

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

RECEIVED
APR - 6 2012

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska

Dear Chairman Olson and Council members,

I request the Council take final action to reduce halibut bycatch in the Gulf of Alaska by at least 15%—the maximum reduction being considered at this time.

Commercial and sport fishermen have experienced dramatic cuts in their harvests over the last decade. The limit on halibut bycatch in the Gulf of Alaska, on the other hand, has not been significantly changed since 1989. Currently there is a halibut bycatch limit of 2,300 metric tons (mt) in the GOA—or just over 5 million pounds.

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Cuts in catch limits have and will continue to have dramatic effects on our fisheries, businesses, economies and communities that depend on the halibut resource. Each halibut caught as bycatch has a direct effect on the spawning biomass and yield of halibut available to other sectors now and in the future. It is critical that the Council take meaningful final action now by **reducing Gulf of Alaska halibut bycatch by at least 15%.**

Sincerely,

THANKS FOR YOUR HELP!
LEE ROBBINS / CAPTAIN
KODIAK ALASKA

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

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Sincerely,

Gary Salter
Magnum Charters
Kodiak, AK.

SIGN-ON TO SUPPORT REDUCING HALIBUT BYCATCH IN THE GULF OF ALASKA!

Mr. Eric Olson, Chair

North Pacific Fishery Management Council

605 West 4th Avenue, Suite 306

Anchorage, AK 99501

Dr. Jim Balsiger, Regional Administrator

NOAA Fisheries, Alaska Region

PO Box 21668

Juneau, AK 99802

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska

Dear Chairman Olson and Council members:

We, the undersigned commercial fishermen, sport fishermen, coastal residents and stakeholders **request the Council take final action to reduce halibut bycatch in the Gulf of Alaska by at least 15%**—the maximum reduction being considered at this time.

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Sincerely,

Cc: Sean Parnell, Governor

Cora Campbell, Commissioner, ADF&G

Lisa Murkowski, U.S. Senator

Mark Begich, U.S. Senator

Don Young, U.S. House Representative

Add Your Name to the Council Letter Supporting Reduction in Gulf of Alaska Halibut Bycatch

PLEASE PRINT CLEARLY!

Print Name	Address	Vessel/Occupation/ Interest in Halibut (Sport, Commercial, Coastal Resident, Consumer, etc.)	Email address (if you would like to receive updates on bycatch)
DIANNE M. DUBUC	POB 584 SEWARD, AK 99664	FLV FLORETTE C. RESIDENT / SPORT CHARTER	florette@drcetic.net
STEVE BABINEC	P.O. Box 2803 Seward AK 99664	LEGACY Resident / Sport Charter	captstevbab @yahoo.com
LESUE Pemberton	Box 606 Seward, AK	ALASKA coastal Ventures Commercial / Sport charter	puffinchen@tense@ gci.net
John P. Nelson	PO Box 2771 Seward, AK 99664	Capt. Tug Janitor OWNER SIKAREAS	
Michael L. Brittain	Box 1936 Seward, AK 99664	charter boat operator Sport/resident/consumer	m1brill@att.net

Subject: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska
From: Frank Fiss <Frank.Fiss@tn.gov>
Date: 4/10/2012 5:35 AM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

RECEIVED
APR 10 2012

Dear Chairman Olson and Council members,

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Sincerely,

Frank Fiss, Sport Angler from Nashville, TN

RECEIVED
APR 16 2012

Dan Sherry
9620 Stanfield Rd.
Brentwood, TN 37027

April 10, 2012

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

Re: Halibut by-catch Limit Reduction

Dear Mr. Olson:

This letter concerns the North Pacific Fishery Management Council's (NPFMC) consideration to reduce the halibut commercial fishing by-catch. I understand that the NPFMC is considering a reduction from current limits to as low as 15%.

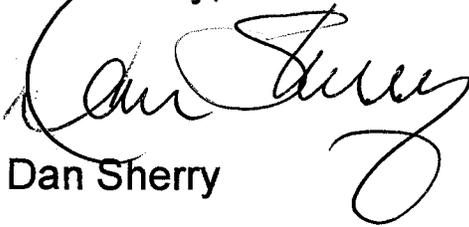
I am a fisheries biologist retired from the Tennessee Wildlife Resources Agency and have enjoyed annual fishing trips to the Kodiak Island area for many years. I am a freshwater fisheries biologist (not marine) but have always appreciated what appeared to me to be a more sustainable fishery (for a variety of species) in Alaska compared to other marine environments I visit. However, I've also noticed a gradual decrease in particularly the average size of the halibut I

catch over the years.

i'm sure you (not i) have the appropriate data to assess this issue. However, I urge you to consider the most restrictive halibut by-catch limit - 15% - for your regulations. Each year I bring a different group of mostly Agency fisheries folks for the trip of their lives. Protection of this uniquely valuable fishery deserves the most conservative approach to its sustainability.

Thank you for considering this comment.

Yours truly,

A handwritten signature in black ink, appearing to read "Dan Sherry". The signature is fluid and cursive, with a large loop at the end of the last name.

Dan Sherry

Cc: Dr. Jim Balsiger, RA, NOAA Fisheries Alaska Region

Mr. Eric Olson, Chair

North Pacific Fishery Management Council

605 West 4th Avenue, Suite 306

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Sincerely,

Wan Peroni
Bx 8401
Kodiak
99615

Mr. Eric Olson, Chair

North Pacific Fishery Management Council

605 West 4th Avenue, Suite 306

Anchorage, AK 99501

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Sincerely,



S.D. Sheldon

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

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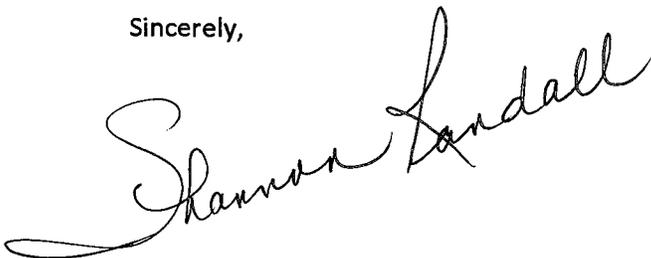
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Sincerely,

A handwritten signature in cursive script that reads "Shannon Sandall". The signature is written in black ink and is positioned below the word "Sincerely,".

ALISSA RENE' SHERRY

DRALISSASHERRY@GMAIL.COM

RECEIVED
APR 12 2012

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

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska

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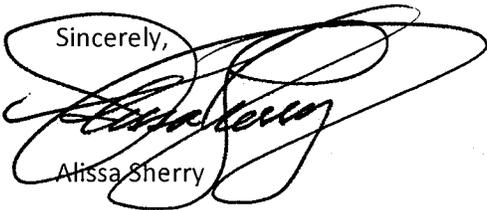
I request you use what influence you have to encourage the North Pacific Fishery Management Council to take final action to reduce halibut bycatch in the Gulf of Alaska by at least 15%—the maximum reduction being considered at this time.

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Sincerely,



Alissa Sherry

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

RECEIVED
APR 16 2012

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska. At the council's meeting, June 4 – 12, 2012 in Kodiak, Alaska.

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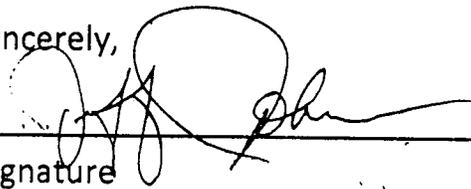
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Sincerely,

Signature



Date

4/4/12

Print Name

Jeff Johnson

Address

City

State

Zip

1914 Mill Bay RD, KOOIAK, AK, 99615

Occupation

Veterinarian

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
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Sincerely,

Craig R. Olson
Signature

1/4/12
Date

CRAIG R. OLSON
Print Name

Box 32 , KODIAK , AK , 99615
Address City State Zip

General contractor
Occupation

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
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Sincerely,



Signature

11-7-12
Date

George Kirk
Print Name

Box 2796 Kodiak, AK, 99615

Address

City

State

Zip

halibut fisherman
Occupation

Mr. Eric Olson, Chair

North Pacific Fishery Management Council

605 West 4th Avenue, Suite 306

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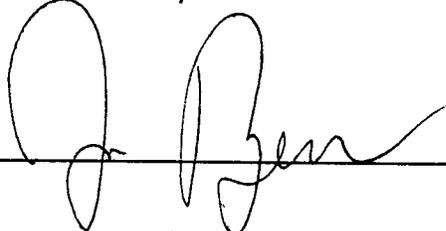
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Cuts in catch limits have and will continue to have dramatic effects on our fisheries, businesses, economies and communities that depend on the halibut

resource. Each halibut caught as bycatch has a direct effect on the spawning biomass and yield of halibut available to other sectors now and in the future. It is critical that the Council take meaningful final action now by reducing Gulf of Alaska halibut bycatch by at least 15%.

Sincerely,



14-4-12

Signature

Date

Jon Becker

Print Name

Po Box 82266, Fairbanks, AK, 99708

Address

City

State

Zip

Biologist

Occupation

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

RECEIVED
APR 16 2012

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska. At the council's meeting, June 4 – 12, 2012 in Kodiak, Alaska.

Dear Chairman Olson and Council members:

I request the Council take final action to reduce halibut bycatch in the Gulf of Alaska by at least 15%—the maximum reduction being considered at this time.

Commercial and sport fishermen have experienced dramatic cuts in their harvests over the last decade. The limit on halibut bycatch in the Gulf of Alaska, on the other hand, has not been significantly changed since 1989. Currently there is a halibut bycatch limit of 2,300 metric tons (mt) in the GOA—or just over 5 million pounds.

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Sincerely,

Thomas S. Finn, 4-4-12

Signature

Date

Thomas S. Finn

Print Name

POBx 8506, Kod, AK, 99615

Address

City

State

Zip

Marine Welder

Occupation

Mr. Eric Olson, Chair

North Pacific Fishery Management Council

605 West 4th Avenue, Suite 306

Anchorage, AK 99501

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska, agenda item C-1 (b)

Dear Chairman Olson and members of the Council,

My name is Mary Glamann and I have been sport/subsistence fishing in Alaska for over 30 years. As a halibut fisherman, I depend on a healthy halibut resource. Commercial harvesters, charter operators, sport fishermen, processors, coastal residents and stakeholders have all come together to ask the Council to take final action to reduce halibut by-catch in the Gulf of Alaska. Coastal Alaskans are dependent on halibut for food, sport, and livelihood and I urge the Council to adopt a 15% reduction in halibut by-catch at the June 2012 meeting.

Halibut stocks and catch limits in the Gulf of Alaska have declined significantly over the past decade. Exploitable halibut biomass has dropped 58% in the Gulf of Alaska over the past decade with the catch limits for the directed halibut fisheries declining significantly (by 70% in 2C, 47% in 3A and 70% in 3B). The Gulf of Alaska charter fleet has also experienced substantial reductions in catch limits.

The 1,113 2C quota share holders, 1,420 3A quota share holders, 490 3B quota share holders, 274 individual charter permit holders in 2C, 317 individual charter permit holders in 3A, and countless sport and subsistence halibut harvesters stand united to protect the halibut resource and ensure that each sector is held responsible for the health of the resource. Given the halibut by-catch limit was set in 1989 and has remained relatively unchanged, I urge the Council to adopt a 15% reduction to help protect and conserve the halibut resource for the benefit of halibut quota share holders, crewmembers, processors, charter operators, sport harvesters, subsistence users, and coastal Alaskans that depend on halibut for food, sport and livelihood.

Sincerely,

Mary Glamann

119 Bancroft Drive,

Kodiak, AK 99615

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

RECEIVED
APR 16 2012

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska

Dear Chairman Olson and Council members,

I request the Council take final action to reduce halibut bycatch in the Gulf of Alaska by at least 15%—the maximum reduction being considered at this time.

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At the same time the exploitable biomass—the portion of the halibut population that is available for harvest—has declined by 58% over the past decade. The state of the halibut stock is uncertain; previous assumptions regarding strong incoming year classes are now in doubt. While everything else—commercial and charter limits and the stock itself—have gone down, the bycatch limit has stayed relatively constant. It is time for the Council to address this inequity by reducing halibut bycatch NOW. All sectors must do their part to conserve and rebuild the halibut stock.

Cuts in catch limits have and will continue to have dramatic effects on our fisheries, businesses, economies and communities that depend on the halibut resource. Each halibut caught as bycatch has a direct effect on the spawning biomass and yield of halibut available to other sectors now and in the future. It is critical that the Council take meaningful final action now by reducing Gulf of Alaska halibut bycatch by at least 15%.

Sincerely,



Mr. Eric Olson, Chair

North Pacific Fishery Management Council

605 West 4th Avenue, Suite 306

Anchorage, AK 99501

RECEIVED
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Sincerely,



Thomas B Hillman
301 Appaloosa Run
Liberty Hill TX 78642-3862

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

RECEIVED
APR 16 2012

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska. At the council's meeting, June 4 – 12, 2012 in Kodiak, Alaska.

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Sincerely,

James R. Horn

Signature

1 4/4/12
Date

JAMES R. HORN

Print Name

1776 MISSION RD , KODIAK , AK , 99615

Address

City

State

Zip

Commercial Fisherman

Occupation

Dr. Jim Balsiger, Regional Administrator

NOAA Fisheries, Alaska Region

PO Box 21668

Juneau, AK 99802

RECEIVED
APR 26 2012

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska

Dear Dr. Jim Balsiger,

I request you use what influence you have to encourage the North Pacific Fishery Management Council to take final action to reduce halibut bycatch in the Gulf of Alaska by at least 15%—the maximum reduction being considered at this time.

Commercial and sport fishermen have experienced dramatic cuts in their harvests over the last decade. The limit on halibut bycatch in the Gulf of Alaska, on the other hand, has not been significantly changed since 1989. Currently there is a halibut bycatch limit of 2,300 metric tons (mt) in the GOA—or just over 5 million pounds.

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Sincerely,


Cheryl Luker
Wilderness Lodge, Manager

27 Apr 2012

RECEIVED

MAY -8 2012

To: NPFMC

From: James B. Borden

Re: Halibut by-catch by bottom trawlers

our halibut population in the gulf of Alaska is down by 50% - our IFQs are being cut by 10% or more per year - the trawler by-catch is a waste and requires a large reduction - lets cut it 15% now and more next year

James B. Borden
Commercial halibut
fisherman

Subject: halibut
From: James Kallander <jkall@ak.net>
Date: 4/29/2012 5:25 AM
To: npfmc.comments@noaa.gov
CC: "Cora (GOV) Campbell" <cora.campbell@alaska.gov>

Hi.

I am a life long commercial fisherman and a resident of Cordova Alaska. I have long lined since 1976. All of my quota is in 3A or the Gulf of Alaska. The Halibut resource has been fully utilized for over 100 years beginning with long liners. In my 35 year fishing career I have watched management continually allocate Halibut away from long line fisherman to other users, most recently the commercial charter sector. This is a plea with you to stop, stop taking away from the long line fisherman and their families. Reduce the by catch allocation now and continue to reduce to reduce it over a period of time. Additionally Im asking to stop giving more and more to the charter fleet. With your help they continue to push the long line fleet aside with no regard for a limit or the health of the resource. It appears now that the State of Alaska has jumped onboard with the charter fleet in their quest to allocate away from resident commercial longline to charter. The North Pacific Council is all that stand between the longline user and all others. Please protect the oldest commercial fishery in the the State of Alaska.

Jim Kallander

James Kallander
PO Box 2272
Cordova AK 99574
h 907-424-7603
c 907-253-7603
jkall@ak.net

Subject: Halibut Bycatch

From: Lynn Shawback <pikelakeakn@gmail.com>

Date: 4/29/2012 2:00 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Hi,

Halibut bycatch must be reduced to insure future halibut generations. Halibut are slow growing and must be protected from a fishery that does not contribute to the well being of another fishery. Alaska State constitution states that an industry or fishery cannot continue if it is detrimental to to the well being of another industry or fishery. I am commenting that bycatch must not be used in any management agenda. No more bycatch.

Sincerely,

Lynn R. Shawback
mile 13 Alaska Peninsula Hiway
King Salmon, Alaska 99613

907-246-3360

Sent from my iPad

Subject: Comments on Halibut Bycatch by the trawl fleet.
From: Joel Steenstra <joelst99@yahoo.com>
Date: 4/30/2012 3:11 PM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Dear NPFMC,

My name is Joel Steenstra. I am a sport fisherman, charter fisherman, subsistence fisherman, and a commercial fisherman. I reside in the community of Craig Alaska. I am asking you to take to take the cuts that would conserve the most amount of halibut. We must rebuild our stocks in Alaska to previous levels. Over the last 10 years I have watched the amount of halibut decline in my area. I have taken huge cuts on my charter boat, which in turn has mean that I only have charters for 40 days a summer, compared to 65 days a summer before we took our cuts. I ask that the trawl feet also take big cuts, so that the stocks may have a chance to recover. Too many of us depend on halibut. Not only for our livelihoods, but for our own personal freezers.

Joel Steenstra
Craig, Alaska

Subject: Cut halibut bycatch
From: Kgg55308@aol.com
Date: 4/30/2012 5:43 PM
To: npfmc.comments@noaa.gov

Greetings

Its time to man up and take the needed action to cut this terrible waste of Halibut. I love fishing them and it kills me to think of all the fish that are wasted. It is criminal. If I as a sport fisherman caught one and then after it was dead threw it back to take a bigger fish i would be fined for wonton waste and rightly so. Bycatch is wasting halibut by the ton. MAKE IT STOP! Its time to have the courage to make the needed cuts to insure healthy halibut stocks for all of us.

Kevin Gross

by catch and our US fisheries

Subject: by catch and our US fisheries
From: Scott Jouppi <hotjouppi@gmail.com>
Date: 4/30/2012 6:58 PM
To: npfmc.comments@noaa.gov

Dear People,

I am in full support of reducing the by catch. I am actually in support of stopping all trawlers within 200 miles of US and Canadian waters. It is the trawlers that have whipped out our fishery. I used to fish Bristol back in the late 70s and 80s then went back in the middle 90s it was not the same.

Lets reduce by catch and at the same time lets start talking about increasing the US and Canadian territorial water distance

Subject: Re: DO YOU CARE ABOUT HALIBUT BYCATCH???

From: john maher <maher@sailmycia.com>

Date: 5/1/2012 10:58 AM

To: npfmc.comments@noaa.gov

- **As a subsistence fisherman, I strongly support reductions in Gulf of Alaska halibut bycatch.**
- **The exploitable biomass—the portion of the halibut population that is available for commercial harvest—has declined 58% over the past decade.**
- **To conserve stocks, Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%.**
- **Trawl bycatch caps have not been reduced since 1989.**
- **Bycatch now kills as many halibut, in numbers of fish, as are harvested in the commercial halibut fishery.**
- **Gulf coastal communities depend on halibut for sustenance and livelihood.**
- **Reducing bycatch is critical to conserve and rebuild the halibut resource.**
- **National Standard 9 of the Magnuson-Stevens Act requires that bycatch be reduced.**
- **The Council should reduce halibut bycatch NOW by at least 15%.**

thank you

john maher
po box 6422
sitka Ak, 99835

bycatch numbers a disgrace....

Subject: bycatch numbers a disgrace....
From: "scott egger" <cod@acsalaska.net>
Date: 5/1/2012 11:58 AM
To: <npfmc.comments@noaa.gov>

Sir.....I am a resident and sportfisherman who lives in Ninilchik. My family relies on halibut from Cook Inlet for our basic nutrition. It is consumed at least weekly throughout the year. I have fished CI since 1982. I have watched the resource nearly collapse in my area. The bycatch numbers are a disgrace. I recommend they be cut to the furthest extent possible. Thanks.

Scott Egger----

PO box 39097---Ninilchik, Ak. 99639-----567-3253

please reduce halibut bycatch

Subject: please reduce halibut bycatch
From: Warren Thetford <balboamaps@gmail.com>
Date: 5/1/2012 12:52 PM
To: npfmc.comments@noaa.gov

Hello,

My daughter and I travel to Alaska every summer as sport fishermen. We are happy to spend quite a bit of money in the state.

The allowable bycatch of halibut is difficult to accept. To see so much waste of a valuable resource.... Please reduce the allowable bycatch as is currently being considered.

Thanks you,
Warren Thetford

--
toll free
877-777-8840

Balboa Map Company
1515 Texas Ave, Ste 212
Lubbock, TX 79401

Subject: Gulf of Alaska Halibut bycatch
From: bergmans <bergmans@gci.net>
Date: 5/1/2012 3:51 PM
To: npfmc.comments@noaa.gov

Chairman Olsen and member of the council,

I support reductions in the Gulf of Alaska halibut by-catch.

I invested in 2C halibut after the IFQ program was implemented because it helped to diversify my SE Alaska fishing operation. Little did I realize at the time that all my hard work paying off quota would disappear as quota cuts evaporated everything that I worked for.

I'm no halibut biologist, but given the success of the "experts," my years of halibut fishing experience leads me to comment.

There are likely lots of reasons that the halibut resource is not as strong as it used to be.

Some say it is just a cycle. I sure hope so.

Bad management plan that lead to overharvest is one theory that sounds plausible. I believe that some of that occurred here in SE. In my opinion our current harvest levels now are helping the resource rebound locally. However gulf wide halibut stocks are in steep decline.

Equally possible is by-catch in trawling. Every commercial halibut fishermen have seen the picture of nets bulging with undersize halibut. Everyone has heard the stories of trawlers manipulating the observer coverage to produce artificial numbers.

Since IFQ's was implemented on halibut there has been a growth in the Pcod fishery. Hook and line by catch is a possibility. I'm sure that non quota holders are gently releasing halibut caught on Pcod gear.

I had to buy IFQ if I wanted to go fishing at considerable expense and sacrifice. Now it is almost all gone, yet by-catch is allowed to continue to take more halibut than the whole 2C commercial harvest.

If quota holders must take reductions then every resource user should share some responsibility for rebuilding the stocks. By-catch should be no different.

If trawlers and Pcod fishermen need more by-catch, make them buy quota. Given my personal experience buying IFQ I understand why by-catch fishermen have always opposed this idea.

It can be hard to find consensus between IFQ holders and charter fishermen. Perhaps you remember a few previous disputes. This is one issue that charter, sport and IFQ holders agree on. By-catch is part of the problem.

Thank you for your time and service.

Sincerely,

Bert Bergman
801 Charles St.
Sitka, Ak 99835

Subject: Halibut Bycatch Comment
From: Luke Fanning <fanning.luke@gmail.com>
Date: 5/2/2012 8:16 PM
To: npfmc.comments@noaa.gov
CC: Christine Fanning <christine.e.fanning@gmail.com>

Dear NPFMC,

My family and I operate a small commercial fishing business in Juneau, Alaska. In the area we fish (2C, SE Alaska), the halibut quota has been reduced by nearly 80% in recent years. There are many fishermen who can no longer make their loan payments on their quota, and who have lost tens of thousands of dollars as the resource has collapsed. Meanwhile, the trawl bycatch of halibut has been left unaltered, and it continues to be one of the dirtiest fisheries in the State. It appears there is little incentive for the GOA trawl fleet to work to reduce their bycatch, and many of them believe that continuing to fish dirty could benefit them if bycatch is rationalized in the future. It is critical that all commercial users share in the pain when necessary to conserve the halibut stocks.

I understand that there is no option on the table that would reduce halibut by-catch by anything close to the reductions we have had to endure in 2C, but please consider reducing the halibut trawl bycatch by at least 15% this round. A 15% reduction is a mere fraction of the cuts other areas have already had to absorb.

Thank you for your time and efforts to conserve this resource.

Luke and Christine Fanning
F/V Kelsie Dawn
Juneau, Alaska

Subject: Halibut limits

From: "Lou Koszewski" <lou@ustankprotectors.com>

Date: 5/3/2012 3:33 AM

To: <npfmc.comments@noaa.gov>

Hello,

It has taken a quarter of a century, but fishery managers are finally poised to take action to reduce the five million pounds of halibut allowed to be taken as bycatch in Gulf of Alaska (GOA) fisheries. Industry watchers are hoping that public comments will sway them to make the largest cuts under consideration.

Currently, 2,300 metric tons of halibut bycatch is allowed in the GOA groundfish fisheries. That is further broken down to 2,000mt for the trawl sector and 300mt for hook and line fisheries, primarily the cod fleet. Those are the two fisheries that have the highest amounts of halibut bycatch.

At its June meeting in Kodiak, the North Pacific Fishery Management Council (NPFMC) will vote to cut the Gulf "prohibited species" bycatch limits by five, 10 or 15 percent.

"These are fairly small cuts at this juncture but it's a first step to continually reducing halibut bycatch," said Theresa Peterson of Kodiak, who is a member of the Council's Advisory Panel.

"It has been 25 years since the bycatch limits were established and they have remained relatively unchanged since then," she added. "In this same time period the commercial halibut catch in the Gulf has been reduced 63%. There are a large number of people that depend on that resource and these cuts have had and will continue to have dramatic effects on our fisheries and businesses and community economies."

The International Pacific Halibut Commission, which manages the halibut fisheries, estimates that each pound of bycatch results in lost yield ranging from .9 pounds to 1.1 pounds, depending on the region. This means one pound of halibut caught as bycatch results in 1.5-1.7 lbs. of lost spawning biomass, according to the Alaska Marine Conservation Council (AMCC). Because the IPHC manages the halibut fisheries based on the biomass of the halibut stock, bycatch has a direct impact on all halibut harvesters.

Sport fishermen also are feeling the pinch. The annual bycatch total exceeds the combined harvest level for the sport halibut fisheries in Southeast and Southcentral Alaska, which together totaled over 4.4 million pounds in 2010.

"Many people in Alaska and around the nation are concerned with the condition of the halibut stocks and council members need to hear from people," Peterson stressed.

The AMCC has generated a sign on letter that provides an easy way for people to show their support for the 15% halibut bycatch reduction. It will be presented as a petition to the NPFMC when it meets in Kodiak in early June. Kodiak is the fishing community that will be most affected by the Council's bycatch decision.

"Halibut bycatch is first up on the agenda and it is critical that the voting Council members hear from people when they are in Kodiak," Peterson said. "Every testimony matters and they really like to hear from community members."

I support reducing the bycatch to 10% not 15%. I think the numbers of Halibut caught by local and out of State fisherman should be increased, not reduced. Reduce the commercial fishing first, Charter second, and personal fishing third.

Thanks and have a great day!!!

Lou

Louis Koszewski
(630)719-9754 PH

Subject: Halibut bycatch caps

From: Philip Tschersich <tscheezy@yahoo.com>

Date: 5/3/2012 9:21 AM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Dear NPFMC members,

I have lived in Kodiak for 22 years, and I fish my family's halibut IFQs in the fall. We have a tiny share (600 pounds) since we fished out of an open skiff, hand pulling the ground line back in the day.

Despite being a small player, the value of the catch is critical to our annual income. My family setnets for salmon on the west side of Kodiak in the summer, and that has been less lucrative than we would like for a long time now. With halibut prices high, the small amount of IFQ fish we catch is a meaningful source of income.

I support science-based fisheries management and am sympathetic to the difficulty in setting harvest levels based on limited or incomplete information. Management of a public resource is necessarily a political process on some level, but the out-sized influence of those fishing interests that damage the halibut resource as a byproduct of harvesting their target species is unacceptable. If scientists revisit the halibut production model and decide they need to reduce harvest due to changes in the model or based on some new stock information, I can accept that. However, if the trawl fleet is not included in a far more central way in these painful reductions, then the process is skewed, wasteful, and unfair. The burden of conservation is being disproportionately placed on the fishers who are not wasting the resource. Halibut fishermen are using their catch to financially benefit coastal communities. By comparison, that same number of fish are being dumped at sea by the drag fleet which represents lost reproductive capacity and foregone harvest of a marketable product. Trawl bycatch caps need to be revisited regularly, and should be placed on a trajectory for deeper reductions over time, and I would consider an immediate 15% reduction to be an absolute minimum.

Respectfully,
Philip, Kodiak

Subject: Halibut Bycatch

From: William Polson <fisherbillp@yahoo.com>

Date: 5/3/2012 6:28 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Council members,

I am a IFQ holder and have seen my quota drop considerably. I would like to go on record supporting the 15% reduction in halibut bycatch by the trawl fleet. I also think in the future the bycatch quota should go down the same amount the halibut quota goes down.

Thanks for listing. William Polson. Box 2594 Kodiak, Ak 99615

Subject: Reduce Halibut Bycatch in the Gulf of Alaska

From: "Goetzinger, Karl W" <karl.w.goetzinger@boeing.com>

Date: 5/5/2012 5:12 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Dear NPFMC:

Please take final action to reduce halibut bycatch in the Gulf of Alaska by at least 15%-the maximum reduction being considered at this time.

Commercial and sport fishermen have experienced dramatic cuts in their harvests over the last decade. The limit on halibut bycatch in the Gulf of Alaska, on the other hand, has not been significantly changed since 1989. Currently there is a halibut bycatch limit of 2,300 metric tons (mt) in the GOA-or just over 5 million pounds.

At the same time the exploitable biomass-the portion of the halibut population that is available for harvest-has declined by 58% over the past decade. The state of the halibut stock is uncertain; previous assumptions regarding strong incoming year classes are now in doubt. While everything else-commercial and charter limits and the stock itself -have gone down, the bycatch limit has stayed relatively constant. It is time for the Council to address this inequity by reducing halibut bycatch by 15%. All sectors must do their part to conserve and rebuild the halibut stock. Each halibut caught as bycatch has a direct effect on the spawning biomass and yield of halibut available to other sectors now and in the future. It is critical that the Council take meaningful final action now by reducing Gulf of Alaska halibut bycatch by at least 15%.

Sincerely,

Kurt & Karl Goetzinger

Cordova, Alaska

—Picture (Metafile) 1.jpg—

—Picture (Metafile) 2.jpg—

—Picture (Metafile) 3.jpg—

Subject: Halibut
From: Padi Anderson <padi.anderson@gmail.com>
Date: 5/6/2012 3:51 AM
To: npfmc.comments@noaa.gov

Chairman Eric Olson

As a commercial fishing boat I strongly support reductions in Gulf of Alaska halibut bycatch.

The Council should reduce halibut bycatch NOW by at least 15%.

The exploitable biomass—the portion of the halibut population that is available for commercial harvest—has declined 58% over the past decade.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%.

Trawl bycatch caps have not been reduced since 1989.!!!

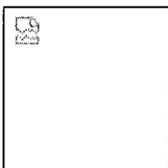
Bycatch now kills as many halibut, in numbers of fish, as are caught in the commercial halibut fishery.

Gulf coastal communities depend on halibut for sustenance and livelihood.

National Standard 9 of the Magnuson-Stevens Act (federal legislation for fisheries of the U.S.) requires that bycatch be reduced.

--

Padi Anderson



F/V Rimrack
Rye Harbor NH
www.rimrackfish.com
603.343.4924 home
603.343.1500 cell

From: Jarl Gustafson <jarlgust@yahoo.com>

Date: 5/7/2012 3:50 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

May

7, 2012

My name is Jarl Gustafson. I am a small boat (F/V Vigor) owner/operator commercial fisherman from Homer AK. The healthy halibut resource has been a mainstay of my family's livelihood for over 25 years.

