's taking so much longer for the halibut stock to grow into larger reproducing size. Until that answer comes the only recourse is either adopting the

Halibut Catch Sharing plan or remain with the norm of one “minnow size” charter fish per day along with increasing cuts to commercial quotas. The other advantage of the Halibut Catch Sharing plan is that when the stocks improve, NMFS will have the ability to remove the bag and size limitation in a much timelier manner than the years it normally takes for regulations to work through the North Pacific Fisheries Management Council process.

As Alaskans whose statehood is forged from a pressing need to protect salmon stocks shouldn't every fishing sector have a role in rebuilding the halibut resource? As Alaskans who herald being the only state with a constitutional provision for sustained yield, shouldn't we all fairly share in the burden to not overharvest? If you answer “yes”, please support the plan now before the National Marine Fisheries Service.

Kate Troll

September 20, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501

**Re: Agenda Item C-2(b) GOA Halibut PSC limits**

Dear North Pacific Fishery Management Council members,

Although I am not necessarily a stakeholder of the halibut resource at present, I strongly support reductions in halibut bycatch (halibut PSC) in the Gulf of Alaska. Protecting this precious resource for our children and our children's children to come is more important than making x amount of profit in x amount of time. The Council should reduce bycatch by the maximum amount being considered—15%. This reduction is still insufficient and further reductions to halibut bycatch levels should be made in the future. It is time for the Council to take action and reduce the halibut bycatch limit for the Gulf of Alaska. Action should not be delayed for any reason. Fishermen who participate in directed halibut fisheries have been facing reductions in their harvest for years—yet the fisheries that cause mortality to halibut as a waste have continued to operate under the same limits since 1986. The exploitable biomass—the portion of the halibut population that is available for harvest—has declined by 50% over the past decade. The catch limit for the commercial halibut fishery in 2C, 3A and 3B has been reduced by over 50% from 2002-2011, and the daily catch limits for the charter sector in 2C has been reduced from 2 fish of any size to 1 fish less than 37". New proposals for the charter sector in 3A could also reduce bag limits and impose size limitations. This inequity needs to be addressed immediately and halibut bycatch must be reduced NOW. We, as stewards of the Earth, have a responsibility to give as much as we take, and we are not holding ourselves accountable to the extent that is needed, in order for our planet to sustain itself for future generations to benefit off of this symbiotic relationship that we humans have with this planet. Please, listen to the Earth, and listen to the people who rely upon this relationship, and to the unspoken voices of the future people who will rely upon this precious resource when they enter the world. Thank you for listening.

Sincerely,

Christiana Wright  
Born and raised in Fairbanks, AK  
Currently residing in Palmer

September 20, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501

**Re: Agenda Item C-2(b) GOA Halibut PSC limits**

To Whom It May Concern,

I am writing to let it be known I strongly support action to reduce halibut bycatch in the trawl fisheries now. I feel the North Pacific Fishery Management Council should reduce halibut bycatch by the maximum amount being considered (15%) or more. As a stakeholder of the halibut resource in Homer, Alaska I feel continued waste of halibut in the Gulf of Alaska could affect my business, livelihood, and the livelihood of this community as well. Currently there is a halibut PSC bycatch limit of 2,300 metric tons (mt) in the GOA—or just over 5 million pounds! The portion of the halibut population that is available for commercial harvest has declined by 50% over the past decade. Fishermen who participate in directed halibut fisheries have been facing reductions in their harvest for years—yet the fisheries that cause mortality to halibut as a waste have continued to operate under the same limits since 1989. The catch limit for the commercial halibut fishery in 2C, 3A and 3B has been reduced by over 50% from 2002-2011, and the daily catch limits for the charter sector in 2C has been reduced from 2 fish of any size to 1 fish less than 37". New proposals for the charter sector in 3A could also reduce bag limits and impose size limitations. These regulations could cause devastating effects to the Homer community. Every year from May to September for 37 years my family has operated a campground and RV park across the street from the Homer Small Boat Harbor. The majority of our guests stay with us while they are in Homer halibut fishing and it has been that way for all the 37 years my family has operated the campground. Both Alaskan residents and people from around the world come to Homer, "the halibut fishing capitol of the world", to camp out and catch halibut. Cutting the allowable catch for the charter sectors here would have a large, negative impact on the Homer community and surrounding area. It is time for the Council to take action and reduce the halibut bycatch limit for the Gulf of Alaska. Action should not be delayed for any reason. Regulations need to be made, but they must be made to the correct fisheries. Limiting the charter sectors further and letting the wasteful by-catch of the trawl fisheries continue is not right. This inequity needs to be addressed immediately and halibut bycatch must be reduced now.

