



Alaska Trollers Association

130 Seward #205
Juneau, AK 99801
(907) 586-9400 phone
(907) 58604473 fax
ata@gci.net

August 25, 2013

Mr. Glenn Merrill, Asst Regional Administrator
Sustainable Fisheries Division
Alaska Region, NMFS
PO Box 21668
Juneau, AK 99802-1668

RE: Halibut Catch Sharing Plan FDMS Docket Number NOAA-NMFS-2011-0180

Dear Mr. Merrill:

The Alaska Trollers Association (ATA) supports the North Pacific Fishery Management Council's (Council) catch sharing plan for halibut and appreciates the Council's ongoing commitment to find a meaningful resolution of this issue. The time for enacting a fair and balanced halibut management plan for the guided sportfishing industry is long overdue. This dispute has drained government and industry budgets and frayed important relationships in towns throughout Alaska. After twenty years, it's time to bring this chapter to a close. **We urge you to implement the proposed the Halibut CSP (CSP) in 2014.**

Since 1925, ATA has represented the interests of small boat hook and line salmon fishermen operating in state and federal waters off the coast of Alaska. With more than 2,600 permit holders, the troll fleet is the largest in the state and is 85% resident; roughly 1 of every 35 people in Southeast Alaska works on one of our boats. Troll vessels range from 16 to 60 feet in length. Since the late 1800's, halibut has been an important component of many troller's annual harvest.

Trollers who utilize setline gear hold IFQ primarily in areas 2A and 3C. Whether or not they received initial IFQ shares, many had to buy into the federally mandated program at great cost, simply to maintain a viable operation. The promise of the IFQ program was supposed to be a more stable and rational fishery. Instead, fishermen have been put at significant financial risk from both a precipitous drop in the annual halibut TAC and years of de-facto reallocation to the guided sportfishing industry. Without meaningful limits, the charter fleet has been allowed to overshoot harvest goals and avoid programs recommended by the Council. Still, many in the guided industry claim they must have even more.

ATA strongly supports sustained yield management of the nation's fisheries resources, as well as ample opportunity for all citizens to access product. Some choose to take their share of halibut at the seafood counter or restaurant. Others want to catch their own, some with the assistance of a guide. All uses are legitimate and important, so allocations should reflect that fact.

The proposed CSP will provide the guided sportfishery an allocation far above its historic average – which is mostly unprecedented in Alaska fishery allocation. Still, ATA supports the CSP, because it provides the necessary tools to create and sustain a more balanced and rational harvest and allocation plan.

The ever increasing demand by the guided sport industry has impacted the seafood industry, consumers, resident anglers, and subsistence users. Commercial fishermen have been held accountable for the guided industry overages, resulting in a destabilizing effect on industry and less availability of product for consumers. Increased competition and the risk of local depletions are among the top concerns of resident anglers.

In 2C, over 95% of the halibut resource is taken by guided anglers. According to data from ADFG, in 2012 non-residents to the Southeast region logged 96% of the 2C angler days and 92-100% of the harvest of all sport caught species, which included 97% of the halibut. Residents who often use small boats to harvest halibut complain that they have to travel farther to find fish, which can add significant cost and even risk, given Alaska's quickly changing weather.

The CSP is unlikely to disrupt the guided industry during the season. Importantly, it will allow the Council to regularly work with the guides, to design yearly management measures to keep their clients fishing while also respecting harvest limits. This is similar to what is done at the Pacific Fishery Management Council for the Washington, Oregon, and California sport fishery. ATA strongly supports such a process.

Once the CSP is in place, we encourage the Council and guided industry to work on two related issues.

First, the 'self-guided' operations that are springing up throughout 2C, and probably also in 3A, must be sorted out and brought under the plan. These operators claim to simply lease vessels to clients who want to fish on their own. These harvests currently fly under the radar and are logged as non-guided harvest. While it's likely that some of these people do fish without assistance, it is also well known that many do not. When you walk a client to the end of the dock, hand them the right fishing gear and instructions about where to go and what to do - or follow them in a separate boat - that's a guide operation to most people. NMFS and the Council are well aware of this matter and hopefully will take action to address it. Failure to do so will be unfair to all users, including guided operators who follow the rules.

Also, it's important that the concerns of local residents be considered in any halibut management plan, to ensure safe and healthy nearshore fisheries for anglers and subsistence harvesters.

For the mutual long-term benefit of the seafood industry, consumers, sportfishing guides and clients, the support sector, and the many independent anglers who each serve our coastal communities in unique and important ways, we urge your support of the Halibut CSP. The CSP is the product of painstaking negotiations by the Council with all affected parties – for more than 20 years. We encourage you to approve the plan and implement in the 2014 season.

Thanks in advance for your consideration.

Sincerely,

Dale Kelley
Executive Director