Re; Item C-1 (b) on the council agenda

It is my wish to encourage all council members to vote for the maximum reduction in halibut bycatch (15%) on the table. I feel strongly that this is still not enough, but it's a start. Please do not prolong this action.

Thank you for your time.

Jarl

RECEIVED
MAY -8 2012

Lewis

**CITY OF HOMER
HOMER, ALASKA**

RESOLUTION 12-034

A RESOLUTION OF THE CITY COUNCIL OF HOMER,
ALASKA, URGING THE NORTH PACIFIC FISHERY
MANAGEMENT COUNCIL TO ADOPT MEASURES THAT
REDUCE THE HALIBUT PROHIBITED SPECIES CATCH IN
THE GULF OF ALASKA GROUND FISH FISHERIES.

WHEREAS, Halibut bycatch (prohibited species catch or PSC) limits in the Gulf of
Alaska groundfish fisheries have not been significantly changed since 1989; and

WHEREAS, Currently there is a halibut bycatch limit of 2,300 metric tons (mt) in the
Gulf of Alaska--or just over 5 million pounds; and

WHEREAS, A maximum reduction in the halibut PSC limit of 15% is being considered
by the North Pacific Fishery Management Council for final action in June 2012; and

WHEREAS, Exploitable biomass--the portion of the halibut population that is available
for harvest--has declined by 58% over the past decade; and

WHEREAS, Every pound of halibut caught as bycatch results in a direct loss of yield and
spawning biomass of the halibut resource; and

WHEREAS, Cuts in catch limits have and will continue to have dramatic effects on our
fisheries, businesses, economies and communities that depend on the halibut resource; and

WHEREAS, Halibut play a key role in the economy of the City of Homer;

NOW, THEREFORE, BE IT RESOLVED by the Homer City Council:

SECTION 1. That the Homer City Council urges the North Pacific Fishery
Management Council to take meaningful final action now by reducing Gulf of
Alaska halibut bycatch by at least 15% .

SECTION 2. That copies of this Resolution be provided to Governor Sean Parnell
and all members of the North Pacific Fishery Management Council.

SECTION 3. That this Resolution takes effect immediately upon adoption.

PASSED AND ADOPTED by the City Council of Homer, Alaska, this 23rd day of April,
2012.

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Page 2 of 2
RESOLUTION 12-034
CITY OF HOMER

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ATTEST.

Handwritten signature of J. Johnson.

J. JOHNSON, CMC, CITY CLERK

Fiscal Note: N/A

CITY OF HOMER

Handwritten signature of James C. Hornaday.
JAMES C. HORNADAY, MAYOR

Dr. Jim Balsiger, Regional Administrator

NOAA Fisheries, Alaska Region

PO Box 21668

Juneau, AK 99802

RECEIVED
MAY -8 2012

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska

Dear Dr. Jim Balsiger,

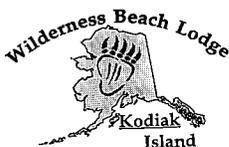
I request you use what influence you have to encourage the North Pacific Fishery Management Council to take final action to reduce halibut bycatch in the Gulf of Alaska by at least 15%—the maximum reduction being considered at this time.

Commercial and sport fishermen have experienced dramatic cuts in their harvests over the last decade. The limit on halibut bycatch in the Gulf of Alaska, on the other hand, has not been significantly changed since 1989. Currently there is a halibut bycatch limit of 2,300 metric tons (mt) in the GOA—or just over 5 million pounds.

At the same time the exploitable biomass—the portion of the halibut population that is available for harvest—has declined by 58% over the past decade. The state of the halibut stock is uncertain; previous assumptions regarding strong incoming year classes are now in doubt. While everything else—commercial and charter limits and the stock itself—have gone down, the bycatch limit has stayed relatively constant. It is time for the Council to address this inequity by reducing halibut bycatch NOW. All sectors must do their part to conserve and rebuild the halibut stock.

Cuts in catch limits have and will continue to have dramatic effects on our fisheries, businesses, economies and communities that depend on the halibut resource. Each halibut caught as bycatch has a direct effect on the spawning biomass and yield of halibut available to other sectors now and in the future. It is critical that the Council take meaningful final action now by reducing Gulf of Alaska halibut bycatch by at least 15%.

Sincerely,



966 61st Street
Pipestone, MN 56164

Mr. Eric Olson, Chair

North Pacific Fishery Management Council

605 West 4th Avenue, Suite 306

Anchorage, AK 99501

RECEIVED
MAY 7 8 2012

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska

Dear Chairman Olson and Council members,

I request the Council take final action to reduce halibut bycatch in the Gulf of Alaska by at least 15%—the maximum reduction being considered at this time.

Commercial and sport fishermen have experienced dramatic cuts in their harvests over the last decade. The limit on halibut bycatch in the Gulf of Alaska, on the other hand, has not been significantly changed since 1989. Currently there is a halibut bycatch limit of 2,300 metric tons (mt) in the GOA—or just over 5 million pounds.

At the same time the exploitable biomass—the portion of the halibut population that is available for harvest—has declined by 58% over the past decade. The state of the halibut stock is uncertain; previous assumptions regarding strong incoming year classes are now in doubt. While everything else—commercial and charter limits and the stock itself—have gone down, the bycatch limit has stayed relatively constant. It is time for the Council to address this inequity by reducing halibut bycatch NOW. All sectors must do their part to conserve and rebuild the halibut stock.

Cuts in catch limits have and will continue to have dramatic effects on our fisheries, businesses, economies and communities that depend on the halibut resource. Each halibut caught as bycatch has a direct effect on the spawning biomass and yield of halibut available to other sectors now and in the future. It is critical that the Council take meaningful final action now by reducing Gulf of Alaska halibut bycatch by at least 15%.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald N. Kuen". The signature is fluid and cursive, with a long horizontal stroke at the end.

From: keith kalke <oceanhuntercharters@yahoo.com>

Date: 5/8/2012 12:56 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

To the north council

Please consider my comment in your june meeting in Kodiak regarding trawl bycatch.

It would seem to me every one in the fishing community regardless of political positions would be on board with limiting bycatch and waste in all areas. The current goal of only 15% is really just a token approach to a much larger problem. I think as American's we are obligated to take the lead in all endeavors to show the world how things should be done. We are able to at the present time to do much better than the suggested reduction. I know the monetary value of the pollack fleet but that can and should not interfere with common sense. Please not only limit the bycatch to 15% but please strive for more. In the interest of all please do the right thing.

As I have testified in the past at north council meetings all halibut bycatch landed by the trawl fleet should be processed. the poundage should then be deducted from the long line quota. In turn the long liners should receive compensation minus the processing fees established by the IPHC in conjunction with the department of fish and game or NOAA. I think this would be a great problem solver for all interested parties.

Rough Example

10,000 lb longline IFQ

1,500 Trawl bycatch ticket

new 8,500 lb long line IFQ

Long line IFQ holder to receive compensation for the 1,500 Lbs from a set up bycatch fund after all processing costs are considered.

This approach I think only makes sense to all. It does add a small burden to the trawl fleet but it does take a large percentage of the waste factor out of the process and compensates the long line fleet for any IFQ reduction. The 1,500 lbs means less time fishing to catch your quota. Saving the fisherman time fuel bait and so on at the same time eliminating the word bycatch from the trawl fleet and relieving the pressure on the Halibut. Meaning more opportunities for the recreational fleet as well. Now this all sounds good on paper but a small committity of Trawlers, Long liners and government representative can hash out processing fees and so on.

This is a win win for all in my mind but then again it does not eliminate or address the Salmon trawl bycatch. I'm still hoping science in the trawl fleet and clean fishing practices can make the much needed difference in that concern.

thank you for your consideration

Best Regards

Capt Keith Kalke

Ocean Hunter Charters

po box 1900

homer Ak 99603

1-907-299-1735

Subject: Agenda item C1(a) GOA Halibut PSC
From: Jaycen Andersen <alaskasfreshes@gmail.com>
Date: 5/8/2012 9:50 PM
To: npfmc.comments@noaa.gov

Agenda item C1(a) GOA Halibut PSC

Dear Chair Olson and Council members,

My name is Jaycen Andersen. I'm 28 years old. I own a commercial fishing vessel from which I troll and Halibut fish from. In the last four to five years the Gulf of Alaska commercial harvest limits have been cut 60%. The trawl bycatch caps haven't been reduced since 1989. Why is this? Why have all other sectors of the fisheries been held accountable for conservation of the resource and they haven't? Reducing bycatch limits is important for everyone, from commercial to sport, to the subsistence fisherman. Action needs to be taken now. I strongly urge a reduction in the Halibut bycatch ASAP by AT LEAST 20%. It's time for us all to take action on conservation issues so we can continue to have a resource for years to come. Thanks for your attention on this matter,

Jason Andersen
F/V Cinnabar
P.O. Box 99
Sitka, AK 99835

Subject: halibut bycatch
From: Carolyn Nichols <carenichols@hotmail.com>
Date: 5/8/2012 3:08 PM
To: NPFMC <npfmc.comments@noaa.gov>

May 8th 2012

To NPFMC

I would like to see the Gulf Of Alaska PSC caps reduced by a minimum of 15% by 2013. I feel that this is a minimum in that the PSC limits for the trawl fishery have not changed since 1986 and the setline since 1995. Since 1986 the Gulf of Alaska halibut fishery has been reduced 63%. Every sector of any fishery needs to take part in the conservation of the resource- especially those whose only participation in a fishery is thru bycatch. Many Alaskan halibut fishermen are in great financial trouble due to the deep cuts in the allowable catch. A lot have had to take on other jobs just to make payments on loans for IFQs due to these decreases in catch- For a sectors bycatch level to be allowed to stand untouched is not acceptable.

Personally, as a SE Alaska halibut fisher I feel that the bycatch level declines ought to be in line with the lowering of the catch levels. I have felt the cuts – and it hurts to say the least.

WE all need a healthy resource to stay in business.

Thank You

Carolyn Nichols

111 Knutson Drive

Sitka, AK 99835

Subject: halibut bycatch
From: Carolyn Nichols <carenichols@hotmail.com>
Date: 5/8/2012 3:04 PM
To: NPFMC <npfmc.comments@noaa.gov>

To Chariman Eric Olson

As a commercial fisherman, seafood lover and sport fisherman I strongly support reductions in Gulf of Alaska halibut bycatch.

- The exploitable biomass—the portion of the halibut population that is available for commercial harvest—has declined 58% over the past decade.
- To conserve stocks, Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%.
- Trawl bycatch caps have not been reduced since 1989.
- Bycatch now kills as many halibut, in numbers of fish, as are caught in the commercial halibut fishery.
- Gulf coastal communities depend on halibut for sustenance and livelihood.
- Reducing bycatch is critical to conserve and rebuild the halibut resource.
- National Standard 9 of the Magnuson-Stevens Act (federal legislation for fisheries of the U.S.) requires that bycatch be reduced.
- The Council should reduce halibut bycatch NOW by at least 15%.

Thank You

Ryan Nichols

305 Islander Drive

Sitka, AK 99835

Subject: trawl bycatch
From: Christopher White <chriswht50@gmail.com>
Date: 5/9/2012 10:32 AM
To: npfmc.comments@noaa.gov
CC: halibut@akmarine.org

Dear Council-

My family and I make our living fishing halibut and salmon in Alaska.

The reduction in quota over the last years has been very painful. The trawl fleet bycatch--untouched since 1989--is causing a large part of this pain. Why in tarnation should they be allowed to effect everyone: commercial, subsistence, sport, so spectacularly? There is a good solution: reduce their bycatch NOW by at least 15%--though I would recommend 50%.

The playing field needs to be more level for all. If not now, when?

Thank you

Chris White
F/V Vulcan

Deep Sea Fishermen's Union of the Pacific

5215 Ballard Avenue N.W.

Seattle, WA 98107

Phone: (206) 783-2922



Fax: (206) 783-5811

www.dsfu.org



Established 1912

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MAY 1 2012

May 4, 2012

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

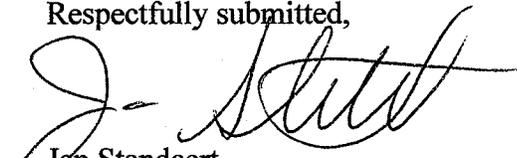
Dear Chairman Olson:

We are the Deep Sea Fishermen's Union, celebrating 100 years supporting the crewmen fishing halibut in the North Pacific. We are affiliated with the Sailors Union of the Pacific and the AFL/CIO.

In this letter, we are reiterating what we have already testified at previous council meetings. We strongly support the reduction of halibut by-catch in the trawl fishery in the Gulf of Alaska. As a directed fishery, the longliners have taken reductions in excess of 60% where the trawl by-catch caps have not been reduced since 1989. It is not only unfair but it is hazardous to the halibut population. We believe, according to National Standard 9 of the Magnuson-Stevens Act, that it is mandatory to reduce bycatch.

As stewards of the resource we think it is necessary to reduce the halibut bycatch now by at least 15% to conserve and re-build the halibut resource.

Respectfully submitted,



Jan Standaert
President

halibut bycatch

Subject: halibut bycatch

From: "Jenny Carroll / Paul Dungan" <icybay1@gmail.com>

Date: 5/12/2012 9:27 AM

To: <npfmc.comments@noaa.gov>

My Name is Paul Dungan. I have been a participant in the halibut fishery in areas 3a and 3b since 1980. I continue to crew and I own quota shares.

I want to strongly encourage the council to impose greater limits on the trawler by catch of halibut.

Thank you very much for your efforts. Paul Dungan

57725 Icy Bay dr.
Homer, AK 99603

Subject: Agenda item C1(a) GOA Halibut PSC
From: Joseph D'Arienzo <delsenzo@live.com>
Date: 5/13/2012 10:50 AM
To: <npfmc.comments@noaa.gov>

Chairman Olson and Council Members

As a commercial halibut fisherman and resident of Southeast Alaska for over 30 yrs., I strongly support reductions in Gulf of Alaska halibut bycatch. Commercial catch limits in the Gulf have been reduced by 60% and Southeast charter limits by 34%.

Yet, trawl halibut bycatch caps haven't been reduced since 1989! Consequently, trawl bycatch kills as many halibut as are harvested in the commercial fishery!

I would think that the Council, responsible for the health of the resource, couldn't help but see the logic and need of reducing trawl bycatch.

Sincerely,

Joe D'Arienzo
2219 Sawmill Crk. Rd.
Sitka, Alaska 99835

Subject: Reduce Halibut Bycatch
From: ve ganda <veganda@gmail.com>
Date: 5/13/2012 7:45 AM
To: npfmc.comments@noaa.gov

Chairman Eric Olson:

As a concerned citizen, I strongly support reductions in Gulf of Alaska halibut bycatch. I support reducing the amount of allowable bycatch by at least 15%. I understand that Trawl bycatch caps have not been reduced since 1989 and this affects the species population which subsequently may affect the environment and later the livelihood of fishers' communities.

As American citizen, i appreciate your representation, please voice my concern.

Fernanda Vega
better food systems advocate

--

Life is like riding a bicycle.
To keep your balance you must keep moving. a Einstein
ॐ paix



Alaska Longline FISHERMEN'S ASSOCIATION

Post Office Box 1229 / Sitka, Alaska 99835 907.747.3400 / FAX 907.747.3462

May 14, 2012

Chairman Eric Olson
NPFMC
605 West 4th Street Ste. 306
Anchorage, AK 99501

C-1 Halibut Bycatch

Dear Chairman Olson,

On behalf of the Alaska Longline Fishermen's Association (ALFA), I am submitting these comments on Gulf of Alaska Halibut Prohibited Species Catch (PSC) limits. ALFA urges you to take final action in June to reduce Gulf of Alaska halibut Prohibited Species Catch (PSC) caps by 15%. ALFA considers bycatch reductions urgently necessary to:

1. Conserve the resource
2. Meet Magnuson Stevens Act mandates
3. Equitably balance the burden of resource declines

These reasons are discussed in some detail below, but before going into that detail I would like to provide you with a brief overview of the work we have been doing to address bycatch in our fisheries. I include this information so you understand that while our association recognizes that all fisheries have bycatch, we also believe that all fisheries have the responsibility and the ability to address and control bycatch rates.

ALFA's Fishery Conservation Network

Attached you will find a flyer introducing you to ALFA's Fishery Conservation Network (FCN); more information on the FCN can be found on the ALFA at

http://alfafish.org/research.shtml?gpm=1_1 or on the Community Fisheries Network blog at:
<http://blog.ecotrust.org/an-alaska-fishing-community-takes-care-of-its-own/>

ALFA's FCN empowers stewardship innovation through research and collaboration. FCN fishermen are engaged in a range of conservation and research initiatives, but of particular relevance to the Council's action at this meeting is the FCN initiative to identify and map

areas of high rockfish concentrations. Since 2009, ALFA FCN members have recorded catch and bycatch rate data from their halibut and sablefish sets and have provided this information, along with set latitude/longitude and ADFG fish tickets, to ALFA. FCN members have also gathered and shared Nobeltec bathymetry data with ALFA. We have compiled this data, overlaid the set bycatch rate data over the seafloor structure data in a GIS format, and provided the mapped data in both hard and electronic forms back to FCN fishermen. These maps have been enhanced with multi-beam sounding data provided to the FCN specifically for this bycatch initiative. This year, each FCN members received scalable seafloor maps overlaid with their individual sets color coded by set quadrant to reflect bycatch rates. The maps allow fishermen to recognize the seafloor structures that concentrate rockfish and to adjust sets to control bycatch rates.

Over the three years of the program, we have gathered data from over 500 sets and 2,000 set segments. Over 70 quota share holders are participating in the FCN. In the first two years of the program, FCN members reduced demersal shelf rockfish bycatch by 20% in the halibut target fishery and slope rockfish bycatch by 6% in the sablefish fishery. Because the fleet as a whole is remaining well below rockfish allocations and rockfish is a valuable component of the longline fisheries, the 2011 FCN goal was to remain below Directed Fishing Standards, rather than accomplish further reductions. The fleet was again successful in achieving this goal in both the halibut and sablefish targets: bycatch rates remained below 9% in the halibut target and 2% in the sablefish target. Compiled set data also establishes that fishermen have been adjusting sets to control rockfish bycatch rates; over the three years, only 9 out of 709 logged one mile square blocks containing FCN fishing activity (all three years combined) contained high bycatch sets in 2 out of 3 years and none contain high bycatch rate sets in all three years. Fishermen are using the bycatch and bathymetry maps to move or adjust their sets to avoid rockfish “hotspots.” In sum, through collaboration the FCN has developed the tools longline fishermen need to control rockfish bycatch rates to conservation limits.

We recognize that other sectors have far more sophisticated seafloor mapping software than our fleet and many have been using this software for years. With some effort to organize and collaborate, the vessels participating in the pacific cod trawl fishery, for example, could control halibut bycatch rates to ensure target fisheries were not constrained by reduced PSC limits. As the Council notes in the problem statement for this issue:

*“... there have been significant changes in groundfish and halibut management programs and fishing patterns, environmental conditions, **fishing technology**, and knowledge of halibut and groundfish stocks.” (emphasis added)*

Fishing technology has improved dramatically since the late 1980s; fleets can and should learn to work together to control bycatch rates. The assumption in the analysis that reduced PSC limits will prevent full utilization of some Gulf target fisheries assumes fishing behavior

will not change and therefore overstates economic impacts. As the Magnuson-Stevens Act mandates, wasteful fishing behavior SHOULD change; the Council will catalyze that change by reducing PSC limits.

Reasons for Reducing Halibut Bycatch:

Conservation: The halibut resource is in decline, with the exploitable biomass in the Gulf of Alaska falling by 60% over the past decade. The size at age of halibut has also declined, which could be a result of environmental factors or inter- or intra-species competition. Because of the reduced size at age, halibut are remaining vulnerable to trawl bycatch longer and some may remain vulnerable to trawl bycatch throughout their lives, since many males currently never attain a size and strength that allows them to evade trawl capture. These small halibut are the rebuilding potential of the halibut stock and must be protected for halibut stocks to recover. The International Pacific Halibut Commission (IPHC) estimates that every pound of bycatch reduces directed fishery yield by 1.1 pounds, and that every pound of bycatch reduces the future spawning biomass by 2.2- 5 pounds. These losses are significant for the halibut stock at any level of abundance, but are unacceptable given the current low levels of abundance.

Over the past year, many industry members have argued that while the exploitable biomass is reduced, total biomass is still strong. This argument is suspect for a number of reasons. First, the size and strength of year classes less than 32 inches are not well understood, particularly in the Gulf of Alaska. Second, as the attached graph establishes, total biomass has not increased in the Gulf; both total biomass and total numbers of fish are declining in Gulf IPHC areas. Rebuilding halibut populations depends on reducing pressure on all components of the halibut stock, but reducing removals of small halibut that have not yet contributed to the spawning biomass is of utmost importance.

Others have argued that bycatch is purely an allocation issue. This issue was raised as a question at the joint Council/IPHC bycatch workshop and directly addressed by the panel. Panel participants agreed that impacts to the spawning biomass, and the uncertainty associated with estimating both bycatch and bycatch impacts clearly establishes bycatch as a conservation issue with long-term allocative effects to the directed fishery. No panel member challenged this conclusion. To quote the GOA PSC executive summary:

“The impacts of reducing halibut PSC limits for groundfish target fisheries does not simply reallocate that reduced halibut mortality amounts to directed fishery halibut users. While halibut PSC limits are often closely approached in the GOA groundfish fisheries, these removals are known imprecisely. While all halibut mortality sources are taken into account when commercial IFQ catch limits (and combined catch limits under the proposed Halibut Catch Sharing Plan (CSP)) are set, the negative impacts of these removals on lost spawning biomass and lost yield are not prevented. Incidental catches

of halibut result in a decline in the halibut standing stock biomass, reduced reproductive potential of the halibut stock, and reduced short- and long-term halibut yields to the directed hook-and-line fisheries and the guided sport sector in Area 2C and 3A under the proposed CSP.”¹

Magnuson-Stevens Act mandate: National Standard Nine of the Magnuson-Stevens Fishery Conservation and Management Act directs Council’s to reduce bycatch to the maximum extent practicable. Despite this mandate, the Council has not reduced halibut PSC caps in the Gulf of Alaska since 1989 (trawl) and 1995 (fixed gear).² ALFA maintains that the Council is delinquent in fulfilling this federal mandate, and immediate action is necessary to achieve compliance. It is staggering to note that as many halibut are currently killed as bycatch as are taken in the directed halibut fishery. This resource waste defies Magnuson goals and urgently demands redress.

Equity: Catch limits in the Gulf of Alaska commercial halibut fishery have been reduced by 60% over the past seven years, with larger reduction in Area 2C. Charter allocations have also been reduced, and in recent years management measure have even been implemented that restrain charter harvest to those limits. The reductions in commercial catch limits have had painful economic impacts. These impacts were well documented in the Supplemental Analysis prepared for the Council’s April consideration of the Catch Sharing Plan.³ Table 15 on page 31 of that analysis establishes that a person who bought 3500 pounds of Area 2C quota share (QS) in 2003 now has less than 1000 pounds or a decline of more than 2/3rds. Although the value of the QS is about the same, the ex-vessel revenue is down more than 1/3rd; the increase in ex-vessel price has not been enough to offset the quota decline. Table 16 on page 32 shows that the average vessel harvest has also declined but not by as much as the quota cuts, which indicates that QS holders are fishing together on fewer boats. This costs crew jobs and downstream economic hardships for small coastal communities. Finally, Table 17 on page 33 establishes that a person buying QS periodically over the last six years is now so far underwater that they cannot sell the QS to pay off their debt. Given existing trends and abundance indices, circumstances for fishermen and communities in Area 3A and 3B are only a few years behind Area 2C. In short, the directed fishery and the communities that depend on the directed fishery have accepted substantial and painful catch limit reductions to conserve and rebuild stocks. It seems only fair to support these efforts by reducing halibut bycatch. Commercial fishermen cannot hold on much longer waiting for the Council to do its part to support halibut conservation.

¹ <https://www.box.com/s/85795b711c545dde171c>. page v.

² ALFA understands that recent management changes for the freezer longline sector have reduced halibut bycatch in this sector by 15%. This reduction should be given due consideration when the Council takes action in June.

³ <http://www.fakr.noaa.gov/npfmc/PDFdocuments/halibut/CSPSupplementalAnalysis312.pdf>

The commercial fleet is paying the price of halibut bycatch on another front. The Food and Water Watch recently published its updated Seafood Guide for Consumers, which recommends AGAINST purchasing Alaska halibut. Bycatch (and charter overfishing) are highlighted as significant cause for blacklisting Alaska halibut. To quote from the FWW website:

“A large part of the problem is not just the directed halibut fishery, but also bycatch of halibut in other fisheries (which results in the fish’s removal and mortality) and charter fishing, issues which have been examined and addressed in California, Washington and Oregon, but are still ongoing in Alaska. Fishing for halibut is limited to hook-and-line capture, which usually results in minimal habitat damage, and all halibut captured by other means must be returned to the sea. Halibut landings and bycatch are carefully monitored and trawl fisheries in the Bering Sea are often limited by calculations related to bycatch mortality. For these reasons, there is hope that the population will rebound in the future, **but Alaska will have to take further measures to address bycatch and charter fishing first.**” (Emphasis added)⁴
<http://www.foodandwaterwatch.org/fish/seafood/guide/>

To date the impact of quota reductions have been mitigated, if not compensated, by strong ex-vessel prices. If prices fall as a result of Council failure to reduce other resource removals, the economic impacts to the directed halibut sector will become unsupportable. For halibut fishermen the situation is urgent, if not dire.

Summary: The commercial halibut fleet has a long history of resource stewardship. Over the years the fleet has focused on long-term conservation, even at times voluntarily reducing fishing pressure to conserve stocks. ALFA is continuing this tradition by engaging fishermen in research, bycatch reduction, and habitat mapping through the Fishery Conservation Network. While we recognize that all fisheries have bycatch, we maintain that all fishermen can and should work to reduce bycatch and that minimizing bycatch is an important Magnuson-Stevens Act mandate. The directed fishery has accepted 60% quota reductions Gulf-wide over the past seven years with larger reductions (75%) in Area 2C. Halibut bycatch has not been reduced for decades. Trawl bycatch continues to take large quantities of halibut that have not yet contributed to the spawning biomass, hence the potential contribution of these fish is lost. With the halibut resource in decline and significant uncertainty about stock recovery, all sectors need to participate in protecting the rebuilding potential of the halibut stock. To our membership, small family businesses that are subsidizing their halibut investments with income from other fisheries or shore-based work

⁴ Note: after pressure from ALFA, FWW has removed the blacklist of Alaska halibut from the electronic version of the card, but their website still contains the above information and the 10,000 printed copies of the seafood guide still recommend consumers avoid Alaska halibut.

and grimly trying to hang on until stocks recover, bycatch reduction is urgent. For all these reasons, ALFA requests that the Council take final action in June to reduce Gulf of Alaska bycatch by 15%.

Thank you for your attention to these lengthy comments.

Sincerely,

A handwritten signature in cursive script that reads "Linda Behnken".

Linda Behnken
(Director, ALFA)

Subject: Bycatch comments

From: Marty Remund <remundmarty@yahoo.com>

Date: 5/14/2012 1:08 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

NPFMC, As a 39 year Alaska resident, commercial and subsistence halibut fisherman, I would like to comment on trawl halibut bycatch. I strongly support at least a 15% reduction in halibut bycatch by the trawl fleet in the GOA. To conserve stocks the longline fleet has been cut 60%. Area 2-C where I fish is cut about 75%! Trawl bycatch caps have not been reduced since 1989! Bycatch now kills as many halibut in #'s of fish as are harvested in the commercial halibut fishery! THIS IS UNACCEPTABLE TO SAY THE LEAST!! National standard #9 of the Magnuson Stevens Act requires that bycatch be reduced. Thanks for your time and consideration. Sincerely, Marty Remund Port Alexander, AK.

Subject: Fw: halibut bycatch
From: Gary Egerton <egertongary@yahoo.com>
Date: 5/15/2012 2:16 PM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

----- Forwarded Message -----

From: Gary Egerton <egertongary@yahoo.com>
To: "npfmccomments@noaa.gov" <npfmccomments@noaa.gov>
Sent: Tuesday, May 15, 2012 10:56 AM
Subject: halibut bycatch

Greetings! As a commercial halibut fisherman, I am writing to voice my support for a reduction in halibut bycatch for the gulf trawl fisheries. For the past 25 years the commercial fleet and the charter fleet have been blaming each other for the decline in halibut stocks in southeast alaska, absorbing tremendous cuts in our quotas, while the gulf trawl fleet has been killing 4.4 million pounds a year as bycatch. They must have been laughing at our squabbles. Here in Southeast our quota has been cut from 10 million pounds in 2005 to 2.6 million pounds for 2012. Since the trawl bycatch consists of mainly juvenile halibut (average of 26 inches), it doesn't take a scientist to figure that if the quotas were counted in numbers of fish rather than pounds the gulf trawl fishery kills as many or more halibut as bycatch as the gulf longline fishery takes in the targeted fishery. I am against the 15% reduction because I think it should be more like fifty%. Sincerely, Gary Egerton f/v Valle Lee.

bycatch

Subject: bycatch

From: "Brian and Jackie Bell" <magnum1@alaska.net>

Date: 5/16/2012 8:46 PM

To: <npfmc.comments@noaa.gov>

stop the waste, reduce the bycatch by 15%Brian Bell, box 768, Soldotna, Ak. 99669

Subject: Halibut by catch issue
From: Jim Lavrakas <jlav@gci.net>
Date: 5/17/2012 8:28 PM
To: npfmc.comments@noaa.gov

Dears Sirs,
I would like it known that I am in favor of the proposed minimum 15% reduction of halibut bycatch by bottom trawl fisheries. This is the very least that should be done to protect the halibut resource which has seen such drastic and unaccounted for changes in the last decade.

Thank you.

><(((e> ^ .>(((e> ^ .>(((e> ^ .>(((e>

Jim Lavrakas
Skookum Charters, LLC
Captain / Owner
PO Box 1459
Homer, AK 99603
<http://www.akskookumcharters.com>
907-360-2319 / cell

Subject: reduce halibut bycatch by at least 15%
From: Leslie Stella <rivershore1507@yahoo.com>
Date: 5/17/2012 5:15 PM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Honorable Council Members;

Current commercial fishing bycatch losses of halibut outnumbers the total sport catch. Please re-read that sentence.

That should say it all. How can we enact new limitations on guide caught halibut in SE if the above sentence is true?

How can we take moves to further limit general sport fish catches of halibut is true?