Sincerely,

JC Chapple  
Homer Spit Campground  
P.O. Box 1196  
Homer, AK 99603

To; NPFMC  
Re; GOA halibut PSC bycatch reduction

Sirs; as a lifelong sport and subsistence halibut user, as well as a career commercial longliner,

I'm in of favor of bycatch reduction for all gear types. Start with 15%. 100% retention of all species for

all gear types, though fantasy, would force all fishermen to target more accurately.

Thank you; Steve Branson

Steve Branson  
POB 451  
Kodiak, AK  
99615

# PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C-25 HALIBUT PSC Limit

|               | NAME (PLEASE PRINT)   | TESTIFYING ON BEHALF OF:                               |
|---------------|-----------------------|--|
| <del>1</del>  | Theresa Peterson      | AMEC   |
| <del>2</del>  | Donna Parker          | FV Sea Storm   |
| <del>3</del>  | Merrick Barden        | MCA  |
| <del>4</del>  | Mike Szymaniowski     | Fishermen's First                                      |
| <del>5</del>  | Bill McGill           | FEA  |
| <del>6</del>  | Bob Hezel / Dave Wood | F/V US Intrepid / US Seafoods                          |
| <del>7</del>  | Lori Swanson          | GFF <span style="float: right;"><i>mandant</i></span>  |
| <del>8</del>  | Don Ashley            | FV Gold Rush   |
| <del>9</del>  | Jason Anderson        | AKSC   |
| <del>10</del> | Julie Priddy          | AKPB   |
| <del>11</del> | Julianne Curry        | Petersburg Vessel Owners Assoc                         |
| <del>12</del> | Linda Behrken         | ALFA <span style="float: right;"><i>mandant</i></span> |
| <del>13</del> | BRENT PAINE           | JCB  |
| <del>14</del> | Kenny Down            | FLC  |
| <del>15</del> | Rob Worn              |  |
| <del>16</del> | Aregg Williams        | IPHC   |
| 17            |                       |  |
| 18            |                       |  |
| 19            |                       |  |
| 20            |                       |  |
| 21            |                       |  |
| 22            |                       |  |
| 23            |                       |  |
| 24            |                       |  |
| 25            |                       |  |

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.

Lori Swanson testimony under item C-2(b), October 1 2011

*Excerpt of Groundfish Forum comments on GOA Amendment 88 (rockfish program) proposed rule*

**Amendment 80 sideboards**

The Proposed Rule does not address Amendment 80 sideboards, but it is important that the new program not impact the sideboard history accrued by this sector during the qualifying years for that program. When the original Rockfish Pilot Program was implemented in 2007, each sector (CV and CP) was allocated an amount of halibut PSC based on their actual usage during the qualifying period (96-02) for use in the program. Under this calculation, the CP sector was allocated 108.46 mt of halibut PSC for use in the program. Amendment 80 to the BSAI FMP, implemented the following year, established Gulf of Alaska sideboards for all Amendment 80 vessels, based on the history of the sector from 1998-2004. This resulted in a third-quarter deep-water halibut sideboard of 212.64 mt. To prevent 'double-dipping,' NMFS subtracted the PSC allocation under the pilot program from the 3<sup>rd</sup> quarter sideboard (212.64 – 108.46 = 104.18) and used that number as the sideboard. This calculation is illustrated in the following table from the Amendment 80 Secretarial Review EA/RIR.<sup>1</sup>

Table ES - 21 GOA Trawl Halibut PSC Sideboard estimates (mt)

| Fishery                                 | Season |        |         |       |       | Grand Total |
|---|--------|--------|---------|-------|-------|-------------|
|   | 1      | 2      | 3       | 4     | 5**   |             |
| GOA Deep water species trawl fishery    | 129.0% | 114.34 | 114.18* | na**  | na**  | 357.52      |
| GOA Shallow water species trawl fishery | 1.7%   | 37.37  | 29.27   | 14.7% | 5.98% | 10.58%      |
| Grand Total                             | 130.7% | 151.71 | 143.45  | 14.7% | 5.98% | 368.10      |

Source: NPFMC summary of NMFS weekly PSC reports

Note: F.V. Bolder Fleece data has been deducted from the catch data

\* Third season halibut PSC mortality (212.64 mt) is reduced by the allocations made to the CP sector in the RCP (108.46 mt)

\*\* Fourth season deep water was combined with first season deep water and would rollover if not fully utilized

\*\*\* Deep and Shallow water species have been combined since the season does not species specific at port of origin in the past

Under the revised rockfish program, the CP sector will be allocated 84.7 mt of halibut PSC – less than under the original program – based on the new suite of qualifying years. The Council did not discuss any revisions to Amendment 80 as a result of the new rockfish program, so the 3<sup>rd</sup> quarter deep-water halibut sideboard should be calculated as was done in the past: the CP halibut allocation (84.7 mt) should be subtracted from the Amendment 80 3<sup>rd</sup> quarter halibut mortality (212.64 mt) to result in a new 3<sup>rd</sup> quarter deep-water sideboard of 127.94 mt.