Certainly the first place to look is to take serious steps to limit halibut bycatch. That means by at least 15%

Thank you for your consideration,

Leslie Stella
PO BOX 8895
Kodiak, AK 99615

Subject: Halibut by catch waste

From: "Carol Whitney" <carol.alaskafishinlady@gmail.com>

Date: 5/17/2012 4:34 PM

To: <npfmc.comments@noaa.gov>

We wish to voice our dismay at the absolute waste of the halibut by catch which is 5 million pounds. This is more than the sports catch or the entire commercial fishery. The halibut that they kill and throw back are under sized therefore it is much more than the other fisheries combined. My recommendation that the bottom trawl fishery find ways to completely eliminate this or stop fishing. If this practice was stopped there would be no need to limit the sports fishery. Sincerely Dick and Carol Whitney

Subject: Representative Seaton's Editorial
From: Vicki Van Fleet <jgvvf18@gmail.com>
Date: 5/17/2012 11:58 AM
To: npfmc.comments@noaa.gov

After reading Representative Paul Seaton's letter to the editor in today's Juneau Empire regarding the proposal for reducing bycatch waste by 15%, I urge the council to pass this proposal. Bottom trawl fisheries have long been extremely destructive to Alaska's Commercial & Sport Fishing industries.

As a 37 year resident of Alaska I respectfully ask the council to not let large corporate fisheries destroy Alaskans resource and livelihood!

Thank you for your time,

Vicki Van Fleet
Juneau, AK

bycatch

Subject: bycatch

From: Mark Schaefer <MPSchaefer@wpyr.com>

Date: 5/17/2012 11:03 AM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

I support Rep. Paul Seatons viewpoint and editorial published in the Juneau Empire. Please do as he suggests.

Regards, MS

<http://juneauempire.com/opinion/2012-05-17/my-turn-reduce-waste-our-alaska-halibut#.T7VJf-jOwk0>

Subject: Reduce halibut bycatch

From: Linda Kadrlik <adventuresafloat@gci.net>

Date: 5/17/2012 9:54 AM

To: npfmc.comments@noaa.gov, governor@alaska.gov

Greetings from Juneau,

As recreational fishers and charter operators, we urge you to take action on the commercial fisheries halibut bycatch by reducing the waste of our halibut resources by at least 15%. Lets allow young halibut to grow to commercial size. Reducing the commercial bycatch will provide more fishing opportunities for Alaskans. Francis and Linda Kadrlik

Adventures Afloat

Francis and Linda Kadrlik

4950 Steelhead, Juneau, AK 99801

(800) 3AFLOAT, (907) 789-0111

FAX: (907) 789-3312

<http://home.gci.net/~valkyrie>

Subject: Gulf of Alaska by catch
From: chris cunningham <cdc.1@hotmail.com>
Date: 5/17/2012 6:34 AM
To: <npfmc.comments@noaa.gov>

To whom it may concern...,

I've lived in southeast Alaska since the early 60's and have watched the halibut stock become less available to fisherpersons thru out this time. I do not support a 5 million pound by catch for the Gulf of Alaska. With the commercial fleet IFQ program cut 50% in the last few years and the sport and charter fishermen with a decreasing daily limit, it appears that halibut stocks are not rebounding with any confidence. I believe the Gulf of Alaska fisheries by catch should be cut to 80% of it's present level. This would still allow for a million pounds of by catch, and if stocks do not show aggressive signs of recovery, a moratorium placed on the Gulf of Alaska fisheries.

Thank you for your consideration, Chris

Cunningham

Subject: June 6th meeting-- comments

From: Andy <ynot@gci.net>

Date: 5/18/2012 10:40 AM

To: NPMC Council <npfmc.comments@noaa.gov>

Trawl caught halibut bycatch is on your June 6th agenda. Attached is an opinion piece written by Senator Paul Seaton from Homer addressing the problem and asking for a reduction in the trawl bycatch limit on 15%. I am in agreement with Senator Seaton's analysis and conclusions. I favor a reduction in this cap of at least 15% of the present limit and I favor 100% observation of all trawl catches in order to verify what the actual bycatch rates really are.

Sincerely,
Andy Lundquist, Kodiak

— Seaton opinion piece halibut bycatch.jpg —

4 - KODIAK DAILY MIRROR, Thursday, May 17, 2012

Reduce the waste of Alaska halibut

Waste of our Alaska fishery resources is in the news again as the North Pacific Fishery Management Council approaches its June 6 meeting in Kodiak. A proposal has finally reached the table to reduce bycatch by 15 percent.

GUEST OPINION

By Paul Seaton

Bycatch is the allowed death and wastage of halibut from fisheries. I call this a mild reduction, but there are two other options that would reduce the kill rate by only 10 percent or even a meager 5 percent. I hope Alaskans from all walks of life will call or send in a short note by letter or email to push our resource managers to finally take this baby step to control the killing of unwanted halibut during the course of another fishery.

I say small step because the 15 percent bycatch reduction is in comparison to commercial halibut catch reductions of over 50 percent and in comparison to the current issue of potentially limiting the sport-guided catch from a two-fish daily limit to only one fish per day.

How crazy is it to limit Alaskans access to their halibut resource while leaving the Gulf of Alaska allowable waste at over 5 million pounds per year? That is more poundage than the entire sport fishery. Since most bycatch is killed while below legal size, the waste is actually a higher number of fish than the entire commercial fishery.

No one knows why, but the many years. Unfortunately, unwanted juvenile fish do so before that group of fish reach other words, the small-sized years of that bycatch killing below legal size. Also, because bycatch the bycatch becomes a larger total halibut population weight.

Sen. Ted Stevens and I have discussed about why the federal government trawl fisheries. He advised that at the management council argument to keep such a fishery going others in the crab and halibut its targeted fishing.

However, fish politics being a condition for the Gulf of Alaska since reduction doesn't seem like a good suggestion for a high bycatch fishery. It would be a start and would set the momentum of saving our halibut resource.

Alaska has six of the 11 votes in the Pacific Fishery Management Council. The Alaska Department of Fish and Game, not directly involved, sets the rules for use and development in Alaska. Together we can ensure proper resource management so vital to Alaskan communities.

I urge Alaskans to have their voices heard by contacting the governor's office in Anchorage, or email governor@alaska.gov and additional information call [907-495-6262](tel:9074956262) or email your comments to comments@noaa.gov.

Those people know the details. I know that you as the Alaskan can help reduce the waste of your resource.

Paul Seaton has been a legislator of the House Resources Committee and the Alaska Marine Conservation Council halibut fisherman from 1974 to 1982.

halibut

Subject: halibut

From: "Suzanne Shea" <sheawhite@acsalaska.net>

Date: 5/18/2012 4:46 PM

To: <governor@alaska.gov>, <npfmc.comments@noaa.gov>

I support action to reduce the bycatch waste of Alaskan halibut.

Suzanne Shea
8121 Gladstone St
Juneau AK
789-2220

Subject: Stop the halibut bycatch

From: "Lee Murrell " <leem@yakutatseafoods.com>

Date: 5/18/2012 4:11 PM

To: <npfmc.comments@noaa.gov>

To whom it may concern:

I am writing to strongly suggest that a hard number and a serious reduction beyond that are implemented. The allowance of juvenile halibut that are discarded or returned to boats as prohibited by catch is simply amazing. I am neither a fisheries biologist nor am I an environmentalist. This is easy to see with the signature at the bottom. I just understand that the size of halibut has decreased greatly over the years that I have been involved; Halibut do not grow as fast as Pollock...whom that fleet is the main contributor to the incidental by catch that is allowed to happen so that the Pollock can be harvested... Any way I will be following this debate closely and urge NOAA to support sustainable harvesting practices and not to allow a slow growing, slow to mature, prized fish for both sportsmen, commercial fishers, and most importantly to the plate and palate. May I suggest and strongly urge the proper enforcement to protect the halibut stocks.

Respectfully

Lee Murrell

leem@yakutatseafoods.com

QA Manager\Compliance

Yakutat Seafoods

PO Box 419 Yakutat, AK 99689

Phone (907) 784-3392

Fax (907) 784-3686



Subject: Halibut Bycatch

From: Mike McKinley <mrmckin@yahoo.com>

Date: 5/18/2012 3:56 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Please consider raising the Halibut bycatch quota to AT LEAST 15%. All sport species are being decimated by the bycatch of the massive trawlers.

Thanks

Mike McKinley

Sterling, Alaska

907-260-6453

Romans 6:23

²³ For the wages of sin is death, but the gift of God is eternal life in^[b] Christ Jesus our Lord.

Bycatch

Subject: Bycatch

From: Ty Hewitt <aldermonkey@gmail.com>

Date: 5/19/2012 12:01 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Reduce halibut bycatch in the gulf of AK by 15%! Do whatever necessary to rebuilt our halibut stock.

Ty Hewitt

Sent from my iPhone

Subject: Halibut Bycatch

From: Ron Conatser <ronc@wildblue.net>

Date: 5/20/2012 8:41 AM

To: npfmc.comments@noaa.gov

Dear Sirs:

I am writing today about the crime that is taking place with the Trawl Fleet in the Gulf of Alaska. I can't believe That they kill more fish and then throw away more then we as longliners get to keep. Oh thats right Tyson Foods and Ted Stevens kid is wrapped up in that fisheries

If you guys can't cut that by a least 15% there is no hope in this fisheries

Ron Conatser
F/V Ida Lee
3656-F Beck Road
Rice Wa 99167

509-722-3155

Subject:

From: Randy Brand <RBrand@grtnw.com>

Date: 5/20/2012 2:22 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

I support all efforts to eliminate or reduce by catch.

Great Northwest, Inc.

www.grtnw.com

Randy Brand

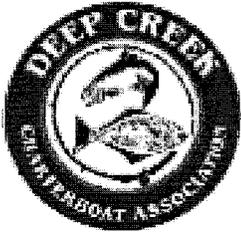
rbrand@grtnw.com

Subject: Bycatch reduction
From: Linda Holmes <chubbatucker@yahoo.com>
Date: 5/21/2012 8:33 PM
To: npfmc.comments@noaa.gov

Hi my name is Travis Conatser.

I have spent the last 21 years working in the commercial long line fishery. The last 10 years I have invested my money buying halibut IFQ's, Now they have been cut in half. I don't think that it is right for the long line fleet to take all of the cuts to try to protect the resource, when the problem is coming from other areas of the industry. We need to all be on the same page to protect the halibut stock. I strongly support the 15% bycatch reduction for the trawl fleet, I personally feel that it should be more with the statistics showing the trawl bycatch being over twice what the long line fleet is allowed to target, The real disturbing part of those statistics is the average size of the trawl caught halibut being 26" long. It looks poundage wise they are taking twice as much but fish fore fish the trawl fleet are killing thee to four times as many fish as the long line fleet. 15% doesn't seem like a big enough cut but you have to start somewhere.

Thank you Travis Conatser



Deep Creek Charterboat Association

P.O. Box 423—Ninilchik, AK 99639

Board of Directors

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Aaron Mahoney
398-0295

captaaron@alaskagulfcoastexpeditions

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blossom@acsalaska.net

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262-7139

cisprifv@acsalaska.net

21 May 12

North Pacific Fishery Management Council

Re: June meeting agenda item to address halibut bycatch

Council members,

As you would expect, our membership is keenly interested in the issue of halibut bycatch which you will be considering at your June meeting in Kodiak.

For many years, we have been at the center of some very controversial proposals to manage the charter halibut fishery. We have seen the very fabric of our industry stretched to the limit due to the negative publicity surrounding cuts in size and bag limits for our clientele. All of these proposals to severely regulate our industry are influenced by the lax attitude toward the waste of the halibut resource from commercial bycatch of halibut when fishing for other species.

Simply put- it is time to take significant action to reduce the bycatch of halibut by commercial fishermen.

We believe you have three levels of proposed reductions and urge you to select the highest percentage of cutback in bycatch proposed. We also recommend you mandate the highest level of observation to insure the cutbacks are implemented properly.

thank you
Aaron Mahoney, president



May 21, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska, agenda item C-1 (b)

Dear Chairman Olson and members of the Council,

Kenai River Sportfishing Association (KRSA) is a 501 (c) 3 non-profit association of anglers and conservationists dedicated to the sustainability of fisheries resources in Alaska. We would like to provide comment on the proposed final action on the halibut prohibited species catch (PSC) limits in the Gulf of Alaska.

KRSA strongly urges the Council to adopt the 15% reduction in halibut bycatch at the June 2012 meeting. After many years of discussion, the issue of applying a reduction in the PSC limits for halibut in the Gulf of Alaska is at hand – many diverse interests from both the commercial and recreational sectors are advocating for a 15% reduction, from harvesters and processors to charter operators and sport anglers.

With the significant decline in halibut stocks and corresponding decrease in catch limits for both the commercial and charter sectors, it is time to act in a meaningful manner to reduce halibut bycatch and share in the burden of conservation equitably. A 15% reduction is the most fair-minded approach when contrasted to the more than 50% decrease in the commercial fisheries and bag limit reduction in the southeast charter fleet.

As halibut bycatch limits have remained relatively unchanged since established in 1989, KRSA urges the Council to adopt a 15% reduction to help protect and conserve the halibut resource for the benefit of all users, in both the commercial and recreational sectors.

Respectfully,

A handwritten signature in cursive script that reads "Ricky Gease".

Ricky Gease, Executive Director
Kenai River Sportfishing Association
224 Kenai Avenue, Suite 102
Soldotna, AK 99669

May 22, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska, agenda item C-1 (b)

Dear Chairman Olson and members of the Council:

My name is Jodi Evers. I own the Deep Creek Sport Shop in Ninilchik, a small Coastal community. I book charters and lodging and have for 20+ years. My business, as well as the local economy is dependent on a healthy halibut resource. My family also participates in charter and sport fishing in Alaska and has for close to 30 years. As consumers of halibut, we all depend on a healthy halibut resource.

Commercial harvesters, charter operators, sport fishermen, processors, coastal residents and stakeholders have all come together to ask the Council to take final action to reduce halibut bycatch in the Gulf of Alaska. Coastal Alaskans are dependent on halibut for food, sport and livelihood. I urge the Council to adopt a 15% reduction in halibut bycatch at the June 2012 meeting.

Halibut stocks and catch limits in the Gulf of Alaska have declined significantly over the past decade. Exploitable halibut biomass has dropped 58% in the Gulf of Alaska over the past decade with the catch limits for the directed halibut fisheries declining significantly (by 70% in 2C, 47% in 3A and 70% in 3B). The Gulf of Alaska charter fleet has also experienced substantial reductions in catch limits.

The 1,113 2C quota share holders, 1,420 3A quota share holders, 490 3B quota share holders, 274 individual charter permit holders in 2C, 317 individual charter permit holders in 3A and countless sport and subsistence halibut harvesters stand united to protect the halibut resource and ensure that each sector is held responsible for the health of the resource.

Given the halibut bycatch limit was set in 1989 and has remained relatively unchanged, I urge the Council to adopt a 15% reduction to help protect and conserve the halibut resource for the benefit of halibut quota share holders, crewmembers, processors, charter operators, sport harvesters, subsistence users and coastal Alaskans that depend on halibut for food, sport and livelihood.

Sincerely,

Jodi L. Evers
PO Box 39547
Ninilchik, AK 99639

Subject: Please

From: Tina Krause <fv.legacy@yahoo.com>

Date: 5/22/2012 9:03 AM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Please lets get together and stop this halibut bycatch by the trawlers, they are killing off our halibut, look at all the cuts us halibut fisherman have taken and look at the damage they have done. they catch and throw away more then all of us ifq holders put together, a rotten shame it is, please help!!!!

Subject: help

From: Tina Krause <fv.legacy@yahoo.com>

Date: 5/22/2012 9:00 AM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

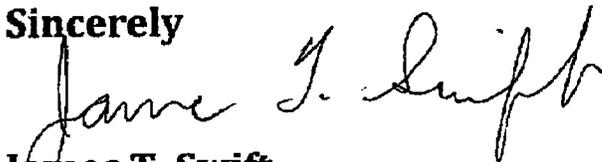
hello, heres my input, we need to stop this halibut by catch by the trawlers, they are killing off our halibut fishery , why do we get cut after cut and they just continue to kill kill kill, they are catching more halibut then all of us ifq holders and its just thrown back dead!
Ifq holder, Christina Krause

May 22, 2012

- **As a commercial halibut fisherman and subsistence fisherman, I strongly support reductions in Gulf of Alaska halibut bycatch.**

- **The exploitable biomass—the portion of the halibut population that is available for commercial harvest—has declined 58% over the past decade.**
- To conserve stocks, Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%.
- Trawl bycatch caps have not been reduced since 1989.
- **Bycatch now kills as many halibut, in numbers of fish, as are harvested in the commercial halibut fishery.**
- Gulf coastal communities depend on halibut for sustenance and livelihood.
- Reducing bycatch is critical to conserve and rebuild the halibut resource.
-
- **National Standard 9 of the Magnuson-Stevens Act requires that bycatch be reduced.**
- **The Council should reduce halibut bycatch NOW by at least 15%.**

Sincerely



**James T. Swift
PO Box 1193
Sitka AK
F/V Sherri Marie**

Homer Charter Association

P.O. Box 148 Homer, Ak. 99603

President: Gary Ault, Vice president: Donna Bondioli, Secretary/Treasury: Geri Martin,
Board Members: David Bayes, Phil Warren, Alternates: Scott Glosser, Joe Svymberski

Eric A. Olson, Chairman
North Pacific Fisheries Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252

May 20, 2012

Chairman Olson,

The Homer Charter Association (HCA) is an organization representing 31 charter companies and associated businesses from the Homer area. Its mission is to preserve and protect the fishing rights and resources necessary for the Homer charter fleet to best serve the recreational fishery. The Homer Charter Association submits the following comments on the Gulf Of Alaska Prohibited Species Cap issue before you at this meeting.

The association feels that the PSC halibut catch is excessive and needs to be addressed immediately. When the IPHC states: *"The existing GOA (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 to the context of halibut stock dynamics."* This statement is very concerning to us. The HCA hopes the NPFMC will take this opportunity to place the health of the fishery and the needs of the directed fishery first and reduce bycatch by at least 15% as soon as possible. The HCA believes that the trawl fishery can make the necessary changes to decrease wasteful behaviors.

We feel that it is time for:

- 100% observer coverage on all boats engaged in the GOA groundfish fishery. Whether the fishery observer is a human or a live video feed with GPS documentation it is absolutely essential to observe and gather accurate information. No one knows how many tons of other species, not named or counted were destroyed.
- Halibut populations in the Gulf of Alaska have varied dramatically in recent years. The exploitable biomass has declined by 50% over the past decade and growth rates have also declined. Longline and guided recreational fishermen catches were reduced by 17% and 15% respectively this year so a halibut bycatch reduction by the maximum proposed 15% is a must.
- Economic losses suffered by crab fishermen, halibut longline fishermen and recreational fishermen need to be analyzed.
- *The goal should be to prevent overfishing by all user groups.*
- A funding source taken from the trawl fishery participants needs to be implemented to research improved trawl techniques and equipment. Strip mining the ocean floor is no longer acceptable.
- The trawl industry is urging the Council to pursue economic incentives, including bycatch shares and cooperative management systems that allow for individual accountability. This rewards the clean fishers with the ability to keep fishing while removing the unclean operators from the fishery until their behavior changes.

In closing, The Homer Charter Association feels that the new data coming from IPHC concerning biomass levels indicates that halibut bycatch must be reduced now. The reduction amount should err on the side of conservation and not be held to the proposed 15% max figure. This reduction is still insufficient and further reductions to halibut bycatch levels should be made in the future.

Thank you,

Gary Ault,
President, Homer Charter Association



May 22, 2012

North Pacific Fishery Management Council

605 West 4th Avenue, Suite 306

Anchorage, AK 99501-2252

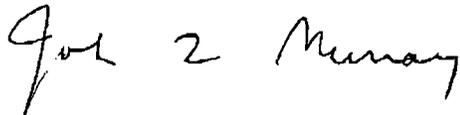
Dear Council:

I am a harvester of halibut commercially (quota shares), sport and subsistence. As a coastal resident in Sitka, I offer these thoughts as a rational way to increase halibut stocks by reducing bycatch. I believe this is something that is long overdue and I feel the Council needs to act quickly and decisively to reduce halibut bycatch in the trawl fishery in the Gulf of Alaska.

My IFQ quota shares have been drastically reduced in the 2C area. This reduction in quota shares has caused financial hardships for many commercial fishermen. In addition, all user groups are constantly fighting over the halibut resource. I believe a rationale reduction will help mend some of the fences as more halibut become available for both commercial and sports harvesters.

The trawl fishery needs a bycatch reduction of at least 15 percent. It is unconscionable to let their amount of wastage continue at the expense of other users and the resource in general.

Sincerely,

A handwritten signature in black ink that reads "John Murray". The signature is written in a cursive, slightly slanted style.

John Murray

F/V Sea Bear, 224 Observatory Street, Sitka AK 99835

5/23/12

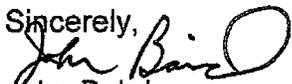
Dear Chairman Olson and members of the Council,

My name is John Baird and I have been involved as a commercial fisherman, sport fisherman and now in the processing sector in Alaska for 36 years. I depend on a healthy halibut resource. Commercial harvesters, charter operators, sport fishermen, processors, coastal residents and stakeholders have all come together to ask the Council to take final action to reduce halibut bycatch in the Gulf of Alaska. Coastal Alaskans are dependent on halibut for food, sport, and livelihood and we urge the Council to adopt a 15% reduction in halibut bycatch at the June 2012 meeting.

Halibut stocks and catch limits in the Gulf of Alaska have declined significantly over the past decade. Exploitable halibut biomass has dropped 58% in the Gulf of Alaska over the past decade with the catch limits for the directed halibut fisheries declining significantly (by 70% in 2C, 47% in 3A and 70% in 3B). The Gulf of Alaska charter fleet has also experienced substantial reductions in catch limits.

The 1,113 2C quota share holders, 1,420 3A quota share holders, 490 3B quota share holders, 274 individual charter permit holders in 2C, 317 individual charter permit holders in 3A, and countless sport and subsistence halibut harvesters stand united to protect the halibut resource and ensure that each sector is held responsible for the health of the resource. Given the halibut bycatch limit was set in 1989 and has remained relatively unchanged, we urge the Council to adopt a 15% reduction to help protect and conserve the halibut resource for the benefit of halibut quota share holders, crewmembers, processors, charter operators, sport harvesters, subsistence users, and coastal Alaskans that depend on halibut for food, sport and livelihood.

Sincerely,


John Baird

P.O. Box 6091

Sitka Alaska, 99835



POB 796, Homer, AK 99603

5/20/2012

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska

Dear Chairman Olson and Council members

North Pacific Fisheries Association (NPFA) was established in 1955. NPFA is a community based multi-gear group of commercial fishermen of Homer, AK.. Our membership includes commercial fisherman that participate in fisheries statewide. Our membership can be found fishing salmon, cod, halibut, black cod, herring and crab from Dixon Entrance in Southeast Alaska to Adak and north to St. Mathews Island. NPFA is a United Fishermen of Alaska (UFA) member group.:

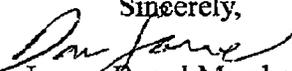
NPFA believes that the North Pacific Fisheries Management Council should take final action to reduce halibut bycatch in the Gulf of Alaska by at least 15%—the maximum reduction being considered at this time. **The time to take action is NOW.** .

Commercial halibut fishermen have experienced dramatic cuts in their harvests over the last 10 years. The exploitable biomass, that portion of the halibut population available for harvest, has declined by 58% over the past decade. The state of the halibut stock is uncertain; previous management assumptions are not answering questions of existing halibut stock characteristics. Commercial and charter limits and the stock itself—have gone down. However the bycatch limit on halibut in the Gulf of Alaska, by contrast, has not been significantly changed in almost 13 years. The current halibut bycatch limit of 2,300 metric tons (mt) in the GOA is just over 5 million pounds.

Cuts in catch limits have and will continue to have dramatic negative effects seen in our fisheries, businesses, economies, and our Homer community life. Each halibut caught as bycatch has a direct effect on the spawning biomass and yield of halibut available to other sectors now and in the future. It is critical that the Council take meaningful final action NOW by reducing Gulf of Alaska halibut bycatch by at least 15%.

All halibut users must do a meaningful part to conserve and protect our halibut resource. Our fishermen and our community depend on a healthy fish stocks.

Sincerely,


Don Lane, Board Member, NPFA

Patricia Phillips
PO Box 109
Pelican, Alaska 99832
May 24, 2012

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

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska

Dear Chairman Olson,

My family lives a commercial fishing and subsistence way of life. We are third generation Pelican residents and of Alaska Native lineage. My father was born at Afognak, and my mother at Wainwright. My husband's mother was born at Howkan, and his father at Chichagof Mine. Afognak and Howkan were once vibrant coastal Native villages. We are a remnant of Native people whose culture and livelihood is intricately intertwined with resources from the sea. Our subsistence activities include the harvest of marine resources, through commercial and subsistence fishing. We participate in shared activities, including the harvest and distribution of subsistence resources. For us, these are cultural, or customary and traditional practices passed down through generations. Like many in remote rural coastal Alaska, we depend on healthy marine resources for food and livelihood.

It is my opinion, that for the kind of quota reductions that the directed halibut fishery has endured, and to safeguard this rich halibut resource, the PSC percentage should be 25% or greater, at a sliding scale linked to recommendations from the International Pacific Halibut Commission (IPHC) stakeholder process. However, given the request for comment, I urge the Council to adopt a 15% reduction in halibut PSC at its June 2012 meeting.

The halibut resource and catch limits managed by the IPHC for the Gulf of Alaska are significantly and negatively impacted by an unrealistically high level of halibut PSC in the Gulf of Alaska. The PSC has a profound adverse effect on the sustainability of communities in Alaska. Exploitable halibut biomass dropped 58% in the Gulf of Alaska in recent years, with the catch limits for the directed halibut fisheries declining drastically (70% in 2C, 47% in 3A and 70% in 3B).

The NPFMC stakeholders should consider the disproportionately high and adverse human health and environmental effects the halibut PSC is having on human health and the degradation of the marine environment/halibut habitat. The small remote rural coastal communities have very limited economic opportunities and a disproportionate number of residents hold fishing permits and fishing boats. These fishing jobs are made up of people from our communities. Halibut is an important food source in our communities, and the opportunity to "catch a halibut" for sustenance is integral to our continued way of life.

Given the halibut PSC limit was set in 1989 and remains relatively unchanged, I urge the Council to adopt a 15% reduction to help protect and conserve the halibut resource for the benefit of future generations of Alaskans that depend on the halibut resource for its way of life.

Sincerely,
Patricia Phillips
F/V Pacific Dawn

*Thank you,
Patricia Phillips*

May 24, 2012

Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
Npfmc.comments@noaa.gov

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska, Agenda Item C-1(b)

Dear Chairman Olson and members of the Council,

My name is Richard Curran. I have fished commercially for halibut off Alaska since the 1970s. I have fished all areas from Southeast Alaska to the Aleutian Islands and I currently fish 3A. Halibut is an important part of my annual income and a fishery in which I have made a substantial investment.

Halibut stocks are at a critical juncture. Stocks are low, size at age has dropped in half, and reapportionment has destabilized the set line fisheries. Halibut quota has declined 50% (even more in Southeast Alaska). The average IFQ holding in 2C is now only 2357 pounds (the average charter boat catch is 3397 pounds). The 5,000,000 pounds of halibut trawl bycatch is almost double the 2,680,000 pound 2C quota! 2C IFQ fishermen can not afford to lose one more pound. Many IFQ fishermen in Southeast can no longer make IFQ payments.

It is time for the trawl fishery to do its part to conserve the halibut resource. The Council should lead on this issue. Please adopt the option that reduces halibut bycatch at least 15%; a lesser reduction is not meaningful.

Sincerely,

Richard Curran
F/V Cherokee

Subject: halibut bycatch reduction

From: Jim Dettling <jrddiver@yahoo.com>

Date: 5/24/2012 5:46 AM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska, agenda item C-1 (b)

Dear Chairman Olson and members of the Council,

My name is James Dettling. My family and I have been sportfishing in Alaska for 10 years. As a halibut fisherman, I depend on a healthy halibut resource. Commercial harvesters, charter operators, sport fishermen, processors, coastal residents and stakeholders have all come together to ask the Council to take final action to reduce halibut bycatch in the Gulf of Alaska. Coastal Alaskans are dependent on halibut for food, sport, and livelihood and we urge the Council to adopt a 15% reduction in halibut bycatch at the June 2012 meeting.

Halibut stocks and catch limits in the Gulf of Alaska have declined significantly over the past decade. Exploitable halibut biomass has dropped 58% in the Gulf of Alaska over the past decade with the catch limits for the directed halibut fisheries declining significantly (by 70% in 2C, 47% in 3A and 70% in 3B). The Gulf of Alaska charter fleet has also experienced substantial reductions in catch limits.

Commercial halibut quota share holders, charter fishing businesses and countless sport and subsistence halibut harvesters stand united to protect the halibut resource and ensure that each sector is held responsible for the health of the resource. Given the halibut bycatch limit was set in 1989 and has remained relatively unchanged, we urge the Council to adopt a 15% reduction to help protect and conserve the halibut resource for the benefit of halibut quota share holders, crewmembers, processors, charter operators, sport harvesters, subsistence users, and coastal Alaskans that depend on halibut for food, sport and livelihood.

Sincerely,
James Dettling, MD
10979 Willow Heights Dr.
Las Vegas, NV 89135



Eric Olson, Chair
North Pacific Fishery Management Council
Attn: Chris Oliver, Executive Director
604 West 4th Avenue, Suite 306
Anchorage, AK 99501
re: Halibut bycatch

RECEIVED
MAY 25 2012

May 24, 2012

Chair Olson and Members of the Council:

Attached you will find the official position statement from the Southeast Alaska Guides Organization (SEAGO) on the proposed percentage reduction of halibut bycatch for the trawl and hook-and-line fleets in the Gulf of Alaska.

Our board thoroughly considered this issue during its board meeting on May 21st, 2012.

I will be in attendance at your June meeting in Kodiak and will provide additional comments during your deliberations.

I appreciate your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Heath E. Hilyard". The signature is written in a cursive, flowing style.

Heath E. Hilyard, Executive Director
SEAGO



POSITION STATEMENT

ISSUE

Halibut Bycatch - *Final Action on the proposed rule considered by the North Pacific Fishery Management Council (hereinafter referred to as "the Council") during their June 2012 meeting in Kodiak, Alaska.*

SEAGO MISSION STATEMENT

Our mission is to promote the tradition of sport fishing in Southeast Alaska through reasonable regulations that ensure the long-term sustainability of our businesses and fish resources.

OFFICIAL POSITION

As reflected in the SEAGO Mission Statement, sustainability of our fisheries remains one of our organization's guiding principles.

To that end, we support the 15% maximum reduction in halibut bycatch (or Prohibited Species Catch/PSC) by the trawl and hook-and-line fleets in the Gulf Of Alaska (GOA). SEAGO's support of this position does not reflect a punitive attitude toward these sectors or gear groups. Rather, this position reflects our dedication to best practices, conservation and regulatory/statutory mandates by state and federal governments (MSA, specifically).

We recognize that science is, at best, inconclusive about the relationship between BWAM and the respective health of Sbio/Ebio. However, we believe that an overall reduction of bycatch in all areas and sectors, by all gear groups will ultimately yield positive results to the sustainability of the halibut resource.

We remain committed to the development and adoption of management measures that reasonably balance the interests of conservation and economics for all stakeholders.

Nothing in this position statement should be interpreted to mean that SEAGO is unwilling to consider supporting some alternative measure to a percentage reduction to the cap should such an option be put forward for the Council's consideration.

AFFIRMED:

May 21, 2012

PO Box 422 · Sitka, AK 99835
<http://www.seagoalaska.org> · heath@seagoalaska.org
907.244.4909

Subject: reduction of halibut bycatch

From: Art Bloom <artmbloom@gmail.com>

Date: 5/25/2012 7:47 AM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

- As a commercial halibut fisherman I strongly support reductions in Gulf of Alaska halibut bycatch (halibut PSC).
- The exploitable biomass—the portion of the halibut population that is available for commercial harvest—has declined 58% over the past decade.
- To conserve stocks, Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%.
- Trawl bycatch caps have not been reduced since 1989.
- Bycatch now kills as many halibut, in numbers of fish, as are harvested in the commercial halibut fishery.
- Gulf coastal communities depend on halibut for sustenance and livelihood.
- Reducing bycatch is critical to conserve and rebuild the halibut resource.
- National Standard 9 of the Magnuson-Stevens Act requires that bycatch be reduced.
- The Council should reduce halibut bycatch NOW by at least 15%.
-
- Thank you for taking action to reduce bycatch and waste of the resource, Arthur Bloom, Juneau, Alaska

Native Village of Port Graham

PORT GRAHAM VILLAGE COUNCIL

63998 GRAHAM ROAD, UNIT 1
P.O. BOX 5510 • PORT GRAHAM • ALASKA 99603-5510
907-284-2227 FAX 907-284-2222

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

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska, agenda item C-1 (b)

Dear Chairman Olson and members of the Council,

My name is Patrick Norman, Chief of the Village of Port Graham, our residents have been (commercial, sport, Charter, subsistence) fishing in 3A Alaska waters for many years.) As halibut fisherman, our village depends on a healthy halibut resource. Commercial harvesters, charter operators, sport fishermen, processors, coastal residents and stakeholders have all come together to ask the Council to take final action to reduce halibut bycatch in the Gulf of Alaska. Coastal Alaskans are dependent on halibut for food, sport, and livelihood and we request the Council to adopt a 15% reduction or more in halibut bycatch at the June 2012 meeting.

Halibut stocks and catch limits in the Gulf of Alaska have declined significantly over the past decade. Exploitable halibut biomass has dropped 58% in the Gulf of Alaska over the past decade with the catch limits for the directed halibut fisheries declining significantly (by 70% in 2C, 47% in 3A and 70% in 3B). The Gulf of Alaska charter fleet has also experienced substantial reductions in catch limits.

The 1,113 2C quota share holders, 1,420 3A quota share holders, 490 3B quota share holders, 274 individual charter permit holders in 2C, 317 individual charter permit holders in 3A, and countless sport and subsistence halibut harvesters stand united to protect the halibut resource and ensure that each sector is held responsible for the health of the resource. Given the halibut bycatch limit was set in 1989 and has remained relatively unchanged, we request the Council to adopt a 15% reduction or more to help protect and conserve the halibut resource for the benefit of halibut quota share holders, crewmembers, processors, charter operators, sport harvesters, subsistence users, and coastal Alaskans that depend on halibut for food, sport and livelihood.

Sincerely,



Patrick Norman Chief Port Graham Village Council

Subject: Halibut bycatch reduction

From: Bob/Alice Schell <alfaye@gci.net>

Date: 5/25/2012 1:38 PM

To: npfmc.comments@noaa.gov, npfmc.comments@noaa.gov

I have been a commercial halibut fisher for over 40 years. I sold my first halibut in 1967. The first years of my involvement in the fishery were in a small way as 300 to 800 pound deliveries during the troll fishery. In the early 80's, I began fishing with a crew and conventional longline gear. I recieved a relatively small quota when the IFQ fishery was started and subsequently bought two smaller sized blocks as a means of keeping the fishery economical for my business. My quota dropped from a one time high of 18,000 pounds to a low of 4000 pounds last year. Now that is a hell of a reduction. Right now, I am supporting the maximum of 15% bycatch reduction. In reality it should be much more. All segments of the directed halibut users have suffered through the reduction of the halibut stocks except the group that accounts for the fewest number of fishers and the largest kill total-the trawl fleet. The council has an opportunity to help the resource through the minimal reduction of 15% that is now an action item. Canada has been able to reduce their bycatch without determent to this same type user group. We need to quit dragging our butts and get with the program to keep the halibut resource viable for all users. Now is the time.

Robert Schell
Box 1367
Sitka, AK 99835
907-747-8541
FV Alice Faye

KACO

Kodiak Association of Charterboat Operators

RECEIVED
APR - 6 2012

P.O. Box 1031 Kodiak, Alaska 99615-1031 / www.kodiakaco.com / kodiak.kaco@gmail.com

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

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska

Dear Chairman Olson and Council members,

KACO is an organization comprised of 24 businesses that operate saltwater charter fishing boats on Kodiak Island. In addition, KACO represents 14 non-charter businesses and individuals on Kodiak Island.

We request the Council take final action to reduce halibut bycatch in the Gulf of Alaska by at least 15%—the maximum reduction being considered at this time.

Commercial and sport fishermen have experienced dramatic cuts in their harvests over the last decade. The limit on halibut bycatch in the Gulf of Alaska, on the other hand, has not been significantly changed since 1989. Currently there is a halibut bycatch limit of 2,300 metric tons (mt) in the GOA—or just over 5 million pounds.

At the same time the exploitable biomass—the portion of the halibut population that is available for harvest—has declined by 58% over the past decade. The state of the halibut stock is uncertain; previous assumptions regarding strong incoming year classes are now in doubt. While everything else—commercial and charter limits and the stock itself—have gone down, the bycatch limit has stayed relatively constant. It is time for the Council to address this inequity by reducing halibut bycatch NOW. All sectors must do their part to conserve and rebuild the halibut stock.

Cuts in catch limits have and will continue to have dramatic effects on our fisheries, businesses, economies and communities that depend on the halibut resource. Each halibut caught as bycatch has a direct effect on the spawning biomass and yield of halibut available to other sectors now and in the future. It is critical that the Council take meaningful final action now by reducing Gulf of Alaska halibut bycatch by at least 15%.

Sincerely,


Dave Jones
KACO President

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

RECEIVED
APR - 6 2012

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska

Dear Chairman Olson and Council members,

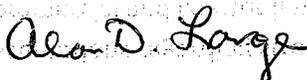
I request the Council take final action to reduce halibut bycatch in the Gulf of Alaska by at least 15%—the maximum reduction being considered at this time.

Commercial and sport fishermen have experienced dramatic cuts in their harvests over the last decade. The limit on halibut bycatch in the Gulf of Alaska, on the other hand, has not been significantly changed since 1989. Currently there is a halibut bycatch limit of 2,300 metric tons (mt) in the GOA—or just over 5 million pounds.

At the same time the exploitable biomass—the portion of the halibut population that is available for harvest—has declined by 58% over the past decade. The state of the halibut stock is uncertain; previous assumptions regarding strong incoming year classes are now in doubt. While everything else—commercial and charter limits and the stock itself—have gone down, the bycatch limit has stayed relatively constant. It is time for the Council to address this inequity by reducing halibut bycatch NOW. All sectors must do their part to conserve and rebuild the halibut stock.

Cuts in catch limits have and will continue to have dramatic effects on our fisheries, businesses, economies and communities that depend on the halibut resource. Each halibut caught as bycatch has a direct effect on the spawning biomass and yield of halibut available to other sectors now and in the future. It is critical that the Council take meaningful final action now by reducing Gulf of Alaska halibut bycatch by at least 15%.

Sincerely,


Alan D. Large

Chairman Eric Olson
NPFMC
605 West 4th Street Ste. 306
Anchorage, AK 99501

RECEIVED

MAY 19 2012

C-1 Halibut Bycatch

Dear Chairman Olson,

Please take action this June to reduce halibut bycatch by 15%. To those of us who have lost 75% of our halibut quota, 15% seems to be the absolute minimum bycatch should be reduced. During this time of reduced abundance, all sectors need to share in rebuilding stocks. We have done our part; the other fisheries need to do theirs.

I understand that trawl bycatch is comprised primarily of immature fish that have not yet contributed to the spawning biomass. These fish are our hope for the future. My family and I have invested a large part of our savings in halibut quota shares, believing fishery managers would take care of the resource and the industry that depends on it. We have lost over half our income due to the declines and hold quota that is worth far less than what we paid for it. We are trying to hang on to our shares, but need to know there is something worth wait for.

Our fleet has worked hard to control bycatch rates in our fishery through ALFA's Fishery Conservation Network. I am sure the trawlers have far more sophisticated electronics than our fleet, and could work together to lower bycatch rates so they are not shut down by the lower PSC limit.

The Magnuson-Stevens Act calls for regional council's to reduce bycatch, yet Gulf of Alaska bycatch caps have not been reduced since 1989. Please make the right choice to fulfill your responsibilities, take care of the resource, and protect the future of the halibut fishery.

Thank you.

Kent Barkhau

Subject: Halibut bycatch for trawler fleet

From: dewwhite55@gmail.com

Date: 5/23/2012 3:16 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

CC: "kelly@akmarine.org" <kelly@akmarine.org>

I encourage you to reduce the halibut bycatch for the trawl fleet by 15%. I am not affiliated with any fishing association and, in fact, I probably have not fished in the last 15 years. I have, however, witnessed the reductions imposed on the sport fishing halibut charter businesses. I also lived in Kodiak from 1987 to 1992 and have witnessed the decimation that the trawler industry does to the fish resources. The by catch for the trawlers has not been reviewed or adjusted since 1986 and 1993. For one of the trawler fisherman to state that losing 20% of his production per tow because of his use of halibut excluders was unacceptable is shocking to me. The small commercial fisherman and sport fisherman deserve to be considered and recognized. Please begin to hold the trawl fleet accountable.

Donna White
12800 Stephenson Street
Anchorage, AK. 99515

Reduce by catch

Subject: Reduce by catch

From: Carol Paulsen <paulsen426@att.net>

Date: 5/23/2012 12:46 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Please support the proposal to
reduce bycatch by fifteen per cent
We need to limit halibut waste.
Thank you. Carol Paulsen
Sterling Alaska

Sent from my iPhone

Subject: June meeting agenda item C-1(b) comments and inputs
From: John Baker <info@afishunt.com>
Date: 5/23/2012 11:05 AM
To: npfmc.comments@noaa.gov

Please accept the following as my input for the June meeting agenda item C-1(b) reference halibut bycatch issue:

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska, agenda item C-1 (b)

Dear Chairman Olson and members of the Council,

My name is John Baker have been a charter operator in area 3A for 20 years. As a halibut fisherman, I depend on a healthy halibut resource. Commercial harvesters, charter operators, sport fishermen, processors, coastal residents and stakeholders are all united in this effort to ask the Council to take final action to reduce halibut bycatch in the Gulf of Alaska. Coastal Alaskans are dependent on halibut for food, sport, and livelihood.

The halibut bycatch limit was set in 1989 and has remained relatively unchanged since then. It is time for that to change and reflect the urgency needed to protect the resource. I urge the Council to adopt a 15% reduction in halibut bycatch at the June 2012 meeting and mandate all monitoring necessary to insure the cuts are made.

John G. Baker, Lt Col, USAF(ret), Sharon R. Baker
Afishunt Charters & Alaskan Angler RV Resort
PO Box 39388
Ninilchik Ak 99639
800-347-4114, 907-567-3393
www.afishunt.com
www.alaskabestrvpark.com
info@afishunt.com

Subject: Halibut

From: Lee Woodard II <rscamaro572@gmail.com>

Date: 5/24/2012 3:00 PM

To: npfmc.comments@noaa.gov

I am Lee Woodard owner of the Leslie Lee and Pacific Storm, two trawlers that operate in the G.O.A. I would only ask that the council and all those involved consider how valuable each pound of Halibut by-catch is when used to harvest tons of groundfish. Also, if the halibut that are caught in the trawl fishery were utilized instead of forced to be discarded, then it would remedy to a large extent, the fishery for Halibut. Thank you so much, Lee L. Woodard II

Reduce the Gulf of Alaska halibut bycatch cap

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: LORIN CLIFFORD <TIMEMGMT@MTAONLINE.NET>
Date: 5/25/2012 8:54 AM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

Sincerely,

LORIN CLIFFORD
H.B.
PALMER, AK 99645

Subject: Halibut PSC By-Catch, reduce 15%
From: Kruzof <kruzof@ak.net>
Date: 5/25/2012 10:31 AM
To: npfmc.comments@noaa.gov
CC: cora.campbell@alaska.gov, governor@alaska.gov

Dear Council members,

As a Commercial setline fisher of Halibut for 30 years I ask council to please consider reducing the prohibited species catch limit by the trawl sector.

Given the halibut bycatch limit was set in 1989 and has remained relatively unchanged, we urge the Council to adopt a 15% reduction to help protect and conserve the halibut resource for the benefit of halibut quota share holders, crewmembers, processors, charter operators, sport harvesters, subsistence users, and coastal Alaskans that depend on halibut for food, sport and livelihood.

Thank You,

Jim Hubbard
F/V Kruzof

Subject: FW: Trawl halibut bycatch
From: Gary Mulligan <gpfishagan@hotmail.com>
Date: 5/25/2012 3:11 PM
To: <npfmc.comments@noaa.gov>

From: gpfishagan@hotmail.com
To: npfmc.coments@noaa.gov
Subject: FW: Trawl halibut bycatch
Date: Fri, 25 May 2012 16:08:01 -0700

From: gpfishagan@hotmail.com
To: npfmc.coments@noaa.gov
Subject: Trawl halibut bycatch
Date: Mon, 14 May 2012 06:45:38 -0700

Dear Eric Olson, As an active halibut IFQ holder and fisherman, I implore the NPFMC to take strong action to curb the trawl bycatch by at least 15%. My position is that this is not nearly enough given the reduced halibut biomass and the reductions in catch required of the commercial halibut fleet. This issue of waste by the trawl fleet must be addressed. Please do what is right. Put the resource first! Thank You, Gary Mulligan F/V Phyllis Ann

Subject: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska, agenda item C-1 (b)
From: Margie Bezona <Margie.Bezona@kanaweb.org>
Date: 5/25/2012 4:37 PM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>
CC: KANA Board of Directors <KANABoardofDirectors@kanaweb.org>, Andy Teuber <Andy.Teuber@kanaweb.org>

Good afternoon:

The Kodiak Area Native Association is urging the North Pacific Fishery Management Council to adopt a 15% reduction in halibut bycatch at the June 2012 meeting. Please see the attached letter concerning the Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska, agenda item C-1(b).

Please let me know if you have any questions.

Thank you,
Margie Bezona
Senior Vice President of Administration
Kodiak Area Native Association
907-486-9816

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— Attachments: —

Halibut Prohibited Species Catch (PSC) Limits.pdf

35.8 KB

Subject: Reduce halibut bycatch

From: "Bill & Sharon Young" <youngak@acsalaska.net>

Date: 5/25/2012 5:45 PM

To: <npfmc.comments@noaa.gov>

We are 18-year Alaska residents and sports fishers; we support a reduction in halibut bycatch.

Thank you.

William and Sharon Young
3547 Ida Lane
Fairbanks AK 99709

Kodiak Area Native Association



3449 Rezanof Dr. East
Kodiak, Alaska 99615
Phone (907) 486-9800

May 25, 2012

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

**Re: Halibut Prohibited Species Catch (PSC) Limits
in the Gulf of Alaska, agenda item C-1 (b)**

Dear Chairman Olson and Members of the Council,

Kodiak Area Native Association was formed in 1966 as a 501(c) (3) non-profit corporation to provide health and social services for the Alaska Natives of the Koniag region. The KANA service area includes the City of Kodiak and its connecting road system along with the six remote villages of Akhiok, Karluk, Larsen Bay, Old Harbor, Ouzinkie and Port Lions which encompass the ten federally recognized tribes of Kodiak Island.

The Alaska Native residents of Kodiak Island rely on a healthy halibut resource. Commercial harvesters, charter operators, Tribes, sport fishermen, processors, coastal residents and stakeholders have come together to ask the Council to take final action to reduce halibut bycatch in the Gulf of Alaska. Alaska Natives are dependent on halibut for subsistence and livelihood and we urge the Council to adopt a 15% reduction in halibut bycatch at the June 2012 meeting.

Halibut stocks and catch limits in the Gulf of Alaska have declined significantly over the past decade. Exploitable halibut biomass has dropped 58% in the Gulf of Alaska over the past decade with the catch limits for the directed halibut fisheries declining significantly (by 70% in Area 2C, 47% in Area 3A and 70% in Area 3B). The Gulf of Alaska charter fleet has also experienced substantial reductions in catch limits.

The 1,113 Area 2C quota share holders, 1,420 Area 3A quota share holders, 490 Area 3B quota share holders, 274 individual charter permit holders in Area 2C, 317 individual charter permit holders in Area 3A, and countless sport and subsistence halibut harvesters stand united to protect the halibut resource and ensure that each sector is held responsible for the health of the resource. Given the halibut bycatch limit was set in 1989 and has remained relatively unchanged, we urge the Council to adopt a 15% reduction to help protect and conserve the halibut resource for the benefit of halibut quota share holders, crewmembers, processors, charter operators, sport harvesters, subsistence users, and coastal Alaskans that depend on halibut for food, sport and livelihood.

Respectfully,

A handwritten signature in black ink, appearing to read "Loretta Nelson". The signature is fluid and cursive, with a long horizontal line extending to the right.

Loretta Nelson

Chairperson

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: "John D. Bennett" <hydrojohn@gmail.com>
Date: 5/26/2012 8:33 AM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

As an Alaskan, who fishes halibut for my family's consumption, I strongly support reductions in the Gulf of Alaska halibut bycatch.

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

John D. Bennett
1479 Farmers Loop Road
Fairbanks, AK 99709

15% reduction!

Subject: 15% reduction!

From: "keefen@students.wvu.edu" <keefen@students.wvu.edu>

Date: 5/26/2012 11:43 AM

To: <npfmc.comments@noaa.gov>

As a foodservice employee for the last six years and a student at WWU in Bellingham I see the end result and have studied the effects of commercial fishing. I must not only urge, but demand a 15% reduction in ground fish bycatch limits in the gulf of Alaska.

With the worlds fisheries diminishing and new diseases plaguing fish in ever warming waters a 15% reduction is the least we can do to save our oceans, fisheries, and create a heritidge of sustainability.

Nicholas Ian Keefe
Operations Coordinator WWU
KUGS-FM Bellingham
Sent with Verizon Mobile Email

Subject: Halibut Prohibited Species Catch (PSC) Limits in the GOA,agenda item c-1 (b)

From: Jetta Budd <tjbudd@alaska.com>

Date: 5/26/2012 1:39 PM

To: npfmc.comments@noaa.gov

Mr. Eric Olsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave., Suite 306
Anchorage, AK 99501

Dear Chairman Olsen and members of the Council,

My name is Tom Budd. I have been a halibut fisherman in the GOA for more than 30 years. It made a huge difference when the original Magnuson Act was invoked on the halibut stocks. In short order there were more fish. It seems that much of the foreign trawl fleet was displaced by our own domestic fleet. This was a good thing, but, the problem of bycatch still remains a thorn in the side of halibut stock recruitment and abundance. Although trawlers do not operate in SE Alaska they do operate in the western gulf and Bering Sea. Science has shown that halibut migrate and therefore the excessive bycatch to the west of me affects all users of halibut from Seattle to Nome. Please support a 15 % reduction in the trawl bycatch of halibut.

Respectfully,
Tom Budd
F/V Lady Brijet
1718 Edgecumbe Dr.
Sitka, AK 99835

Subject: Re: Agenda Item C-1 (b) GOA Halibut PSC

From: Pete Wedin <pete@captpete.com>

Date: 5/26/2012 10:05 PM

To: npfmc.comments@noaa.gov

Dear Chairman Olsen and Members of the Council:

I run a small charter business in Homer, AK and have for years followed the deliberations of the North Pacific Fisheries Management Council as it pertains to my business and the halibut fishery that supports us. We have been involved in many contentious issues and for the most part, I have been happy with how the Council has responded to the needs of the all of the small-boat fishing interests in the Gulf of Alaska. One deficiency that stands out in these 20+ years of following these proceedings is the lack of action in the halibut bycatch issue.

The Magnuson-Stevens Act mandates bycatch reductions and yet amidst heavy reductions in halibut quota shares for IFQ holders in the commercial fishery and both threatened and enforced charter limit reductions in area 2-C and 3-A, we have seen no action on trawl bycatch levels of the "prohibited species cap" in the GOA. This is frustrating, when one group of "users" is unrestricted and all others suffer.

There are many factors that may account for the drop in halibut abundance, but it seems only fair that everyone should be held accountable for the health of the resource. It is only fair and equitable that the trawl fleet halibut bycatch cap be reduced at this time.

Many of us have watched the biomass shrink over the years. Sure, there are lots of halibut, but the numbers don't fill the fish box or fish hold. The vast majority of these fish are undersize and need to have a chance to reach marketable size. It is hard to imagine this happening when the trawl fleet is wasting more than the recreational fleet harvests each year.

None of us will change our behavior if no one says we have to. I ask you to do the right thing and reduce the cap on bycatch by 15% and give this a chance to turn this downward trend around. You can always adjust this plan later if it does not seem to be the right thing, but please, go with the precautionary principle and do the right thing. Vote today to reduce bycatch by 15%.

Thank you!

Pete Wedin
Capt. Pete's Alaskan Experience
P.O. Box 3353
Homer, AK 99603
907-235-2911

--

Pete Wedin
Capt. Pete's Alaska
P.O. Box 3353
Homer, AK 99603
907-235-2911

Subject: Trawler Bycatch
From: Erik Bahnsen <atlthiker@hotmail.com>
Date: 5/27/2012 10:37 AM
To: <npfmc.comments@noaa.gov>

Hello,

I'm righting in regards to Trawler bycatch in The Gulf Of Alaska. I'm a charter captain in Sitka,AK, and also a halibut and blackcod longline fisherman. I'm concerned with the recent reductions to quota in both the sport and commercial halibut fisheries. While we have been cut 60% commercially and 34% in the charter sector the trawl fleet keeps dragging along. There bycatch numbers have not been cut since 1989. The council should reduce halibut bycatch in the Trawl fleet by at least 15%.

Thanks

Erik Bahnsen

Subject: fishing
From: Zak Vickstrom <zvickstrom@hotmail.com>
Date: 5/27/2012 11:31 AM
To: <npfmc.comments@noaa.gov>

Mr. Olsen and council members,

As a career fisherman and local to Kodiak Island, I have had a chance to observe the different fisheries and have insight on their many perspectives. No fishery is clean. With luck and a skilled skipper each gear type operates quite efficiently with minimal bycatch. Unfortunately not all skippers are as skilled, Murphy's Law trumps situation continually, and species not intended are caught. With longlining, siening, or pot fishing the bycatch stays minimal with a good survival rate on most released fish but if a trawler makes a mistake the outcome is not so good. I was once employed by a trawler and worked through such an outcome, a bad tow was not worth the money. The boat I was on was a good boat with a professional skipper and although we were lucky with the midwater net the bottom net destroyed. To make a little money from the sole fishery we repeatedly scooped up tens of thousands of baby halibut. I don't think that any more than fifty percent of the released survive and grow to be big fish. That boat was equipped with gear from the ninety's which had one hundred and eighty feet for the maximum spread, or width of the net. The draggers of today pull nets with a minimum of seven hundred feet of width. I don't want to think about what a bad tow does for them. Not only should the bycatch allowance be reduced as much as possible the size limitations for boat and net that should have been implemented in the eighty's should be put into effect. I don't believe your council has the power to defy any capital gained by the state, therefore I expect the same trend to follow through such as the east coast. Hopefully the financial perspective can be worked around and a local fishery and subsistence lifestyle can be preserved for future generations. My name is Zachary Lloyd and I am currently a long liner. My fellow constituents and I thank you for your attempt in this matter, and hope that this letter can be of help.

North Pacific Fisheries Management Council
209th Plenary Session Comment

May 27, 2012

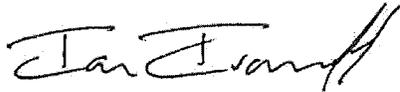
Ian Ivanoff
Fisherman
Comment: ITEM C-1 Halibut By Catch

As a fisherman and an observer of the data I insist that the council implement Option 2 Suboption 2C and Suboption 3C, fifteen percent reductions in the PSC for hook & line and trawl fisheries. In recent years, the halibut biomass in the GOA has decreased significantly in both quantity and size, and is trending towards a collapse. During the same time period of the decline in the halibut biomass no material action has been taken by the council to align the bycatch quantities with the condition of the halibut biomass. Under the current PSC limits, every year 5 million pounds of halibut is allowed to be discarded as waste, which the data shows to be negatively impacting the halibut biomass. Lowering the PSC limit is essential in recovering the halibut biomass, and is the only effective means to modify fishing activities to minimize halibut bycatch. As described in the EA/RIR/IRF analysis the current PSC avoidance efforts are inconsistent, under utilized, and not fully effective.

The regulatory impacts of the proposed PSC limit reductions should carry minimal weight in the council decision to reduce PSC limits. The revenue impacts presented in the EA/RIF/IRF analysis are approximations and inconsistent, and should be considered as such in the council's decision. The revenue loss presented in the analysis for the hook & line and trawl fisheries uses historical data to calculate the revenue losses that would have occurred in the past. However, the revenue loss calculation does not consider all of the variables of the fisheries.

For example, the calculations do not take into account that the fisheries avoidance efforts would have increased when faced with a closure due to lower PSC limits. Lower PSC limit would have forced improved halibut avoidance, and the majority of the target species still would have been caught. On the other hand, a model is used to project future gains for the direct halibut fisheries taking into account a number of variables, which lead to a low revenue gain. For example, in the analysis a 496,000 pound reduction in trawl PSC limit is calculated to only provide a gain in the IFQ halibut fishery of 310,100 pounds (38% of the gains disappear). The revenue loss and gain analysis used to determine the regulatory impacts are inconsistent, and when re-examined the losses and gains should be considered nearly equal. Furthermore, any theoretical regulatory impacts should hold little significance when compared to the known environmental impacts of not adjusting PSC limits.

Regards,

A handwritten signature in black ink, appearing to read "Ian Thompson". The signature is fluid and cursive, with a large initial "I" and "T".

Subject: Halibut bycatch in the GOA
From: steven ivanoff <stevenivanoff@hotmail.com>
Date: 5/27/2012 10:04 PM
To: <npfmc.comments@noaa.gov>

May 27, 2012

Dear Chairman Olson and members of the Council,

I am Steven Ivanoff and I am the owner/operator of the F/V Aleutian Belle. I am commenting on agenda item C-1(b).

I have fished halibut, cod, salmon, crab, pollock, shrimp, sea cucumbers and herring off Kodiak Island for 32 years. I received initial halibut and sablefish quota shares and have invested in more halibut quota shares in 3A and 3B. I am extremely concerned at the decline in my halibut catch limits, specifically 47% in 3A and 70% in 3B. I am paying for poundage that I don't have anymore. I believe it is time for the Council to take action on the trawl fleet bycatch limits. Specifically, **I urge the Council to adopt a 15% reduction in halibut bycatch at the June 2012 meeting. Also, I urge the Council to adopt 100% observer coverage on all trawl vessels.**

Thank you,

Steven Ivanoff

Subject: Halibut Trawl Bycatch

From: Brett Zaenglein <brettzaenglein@me.com>

Date: 5/28/2012 7:35 AM

To: npfmc.comments@noaa.gov

Chairman Olson,

As a commercial fisherman of 22 years I strongly support that the North Pacific Management Council votes to reduce the trawl bycatch by at least 15% at your next meeting. I also hope that the council will continue to vote for fair solutions that further reduce trawl bycatch of halibut, salmon, and crab in the immediate future.

Brett Zaenglein
Sitka

Subject: Halibut Bycatch!

From: Michael Patitucci <tuccilaroo@yahoo.com>

Date: 5/28/2012 12:06 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Dear Mr. Eric Olson, Chair North Pacific Fishery Management Council ,
My name is Michael A. Patitucci and I have been a Kodiak commercial halibut fishermen for 30 years. Halibut fishing has been a main supporter for my family. In the last two years the stocks have been severely cut back. I am extremely up set about how the drag fleet has been getting away with the systematic annihilation of the halibut stocks. The sad part is the bycatch that the trawlers do report has been so skewed between lack of observers on the boat, or on the back deck. How do I know this, because I worked on the back deck of a dragger for three winters. We only had an observer for a third of the time, which in reality is only one sixth of the time, (when the observer went to sleep the Captain went were ever he wanted). My Captain was a fifth generation dragger from the east coast. He made a comment to me years ago, "when they find a market for the arrow tooth flounders you can kiss your halibut fishery good by!" He was speaking from experience because that is what happened on the east coast.

We need 200 percent observer coverage. the boat needs to be penalized for how dirty they fish and rewarded for how clean they fish. Now it's just the opposite. The halibut bycatch needs to be at least 30 percent or more, it is the only way they can clean up there fishing operation. I urge you to please support sustainable fishing.

Sincerely,

Michael A. Patitucci

F/V Denise Marie, 46 Ft

PO BOX 1511 Kodiak, AK 99615

Subject: Halibut Prohibited Species Catch Limits, agenda item C-1(b)

From: Bob Martin <argonautbob@yahoo.com>

Date: 5/28/2012 12:23 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Dear Chairman Olson and members of the council,

My name is Bob Martin and I have been a commercial fisherman in Alaska since 1982. I have been involved in many fisheries but have spent most of my time in the Salmon, Pacific Cod and Halibut fisheries. Although I am not a direct stockholder in the halibut fishery(own no quota), I have been a crewman on many vessels and have seen my opportunities slip away with reduced catch limits to the directed halibut fishery. Fishermen are reducing crew sizes and consolidating their operations to counteract the reduced quotas.

As Halibut stocks and catch limits continue to decline I find myself asking the question, how can a particular gear group be allowed to continue to harvest and discard halibut (PROHIBITED SPECIES) at a rate that is now surpassing what is allowed in the directed fishery. It is my understanding that the trawl bycatch limits have not been adjusted since 1989 and the directed fishery catch limits are adjusted and modified on an annual basis.

All user groups, commercial, subsistence, charter and personal use as well as businesses in our communities benefit from healthy and thriving halibut resource. Each sector should be held accountable and asked to do their part in the conservation and the rebuilding of the halibut stocks.

I stand united with many and ask the council to reduce the halibut bycatch in the GOA by at least 15%!