NMFS is interpreting the Amendment 80 3<sup>rd</sup> quarter deep-water halibut sideboard under the new rockfish program to be 104.18 mt, unchanged from the Rockfish Pilot Program, which effectively reduces the overall Amendment 80 access to halibut from our historic 212.64 tons (which was used as the basis of the original Amendment 80 sideboard calculation), to a total of 188.88 metric tons – a reduction of about 24 metric tons. No other sector is subject to this reduction. There will be an additional reduction of 12.5% of the rockfish program allocation (10.6 mt), per Council action, for a total reduction UNDER STATUS QUO of about 35 metric tons, or about 6% of the total annual Amendment 80 sideboard amount.

<sup>1</sup> Amendment 80 Secretarial Review EA, July 20, 2007, page xxv.



Lori Swanson testimony under item C-2(b), October 1 2011

**Effect on Amendment 80 vessels of applying a 10% reduction to the 5<sup>th</sup> season (see table 4-85, page 188)**

The Amendment 80 combined 5<sup>th</sup> season sideboards = 119 mt (~40% of the 5<sup>th</sup> season apportionment of 300 tons overall).

If the 10% reduction (200 mt) is applied proportionately based on this ratio, the Amendment 80 portion of the reduction will be 80 mt (40% of 200 mt).

As a proportion of total annual Amendment 80 sideboards a 10% reduction in the overall trawl PSC cap , represents **14.4% reduction to Amendment 80 sector** (80 tons out of a total of 555 tons).

Under this scenario, the total reduction to the Amendment 80 sector from the rockfish pilot program, NMFS interpretation of Amendment 80 sideboards, and the 5<sup>th</sup> quarter 10% PSC reduction is **115 tons, which is over 20% of the total Amendment 80 sideboard amount.**



# Alaska Longline

## FISHERMEN'S ASSOCIATION

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September 22, 2011

North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Street, Ste. 306  
Anchorage, AK 99501

FAX: 907 271 2817

Dear Chairman Olson and Members of the Council,

The Alaska Longline Fishermen's Association (ALFA) asks that you identify as a preliminary preferred alternative a 15% reduction in the Gulf of Alaska trawl and fixed gear PSC caps to be implemented through the Annual Specification process for 2012 and beyond.

The Gulf of Alaska halibut PSC caps have not been modified since 1986 for the trawl sector and not since 1995 for the fixed gear sector. Since these caps were set the halibut stock and the halibut fisheries have changed dramatically. In just the past four years, the coastwide exploitable biomass of halibut has declined by 23% with far larger declines in some areas (EAVRIR/IRFA for CSP at 58). As your problem statement for this action identifies, the catch limits for the combined IPHC areas 2C, 3A and 3B have been reduced by almost 50% since 2002. The charter catch limit in Area 2C has been reduced by 45% and the 3A charter catch limit is slated for a reduction under the CSP to conserve stocks. Both conservation and equity considerations indicate that halibut catch in other fisheries should likewise be reduced.

Rebuilding North Pacific halibut stocks depends on protecting the large year classes of under 32 inch halibut that are currently swimming around the Gulf and Bering Sea. Because halibut growth rates have slowed, these small halibut are taking far longer than was projected to reach directed fishery harvestable size and are also remaining vulnerable to trawl bycatch for an extended period. Coastal fishermen who have invested in halibut shares are trying to hang on, economically, until these strong year classes of small fish grow to harvestable size. If too many are lost to bycatch, halibut stocks will not rebound and all halibut fishermen, including subsistence, sport, charter and commercial, as well as Alaska coastal communities will suffer.

We recognize that all fisheries, including the directed halibut fishery, have bycatch. ALFA members are working to address bycatch issues through a number of initiatives. Our membership has formed a Conservation Network that assists fishermen with identifying and avoiding areas of high rockfish bycatch

rates by sharing bycatch and benthic mapping data. We intend to expand the network to address other issues as they are identified.

National Standard nine from the Magnuson-Stevens Act directs Council's to reduce bycatch and bycatch mortality to the extent practicable. ALFA believes the current status of the halibut stocks and the halibut fisheries calls for a reduction in halibut bycatch to rebuild stocks and protect those who have historically depended on the halibut resource for sustenance and livelihood. We urge the Council to identify as the preliminary preferred alternative a 15% reduction in Gulf trawl and fixed gear caps and to implement that reduction through the 2012 Annual specification setting process.

Sincerely,



Linda Behnken  
(Director, ALFA)