Sincerely,
Bob Martin
F/V Soulmate
F/V Argonaut
P.O. Box 1867
Kodiak, AK. 99615

Subject: Halibut bycatch

From: luella.ak@juno.com

Date: 5/28/2012 4:02 PM

To: npfmc.comments@noaa.gov

CC: halibut@akmarine.org,timeevers@acsalaska.net,jodievers@acsalaska.net,
mstays@clearwire.net

I strongly support action to reduce halibut bycatch .

As a halibut sport fisherman I strongly support reductions in Gulf of Alaska halibut bycatch by Trawlers. Trawl bycatch caps have not been reduced since 1989. Bycatch now kills as many halibut, in numbers of fish, as are harvested in the commercial halibut fishery. This is a terrible waste and reduction of Halibut levels. Alaska's goal should be to keep all trawlers out of Alaska.

John W. Sutherland luella.ak@juno.com

Luella M. Sutherland

Subject: Halibut bycatch

From: "Margaret" <mikado@ptialaska.net>

Date: 5/28/2012 9:39 PM

To: <npfmc.comments@noaa.gov>

As a commercial fisherman for over 30 yrs , I am very concerned about the state of our oceans and fisheries. I'm sure you are aware of the harvestable quota of halibut decline over the last few years.and the decrease of commercial halibut fishermen and sport fishermen's quota. Evidently these quotas are reduced so that the halibut can rebuild and we can keep a sustainable fishery. So therefore why doesn't the trawl fleet share in a reduction of their halibut bycatch. The trawl fleet catches harvestable size halibut also not just small fish. They are participating in the reduction of harvestable and breeding size halibut and should participate in lowering their quota also. NPFMC is responsible for making the rules regarding trawl bycatch, you've tried doing nothing for 25 yrs while the halibut commission has reduced the other halibut participants considerably, and the harvestable quota is still dropping. Doing nothing hasn't worked so why not try doing something 15% reduction means 661,380 lbs which still means they get to throw away 3.7millionlbs. Some advocates say they need more science,some say more observer coverage, others say better escape panels for halibut,yet others say they need no change in the bycatch so they can carry on a sustainable trawl fishery.

What about the sustainable halibut fishery? Yes we can stall on this decision for a few more years and soon the halibut by catch rate will drop , but hopefully thats not what anyone wants. The only way a reduction will happen now is if you make the rule then it will be followed . I respectfully encourage you to reduce the bycatch by 15%,and if you don't maybe you could give us your reason why so we could understand your line of thinking. A 15% reduction is about the least radical rule you'll ever make.The halibut fleet and sport fleet have adapted to 50%plus reductions the trawl and longline fleet can do the same.

Respectfully, Pete Hannah

Subject: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska, agenda item C-1 (b)
From: "Tim Evers" <timevers@acsalaska.net>
Date: 5/28/2012 6:57 PM
To: "NPFMC EMAIL Comments" <npfmc.comments@noaa.gov>

Mr. Eric Olson, Chair North Pacific Fishery Management Council

605 West 4th Avenue, Suite 306

Anchorage, AK 9950

npfmc.comments@noaa.gov

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska, agenda item C-1 (b)

Dear Chairman Olson and members of the Council,

My name is Tim Evers, my wife and I have owned a small halibut charter business in Ninilchik, Alaska for 30 years. We have been blessed in the past with a healthy halibut resource. Commercial harvesters, charter operators, sport fishermen, processors, coastal residents and stakeholders have all come together to ask the Council to take final action to reduce halibut bycatch in the Gulf of Alaska. Coastal Alaskans are dependent on halibut for food, sport, and livelihood and I urge the Council to adopt a 15% reduction in halibut bycatch at the June 2012 meeting.

Halibut stocks and catch limits in the Gulf of Alaska have declined significantly over the past decade. Exploitable halibut biomass has dropped 58% in the Gulf of Alaska over the past decade with the catch limits for the directed halibut fisheries declining significantly (by 70% in 2C, 47% in 3A and 70% in 3B). The Gulf of Alaska charter fleet has also experienced substantial reductions in catch limits.

Commercial halibut quota share holders, charter fishing businesses and countless sport and subsistence halibut harvesters stand united to protect the halibut resource and ensure that each sector is held responsible for the health of the resource. Given the halibut bycatch limit was set in 1989 and has remained relatively unchanged, I urge the Council to adopt a 15% reduction to help protect and conserve the halibut resource for the benefit of halibut quota share holders, crewmembers, processors, charter operators, sport harvesters, subsistence users, and coastal Alaskans that depend on halibut for food, sport and livelihood.

Sincerely,

Tim Evers

Deep Creek Sport Shop

PO Box 39547

Ninilchik, Alaska 99639

Tim Evers <timevers@acsalaska.net>

owner/operator

Fishward Bound Adventures

May 28, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

**Re: Halibut Prohibited Species Catch (PSC) Limits
in the Gulf of Alaska, agenda item C-1 (b)**

Dear Chairman Olson and Members of the Council,

My name is Michael Hansen and I have been commercial fishing in Alaska for 59 years. As a halibut fisherman, I depend on a healthy halibut resource. Commercial harvesters, charter operators, sport fishermen, processors, coastal residents and stakeholders have all come together to ask the Council to take final action to reduce halibut bycatch in the Gulf of Alaska. Coastal Alaskans are dependent on halibut for food, sport, and livelihood and we urge the Council to adopt a 15% reduction in halibut bycatch at the June 2012 meeting.

Halibut stocks and catch limits in the Gulf of Alaska have declined significantly over the past decade. Exploitable halibut biomass has dropped 58% in the Gulf of Alaska over the past decade with the catch limits for the directed halibut fisheries declining significantly (by 70% in 2C, 47% in 3A and 70% in 3B). The Gulf of Alaska charter fleet has also experienced substantial reductions in catch limits.

The 1,113 area 2C quota share holders, 1,420 area 3A quota share holders, 490 area 3B quota share holders, 274 individual charter permit holders in area 2C, 317 individual charter permit holders in area 3A, and countless sport and subsistence halibut harvesters stand united to protect the halibut resource and ensure that each sector is held responsible for the health of the resource. Given the halibut bycatch limit was set in 1989 and has remained relatively unchanged, we urge the Council to adopt a 15% reduction to help protect and conserve the halibut resource for the benefit of halibut quota share holders, crewmembers, processors, charter operators, sport harvesters, subsistence users, and coastal Alaskans that depend on halibut for food, sport and livelihood.

Sincerely,

/s/ Michael R. Hansen

Michael R. Hansen
F/V Contender

PO Box 822
Kodiak, AK 99615

Subject: Council letter, halibut bycatch
From: "Tom" <tomevich@comcast.net>
Date: 5/29/2012 6:48 AM
To: <npfmc.comments@noaa.gov>

Tom Evich
F/V Karen Evich
2051 North Shore Rd.
Bellingham, WA 98226
Cell (360) 201-0486
Fax (360) 393-4681

May 29, 2012

Chairman Eric Olsen
North Pacific Management Council
605 4th Ave. Suite 306
Anchorage, AK 99501-225

Dear Chairman Olsen,

I own and operate a 58' fishing vessel that trawls for Cod and Pollock in the Western Gulf, and some times in the Central Gulf, and has been doing so since 1989. In that time I have observed the Halibut fishery go from being an over capitalized derby, to being rationalized, to then becoming extremely lucrative with huge prices and big quotas. Now the fishery is experiencing some difficulty. So what does the Halibut fleet do? Look for a scapegoat, of course. You would think that I/we would be use to this by now. In years past the Halibut fleet was doing just fine, and at times I remember the trawlers being closed early for by-catch. What is most frustrating to me is the order in which this Council has chosen to deal with the "problem".

First, in all reality the Western Gulf has not been an observed fishery. The trawl fleet is made up of, almost entirely, of under sixty foot vessels. I acknowledge that while bottom trawling for Cod I do catch some Halibut, but how much? I don't have a clue. This next winter we will have some observer coverage. Why not wait until you have some hard numbers before potentially costing the trawl fleet, processors and communities a lot of money. I am certain that I don't have to explain that a pound of Halibut does have value as by-catch for the trawl fleet. I believe that the Halibut fishery is the most studied fishery in the North Pacific. I have not read anything that suggests a smoking gun in the hands of the trawl fleet. It is also my understanding that the recruitment is huge, and I agree. From what I

witnessed this past winter there is an extremely healthy population of young Halibut. They are not making it to maturity. How do you blame a trawler for that? I have always been told that we are indiscriminate killers, but how is it possible that we destroy the large fish, but leave a lot of small ones in the water? I have problems with an observer coming on my boat next winter. I am not worried about what they will see when I haul back. I already know what they are going to see. What I don't want the extra person, in the way, on a small boat. But, I have listened to several long-liners that are terrified of what an observer is going to see coming over the rail. Remember, there is no fishery without sin.

Second, it is next to impossible to control by-catch while "racing for fish". I hope this Council is as tired of reading that statement as I am in writing it. I am in the process of buying a Halibut excluder. But, what if none of the other trawlers in the Western Gulf do the same? I hope that I am wrong, but at this point, I do not hear of a lot of boats, in my area, buying salmon excluders for the fall Pollock season. So I make the investment to control my by-catch, whether it be Salmon or Halibut, and if others don't do the same, and the targeted fishery is closed early, I am being punished for the actions, or lack there of, of others.

Right now in the Western Gulf there are no processors that buy flat fish. I am worried that some time in the future, if market conditions change and there is an opportunity to harvest flatfish, we may not be able to take advantage of it if we have a too small, fixed Halibut cap.

I would like to ask that you leave the Halibut by-catch quota where it is now until you get more information, which will be coming soon. At least then decisions can be made based on fact rather than emotion and political pressure.

Sincerely,

Tom Evich
Owner/Operator
F/V Karen Evich

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska, agenda item C-1 (b)

Dear Chairman Olson and members of the Council,

As a commercial halibut fisherman, my livelihood is dependent on the halibut resource. Commercial harvesters, sport fishermen, processors, coastal residents and stakeholders have all come together to ask the Council to take final action to reduce halibut bycatch in the Gulf of Alaska. Coastal Alaskans are dependent on halibut for food, sport, and livelihood and we urge the Council to adopt a 15% reduction in halibut bycatch at the June 2012 meeting.

Halibut stocks and catch limits in the Gulf of Alaska have declined significantly over the past decade. Exploitable halibut biomass has dropped 58% in the Gulf of Alaska over the past decade with the catch limits for the directed halibut fisheries declining significantly (by 70% in 2C, 47% in 3A and 70% in 3B) and the Gulf of Alaska charter fleet has also seen substantial reductions in catch limits.

Given the halibut bycatch limit was set in 1989 and has remained relatively unchanged, we urge the Council to adopt a 15% reduction to help protect and conserve the halibut resource for the benefit of halibut quota share holders, crewmembers, processors, charter operators, sport harvesters, subsistence users, and coastal Alaskans that depend on halibut for food, sport and livelihood.

Sincerely,
Jerry Lundli
F/V Tempest
17746 15th AVE NW
Shoreline WA, 98177



Cordova District Fishermen United
PO Box 939 | 509 First Street | Cordova, AK 99574
phone: (907) 424 3447 | fax: (907) 424 3430
web: www.cdfu.org | email: cdfu@ak.net

May 28, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska, agenda item C-1 (b)

Dear Chairman Olson and Council members:

I am writing on behalf of the members of the Groundfish Division of Cordova District Fishermen United (CDFU), to strongly urge the Council move to adopt a 15% reduction of halibut PSC for the Gulf of Alaska trawl and hook and line fisheries.

As one of Alaska's oldest organizations, CDFU represents the interests of over 800 fishing families in Prince William Sound and the Gulf of Alaska. We have a long tradition of constructive and successful involvement in fisheries policy arenas supporting sustainable fishing practices, fisheries research, and the economic stability of Alaska's coastal communities.

Halibut stocks and catch limits in the Gulf of Alaska have declined significantly over the past decade. Exploitable halibut biomass has dropped 58% in the Gulf of Alaska over the past decade with the catch limits for the directed longline fisheries in the Gulf seeing significant reductions in recent years, about 50% in Area 3A, and are bearing the burden of conserving the halibut resource.

Given the halibut bycatch limit was set in 1989 and has remained relatively unchanged, we urge the Council to adopt the 15% reduction to help protect and conserve the halibut resource for the benefit of all user groups that depend on the resource for food, sport and livelihood.

Thank you,

Robert Beedle
CDFU, Groundfish Div. Chairman

Mike Simpson
CDFU, Groundfish Div. Chairman

Charles E Wilber cwilber@gci.net

Mr Eric Olson, Chair North Pacific Fishery Management Council

605 West 4th Avenue, Suite 306

Anchorage, AK 99501

npfmc.comments@noaa.gov

**Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska,
agenda item C-1 (b)**

Dear Chairman Olson and members of the Council,

My name is Charlie Wilber. I have been fishing Halibut commercially for the past 25 years out of my home in Sitka. I am extremely frustrated by the current state of affairs with the Halibut bycatch of the trawl fishery. Due to a declining Halibut biomass my IFQ limit of Halibut has declined 70% in area 2C since 1996. Longliners and charter fishermen have taken big cuts, but the trawl fleet continues to waste the same amount of Halibut they were allowed to discard when the stocks were healthier. The trawl fleet now wastes more halibut than the entire 2C allocation. I would like to see the trawl bycatch drop 58%, which is proportional to the drop in the exploitable biomass. What has happened to the concept of **share the pain to share the gain** so often discussed at the Council.

I propose that the trawl fleet take stairstepping 15% cuts every year for the next four years. The trawl fleet says they can't rapidly respond to these kinds of cuts. Don't underestimate the ability of fishermen to respond to economic challenges! Longliners have already had to adapt to difficult quota reductions in order to maintain the health and sustainability of the Halibut fishery.

The 1,113 2C quota share holders, 1,420 3A quota share holders, 490 3B quota share holders, 274 individual charter permit holders in 2C, 317 individual charter permit holders in 3A, and countless sport and subsistence halibut harvesters stand united to protect the halibut resource and ensure that each sector is held responsible for the health of the resource. It's time for the Council to discount trawl financed lawyer rhetoric and take strong measures to maintain the Halibut resource for future of all generations.

Thanks for your consideration,

Charlie Wilber F/V Alexa K

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

Re: Agenda item C-1 (b) Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska

Dear Chairman Olson and members of the Council,

My name is Wendy Beck and I been fishing commercially in Alaska for over 30 years. Halibut is vital to our family and our community and I strongly urge the council to take action and adopt the 15 percent reduction in halibut bycatch at the June 2012 meeting.

Halibut stocks and catch limits have decreased significantly and the exploitable biomass that is available has declined by 58 percent over the past decade. Reducing bycatch is critical for the future of halibut and all its user groups. We can no longer accept the outrageous bycatch amounts and allow a few user groups to deplete a resource vital to a broad cross-section of stakeholders.

Now is the time for the Council to be proactive and adopt the highest reduction proposed at 15 percent, to protect and ensure that each user group is held accountable for the health of the resource.

Sincerely,
Wendy Beck
Eider Narrows Setnet Site
Box 2790
Kodiak, AK 99615

From: Walter Sargent <fvmajor@gmail.com>

Date: 5/29/2012 1:28 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Sent from my iPad

Begin forwarded

Public Comment of Walter Sargent, F/V Major & F/V Afognak Strait

North Pacific Fishery Management Council

209th Plenary Session — June 6-12, 2012 — Kodiak, AK

Submitted to npfmc.comments@noaa.gov — Tel: 907-271-2809 Fax: 907-271-2817

RE: C-1 HALIBUT BYCATCH & GOA HALIBUT PROHIBITED SPECIES CATCH

Secretary John Bryson, Governor Sean Parnell, Chairman Olson & Council members:

I reside on Kodiak Island and have fished the directed commercial halibut fishery for 30 years. Halibut PSC limits in the groundfisheries should be cut back at the very least by 15% for the hook and line CP sector and for Trawl gear (suboptions 1-c and 3-c). I've taken over a 60% cutback in halibut catch pounds in one area, and over 50% in another during recent years.

I'd prefer a 50% Halibut PSC limit reduction for Trawl gear to more equitably share the economic burdens imposed by allowing excessive bycatch waste. The applicable "objectives" for all fisheries impacting halibut stocks should not be governed principally by groundfish FMP objectives. Since halibut is not an MSA species, there's no corresponding Halibut FMP with primary objectives to apply.

But there is a means to reconcile this decision-making quandary, and that is by correctly frameworking the overall concern as conservation. That means not buying into trawler allocation-based arguments that they need "another tool in the toolbox."

It means taking the Precautionary Approach, first; sharing the losses of diminished stocks. After all, these are PROHIBITED species catches. The International Pacific Halibut Commission is more direct to the point, calling such wastage what it is: bycatch mortality. Mortality of millions of pounds of halibut annually does serious harm to attaining a long-term Optimum Yield and to sustainability, as required by National Standard 1 of the Magnuson-Stevens Act.

The Council should not listen to unfounded, erroneous and misleading comments that there

is a record number of halibut on the grounds, so everything is alright. It is not being observed by the directed commercial halibut fleet who know these fishing grounds better than NOAA scientists, the trawlers, and many other self-acclaimed experts. The presence of a high number of smaller halibut is no excuse for a failure to cutback PROHIBITED species catches. Smaller fish on the grounds grow up to become bigger fish on a consumer's plate.

I also take issue with the Council's conjecture that there would be no significant economic gain to the directed halibut fisheries, while it outlines massive alleged harms to trawlers under PSC limit cutbacks. As well as the ludicrous idea that halibut are just killing halibut because there are too many, meaning it would be a good thing for trawlers to cull the crop with continued high mortality intervention. That's double hogwash, especially knowing the real value of fresh and fresh-frozen commercial, consumer-benefitting directed halibut fishing. This is not 1989, a time of lower ex-vessel and market prices.

Conservation responsibilities should be shared by all.

Sincerely,

Walter Sargent, F/V Major & F/V Afognak Strait

1830 Mission Road; Kodiak, AK 99615 — Tel: 907-486-3371

Stephen Taufen

GROUNDWELL FISHERIES MOVEMENT

<http://groundswellalaska.com/>

<NPFMC_PC_WalterSargent_HalibutPSC_June2012.docx>



May 29, 2012

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

Re: Agenda Item C-1(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 prohibited species catch (PSC or bycatch) limits in the Gulf of Alaska (GOA). We are happy to see that after over 20 years with largely no change to the halibut PSC limits the Council is taking up this important and timely issue. This issue has been long in coming: those who fish for and depend on the halibut resource have been asking the Council to reduce the PSC limit for years, and it is imperative as a matter of conservation and equity that the Council delays no further in reducing the halibut PSC limits. We therefore respectfully ask you to take final action at this meeting to reduce GOA halibut PSC limits by 15%.

I. Bycatch Has Direct Impacts On The Halibut Stock And Directed Halibut Fisheries

It is clear given currently available information that halibut bycatch in the groundfish fisheries has a direct and immediate effect on directed halibut fisheries, and a direct as well as long-term impact on the spawning biomass of the stock. The impact of bycatch on the CEY available to the directed fisheries is approximately one to one: every pound of bycatch taken in the groundfish fishery represents a loss in yield to the directed fishery of one pound.¹ In addition, every pound of bycatch in the trawl fishery reduces the female spawning biomass by approximately 2 pounds.²

While the impacts on the directed fishery pose significant equity issues (see below), the impacts on spawning biomass pose significant conservation concerns from a long-term perspective. The exploitable biomass of halibut has declined 58% in the past 10 years. Equally disturbing, total biomass has also declined in Gulf of Alaska IPHC management areas (See Appendix I). At the same time, little is known about the U32 fish which are critical to the future of the stock, and current models may be overestimating the number of these fish. These declines are alarming and, as yet, unexplained. In this environment of declines, the emphasis must be on rebuilding. The small fish

¹ Steven R. Hare et. al. Potential yield and female spawning biomass gains from proposed Pacific halibut prohibited species catch limit reductions in GOA groundfish fisheries. In North Pacific Fishery Management Council, Public Review Draft Environmental Assessment/Regulatory Impact Review/Initial Regulatory Assessment to Revise Halibut Prohibited Species Catch Limits, May 11, 2012, Appendix 5 at 45 [hereinafter EA/RIR/IRFA].

² *Id.* at 39.

which are the future of the spawning biomass are critical to the rebuilding potential of the stock. A significant portion of the trawl fleets removals are these same small fish and it is essential that removals of this critical component of the biomass is reduced.

II. Bycatch Limits Must Be Reduced As A Matter Of Equity

Halibut catch limits in the commercial fishery have declined with the stock— since 1986, the commercial catch limit for the GOA halibut fishery have been reduced 63%. And these declines in commercial catch limits are continuing. The 2012 IPHC adopted catch limits represent a decline of 18% from 2011 catch limits coastwide. Catch limits for the charter fishery in Area 2C have been reduced by over 50% (from two fish of any size to one fish of any size and then one fish less than 37 inches). Coastwide, total removals of halibut are at their lowest level since 1984.³

In the same time period in which GOA halibut fisheries have declined by 63%, PSC limits for the groundfish fisheries who catch these same halibut have not been significantly changed since they were implemented in 1986 (with the exception of hook and line fisheries whose limit was reduced in 1995).

This poses a significant equity issue: while commercial and charter fishers have made deep sacrifices to conserve the resource as the population diminishes, the groundfish fishery has been allowed to continue taking the same level of bycatch. Decreasing catch limits have had devastating impacts on halibut fishers. Drops in catch limits have put commercial fishermen in a situation where the value of their catch under the current quota is less than the loan payments they owe on their quota shares. Reductions in the catch limits in the charter fishery have also had significant economic impacts.

While the commercial and charter sectors have lived with these cuts as necessary to protect the resource, this is a bitter pill to swallow when these same users see the groundfish fisheries being allowed to catch the same amount of halibut as bycatch year after year.

This is not an issue of who is at fault—the causes of the declines in the total biomass and the exploitable biomass are not currently known—but rather that all sectors must do their part in rebuilding the resource. After over 20 years of the status quo, it is long past time that the impacts from the groundfish fisheries are reduced as well.

III. National Standard 9 Mandates That Bycatch Be Reduced

National Standard 9 charges the Council “to the extent practicable, (A) minimize bycatch and (B) to the extent bycatch cannot be avoided, minimize the mortality of such bycatch.”⁴ This action is focused on the former part of the standard, to minimize bycatch. On its face, it is difficult

³ EA/RIR/IRFA at 19.

⁴ Magnuson-Stevens Fishery Management and Conservation Act, 16 U.S.C. §1851(a)(9) (2011).

to believe that a bycatch limit set 20 years ago cannot be reduced. The Council is obligated under this standard to minimize bycatch. The Council is required under the provisions of National Standard 9 to weigh the benefits of bycatch reduction against the benefits to the nation. However, in considering the benefits to the nation the Council is specifically instructed to consider: “the net benefits to the Nation, which include, but are not limited to: Negative impacts on affected stocks...; incomes accruing to participants in fisheries that target the bycatch species; environmental consequences ... as well as recreational values.”⁵ The current level of halibut bycatch has negative impacts in all of these categories, diminishing incomes for those in the target halibut fisheries and having profound impacts on the future spawning biomass of the halibut biomass. Under these guidelines, the Council is required to reduce halibut bycatch.

It should be noted here that the current range of alternatives represents a relatively modest reduction. While directed fishery catch limits have been reduced by over 50%, the maximum bycatch reduction under consideration by the Council is 15%. We therefore interpret the range of alternatives itself as the Council’s acknowledgement of the balancing of the interests of the halibut stock and fishery and the groundfish fisheries. Fifteen percent therefore already represents a middle ground for reductions, and we urge the Council to select this alternative now, and to seek additional reductions in the future.

The requirement to minimize bycatch under National Standard 9 is limited to some degree by the phrase “to the extent practicable.” Industry has interpreted this phrase to mean “to the extent which is easily achievable, or doesn’t cost us money.” This interpretation is not only inherently wrong, but is simply not true in this specific case. Industry has many tools available to them, including halibut excluders, and management tools under sector splits.⁶ While any action to reduce bycatch has an associated cost, this is simply a cost of participating in a sustainable fishery. The argument that the fleet cannot use the tools available to them because it will reduce their target catch is at best specious, and at worst, offensive. A well-managed fishery should use every tool available to it, and we urge the Council to emphasize the importance of this principle by rejecting the argument that bycatch reductions are not practicable because they might require some degree of cost or effort from the fleet.

In addition, National Standard 9 is to be applied consistent with the other National Standards. Some argue that reducing halibut bycatch will be inconsistent with achieving optimum yield (OY) under National Standard 1. This is simply not the case: OY is not determined solely by the amount the target fishery can provide, but the greatest overall benefits to the Nation, which includes other factor such as recreational opportunities and the protection of marine ecosystems. In fact OY represents the fishery’s MSY, “as reduced by any relevant economic, social, or ecological factor.”⁷ OY thus explicitly recognizes that optimum yield may not be the full amount determined by MSY, but may be reduced to provide for other needs.

⁵ 50 CFR § 600.350(d)(2012).

⁶ EA/RIR/IRFA at 222-224

⁷ 50 CFR 600.310(e)(3)(i)(A)(2012)

IV. Impacts To The Groundfish Fishery Are Overstated In The EA/RIR And Impacts To The Halibut Stock And Fishery Are Understated And Should Not Be Used As A Basis For Decisionmaking

In examining this issue, it is critical that the Council does not view this as simply a matter of economic balancing of costs and benefits. The Regulatory Impact Review (RIR) presents extensive data on the costs to the groundfish fisheries and benefits to the halibut fishery. The analysis itself is very clear that these numbers cannot be compared:

No direct comparisons are made between potential revenue increases in the directed halibut fisheries and the projected gross revenue foregone in the groundfish fisheries, attributable to the proposed action. Those estimates were made using different methodologies and assumptions, and as such, *direct comparisons would be inappropriate and may generate misleading conclusions* [emphasis added].⁸

In fact, the current methodology used in the RIR presents a low estimate of benefits to halibut fisheries and a high estimate of costs to groundfish fisheries. This presents a skewed image of the relative costs and benefits to the action. It is unclear how this information can be utilized by the Council and the public, and at worst presents a severely misleading portrayal of the relative benefits of the action.

In particular, estimates of benefits to the commercial IFQ sector and charter sector are lower bound estimates, and in fact benefits to the halibut stock and to halibut fisheries may be significantly greater. The Environmental Assessment, in assessing impacts to the halibut fishery, does not take into account the increases in exploitable biomass which are realized by reducing bycatch of the U26 halibut: "Estimates for future years are not provided because growth rates would need to be applied to the U26" halibut and they would need to be added to the exploitable biomass when they reach exploitable size."⁹ In addition, migration is not factored into the benefits, therefore benefits are likely higher in some areas such as 2C and lower in other areas. If the information in the RIR is to be utilized in Council-decisionmaking this additional work should be done to show a more realistic approximation of the potential benefits to the halibut fisheries and halibut-dependent communities.

Estimates of costs to the groundfish fisheries, on the other hand, are likely high estimates. The analysis assumes in making these estimates that behavior will not change, and a lower PSC limit will simply shut the fishery down. In reality, when faced with a lower PSC limit fleets may be able to change behavior, and/or gear to avoid hitting the PSC limits, thereby minimizing the amount of revenue lost.

⁸ EA/RIR/IRFA at 197.

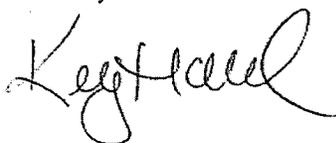
⁹ EA/RIR/IRFA at 167.

V. Recommendations

The halibut stock and fishery are in trouble. It is crucial for both conservation and equity that we reduce halibut PSC limits in the GOA groundfish fisheries immediately. To serve conservation needs, it essential that the halibut currently wasted as bycatch have an opportunity to mature and contribute to the spawning biomass. As a matter of equity, we cannot ask other user groups to keep taking huge hits in their catch limits while bycatch limits remain stagnant. We urge the Council to comply with National Standard 9 of the Magnuson-Stevens Act and continue its legacy of sustainable management by taking final action in June to reduce halibut PSC limits by 15%.

Thank you for your continued attention to this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Kelly Harrell". The signature is fluid and cursive, with the first name "Kelly" written in a larger, more prominent script than the last name "Harrell".

Kelly Harrell
Executive Director

cc: Governor Sean Parnell
Dr. Jane Lubchenco, NOAA Administrator
Senator Mark Begich
Senator Lisa Murkowski
Representative Don Young

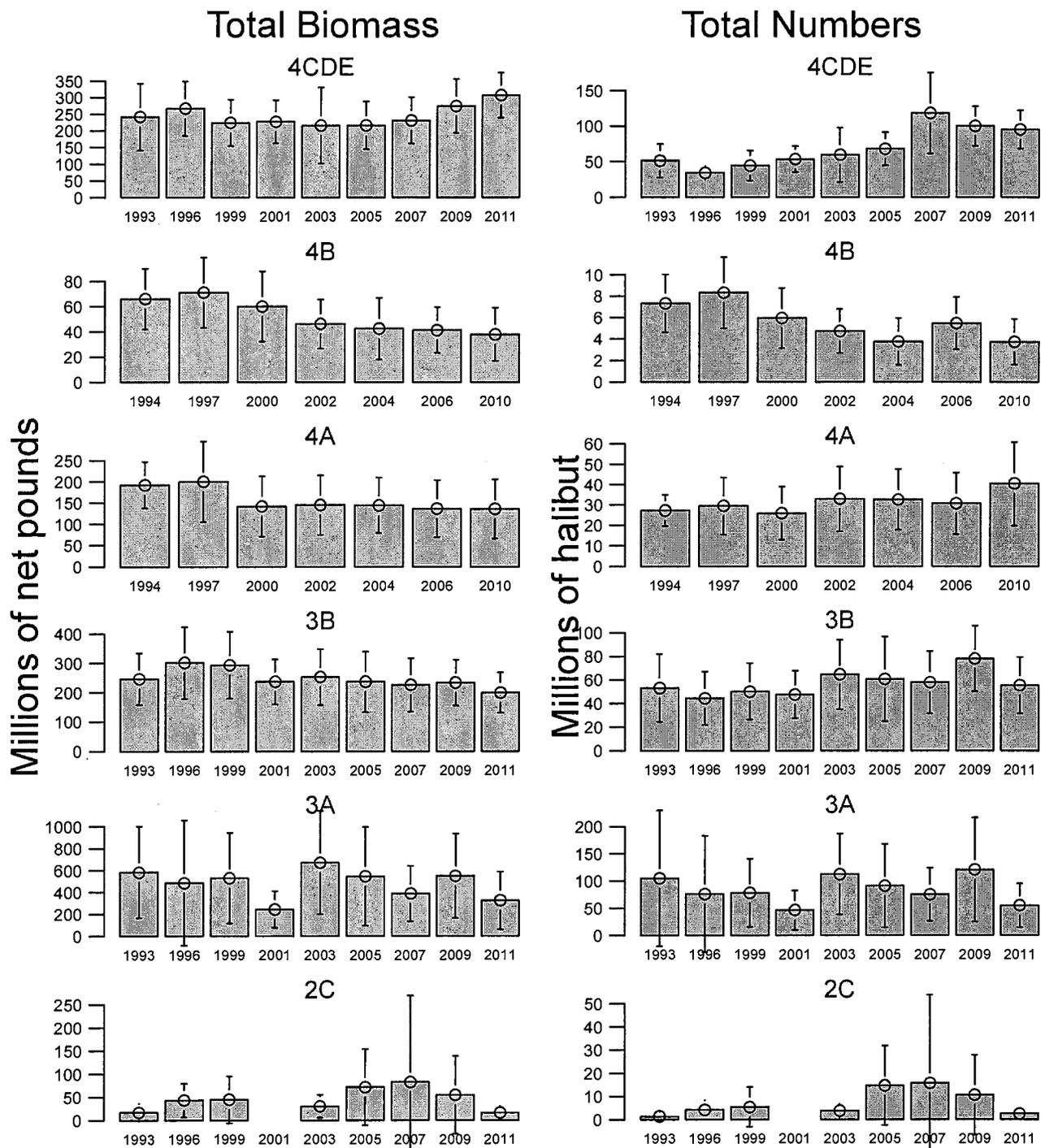


Figure 12. Swept area estimates of total biomass and total numbers of halibut in IPHC Areas 4CDE to 2C.



May 29, 2012

Submitted via Electronic Mail

Eric Olson, Chairman
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252
Fax: (907) 271-2817
npfmc.comments@noaa.gov

Re: Agenda Item C-1 Halibut Bycatch

Dear Mr. Olson:

Thank you for the opportunity to comment on the North Pacific Fishery Management Council (the Council) decision to proceed with a review of Pacific halibut prohibited species catch (PSC) limits for the groundfish fishery of the Gulf of Alaska (GOA). The Council is considering implementing PSC reductions that range from five to fifteen percent through an Amendment 95 to the Fishery Management Plan (FMP).

I submit the following comments on behalf of the Center for Biological Diversity (“the Center”). The Center is a nonprofit corporation with offices throughout the western United States, including Anchorage, Alaska. Its members and staff have researched, studied, observed and sought protection for marine habitat and numerous marine species. The Center promotes better regulation of industrial fisheries and primarily those fisheries that have the highest rate of bycatch. Fisheries with high bycatch rates can deplete marine species and have negative effects on the marine food chain.

Therefore, the Center supports the effort to consider reductions in GOA halibut PSC but submits that in light of the significant uncertainties regarding the overall halibut biomass, the Council should work with the National Marine Fisheries Service (NMFS) to develop a mechanism that provides for more stringent PSC reductions until there is a better understanding of the impacts of GOA removals. The proposed reduction levels do not correspond to the rate of decline of the exploitable biomass and the spawning biomass. The resource uncertainties range from the effects to juvenile migration, size at age and ocean acidification, to questions about the accuracy of existing observer data. Magnuson-Stevens Act (MSA) regulations specifically mandate that NMFS adhere to a precautionary approach when faced with scientific uncertainties.

The Magnuson-Stevens Act and the Precautionary Principle

In 1996, Congress amended the Magnuson-Stevens Act (MSA) with the Sustainable Fisheries Act (SFA), which added ecological concerns to the fishery management process. In particular, Congress added bycatch reduction provisions to stop the “inexcusable amount of waste” associated with bycatch and bycatch mortality in our nation’s fisheries.¹ National Standard 9 requires that “[c]onservation and management measures, shall, to the extent practicable, (A) minimize bycatch, and (B) to the extent bycatch cannot be avoided, minimize the mortality of such bycatch.”²

It is particularly important for the Council’s decision to reflect the adoption of a precautionary approach in the National Standard 9 implementing regulations.³ The regulations direct Councils to adhere to a precautionary approach when there is uncertainty regarding how a management measure relates to factors that range from population effects for the bycatch species to changes in the distribution of benefits and costs and social effects. The basic principle embodied in the precautionary approach lies in the recognition that scientific certainty often comes too late to design effective management responses to environmental changes.

The precautionary approach dictates a structured analysis of risk assessment and risk management. The risks associated with continued bycatch mortality levels are significant and there is considerable uncertainty about the impacts on spawning biomass. The precautionary approach then requires that policies manage risks so as to minimize serious or irreversible damage until further evidence is gathered that shows that current bycatch levels do not pose a significant risk of long-term damage to the halibut resource. In essence, the precautionary approach places the burden of proof on the Council to show that high levels of halibut bycatch are not a risk to the resource. The Center submits that the proposed bycatch reduction levels are not sufficient to meet this standard. The precautionary approach mandates reductions that are more responsive to the significant risks to the halibut resource. While the proposed 15 percent reductions are a start, the precautionary approach favors the development of a plan for further reductions in halibut PSC.

Scientific Uncertainties: the Council Should Consider More Conservative PSC Limits

The proposed Alternative 2 provides for an amendment to the GOA Groundfish Fishery Management Plan (FMP) that would establish a regulatory process to setting halibut PSC limits.⁴ Under Alternative 2, there are two options. Option 2 includes a sub-option that would reduce PSC in trawl fisheries between 5 and 15 percent.⁵

The Center supports the 15 percent reduction in the near-term but submits that Amendment 95 needs to include a plan to provide for more substantial trawl PSC reductions that respond to halibut biomass declines and uncertainties about long-term effects. The biological impacts of halibut PSC mortality include reduced yield due to reduced recruitment and mortality of adults, out of area or “downstream” impacts where halibut removals in one area reduce recruitment and yield in another area, and reduced spawning biomass and egg production.⁶ The Council should carefully consider uncertainties about the

¹ 142 Cong. Rec. S10810 (daily ed. September 18, 1996).

² 50 C.F.R. § 600.350(a).

³ 50 C.F.R. § 600.350(d)(3)(ii).

⁴ Public Review Draft, Environmental Assessment/Regulatory Impact review/Initial Regulatory Flexibility Analysis to Revise Halibut Prohibited Species Catch Limits (hereinafter EA/RIR/IFRA). Amendment 95 to the Gulf of Alaska Groundfish Fishery Management Plan, May 11, 2011.

⁵ *Id.*, Executive Summary at iii.

⁶ *Id.* at 62.

declines in the overall biomass, declining size at age, migration and changing ocean conditions in establishing its PSC limits.

First, the proposed PSC limits should reflect uncertainties about stock biomass and particularly the high levels of juvenile removals. Bycatch mortality in the trawl fisheries has consistently exceeded three million pounds in the GOA over the past decade.⁷ During this same time period, the International Pacific Halibut Commission (IPHC) has established increasingly conservative catch limits for directed fisheries. The statewide 2012 quota is roughly a third of the 2002 quota, indicating a dramatic decline in the harvestable biomass. The Area 2C directed fishery quota of 2.3 million pounds has declined by more than two-thirds since 2002 and is now less than the GOA trawl bycatch. Overall, the current biomass level for Area 2C is the lowest on record and 60 percent lower than the highest level.⁸ Area 3A in the GOA was once the most stable in terms of biomass, but there have been sharp declines in recent years with a continuing downward trend.⁹

These declines indicate significant uncertainty about the long-term effects of trawl bycatch on the spawning biomass. The loss of spawning biomass has become an increasingly significant issue over the past decade because of declining size at age.¹⁰ The environmental assessment (EA) acknowledges that “localized reductions of young female halibut can have potentially serious recruitment ramifications.”¹¹ Nearly three-fourths of the trawl removals (in terms of fish numbers) are less than 26 inches long.¹² According to participants at the April 2012 NPFMC/IPHC halibut bycatch workshop, the small juvenile halibut are the most uncertain and vulnerable portion of the stock.¹³ The establishment of conservative PSC limits would work as a buffer by ensuring that more juvenile females mature into the spawning biomass. According to IPHC scientists, “[i]ncreases in total female spawning biomass would be on the order of twice any trawl PSC reduction.”¹⁴ Sparing more of these fish from bycatch mortality thus creates a stronger buffer against the impacts of other resource uncertainties.

Second, another uncertainty pertains to ongoing studies of halibut migration. In general, juvenile and adult halibut migrate east and south—some for distances of up to 2,000 miles.¹⁵ Migration is not simply a harvest issue; it is relevant to the overall coastal distribution of the species. The GOA is the current center of halibut distribution.¹⁶ This means that GOA bycatch affects halibut distribution in other areas; however, scientists do not understand the full extent of the biomass redistribution and how it will change over time and vary depending on the age and size of the population.¹⁷ There are also uncertainties regarding whether the GOA and Bering Sea are separate stocks and whether there are spawning sub-stocks of varying productivity.¹⁸ Because Area 3A has a critical role in migration, it is important that the

⁷ Williams, G. 2011. Incidental catch and mortality of Pacific Halibut 1962 – 2011. Int. Pac. Halibut Comm. Report of assessment and Research Activities 2011: 381 - 398.

⁸ EA/RIR/IFRA at 59.

⁹ *Id.* at 60.

¹⁰ *Id.* at 62.

¹¹ *Id.* at 59.

¹² Hare et al. 2011. Potential yield and female spawning biomass gains from proposed Pacific halibut prohibited species catch limit reductions in Gulf of Alaska groundfish fisheries. Int. Pac. Halibut Comm. Report of assessment and Research Activities 2011: 233 - 254.

¹³ NPFMC IPHC Workshop on Halibut Bycatch Estimation, Halibut Growth and Migration, & Effects on Harvest Strategy. Meeting Summary. April 24-25, 2012.

¹⁴ Hare et al. 2011.

¹⁵ EA/RIR/IFRA at 18.

¹⁶ Hare et al. 2011. Potential yield and female spawning biomass gains from proposed Pacific halibut prohibited species catch limit reductions in Gulf of Alaska groundfish fisheries.

¹⁷ NPFMC IPHC Workshop. 2012.

¹⁸ Hare et al. 2011; EA/RIR/IFRA at 18.

Council consider uncertainties in downstream impacts and adopt conservative PSC limits to buffer against impacts to the coast-wide distribution of the resource.

The Center has significant concerns about the recent trend in depressed halibut growth rates.¹⁹ There has been a 70 percent decline in size at age over the past 30 years for female halibut in the GOA.²⁰ Scientists expect this trend to continue in the near future.²¹ The primary hypothesis is that the cause is a density dependent effect due to competition among halibut or between halibut and other flatfish that have a similar diet.²² There are uncertainties about how environmental effects such as temperature, ocean current changes and the marine food web relate to declining size at age.²³ In light of these uncertainties, again, a conservative PSC limit is a necessary buffer until further research can more clearly identify the roles of density dependence and other environmental factors in the decline.

Finally, the Center submits that climate change and ocean acidification effects warrant a precautionary approach to halibut PSC. Scientists at the recent halibut bycatch workshop pointed to climate influences on growth or size as a topic for further study.²⁴ The ocean's daily uptake of carbon dioxide has a significant effect on its chemistry and biology. Since the beginning of the industrial era, oceans have absorbed well over one billion tons of carbon dioxide, resulting in a measured decrease in ocean pH. One of the primary impacts is impairment of calcification – the process whereby corals, crabs and other animals make shells and skeletons. Many species at the basis of the marine food web are particularly vulnerable to ocean acidification. The implications of these changes are staggering for larger fish such as halibut. Scientists have identified a need for research into how acidification affects growth, fitness, reproduction, and food availability, and have noted particular concerns for particularly juvenile and larval stages.²⁵ Alaska's waters are particularly at risk to acidification because northern waters are acidifying at a faster rate.²⁶ There is little research into how ocean acidification affects larger species such as halibut.²⁷ It is very possible that larger climatic forces have a significant role in changes to the marine food web.

Therefore, the precautionary approach warrants conservative management measures to buffer against declines to the spawning biomass, migration effects, declines in size at age and the serious impacts of climate change and ocean acidification. The Council should carefully consider these factors in setting PSC limits and ensure that the current Amendment provides a plan for further reductions.

The Council Should Utilize a Precautionary Approach Because of the Absence of Accurate Data Regarding Trawl Halibut Removals

The Center also submits that the absence of accurate baseline data on trawl bycatch warrants a more restrictive management approach until there is a plan to gather accurate data through 100 percent

¹⁹ *Id.* at 16 (explaining the current rate is depressed to levels not seen since the 1980s).

²⁰ *Id.* at 17.

²¹ NPFMC IPHC Workshop on Halibut Bycatch Estimation, Halibut Growth and Migration, & Effects on Harvest Strategy. Meeting Summary. April 24-25, 2012.

²² EA/RIR/IFRA at 16.

²³ *Id.* at 17.

²⁴ NPFMC IPHC Workshop on Halibut Bycatch Estimation, Halibut Growth and Migration, & Effects on Harvest Strategy. Meeting Summary. April 24-25, 2012.

²⁵ Ishimatsu, A. et al. 2008. Fisheries in high CO₂, acidified oceans. Marine Ecology Progress Series Vol 373: 295-302.

²⁶ Alaska Researchers to Study Effects of Ocean Acidification; available at <http://climatesolutions.org/new/alaska-researchers-to-study-effects-of-ocean-acidification>.

²⁷ *Id.*

observer coverage of trawl vessels. There are significant questions regarding the accuracy of the data collected from the current monitoring program. Data gaps exist from sectors that do not have coverage. The 30 percent coverage regulation incentivizes fishing at non-representative locations and times that undercut the statistical reliability of the current estimates.²⁸ As a result, “estimates for these fisheries can be considered to be only a minimum estimate of total halibut mortality.”²⁹ In 2010, less than one percent of the shallow-water flatfish catch was sampled by observers.³⁰

The IPHC has identified the inadequate knowledge of bycatch mortality as a source of uncertainty in understanding stock dynamics and determining appropriate yield.³¹ Improved estimation of halibut bycatch mortality is most important in the GOA because the ratio of halibut mortality to groundfish catch is more than twice as high as the Bering Sea fisheries.³² Monitoring halibut bycatch thus requires a commitment to deploy a level of coverage “that provides statistically reliable bycatch estimates.”³³ The level of precision needed to measure halibut bycatch is quite high because of resource uncertainties. Areas 2A (Washington, Oregon and California coasts), 2B (British Columbia) and 4 (Bering Sea/Aleutian Islands) all implement 100 percent observer coverage for trawl fisheries.³⁴

The Center notes that Amendment 76 to the GOA FMP proposes to restructure the observer program. However, there are questions regarding whether it will achieve adequate levels of observer coverage necessary to acquire precise bycatch data. The restructured program incorporates a broader range of catcher vessels but still only provides for partial coverage with no set level for any fishery.³⁵ The monitoring program also depends on an uncertain funding mechanism.³⁶ The restructured program does not provide assurance that the total bycatch estimate will be sufficiently accurate to address uncertainties about halibut bycatch levels.

The Center realizes that the observer program involves a separate amendment, but the key issue is that there are no plans to attain levels of coverage that conform to the best available science as implemented for other trawl fisheries. Under these circumstances, the precautionary approach mandates stricter PSC limits until the Council, NMFS and the industry can demonstrate the ability to implement 100 percent observer coverage for the trawl fleet. This effort is necessary to ensure that bycatch reduction measures conform to National Standard 2’s requirement that conservation and management measures be based on the best scientific information available.

The Council Should Implement a Long-Term PSC Reduction Plan

In the short term, the Center supports the immediate PSC reduction of 15 percent. However, the Council should supplement this effort with a trailing amendment that further reduces bycatch and is responsive

²⁸ Observer EA at 141, 151.

²⁹ Williams, G. 2011.

³⁰ Turnock, B. et al. 2011. Assessment of the Shallow-water Flatfish Complex in the Gulf of Alaska for 2012, Table 4.A.2.

³¹ International Pacific Halibut Commission, 2011. Effect of reducing bycatch limits in the Gulf of Alaska on the halibut exploitable biomass and spawning potential, including downstream effects from halibut migration at 2-3. March 2011.

³² IPHC Staff. Item 1. Effect of reducing bycatch limits in the Gulf of Alaska on the halibut exploitable biomass and spawning potential, including downstream effects from halibut migration. March 2011 at 2.

³³ 68 Fed. Reg. 11,510, 11504 (2003).

³⁴ Williams, G. 2011.

³⁵ 77 Fed. Reg. 15020.

³⁶ The program will be funded in large part by the halibut IFQ fishery. The average harvest from this fishery went from 65.3 million pounds in 2005 – 2008 to 41.6 million pounds in 2009 – 2012. This creates considerable uncertainty regarding whether basing observer days on ex-vessel revenues would under-fund the program and means there is doubt as to whether even the 30 percent performance standard would be attained.

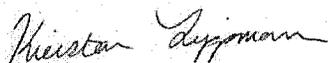
to spatial concerns and trends in the halibut population. This effort should include a specific analysis of trawl fisheries with the highest bycatch rates and the development of specific tools to achieve further reductions. In any given year, target fisheries for arrowtooth flounder (43 percent of trawl bycatch since 2007), shallow water flatfish (29 percent of trawl bycatch in 2010) and yellowfin sole can account for over half of the trawl bycatch.³⁷ The shallow water flatfish fishery in particular wastes over six million dollars worth of halibut per vessel in order to generate an average ex-vessel value of \$1.3 million. This does not make sense from either an economic or ecological perspective. In order to adhere to the precautionary approach and the obligation to minimize bycatch, the Council needs to develop a means to address those particular fisheries that kill the most halibut per unit of targeted catch.

Other trawl fisheries have shown the ability to reduce halibut bycatch well beyond the GOA proposal. Bottom trawl fisheries in British Columbia have averaged just a quarter of a million pounds from 2002 to 2011.³⁸ The B.C. fishery has changed its fishing practices and has a substantially lower discard mortality rate.³⁹ The cap for the Pacific Northwest trawl fisheries was a 50 percent reduction, and the fleet was able to achieve an 87 percent reduction last year from 2009 estimates.⁴⁰ Amendment 80 vessels in the Bering Sea achieved a 40 percent reduction.⁴¹ Yet in the GOA, the bycatch rate went from 1.95 pounds per metric ton in 1985 to 22 pounds per metric ton in 2008 – a tenfold increase.⁴² Amendment 95 does not represent the same level of commitment to reducing trawl halibut bycatch as the other programs, and the Council must have a plan to ensure that its conservation measures achieve similar levels of reduced PSC.

Conclusion

The Center supports efforts by the Council to move forward with addressing the PSC limit, but the Council should consider developing a plan that appropriately responds to uncertainties about the halibut resource. Under these circumstances, in the near term, the Council and NMFS should work to achieve an immediate reduction in the halibut PSC limit as proposed in Amendment 95. With regard to long-term guidance, the Council should consider more stringent limits after obtaining a more complete picture of baseline bycatch data and seeking out additional scientific work that addresses some of uncertainties regarding the halibut resource.

Sincerely,



Kiersten Lippmann
Staff Biologist

³⁷ *Id.*

³⁸ *Id.*

³⁹ NPFMC IPHC Workshop. 2012.

⁴⁰ *Id.*

⁴¹ *Id.*

⁴² *Id.*

Subject: halibut bycatch
From: jesse pavlik <jessepavlik@live.com>
Date: 5/29/2012 2:47 PM
To: <npfmc.comments@noaa.gov>

Dear Chairman Olson and members of the Council<

We the Yakutat Alaska fishermens alliance represent a wide range of commercial fishermen, halibut fishermen being one of the groups we represent.

Our members depend on a healthy halibut resource and we feel that in order to rebuild the halibut resource to a healthy level that can support a sustainable fisherie the council must adopt the maximum reduction of 15% being considered by the council.

Halibut stocks and catch limits have declined significantly over the past decade. The exploitable biomass of halibut has declined by 58% in the gulf of alaska over the past decade with catch limits for the directed halibut fisheries declining significantly(by 70% in 2C,47%in 3A and 70% in 3B). The charter fleet that operates out of the gulf of alaska has also experianced significant catch limits.

Given that the halibut bycatch limit was set in 1989 and has remained relatively unchanged since then, we urge the council to adopt a 15% reduction to help protect and conserve the halibut resource for the benifit of halibut share holders,crewmembers,processors,charter operators,sport harvesters,subsistence users, and coastal alaska comminuties that depend on the halibut resource for there livelihood,food,and sport, and more importantly we urge the council to adopt a 15% reduction for the good of the resource.

Sincerely

Yakutat Alaska Fishermens Alliance



City and Borough of Sitka

100 Lincoln Street Sitka, Alaska 99835

Coast Guard City, USA

May 25, 2012

RECEIVED
MAY 29 2012

The City and Borough of Sitka would appreciate your support of the Resolution passed by our Assembly on the reduction of halibut allowed as bycatch in the Gulf of Alaska Groundfish Fisheries.

Cheryl L. Webster

CITY AND BOROUGH OF SITKA

RESOLUTION NO. 2012-09

A RESOLUTION BY THE CITY AND BOROUGH OF SITKA URGING THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL TO ADOPT MEASURES THAT REDUCE THE HALIBUT PROHIBITED SPECIES CATCH IN THE GULF OF ALASKA GROUND FISH FISHERIES

WHEREAS, halibut bycatch (prohibited species catch or PSC) limits in the Gulf of Alaska groundfish fisheries have not been significantly changed since 1989; and

WHEREAS, currently there is a halibut bycatch limit of 2,300 metric tons (mt) in the GOA—or just over 5 million pounds; and

WHEREAS, a maximum reduction in the halibut PSC limit of 15 percent is being considered by the North Pacific Fishery Management Council for final action in June 2012 ; and

WHEREAS, exploitable biomass—the portion of the halibut population that is available for harvest—has declined by 58 percent over the past decade; and

WHEREAS, every pound of halibut caught as bycatch results in a direct loss of yield and spawning biomass of the halibut resource; and

WHEREAS, cuts in catch limits have and will continue to have dramatic effects on our fisheries, businesses, economies and communities that depend on the halibut resource; and

WHEREAS, halibut play a key role in the economy of the City and Borough of Sitka;

NOW, THEREFORE, BE IT RESOLVED by the Assembly of the City and Borough of Sitka, Alaska as follows:

SECTION 1. That the City and Borough of Sitka Assembly urges the North Pacific Fishery Management Council to take meaningful final action now by reducing Gulf of Alaska halibut bycatch by at least 15 percent.

SECTION 2. That copies of this Resolution be provided to Governor Sean Parnell and all members of the North Pacific Fishery Management Council.

SECTION 3. That this Resolution takes effect immediately upon adoption.

PASSED, APPROVED, AND ADOPTED by the Assembly of the City and Borough of Sitka, Alaska, on this 22nd day of May, 2012.


Cheryl Westover, Mayor

ATTEST:


Serena Wild
Assistant Clerk

SIGN-ON TO SUPPORT REDUCING HALIBUT BYCATCH IN THE GULF OF ALASKA!

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

Dr. Jim Balsiger, Regional Administrator
NOAA Fisheries, Alaska Region
PO Box 21668
Juneau, AK 99802

RECEIVED
MAY 29 2012

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska

Dear Chairman Olson and Council members:

We, the undersigned commercial fishermen, sport fishermen, coastal residents and stakeholders **request the Council take final action to reduce halibut bycatch in the Gulf of Alaska by at least 15%**—the maximum reduction being considered at this time.

Commercial and sport fishermen have experienced dramatic cuts in their harvests over the last decade. The limit on halibut bycatch in the Gulf of Alaska, on the other hand, has not been significantly changed since 1989. Currently there is a halibut bycatch limit of 2,300 metric tons (mt) in the GOA—or just over 5 million pounds.

At the same time the exploitable biomass—the portion of the halibut population that is available for harvest—has declined by 58% over the past decade. The state of the halibut stock is uncertain; previous assumptions regarding strong incoming year classes are now in doubt. While everything else—commercial and charter limits and the stock itself—have gone down, the bycatch limit has stayed relatively constant. It is time for the Council to address this inequity by reducing halibut bycatch NOW. All sectors must do their part to conserve and rebuild the halibut stock.

Cuts in catch limits have and will continue to have dramatic effects on our fisheries, businesses, economies and communities that depend on the halibut resource. Each halibut caught as bycatch has a direct effect on the spawning biomass and yield of halibut available to other sectors now and in the future. **It is critical that the Council take meaningful final action now by reducing Gulf of Alaska halibut bycatch by at least 15%.**

Sincerely,

See signature pages

Cc: Sean Parnell, Governor
Cora Campbell, Commissioner, ADF&G
Lisa Murkowski, U.S. Senator
Mark Begich, U.S. Senator
Don Young, U.S. House Representative

Add Your Name to the Council Letter Supporting Reduction in Gulf of Alaska Halibut Bycatch

PLEASE PRINT CLEARLY!

Print Name	Address	Vessel/Occupation/ Interest in Halibut (Sport, Commercial, Coastal Resident, Consumer, etc.)	Email address (if you would like to receive updates on bycatch)
Bill Lucey	Box 518	City Planning & Natural Resources	blucey@yakutatka.us
Jesse Pavlik	Box 256	Shuttle Mailer Logline	jessepavlik@live.com
Miranda Christianson	3118 Dawson St. #6, Anch. AK 99503	Consumer	gnaccc@alaska.net
Chuck McCullum	601 N. Bragan Anchorage AK 99508	Consumer	chuckmccallum@gmail.com chuckmccallum@gmail.com

Add Your Name to the Council Letter Supporting Reduction in Gulf of Alaska Halibut Bycatch

PLEASE PRINT CLEARLY!

Print Name	Address	Vessel/Occupation/ Interest in Halibut (Sport, Commercial, Coastal Resident, Consumer, etc.)	Email address (if you would like to receive updates on bycatch)
Jeff Jackson	P.O. Box 297 Kaktay, AK 99830	Commercial fisherman, Resident of Kake	jeffjacksonkake@yahoo.com
Henrich KABALCESO	Box 188 Kake, AK. 99830	Mayor of City Kake Commercial Fisherman	
Gary Klushkan	P.O. Box 415 Yakutat AK 99689	Tlingit Warrior	
Wayne Iwers	Box 42 Yakutat	Bay Harvest	wiwers@yahoo
Greg Indreled	Box 413 Yakutat, AK 99689	FIV Integrity FIV Mr. Martha	gregyak@yahoo.com

Add Your Name to the Council Letter Supporting Reduction in Gulf of Alaska Halibut Bycatch

PLEASE PRINT CLEARLY!

Print Name	Address	Vessel/Occupation/ Interest in Halibut (Sport, Commercial, Coastal Resident, Consumer, etc.)	Email address (if you would like to receive updates on bycatch)
Nick Inga CP	1018 S. Lucas St. Palmer, AK. 99645	Coastal Resident old harbor	oldharbor@yux@gaboo
Jeff Peterson	Box 141 Old Harbor AK 99681	Commercial/ Sport Subsistence fisherman	fishout@kodiakcarbos.com
Al Ceatty	Box 1 Old Harbor AK	Marine/la Diver	alceatty@alaska.com alceatty@alaska.com
Freddie Christiansen	AKUT AK.	Miss Holly	
Lawrence Ashonwak	260 West 31 st	Consumer	

Add Your Name to the Council Letter Supporting Reduction in Gulf of Alaska Halibut Bycatch

PLEASE PRINT CLEARLY!

Print Name	Address	Vessel/Occupation/ Interest in Halibut (Sport, Commercial, Coastal Resident, Consumer, etc.)	Email address (if you would like to receive updates on bycatch)
Janet Tunohun	2616 N. Tahiti Sq. Anchorage, AK. 99507	Resident fr. Old Harbor	
David Kennedy	319 S N. Snow Goose Dr. Wasilla AK 99654	Consumer	
Jheronnan w liebsack	1509 W 45 unit 5	Consumer	
Quilighuag Jyga	Box 520720 Big Lake, AK 99652	Coastal Res. from Old Harbor	
Lianna Peterson	Po Box 141 Old Harbor 99673	Consumer Coastal resident Old Harbor	

Add Your Name to the Council Letter Supporting Reduction in Gulf of Alaska Halibut Bycatch

PLEASE PRINT CLEARLY!

Print Name	Address	Vessel/Occupation/ Interest in Halibut (Sport, Commercial, Coastal Resident, Consumer, etc.)	Email address (if you would like to receive updates on bycatch)
Jon Berntsen	8010 Duggan Ct Anchorage AK 99502	Resident Consumer	
Annette Gaddler	3240 E 42nd Ave	Resident from Old Harbor	
Ann Berntsen	800 Duggan Ct Anchorage AK 99502	Recreational consumer	
Carrie Berntsen- Chu	1604 Woodcutter Ct Anchorage, AK 99507	Resident of from Old Harbor	kcczkl@gci.net
Kenneth Chu	1604 Woodcutter Court Anchorage AK 99507	Resident of From Old Harbor	Kcczkl@gci.net

Add Your Name to the Council Letter Supporting Reduction in Gulf of Alaska Halibut Bycatch

PLEASE PRINT CLEARLY!

Print Name	Address	Vessel/Occupation/ Interest in Halibut (Sport, Commercial, Coastal Resident, Consumer, etc.)	Email address (if you would like to receive updates on bycatch)
Julia Horvath	3957 Lunar Dr Apt 4 Anchorage AK 99503	Resident	julesmaid@service bycatch.com
Mary Inge	5000 Tatu Ave Anchorage 99508	Coastal Res from Old Harbor	/
Pete Berntsen Sr	1200 W Diamond Anch.	Resident of FISHermen Old Harbor	
BETTY BERNTSEN	1200 W DIAMOND	Resident from Old Harbor	
Nina Phillips	Box 5005 AKHOK AK 99615	Resident from AKHOK	

Add Your Name to the Council Letter Supporting Reduction in Gulf of Alaska Halibut Bycatch

PLEASE PRINT CLEARLY!

Print Name	Address	Vessel/Occupation/ Interest in Halibut (Sport, Commercial, Coastal Resident, Consumer, etc.)	Email address (if you would like to receive updates on bycatch)
Judy Ashowak	3240 Penland 144	Coastal Resident From Old Harbor	jashowak@hotmail.com
Jennie Casnowak	2607 West 31 st Anch AK 99517	Coastal Resident Old Harbor	XXXXXXXXXX
SHEILA TAPIA Sheila Tapia	1621 Elcadore Dr. #3 Anchorage AK 99507	Coastal Resident from Old Harbor	Sheila mom 65@hotmail.com
Kathleen Kwasnikoff	6329 East 32 nd Ave. Apt. #3 99504	coastal Resident from Old Harbor	Perfect.2b@hotmail.com
Robert Tupaja	616 D. BRAGAN APT #1 ANCH AK 99508	ROAST RESIDENT from OLD HARBOR	

Add Your Name to the Council Letter Supporting Reduction in Gulf of Alaska Halibut Bycatch

PLEASE PRINT CLEARLY!

Print Name	Address	Vessel/Occupation/ Interest in Halibut (Sport, Commercial, Coastal Resident, Consumer, etc.)	Email address (if you would like to receive updates on bycatch)
Jesse Smith	9336 Blackberry St. #11 Anch. AK 99502	Consumer Commercial	
Cheryl Christiansen	9336 Blackberry St. #11 Anch. AK 99502	Consumer Commercial	
Mary Christiansen	2211 DeBono Rd Anch. AK. 99504.	Commercial	
Walter Stanley	#115 Old Harbor AK 99643	Recreational	
ANESIA Krasnikoff	6329 E 32 nd Ave #3 ANCHORAGE, AK 99504	Consumer	

Add Your Name to the Council Letter Supporting Reduction in Gulf of Alaska Halibut Bycatch

PLEASE PRINT CLEARLY!

Print Name	Address	Vessel/Occupation/ Interest in Halibut (Sport, Commercial, Coastal Resident, Consumer, etc.)	Email address (if you would like to receive updates on bycatch)
April Marks	2239 SOBUBS WAY ANCH AK 99508	CEO OLD HARBOR NATIVE CORP	
Brenda Collinge	PO Box 232862 Anchorage AK 99523	Coastal Resident of Old Harbor AK	
Emil Christensen	8211 DEBAER RD ANCHORAGE AK 99504	SIV CARLA REE.C. OLD HARBOR AK 99643	
Annie Lewis	PO BOX 230544 Anchorage AK 99525	Coastal Resident	
DON LEWIS	PO BOX 230544 Anchorage, AK 99525	Consumer	

Add Your Name to the Council Letter Supporting Reduction in Gulf of Alaska Halibut Bycatch

PLEASE PRINT CLEARLY!

Print Name	Address	Vessel/Occupation/ Interest in Halibut (Sport, Commercial, Coastal Resident, Consumer, etc.)	Email address (if you would like to receive updates on bycatch)
Jennie Inga	9920 Grange Drive Unit C Anchorage, AK 99505	Admin. Assist. Old Harbor Native Corporation	jinga@oldharbor.org
Kim Fraser	1720 Bartlett Dr. Anchorage AK 99507	OHNC	Kimfraser kfraser@oldharbor.org
Billie Christensen	7051 Crand Street Anchorage AK 99518		bchristensen@oldharbor.org
Cynthia Lopez	3754 Chaffee Circle Anchorage, AK 99517	Coastal Resident From Old Harbor, AK	Cynthiaraberns@ hotmail.com
Carl Gatter	3240 E 42nd Ave Anchorage AK 99506	Coastal Resident From Old Harbor AK	cgatter@oldharbor.org

Add Your Name to the Council Letter Supporting Reduction in Gulf of Alaska Halibut Bycatch

PLEASE PRINT CLEARLY!

Print Name	Address	Vessel/Occupation/ Interest in Halibut (Sport, Commercial, Coastal Resident, Consumer, etc.)	Email address (if you would like to receive updates on bycatch)
Cody Wersson	1006 BENCH COURT	CONSUMER	
Anthony Tergramsen	P.O. Box 9470 100940 Anchorage AK	Consumer	
Die Olsen	7929 Highlander Drive Anchorage, AK 99518	Sport fisherman Consumer Coastal Resident Kodiak	
James Dyddahl	P.O. Box 47 Hoonah, AK 99829	Commercial Fisherman Coastal Resident	
Bertha Cavanaugh	8422 Uddly Blvd Juneau, AK 99801	Kate Nival Corp.	

Subject: Halibut Bycatch Limit Reduction

From: Darius Kasprzak <kas_dar@yahoo.com>

Date: 5/29/2012 3:32 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Eric Olsen, Chair NPFMC
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

RE: Halibut Prohibited Species Catch (PSC) limits in the Gulf of Ak, Agenda Item C-1 (B)

Mr. Chairman Olsen and Council Members,

I'm Darius Kasprzak, owner-operator of the 46' Kodiak ported jig vessel F/V Marona. I have commercially fished in the Kodiak archipelago for 29 years. I currently commercially jig cod and rockfish, and also participate in the rural subsistence halibut harvest.

In the past decade or less, I have experienced halibut prevalence in the GOA decline from being a near constant nuisance while targeting cod... to the point now where I cannot reliably count on catching and retaining a single subsistence halibut during a jig trip. Of the halibut I do catch, a significant percentage are disfigured and mangled by having their faces ripped off in longline crucifers.

I have also participated extensively as crew on both trawl and longline vessels in the GOA. I have spent many hours scrambling through overflowing trawl alleys trying to get as many live halibut as possible back over the side, before it was time to set the trawl back. On longline operations I have seen small halibut carelessly run through crucifers at high hauling speeds, and also witnessed the discarding of dead, sand flea devoured halibut due to too long of gear soaks on too soft of bottom.

I believe that there is substantial room for improvement as regarding halibut bycatch and bycatch mortality in both the trawl and longline fisheries, and that both sectors will be able to adjust to a reduction in their halibut bycatch limit.

I ask that the Council set bycatch limit reductions at 15%.

In addition, it is noteworthy that that the Alaskan groundfish specie most heavily privatized for almost two decades (halibut) is also the specie exhibiting the most alarming and dramatic stock decline.

Please keep this in mind as you entertain discussion of privatizing other and currently healthy groundfish specie stocks.

Respectfully,

Darius Kasprzak
F/V Marona
807 Jackson Lane, Kodiak AK 99615
kas_dar@yahoo.com

North Pacific Fishery Management Council
605 W. 4th, Suite 306
Anchorage, AK 99501-2252
Fax (907) 271-2817
npfmc.comments@noaa.gov

May 29, 2012

Re: Agenda Item C-1(b) – Final action GOA Halibut PSC

Dear Chairman Olson and members of the Council:

My name is Al Burch. I was the Executive Director of the Alaska Whitefish Trawlers Association for many years—an organization that has represented small, family-owned trawlers that have fished out of Kodiak since the 1960's. Our family owns two small trawlers that have fished out of Kodiak since after the 1964 earthquake. I believe the wisest decisions are based on the best scientific information available and what is best for the shore-based communities dependent on the fisheries. Science and reason, not emotion or politics, should be the basis for decisions that may have far reaching consequences. 30 years on the AP taught me that, "if you can't dazzle them with brilliance, baffle them with baloney". The opponents on this issue, those that are campaigning so hard for the 15% reduction, are ignoring the science and trying to baffle you with nonsense.

The only constant thing about fishing is the changes that will and do take place. We accept that, and through the years we have worked hard to be a part of the positive changes in Alaska's fisheries, including reducing our halibut bycatch. We have experimented with halibut excluders and try hard to reduce the amount of halibut we catch, but there are so many out there, they are hard to avoid. But we will keep trying.

With the race for fish, no individual allocations or accountability and more and more boats entering the fisheries now that catch shares are under discussion, we can't control the players. We need the halibut PSC allocated to the Gulf trawlers to prosecute the fisheries and keep Kodiak healthy, and the processing workers employed all year. We have already taken a cut in halibut bycatch allocations in the rockfish program (a retrospective average of 4.26% using the years 2007 – 2011) – further cuts will not solve the halibut fishery problem but will reduce the amount of groundfish that we land in Kodiak, including Arrowtooth which likely competes with halibut.

Contrary to public opinion, all fisheries have bycatch, not just the trawlers. The commercial IFQ fleet caught almost as much "wastage", by weight, (what we call bycatch) as the trawlers did in 2010. This is according to the IPHC since that fleet has never had any observer coverage. The new observer deployment strategy set to start next year will finally yield some data from this and other previously unobserved fisheries. It's the nature of the beast – bycatch is a necessary evil of fishing and all fishermen have bycatch – we can only try to reduce it as much as possible. But we just don't have the tools like we do in the Rockfish Program.

I urge you to postpone this action, wait for the new observer data and until such time that the Gulf trawlers have a catch share program and are able to deal with their bycatch issues in a responsible manner.

Thanks for your time,
Al Burch, owner F/V Dawn, F/V Dusk
PO Box 884
Kodiak, AK 99615

Petersburg Vessel Owners Association

PO Box 232

Petersburg, AK 99833

Phone & Fax: 907.772.9323

pvoa@gci.net • www.pvoaonline.org

May 29th, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

RE: HALIBUT PROHIBITED SPECIES CATCH (PSC) LIMITS IN THE GULF OF ALASKA, AGENDA ITEM C-1 (B).

Dear Chairman Olson and members of the Council,

The Petersburg Vessel Owners Association (PVOA) is a diverse group of over 100 commercial fishermen and businesses based in Alaska. Our members provide millions of meals to the public annually by participating in a variety of fisheries statewide with our foremost interest being the commercial longline fisheries managed by the North Pacific Fishery Management Council. PVOA appreciates the opportunity to comment on agenda item C-1 (B), Gulf of Alaska (GOA) halibut Prohibited Species Cap (PSC) for halibut. **We support option 2, suboption 3, option C to reduce the GOA trawl PSC limit by 15%.**

Petersburg has a long standing dependence on the halibut resource and many commercial harvesters, processors, charter operators, sport fishermen, subsistence users and support businesses in Petersburg and throughout the State of Alaska are committed to ensuring that the halibut resource is healthy and will survive for future generations. Petersburg residents hold 27% of the 2C halibut quota, and have experienced a 75% reduction in available quota since 2006. Petersburg residents also hold 1 million pounds of 3A quota. Petersburg ranks #3 in the state for number of individual quota share holders with 421. Kodiak ranks #1 for individual quota share holders, Sitka is #2, Homer is #4 and Juneau, Anchorage, Cordova and Wrangell all hold a significant amount of quota share.

Every single Southeast Alaskan community has quota share associated with it, and 2C, 3A and 3B quota share holders live in 97 different communities throughout Alaska. But between 2004 and 2012, Gulf-wide quota reductions have totaled 32 million pounds, an overall reduction of 62%. At a current market

value of \$32 per pound for quota share (average of 2C, 3A, and 3B QS), that **32 million pound reduction would be worth over \$1 billion on the open market.** At a current ex-vessel value of around \$6 per pound, **the 32 million pounds of lost halibut would be worth around \$192 million to commercial harvesters, their crew, processors, families, and the communities they support.**

Halibut crewmembers are the next generation of commercial harvesters. In 2011, 2C crewmembers held 39% of the area quota, worth almost \$28 million on the market and with an ex-vessel value of almost \$5.5 million across the docks. 3A crewmembers hold over 28% of the area quota, worth over \$139 million on the market with an ex-vessel value of almost \$25 million across the docks. 3B crewmembers hold 32% of the area quota, worth \$72 million on the market with an ex-vessel value of over \$14 million across the docks. Plummeting catch limits mean that individuals cannot cover their quota share payments, despite a rise in ex-vessel value of halibut. The next generation of halibut fishermen cannot make a 62% reduction in quota pencil out, and find it difficult to acquire quota to transition into the fishery.

Halibut stocks and catch limits in the Gulf of Alaska have declined significantly over the past decade. Exploitable halibut biomass has dropped 58% in the Gulf of Alaska signifying an unhealthy balance within the halibut resource further highlighting the need to act conservatively. Catch limits for the directed halibut fisheries have declined by 70% in 2C, 47% in 3A, and 70% in 3B. The Gulf of Alaska charter fleet has also experienced substantial reductions in the Guideline Harvest Level (GHL) with the 2C daily charter client limit dropping from the historical two fish of any size to one fish under 37" in 2011 and the 3A charter fleet recently has seen reductions in the GHL. Both the directed commercial halibut fishery and the charter industry have experienced severe reductions in available halibut in order to conserve the resource.

The 1,113 individual 2C quota share holders, 1,420 individual 3A quota share holders, 490 individual 3B quota share holders, 274 individual 2C charter permit holders, 317 individual 3A charter permit holders, and countless sport and subsistence halibut harvesters have come together to protect the halibut resource and ensure that each sector is held responsible for the health of the resource. Given the halibut bycatch limit was set in 1989 and has remained relatively unchanged, we urge the Council to adopt a 15% reduction to help protect and conserve the halibut resource for the benefit of halibut quota share holders, crewmembers, processors, charter operators, sport harvesters, subsistence users, and coastal Alaskans that depend on halibut for food, sport and livelihood.

There are 2,351 individual quota share holders in the Gulf of Alaska areas 2C, 3A and 3B. There are 601 individual Charter Halibut Permit (CHP) holders in the Gulf of Alaska areas 2C and 3A. There are countless processors, sport fishermen, subsistence users, and support businesses

who are dependent on a healthy halibut biomass for food, sport, and livelihood. Twenty years in the making, reductions in halibut bycatch created an unprecedented action where commercial, charter, sport, and subsistence users put aside their differences to stand in unison and ask the Council for final action to reduce halibut bycatch in the GOA by 15%.

Thank you for your time and attention to this important matter. If we can provide further information or answer any questions as you make this important decision, please feel free to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Curry', written in a cursive style.

Julianne Curry
Director

Southeast Alaska Fishermen's Alliance

9369 North Douglas Highway

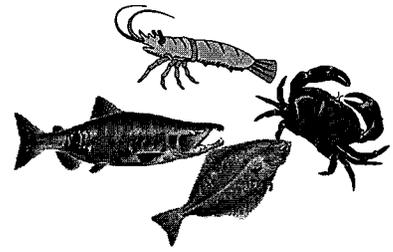
Juneau, AK 99801

Phone: 907-586-6652

Fax: 907-523-1168

Email: seafa@gci.net

Website: <http://www.seafa.org>



May 29, 2012

North Pacific Fishery Management Council

Eric Olson, Chair

605 W 4th Avenue, Suite 306

Anchorage, AK 99501-2252

RE: C-1 (b) Final Action on GOA Halibut PSC

Dear Eric Olson, Chair and Council Members,

Southeast Alaska Fishermen's Alliance represents our members involved in the salmon, crab, shrimp and longline fisheries. We have members who participate in every Alaskan regulatory area for halibut. Most of these members fish on vessels under 60 feet.

As you can imagine with the decline in the halibut resource over the last decade our members have become concerned about the GOA halibut fishery PSC levels not having been re-evaluated since 1989 for the trawl fishery and 1995 for the hook and line gear. The Hook and line gear has also recently had other changes to their fishery that at least a year or two of operation under the new rules should occur before being reassessed.

Our membership supports a 15% reduction in PSC limits (option 2, sub-options 3). Magnuson-Stevens Act National Standard 9 requires that conservation and management measures shall, to the extent practicable, minimize by-catch.

In the Executive Summary (page V) it states that while all removals are taken into account, PSC removals have a negative impact on the lost spawning biomass and lost yield. This in turn results in a decline of the halibut

standing stock biomass, reduced reproductive potential of the halibut stock and reduced short and long-term halibut yields to the directed hook and line fisheries and the guided sport sector in Area 2C and 3A under the proposed CSP.

We would point out in the Executive Summary Regulator Impact Review 1st paragraph it states "The RIR considers the impact of reducing the amount of halibut PSC available to the GOA groundfish fisheries by 5 percent, 10 percent and 15 percent. Impacts are positive for sectors that rely on halibut IFQ and the guided sport fleet and their clients. Negative impacts are realized by the groundfish fleets and the industry sectors and consumers that rely on GOA groundfish harvests." This paragraph mentions the negative impacts on the consumers of the groundfish harvests but forgets to acknowledge the positive impacts for consumers of halibut.

Please take action to reduce the GOA Halibut PSC by 15% in the Gulf of Alaska.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Hansen", followed by a long horizontal line extending to the right.

Kathy Hansen
Executive Director

RECEIVED
MAY 29 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

**Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska,
agenda item C-1 (b)**

Dear Chairman Olson and members of the Council,

Long before the North Pacific fishery management council took steps to set guidelines for halibut charter operator management, they should have taken steps to manage the commercial fishery bycatch. The commercial halibut fishery has been dumping millions of pounds of dead halibut back into the water for years. The North Pacific fishery management counsel didn't seem to be concerned about halibut conservation, even after it was brought to their attention many times. THIS ATROCITY NEEDS TO STOP NOW.

Sincerely,
Robert Jaynes
Valdez, AK 99686

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

**Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska,
agenda item C-1 (b)**

Dear Chairman Olson and members of the Council,

I noticed that the limits to halibut for sport fishermen have been lowered. I will not be travelling to Alaska, nor will I recommend to customers to travel to Alaska until these limits are increased. Please consider lowering the bycatch so that sport fishermen will be able to make the high cost of travel to Alaska pay off with larger ability to catch halibut. Thanks.

Sincerely,
Mike Ryan
Centennial, CO 80122

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

**Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska,
agenda item C-1 (b)**

Dear Chairman Olson and members of the Council,

I fully agree that the amount of by-catch must be reduced but I also believe that the fishery dynamics that changed as a result of Halibut IFQ implantation is directly responsible for reducing the biomass of harvestable halibut. The sized of halibut have slowly decreased the last 15 years and correlates to the change in fishery management and the start of the IFQ system. The change has allowed the commercial fleet to specifically target larger halibut with increased fishing freedom in time and space. A thorough study of how the fishery dynamics changed in 1995 and how it correlates to the steady decline of the halibut resources is warranted. Ending the nine month fishing season and reducing it to 1-2 months outside of the summer months of June, July, and August.

Sincerely,
Melvin Grove
PO Box 520575
Big Lake, AK 99652

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

**Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska,
agenda item C-1 (b)**

Dear Chairman Olson and members of the Council,

For twenty years, I have been vacationing in Alaska with family, friends and business associates drawn to the opportunity for world-class sport fishing. Our semi-annual trips are the highlights of raising my sons. We have fished from the rivers of the Aleknagik and the Kenai, to the coastal waters of Homer, Sitka and Ketchikan. In my opinion, there is no better way to come to appreciate the natural beauty and abundance of the United States than to fish in Alaska. But increasingly, restrictions and cut backs on the species of fish my sons and my friends came to love about Alaska – king salmon and halibut – make it harder to rationalize the expense of traveling there. And one key reason we, as sports fishermen, have seen these restrictions is the desire to maintain the breeding stock and viability of these species.

That is why it is unconscionable to continue to allow commercial fisheries to waste these species, especially halibut, in bycatch. I urge you to support the maximum reduction in bycatch being considered by the North Pacific Fishery Management Council. It makes good sense economically for the state of Alaska and it gives people like me and the dozens of friends and family I have brought to Alaska convinced you listen and care about our opinions. Give us a good reason to keep coming back.

Sincerely,
Lincoln Ferris
5049 Pullman Ave. NE
Seattle, WA 98105-2137

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

**Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska,
agenda item C-1 (b)**

Dear Chairman Olson and members of the Council,

The Trawl Fleet is devastating ALL species, not just halibut. As the Canadians have proved, there is technology already in existence to drastically reduce Halibut Bycatch and wastage, when/if the Trawl Fleet has the required restrictions placed on them. Their fishing actions cause untold damage to the seabed and its ability to sustain the various species, especially halibut and salmon. At the very least the trawl fleet's halibut Bycatch and Wastage should be counted toward the annual COMFish Catch Limits with appropriate reductions in targeted catch. Thank you.

Sincerely,
Ken L. Larson
1074 Eliz Street
North Pole, AK 99705

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

**Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska,
agenda item C-1 (b)**

Dear Chairman Olson and members of the Council,

As you all know our halibut stocks are in a down ward spiral. Every used group needs to be cut to help rebuild our halibut stocks. We all so need to get some real data on the true bycatch numbers of the trawl feet. The 30% observer program that is in places is a joke. We need a 100% observer program so we can get some real numbers.

Sincerely,
James Moody
P.O. Box 1643
Ward Cove, AK 99928

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

**Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska,
agenda item C-1 (b)**

Dear Chairman Olson and members of the Council,

I was out on a family fishing trip to Ketchikan and we went Silver and Halibut fishing. Halibut fishing is one of my favorites because it is a real struggle to get the fish up to the boat, but your reward is a massive fish. You feel like you really worked for the catch. However, we ended up having to throw 3 fish back due to size restraints listed out in the new PSC limits. Honestly, I felt like the fish was being taken right out of my hands. I love the outdoors and enjoy everything Alaska has to offer. However, when you pay money for the right to keep what you catch, and then you are not allowed because it is "too big" that is wrong. I can understand not keeping under-sized fish and allowing them to grow. But to literally take a full grown fish directly out of my hands is out of line.

Sincerely,
Grant Ferris
4747 Sandpoint Way NE, Apt 305
Seattle, WA 98105

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

**Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska,
agenda item C-1 (b)**

Dear Chairman Olson and members of the Council,

Failing to reduce the allotted halibut by-catch is not only negligible but irresponsible. Draggers are not the only fishermen in the sea! There is a whole other spectrum of commercial and sport fisherman who have been paying the price of Dragger bycatch. Year after year they see their quotas cut while draggers are continuously allowed to waste this precious resource. The health and prosperity of Alaskan communities depend on the health and prosperity of their natural resources. The burden of keeping these resources healthy should lye on all the users, including draggers.

Sincerely,
Gloria Roe
11542 Womens Bay Dr.
Kodiak, AK 99615

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska, agenda item C-1 (b)

Dear Chairman Olson and members of the Council,

I respectfully submit that the time for meaningful bycatch reform is long overdue if we are truly, as whole, looking at sustainable fish populations for the future. I would also respectfully encourage the council to reduce the bycatch by the maximum of 15% so that the effects of that reduction can be evaluated over a period of time and see if the results are what one would think they would be, very positive in an overall preservation of our fishery. Thank you for opportunity to express my point of view.

Sincerely,

David Kaffke
67400 Halibut Rd.
Ninilchik, Alaska

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

**Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska,
agenda item C-1 (b)**

Dear Chairman Olson and members of the Council,

I strongly urge you to support regulation that would reduce halibut bycatch waste by at least 15%. This is a preventable waste from fishing trawlers which adds up to 5 million pounds of discarded halibut each year. Our halibut population has been steadily declining with more than 50% decline in halibut available for harvest in the last decade. These limits were set in 1989 when halibut populations were much greater. Alaskans need this important food source! Thank you for your consideration.

Sincerely,
Cheryl Corrick
4075 Teal Avenue
Fairbanks, AK 99709

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

**Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska,
agenda item C-1 (b)**

Dear Chairman Olson and members of the Council,

I salmon seined for 5 years then began trolling in 1978 where I learned of the destructive by-catch practices of the trawl fleet. Now it's 2012, 34 years later and still nothing has been done to curtail this problem. Is it who has the best lobbyist? Why can't this problem be fixed? Is 5,000,000 pounds of waste a year reasonable? No it is not. Please, once and for all, and it is for the good of all, stop the waste. Thank you.

Sincerely,
Carl Porter
P.O. Box 7844
Ketchikan, Alaska 99901

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

**Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska,
agenda item C-1 (b)**

Dear Chairman Olson and members of the Council,

The obvious has been said about the specific topic at hand.

In addition, due to the economy and dwindling lack of interest in fishing caused by less fish, and after three years of losses, we will not be operating in 2012. At maximum capacity, we have 20 guests per week, 5 fishing boats and a staff of of 10 for 4 months.

As I'm sure you know, in 2011, NOAA was successful in reducing the AK Sport fishing fleet by 38% (out of business). NOAA operates under the Department of Commerce. It's Goal is to help develop business. Interesting how the application doesn't fit the Goal.

Sincerely,
Bruce Butterwick
PO Box 471
Anchor Point, AK 99556

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

**Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska,
agenda item C-1 (b)**

Dear Chairman Olson and members of the Council,

I love fishing in the waters of Alaska annually, but that aside the bycatch waste by commercial fishing is criminal. This would not be tolerated in any other business enterprise or industry. A 15% reduction is not nearly enough. **EVERYTHING CAUGHT MUST GO TO MARKET. IF THIS IS NOT COST EFFECTIVE FOR COMMERCIAL FISHING THEN THEY NEED TO FIND BETTER METHODS. SERIOUSLY. BEFORE IT IS TOO LATE. THE DECISIONS WE MAKE TODAY WILL IMPACT TOMORROW.**

Sincerely,
Beth Anderson
1700 W Oak St
Burbank, CA 91506

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

**Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska,
agenda item C-1 (b)**

Dear Chairman Olson and members of the Council,

Bycatch has been a black eye on our great State for too long. The unnecessary and deliberate waste of a fishery goes against everything the people of Alaska stand for. The Draggers have manipulated the politics long enough. Please do all you can to clean up this mess and help our fisheries be stable and healthy.

Sincerely,
Roderic Van Saun
PO Box 39622
Ninilchik, AK 99639

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska, agenda item C-1 (b)

Dear Chairman Olson and members of the Council,

I love Alaska it is so beautiful, the fish and wildlife are amazing.

As a fisherman I know what happens when nature is put out of balance and it appears that this is what has happened because the bycatch of Halibut has not been put in check and has resulted in the loss of millions of pounds of this highly favored fish. Please reduce the bycatch by at least 15%.

Sincerely,
Richard R Smith
9180 South 2700 West
West Jordan, Utah 84088

Groundfish Forum

4241 21st Avenue West, Suite 302
Seattle, WA 98199
206-213-5270 Fax 206-213-5272
www.groundfishforum.org

May 29, 2012

Mr. Eric Olson, Chairman
North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Re: Agenda Item C-1(b): Gulf of Alaska Pacific halibut prohibited species cap (PSC)

Dear Chairman Olson,

Groundfish Forum represents five companies and sixteen vessels operating in the Amendment 80 (A80) sector of the Bering Sea/Aleutian Islands (BSAI) groundfish fisheries. Many of our vessels have a long history of and dependence on Gulf of Alaska fisheries. We are writing to comment on pending Council action to modify the Gulf of Alaska Pacific halibut prohibited species cap (PSC).

We understand that the Council feels the need to reduce halibut PSC to compensate for decreases in the halibut fishery exploitable biomass. We note, however, that halibut NUMBERS are very high and declines in exploitable biomass are the result of a reduced size-at-age; i.e., halibut are growing slowly and in some cases no longer reach the legal size of 32 inches. We also understand that the reason for these growth rate declines are unknown, but bycatch by groundfish fisheries is unlikely the cause. Therefore, reducing bycatch will not increase growth rates or the number of commercial-sized halibut recruiting to the fishery. In fact, a lower PSC limit may exacerbate the problem if it is a result of intra-species (halibut-halibut) or inter-species (groundfish-halibut) competition for resources.

Some maintain that a PSC reduction is 'fair' since halibut target fisheries are experiencing lower catch limits. However, we note that if this is really an equality issue, all sectors should share the pain of reduced limits and all sectors should enjoy the benefit of increased limits. The analysis indicates that several strong year classes are poised to enter the fishery in the next few years. If this action is really based on equity, then we expect that any PSC cuts implemented as a result of low directed fishery limits would be rescinded when the exploitable biomass increases.

We also suggest that any Council action to reduce PSC should be implemented concurrently with GOA PSC rationalization. By providing management tools to slow the fishery and avoid areas/times of high bycatch without reducing fishing opportunities, real halibut PSC savings will be realized. This mirrors the approach the Council took under Amendments 79 and 80 to the Bering Sea/Aleutian Islands FMP. Amendment 79 established a 'groundfish retention standard' which was extremely difficult for our sector to meet while in a race for fish; it was not implemented until after the tools to accommodate the requirement were in place (rationalization under Amendment 80). Reducing PSC limits in the GOA presents the same situation: a requirement that will be harmful to the groundfish sectors particularly at a time of high abundance of and interaction with halibut, which can be mitigated to some extent by providing the tools to fish cooperatively and avoid such areas.

Amendment 80 vessels have fished in the Gulf of Alaska since the 1980's, pioneering fisheries that at the time had no shoreside markets. When Amendment 80 was implemented, 'sideboards' limited our sector to historic 1998 to 2004 participation. These sideboards were designed to prevent impacts to the catcher vessel fleet from Amendment 80 fishing. Halibut PSC history associated with the Rockfish Pilot Program was taken out of the third quarter deep-water sideboard to prevent 'double dipping' during that quarter. When the rockfish program was revised and extended, new allocations resulted in a reduction in Amendment 80 halibut PSC of 24 tons – a direct reallocation to the catcher vessel sector.¹

During the 1998 - 2004 period, there was very little catcher vessel activity in deepwater flatfish. However, since 2004, the catcher vessel sector has significantly increased their effort in deepwater fisheries and, as a result, the second season deep water trawl complex is consistently closed before we are able to reach our historic sideboard levels.

The result is that, while we are limited to our historic participation by sideboards, we are in fact unable to reach those sideboard amounts because of increased effort by the catcher vessel sector. This is one of the reasons we have requested separate sector allocations for catcher vessels and catcher processors. Both sectors could fish much more efficiently (increasing ability to reach optimum yield), with lower PSC rates, if we were not racing against each other. Accordingly, *we still believe that sector allocations are the ultimate answer to control PSC rates.*

While sideboards for other sectors (such as AFA non-exempt catcher vessels) roll forward to future seasons if they are not fully harvested, Amendment 80 sideboards do not. This unique restriction prevents our vessels from realizing any benefit from fishing below a sideboard amount. The no-roll provision was not part of the Council's Amendment 80 action, rather it was an interpretation of the regulation by NMFS. Thus, the Council has the option to allow Amendment 80 sideboards to roll forward (suboption 3.2), which will somewhat improve our ability to access our catch history. *We request that you choose this option.* We do note however, that this change does not address the underlying problem of competition with the shoreside sector, but is better than the status quo.

Suboption 3.3, which would allow shallow and deep water complex halibut to be combined after May 15th, provides no benefit to our sector and appears to be designed to favor the Kodiak-based catcher vessel fleet. However, the same logic applies to fifth season Amendment 80 sideboards, which are currently divided between shallow and deep water complexes (whereas for both AFA non-exempt and crab rationalization sideboards the fifth season complexes are combined). If you choose this suboption, we ask that you extend it to include combining shallow and deep water complex halibut sideboards for Amendment 80 vessels in the fifth season.

In summary, the current low level of exploitable halibut biomass in the GOA is the result of reduced size-at-age, and reducing halibut PSC will not address the real problem. If the Council chooses to proceed with PSC reductions as a matter of 'equity,' then the reductions should be rescinded when the exploitable halibut biomass recovers. The Amendment 80 sector, which has a long history of participation in (and pioneering of) GOA groundfish fisheries, has already experienced reduced opportunities in the Gulf due to increased CV participation in deep water flatfish fisheries. The resulting

¹ The original CP halibut allocation under the Rockfish Pilot Program was 108.5 mt (see Amendment 80 Secretarial Review EA/RIR, July 20, 2007, table ES-21). The revised rockfish program, implemented in 2012, allocated 84.7 mt – a difference of 23.8 mt, which is now only accessible to the catcher vessel sector.

race for PSC between the two sectors would best be addressed by sector allocations of PSC. Allowing our sideboards to roll from one season to the next (*suboption 3.2*) will provide parity with other sideboarded sectors and improve our ability to access our catch history. Finally, we note that the Amendment 80 sector, through the Rockfish Program, has already lost access to 24 metric tons of halibut PSC above and beyond the reductions imposed by that program, a de facto reallocation to the Catcher Vessel sector.

Thank you for the opportunity to comment. We appreciate your consideration of the Amendment 80 sector's dependence on Gulf of Alaska fisheries and the unique restrictions under which we operate.

Sincerely,



Lori Swanson
Executive Director

F/V POINT OMEGA

PO Box 608

Kodiak, Alaska 99615

May 26, 2012

Mr. Eric Olson, Chair

North Pacific Fishery Management Council

Re: C-1(b) Final Action on Gulf of Alaska Halibut PSC Bycatch.

Dear Chairman Olson,

I respectfully urge the council to reduce the halibut PSC in the GOA by 15% and select the following alternatives:

1. A 15 percent reduction in the halibut PSC limit for trawl gear; Alternative 2, Option 2, Suboption 3(c).
2. A 15 percent reduction in the halibut PSC limit for the hook-and-line gear CV sector; Alternative 2, Option 2, Suboption 2(c).
3. A 15 percent reduction in the halibut PSC limit for the hook-and-line gear CP sector; Alternative 2, Option 2, Suboption 1(c).

I have been fishing commercially since I was a small boy and have been allocated halibut quota at the inception of the Halibut /sablefish IFQ program and I have also invested in some additional quota. Since 1995 I have seen many changes in the fishery but the one thing we have not seen is a change in the PSC halibut that is taken by the trawl fleet. As commercial fishermen who depend on the halibut resource to keep our small business afloat I am dismayed to see this lack of good management. Over the past few years, in the areas I fish, I have seen a reduction in my harvestable halibut quota of about 60%. Some areas have been hit

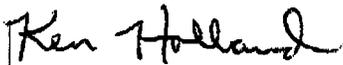
even harder and it is a very hard pill to swallow especially when the largest of the family of fishers in our area, the trawl fleet is still able to catch and dump such a large amount of halibut as PSC. We are all aware that the actual amounts of discarded PSC is largely undocumented as fishing practices tend to be to take observer coverage on trips that are most unlikely to result in the high rates of halibut bycatch.

It has long made me unhappy to note that in programs like the one designed for rockfish in which targeted fishing practices resulted in the allotment of an allocation of Blackcod / sablefish that is a large dollar value to the trawl fleet and is pretty much delivered separately from the main target of rockfish. As young children we were taught not to reward bad behavior and this allocation of what amounts to millions of dollars in saleable blackcod as well as halibut PSC and salmon and crab "bycatch" ,is damaging the ability of other user groups to maximize their fishing in a clean way, is certainly bad behavior that needs to be stopped.

It is my understanding that a majority of the halibut PSC is taken during the cod fishery and since you have only this year implemented the sector split I am wondering why in the interests of conservation and management of our precious resources you awarded the largest sector allocation to the gear group who has the lowest ability to take those cod in a manner that doesn't require them to use a large part of the non harvestable halibut PSC. I thought your mission was to lower bycatch and so far I see political reasons being used to do anything but that.

I find the options in this halibut PSC reductions to be too little and too late considering what we are all facing and I strongly urge you to take the maximum and do a 15% reduction immediately! This is not about allocation it is a conservation issue.

Sincerely<



Ken Holland

Polar Star, Inc.
Patrick Pikus, President
P.O. Box 2843
Kodiak, Alaska 99615
(907) 486-5258 Fax (907) 486-5413

May 29, 2012

Eric Olson, Chair
North Pacific Fishery Management Council

RE: Agenda Item C-1b, Gulf of Alaska Halibut PSC Final Action

Dear Chair Olson:

I urge the council to reduce the annual levels of GOA halibut PSC by 15%. In particular, I believe that the council should select the following alternatives:

Alternative 2, Option 2, Suboption 1c: A 15% reduction for the HAL CP sector.
Alternative 2, Option 2, Suboption 2c: A 15% reduction for the HAL CV sector.
Alternative 2, Option 2, Suboption 3c: A 15% reduction for the trawl CV sector.

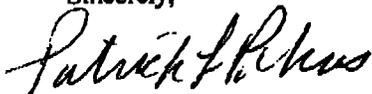
I own and operate two vessels, the F/V Polar Star and the F/V Miss Lori, that longline for halibut out of Kodiak. I have fished for halibut since before the IFQ program was implemented, and I and my crew are substantially dependent on the halibut fishery. Indeed, the halibut resource is vital to a great variety of directed uses that benefit our communities: sport fishing, subsistence, and the commercial IFQ fishery. I am troubled by what I see happening to our halibut resource. We have seen substantial declines in the past decade: a 58% decline in exploitable biomass, which has led to catch limit reductions of 47% for area 3A and 70% for area 3B. This decline is having a tremendous detrimental impact on the directed user groups, and I believe that the council is obligated to do what it can to help arrest the decline.

During the entire period of this decline, the trawl and groundfish longline sectors have had the same level of PSC that they have had since 1986 and 1995, respectively: 2000 mt for the trawl sector, and 300 mt for the longline sector. However, I believe that the amount of PSC actually taken is underreported due to the observer effect in unobserved catch in the trawl fishery. Since the analysis indicates that a pound of trawl bycatch equates downstream to 2.2 pounds of spawning biomass, and given that trawl PSC catch is likely to be significantly higher than 2000 mt, I believe that halibut PSC in the GOA is having an adverse impact on the health of the halibut resource and should be considered a conservation issue.

Members of the trawl industry in recent years have indicated that they have made great strides in reducing PSC rates through gear modification, fishing practices, and the timing of openings. This is reflected in the fact that they have been able to fish for flatfish more extensively in recent years. I believe that the trawl sector would be able to accommodate PSC reductions if they prosecute their fisheries conscientiously. The current PSC levels are wasteful when they do not need to be. Given the seriousness of the situation, I believe that it is incumbent on the council, as stewards of the fisheries, to take action at this time and reduce PSC limits in the GOA by 15%.

Thank you for your consideration.

Sincerely,



Patrick J. Pikus

May 29, 2012

To The North Pacific Fisheries Management Council,

It's time to cut halibut by catch for the Ground fish Fishery in the Gulf of Alaska by at least 15%. This is an issue of both conservation and allocation.

I don't see how you can manage a species of fish when you don't look at the all the user groups and how they are effecting the resource. To single out a few of the users and cut them substantially, then cut the bycatch by very little, then not to take into consideration the non-guided fisherman or subsistence users at all makes no sense. To make things equitable I would think you would look at all user groups; the subsistence users, guide and non-guided users, long liners and those who take halibut as by catch then make a plan that takes them all into account and treats them all fairly. How can you say "fair and equitable" if you haven't taken this approach?

One thing that is very clear at this juncture in the Halibut management is that nobody understands what is happening to the halibut stocks and why they are growing so slowly. I would think that you would want to take conservative measures and give yourself time to figure this out.

According to the IPHC, halibut caught in trawl nets average between 40 – 60cm (15.5 and 23.5 inches). For every pound of these little halibut left in the water our female spawning biomass would increase 2.15 - 5.57 pounds of spawning biomass. The spawning biomass represents the health of our future stocks.

This hard cap for Halibut bycatch has been in place since 1989 and its time we looked at protecting the health of the future resource by cutting halibut by catch in the ground fish fleet by at least 15%.

Thank you for your time and attention,



Chris Donich

(907) 235-3843

YOUR BUSINESS Regulators

by Michel Drouin

Electronic catch monitoring develops in British Columbia



B.C. halibut fisherman Wes Erickson on deck with crewman Suya Farkas in the rear. They're being monitored by two cameras on the stabilizer pole. Pat Cullen photo

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Ten years ago, British Columbia groundfish fishermen found themselves in a no-win position where, because of licensing conditions, they were forced to throw away good fish.

"All the licenses were for a single species, so if you went out on a rockfish trip, then you had to discard the halibut," said longline fisherman John Koolman. "If you went out on a halibut trip, you couldn't keep the rockfish."

"From the industry point of view, it was a waste, and we'd be better off if, within limits, we could keep what we caught."

Fishermen, DFO, and the public all were aware of problems in the groundfish fishery with bycatch and discards, and fishermen decided to be proactive in figuring out a way to account for all fish being caught.

The result was an Integrated Fisheries Management Plan.

The Commercial Industry Caucus was formed to develop a new integrated management plan. The caucus had two representatives from each of five fishing sectors, and one from the processors.

One hundred percent catch monitoring had been required on B.C.'s groundfish trawlers since 1997, but full monitoring of hook-and-line groundfish didn't occur until 2006. Trawl monitoring is done by on-board observers, and hook-and-line monitoring is electronic. All longliners have two cameras: one for a close shot where the fish come over the deck, and one that takes in the whole starboard side of the vessel.

Solution for longliners: It was a challenge to devise a monitoring plan for all longliners.

"We had anywhere from 10 to 15 percent observers, but not all the fleet was capable of taking an observer because of size and accommodation and boat layout," Koolman explained.

Fishermen had to work out a plan that followed guidelines from

the Department of Fisheries and Oceans that stated:

- All groundfish catch must be accounted for.
- Groundfish catches would be managed according to established groundfish management areas.
- Fish harvesters would be individually accountable for all of their catch.

And new monitoring standards would be established and implemented to meet the above three objectives.

DFO also said that species and stocks of concern would be closely examined.

With the introduction of the Integrated Fisheries Management Plan, 100 percent monitoring was implemented.

"With 100 percent monitoring, it put the fleet on a level playing field," Koolman said.

Reduce costs: Electronic monitoring was developed to reduce costs more than anything else, Koolman added.

"When the subcommittee looked at options for monitoring the hook-and-line fishery, we knew what the issues were with cost associated to the observer program," he said.

"At the same time, AMR (Archipelago Marine Research Ltd.) was trying to develop electronic monitoring equipment."

The Integrated Fisheries Management Plan for groundfish was being brought in simultaneously.

"The ability to transfer fish between sectors and caps and rules were developed at the same time as electronic monitoring," Koolman added.

There were casualties along the way, with some fishermen dropping out.

"At the beginning, in the first year, the hook-and-line fleet was rationalized to some point," Koolman said. "Part of it was economics from increased costs of monitoring and accessing quota."

This is one in a series of articles commissioned for a project of the National Fisheries Conservation Center (NFCC) on lessons from experience in the use and design of individual quotas and other "catch share" management systems. NFCC is a nonprofit think tank founded in 1994 with support from the fishing industry, foundations, and NOAA. NFCC's founding director is Brad Warren (who later served as editor and publisher of *Pacific Fishing*), who runs this project.

There is 100 percent dockside monitoring of piece counts and weights, and 100 percent retention of all rockfish.

With a quota system established for all groundfish, no untargeted fish is discarded. Fishermen must purchase, lease, or swap quotas with other fishermen to account

for bycatch.

The hook-and-line monitoring system includes cameras to capture video footage of hauling at the vessel's side and Global Positioning System-linked winch sensors on all boats.

Halibut example: According to British Columbia halibut fisherman Dave Boyes, electronic monitoring of groundfish is an expensive, onerous system but "very worthwhile."

"It is a public resource, after all, and we *continued on page 14*

the bottom line

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YOUR BUSINESS

Regulators *continued from page 13*

need a public license," Boyes said. "We have to show the public through government that we are harvesting this resource in a responsible, sustainable manner."

Accurate catch monitoring is critical to the success of a quota fishery.

With individual vessel quotas (IVQs) a valuable commodity, fishermen have to know that others cannot cheat the system. Halibut fishermen must possess sufficient quota of yelloweye rockfish to cover the incidental capture of yelloweye rockfish, although Pacific halibut may be targeted.

Trading the quota for yelloweye rockfish or any other quota species would break down if it were perceived that fishers could secretly discard or dump quota species.

Electronic monitoring equipment for the hook-and-line fishery costs around C\$8,000, with additional associated fees for installation and audits of the recorded material.

There is 100 percent dockside monitoring of piece counts and weights, and 100 percent retention of all rockfish. The system provides official estimates of total catch in pieces and weight through the fisher logs and dockside monitoring.

If a fisherman is catching dogfish and only earning 25 cents a pound, then obviously his costs are much higher.

Because of rockfish: The regional manager of groundfish for DFO, Tamee Karim, said that from DFO's perspective, conservation concerns for rockfish led to full monitoring of the hook-and-line fishery.

"There is 100 percent mortality associated with rockfish," Karim said. "Because we didn't know what was being caught, something had to be done to improve our monitoring. If we really wanted to know what the harvest was, we needed 100 percent monitoring."

Ten percent of the video footage is reviewed and compared to the logbook, and if it is within an acceptable margin of error, DFO accepts the logbook as a true depiction of the fishery.

"If an audit is outside of the acceptable

margin of error, we review 100 percent of the video footage and replace the logbook with what the reviewer saw," Karim explained.

The margin of error varies with the test and species, but it is between 10 and 15 percent, she added.

Can't differentiate species: While cameras can differentiate most species of groundfish, they cannot differentiate between rockfish species.

"That is more difficult, and that's why we require 100 percent retention so that the species identification can occur at dockside," Karim said.

Karim said DFO did an analysis of the capture of yelloweye rockfish on whether analyzing this 10 percent of data was sufficient and determined that the data is adequate.

Karim said that the on-board observer program is very different because DFO uses the observer's logbook as the data collected from each trip.

Halibut fisherman Boyes said the cost of monitoring to fishermen varies widely according to species.

He calculates that the cost of monitoring, per halibut trip, works out to 3.7 cents per pound for a fish that averages C\$7 a pound in earnings.

If a fisherman is catching dogfish and only earning 25 cents a pound, then obviously his costs are much higher, Boyes said.

Begins with crab: Electronic monitoring of fisheries began in British Columbia with the Area A Dungeness crab fleet in 2000. It is one of the more lucrative and sustainable fisheries in the North Coast of B.C. It stretches north from Vancouver Island to Alaska, from Hecate Strait on the east and to the western coast of Queen Charlotte Islands (Haida Gwaii).

According to *The Economics of British Columbia's Crab Fishery* published by DFO in 2010, Area A's gross revenues for 2007 were estimated to be \$18.4 million — about \$3.5 million more than the other six crab fisheries combined.

With a fleet of 50 crab boats fishing in the area, fishing effort intensified in the late 1990s, with an estimated 70,000 traps deployed by the fleet.

Along with the greater number of traps in the area, gear conflicts emerged, with fishers harvesting from other fisher's traps, stealing traps, and cutting away gear tangled with their own.

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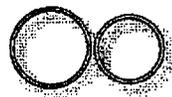
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According to Archipelago Marine Research Ltd., there were also suspicions that some fishers simply hauled other's gear without leplying any of their own.

"Fishers estimated that some fishers were losing as much as C\$100,000 a year from these illegal activities," states a report by Archipelago.

Along with trap limits instituted by DFO, a monitoring program was set in place, at the request of the Area A Crab Fishermen's Association. Working with the association, Archipelago developed a custom-designed electronic monitoring program for the fishery.

The monitoring system automatically logs various data during all fishing trips.

As in groundfish longline monitoring, a video camera, GPS receiver, and hydraulic pressure transducer on the winch send fishing data into a storage unit.

The Area A crab fishery adopted radio frequency identification (RFID) technology to accomplish trap identification.

Pre-assigned RFID read-only tags are inserted into trap buoys. The buoy is passed over a scanner while the trap is being hauled to identify the trap.

The trap identity is checked against records to identify the owner. If a discrepancy is noticed, the video clip and associated data are archived and reported. After fishing for about two weeks, the monitoring system is serviced and data retrieved for analysis.

From 2000 to 2010, Archipelago provided monitoring services in the Area A crab fishery. Fishermen decided in 2010 to seek another service provider, and in a vote chose Ecotrust Canada.

Saving money: By choosing a new service provider, Dungeness crab fishermen on B.C.'s North Coast found a way to reduce costs and maintain a required on-board monitoring program in their fishery.

The total cost of camera and camera computer using the Archipelago system was \$9,000. That fee was \$5,700 for computer box and additional charges for cameras, sensors, and associated equipment.

The Ecotrust data computer box is \$2,700. Cameras and other equipment are similar in cost to that of cameras in the Archipelago system.

A big advantage of the Ecotrust system is that it is used by other fleets other than Area A crab. Also, the Ecotrust system employs open-source software, readily adaptable

to any fishery in the world, said Dan Edwards, executive director of the Area A Crab Association.

"Anybody who wants to build a system for monitoring can go and build their own," he said.

Ecotrust Canada said that using open-source software rather than proprietary software is more affordable and more accessible and helps over time to reduce costs related to updating and upgrading, maintenance, and management.

Costs of monitoring both at-sea and onshore are a concern, particularly for small boat fishermen, Edwards said. Most small boats rent their quota, so lease fees are their single biggest cost, and monitoring is often second.

Bryan Rusch, DFO's North Coast acting regional shellfish coordinator, said that after the first year of monitoring, theft of traps disappeared and the number of permitted traps has remained within required limits. ↓

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To: The NPFMC.

Please read this From OUT
OF Pacific Fishing magazine if
you haven't already.

I am in support of The
15% reduction in halibut bycatch.
along with The 15%, we also
need 100% coverage to really
know the numbers.

Thank you

George Kirk

George Kirk

30 year halibut Fisher

Phantom2@gci.net

Thorvold Olsen
F/V Viking Star
PO Box 322, Kodiak, AK 99615
Telephone 907-654-5387 / Fax 907-486-8126
May 28, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Public Comment: C-1(b) Final Action on Gulf of Alaska Halibut PSC bycatch.

Dear Mr. Olson,

Please reduce the halibut psc bycatch by the draggers by 15%. Please reduce the halibut psc bycatch by the hook and line catcher vessels by 15%. Please reduce the halibut psc bycatch by the hook and line catcher-processors by 15%.

I have seen about a 56% reduction the IFQ pounds that I can fish because of the quota reductions that the IPHC has imposed. The draggers are a big reason why our halibut have dropped so much, this is a known fact. Draggers have a lot of halibut bycatch in their cod, rockfish, arrowtooth flounder and flatfish fisheries and in areas where there is, or used to be, an abundance of halibut.

They also have lots of unobserved halibut bycatch, and they have much higher amounts of halibut bycatch when they do not have observers onboard. I also know that they are destroying the bottom where they fish. Their drag boats are bigger and more powerful than they were 25 years ago. Trawl doors weigh about 2,500 pounds each, and trawl nets weigh between 6,000 to 8,000 pounds each. It has been well known that trawl doors and heavy nets tear up the bottom.

This has been going on since the mid 1980s when the drag fishery started in the gulf of Alaska. It has been going on too long. It is time to do something about the trawlers high halibut bycatch, and their destruction to the bottom.

I am also concerned about the large amounts of halibut that are taken in the longline cod fisheries. It is also very necessary to reduce the halibut bycatch percentage by 15% for the longline catcher vessels and longline catcher-processors.

The halibut resource is in big trouble. I ask you to please reduce the trawlers bycatch by at least 15%. You should really reduce it by 50%. The draggers are good and smart fishermen. They will be able to adjust to the lower bycatch allowances. Don't let them tell you that they can't.

Sincerely



Thorvold Olsen

Norman Mullan
F/V Cindria Gene
PO Box 92; Kodiak, AK 99615
(907)486-5012 Fax: (907)512-3047
May 28th, 2012

Mr. Eric Olson, Chair; North Pacific Fishery Management Council

Re: C-1b Final Action on Gulf of Alaska Halibut PSC Bycatch

Dear Chairman Olson,

I respectfully request that the Council adopt:

1. A 15 percent reduction in the halibut PSC limit for trawl gear; Alternative 2, Option 2, Sub option 3c.
2. A 15 percent reduction in the halibut PSC limit for the hook-and-line gear CV sector; Alternative 2, Option 2, Sub option 2(c).
3. A 15 percent reduction in the halibut PSC limit for the hook-and-line gear CP sector; Alternative 2, Option 2, Sub option 1(c).

I have been a commercial hook-and-line halibut fisherman for over 28 years. I have been troubled by what I see on the halibut fishing grounds.

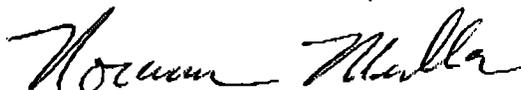
I am concerned about the significant amounts of halibut PSC taken in the trawl fisheries for Pacific cod, shallow water flatfish, arrowtooth flounder and rockfish.

I am confused about why an abundance of this trawl halibut PSC bycatch is unobserved, unreported and not factored into a true and accurate accounting and analyses of the impacts to the conservation and management of the halibut resource that actually result from the trawl halibut PSC bycatch.

I am perplexed by the fact that no responsible party has thus far taken action to address the significant amounts of trawl halibut PSC bycatch other than to compel disruptive reductions in catch limits that impose costs only on the commercial and recreational halibut fisheries, while taking no action to address the security of these fisheries, or the degradation of the sustainability and productivity of the halibut resource that results from trawl halibut PSC bycatch.

The past ten years has seen a 58% decline in exploitable halibut biomass, and reductions of catch limits of 70% for area 2C, 47% for Area 3A and 70% for 3B. It is time for the Council to regulate the trawl sector in a manner that requires them to contribute to addressing the deterioration in the sustainability and conservation of the resource, and the ongoing degradation of the economic, social and cultural benefits that are realized by the commercial hook-an-line fleet, the charter fleet, the fishing lodges, the independent recreational anglers, the consumers, and the residents, workers and support businesses of the coastal communities who have direct dependence on, and derive benefits from the halibut resource.

Sincerely,



Norman Mullan

James Skonberg
F/V Lorena Marie
P.O. Box 70
Ouzinkie, Ak. 99644
phone (907) 680-2224
5/29/12

(Halibut Bycatch)

Dear Chairman Olson + Council members.

My name is James Skonberg + I have been fishing halibut since 1967. My son + grandson are also life long fishermen. We depend on halibut for commercial + subsistence use. The past 3 years I've had to travel farther to catch my T.F.Q's.

2 years in a row I did not catch enough subsistence halibut to sustain my family through the winter. Our local Tribal Council don't have any halibut on hand for there senior citizens.

Since the start of quota shares I've taken over a 50% cut in my catch. Sport + Charter operators have also felt the crunch. I don't think 5, 10, or 15% reduction should be an option. It should be at least 15% or more for the Draggers. If they fish as clean as they say this should not hurt them. We are all in this together so lets all try to concieve together.

Sincerely
James Skonberg

May, 29, 2012

Mr. Eric Olson, Chair North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501 npfmc.comments@noaa.gov

Re: Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska, agenda item C-1 (b)

Dear Chairman Olson and members of the Council,

My name is Gerri Martin and my family has owned and operated a halibut charter fishing business in Homer, Alaska since 1979. As a halibut charter fisherman, we depend on a healthy halibut resource. Commercial harvesters, charter operators, sport fishermen, processors, coastal residents and stakeholders have all come together to ask the Council to take final action to reduce halibut bycatch in the Gulf of Alaska. Coastal Alaskans are dependent on halibut for food, sport, and livelihood and we urge the Council to adopt a 15% reduction in halibut bycatch at the June 2012 meeting.

Halibut stocks and catch limits in the Gulf of Alaska have declined significantly over the past decade. Exploitable halibut biomass has dropped 58% in the Gulf of Alaska over the past decade with the catch limits for the directed halibut fisheries declining significantly (by 70% in 2C, 47% in 3A and 70% in 3B). The Gulf of Alaska charter fleet has also experienced substantial reductions in catch limits.

Commercial halibut quota share holders, charter fishing businesses and countless sport and subsistence halibut harvesters stand united to protect the halibut resource and ensure that each sector is held responsible for the health of the resource. Given the halibut bycatch limit was set in 1989 and has remained relatively unchanged, we urge the Council to adopt a 15% reduction to help protect and conserve the halibut resource for the benefit of halibut quota share holders, crewmembers, processors, charter operators, sport harvesters, subsistence users, and coastal Alaskans that depend on halibut for food, sport and livelihood.

Sincerely,



Gerri Martin
North Country Charters
P.O. Box 889
Homer, Alaska 99603

North Pacific Fishery Management Council
605 W. 4th, Suite 306
Anchorage, AK 99501-2252
Fax (907) 271-2817
npfmc.comments@noaa.gov

May 29, 2012

Re: Agenda Item C-1(b) – Final action GOA Halibut PSC

Dear Chairman Olson and members of the Council:

Alaska Groundfish Data Bank (AGDB) is a member organization that includes the majority of both the shorebased processors located in Kodiak and the trawl catcher vessels based in Kodiak. The Kodiak trawlers are mostly family owned businesses who have participated in the federal groundfish fisheries since Americanization of the fisheries.

This action has the potential to severely impact the community of Kodiak, Kodiak Island processors, the processing workforce, the vessel owners, vessel crews, fishing service and support sectors.

The members of AGDB support the following as an outcome for this action:

- (1) Adopt alternative 2. Amend the GOA Groundfish FMP to remove setting GOA halibut PSC limits from the annual harvest specifications process. GOA halibut PSC limits would be established (and amended) in federal regulation.
- (2) Select Option 1. Retain the present trawl and hook and line halibut PSC limits and write them into regulations.
- (3) Select Suboption 3.2. Allow the Amendment 80 sector to roll unused halibut PSC from one season to the subsequent season (similar to the non-Amendment 80 sectors).
- (4) Select Suboption 3.3. Allow available trawl halibut PSC in the second season deep water and shallow water complexes to be aggregated and made available for use in either complex from May 15th through June 30th. Halibut PSC sideboards for the amendment 80 and AFA sectors would continue to be defined as deep water and shallow water complexes in the second season.

Our support for the selection of both suboption 3.2 and 3.3 is dependent on the method for accounting for halibut PSC usage from May 15th to June 30th. The deduction of halibut PSC must come from the species fishery where it was initially available not the species fishery where it was used. If NMFS cannot implement the accounting for this provision as stated then we do not support either suboption.

The new CGOA rockfish program includes a 4.25% reduction of the trawl 2000 mt halibut PSC cap (~85 mt). This reduction will become effective this year and is being implemented simultaneously with a catch share program. Further reductions of the trawl halibut cap are not unwarranted at this time since the other trawl fisheries do not within a catch share program.

We do not support any further reduction of the halibut PSC caps for either longline or trawl gear until there is a catch share program in place that provides the tools for individual vessel accountability for bycatch control and reduction.

AGDB Comments: GOA Halibut PSC – Final Action June 2012

Page 2

PRESENT FISHERY MANAGEMENT SYSTEM IS NOT DESIGNED FOR BEST USE OF BYCATCH

The NPFMC must understand that they have not created a regulatory environment for the fishing fleet to reduce bycatch. The present management system creates PSC limits that are essentially a common property resource that may be accessed by any GOA fishermen that is licensed to participate in that fishery. Target fisheries constrained by a PSC limit are highly competitive. The PSC limit for a fishery can become an effective limit on the target fishery, preventing the TAC from being completely harvested. This situation sets up "perverse" economic incentives that encourage individual vessels to "race" to catch their intended target species before the fishery's collective PSC limit is taken and the fishery is closed. This race accelerates catch of PSC, resulting in an earlier closure of the fishery. These closures have the potential to inflict significant adverse economic impacts on longline and non-pelagic trawl fisheries in the GOA (analysis page 220).

The "race for the fish," and attendant higher PSC rates, occur because the competition created by PSC limits do not take into account individual behavior of fishing operations, removing any direct individual accountability for their fishery decisions. An operation that fishes with higher halibut PSC rates may realize a direct economic benefit from its actions since they may catch a larger portion of the TAC while using a larger disproportionate amount of the common halibut bycatch cap. Trawl vessels in the GOA fish under Gulf-wide season and fishery complex halibut prohibited species catch limits that are available for use by any licensed trawl vessel. The large fleet (including both catcher vessels and catcher processors) fishing in multiple target fisheries and over a large area (including multiple management areas) make any coordination of the fleet to reduce halibut bycatch virtually impossible. Additionally, with a GOA trawl catch share program under discussion, more and more vessels (both new vessels and vessels with latent history) are participating in the Gulf fisheries in the race for history, exacerbating the use of and race for halibut PSC. The Council should therefore assume that the economic losses suggested in the analysis are real and that there is no way for the fleets, especially the trawl fleet, to save themselves. There are several examples that underline why the fleet cannot save themselves from economic harm.

Example #1 – flatfish quotas are never reached: There is now and always has been incentive for the trawl sector to reduce halibut bycatch since target groundfish quotas are left in the water every year. In 2011, there were 311,665 MT of groundfish target quotas that were not harvested due to a combination of halibut bycatch restraints and fish markets: this compares to 220,699 MT of actual catch.

Example #2 – Pacific cod sectors increases the race: Due to the new Pacific cod splits, the trawl sectors do not race for the trawl cod quota with other gear sectors, however, they do race across the trawl sectors for both halibut PSC and cod catch. The 2012 A season fishery closed due to halibut PSC, the first time since 2006. The 2012 closure was due to a combination of higher cod allocations via the sector split action where the WGOA trawlers received 3 times recent historical catches (requiring more halibut mortality to support the extra catch) and higher halibut bycatch than in recent years for CGOA participants.

The WGOA was closed to trawl catcher vessel targeting Pacific cod on February 22nd when the available quota was reached. The CGOA remained open to trawl catcher vessels targeting Pacific cod and the local Kodiak fleet chose to stand down on cod and move into pollock as a means to reduce halibut PSC usage and rates. Some WGOA trawlers who have endorsements for the CGOA regulatory area fished area 620 and delivered their catch to Sand Point. For the A season 31% (or 2,833 mt) of the CGOA trawl catcher vessel quota was caught and delivered outside Kodiak with 69% (or 6,287 mt) delivered in Kodiak (NMFS personnel communication). This compares to virtually 100% delivered to Kodiak prior to the sector split. The race for trawl cod catch is expected to increase in the future due to the ability of the WGOA and CGOA CV sectors to cross over between

areas. This example highlights the inability of the fleet to coordinate their activities in early 2012 and underlines their inability to implement effective PSC reduction strategies (analysis page 233).

Example #3 – Gear improvements: The groundfish fleet has shown great innovation in improving gear technology but in all cases the individual incentives need to be created for gear development and use. The halibut excluder for cod trawl can be effective when tuned for optimal performance but with the race for catch most vessels do not use the excluder, thinking they will lose out on target cod catch. Other versions of halibut excluders have not proven useful as yet for excluding small halibut in the flatfish fisheries: average sizes of arrowtooth flounder, flathead sole and halibut are similar and are very difficult to exclude based on size or shape differences or behavior. The use of excluders presently is not encouraged due to lower target catch rates and the race for flatfish catch. Without individual accountability incentives for investment in gear development and excluder usage is hampered. Additionally the new Annual Catch Limits impede the ability to move forward with exempted fishing permits (EFP) to test gear. The CGOA fleet has planned to test salmon excluders in the GOA pollock fishery this fall. The research has been delayed from the fall of 2012 to at the earliest the spring of 2013 due to conflicts with new Annual Catch Limits and the accounting of research catch. Unless pollock and Chinook salmon can be made available for the research the testing of the salmon excluder appears unlikely.

Because the fishing fleets do not have the tools this action does not comport with NS nine – bycatch reduction to “the extent practicable” and the balance of NS one – optimal yield. The Council should develop the appropriate regulatory environment for individual accountability before reducing the present halibut bycatch caps.

CUMULATIVE IMPACTS TO THE FISHERY REGULATORY ENVIRONMENT FOR THE TRAWL SECTOR IS NOT UNDERSTOOD
The analysis does not inform the Council action with respects to the present fishery regulatory environment since multiple actions have been newly implemented in 2012 or will be implemented in 2013. The effects of all the actions in combination on the fishery environment while listed in section 3.8 are incomplete since two FMP amendments are excluded (CGOA trawl sweeps for flatfish targets and crab bycatch measures for Kodiak eastside) and none of the effects of the previous actions are analyzed in combination with this action. It is obvious that groundfish participants will be worse off when all the measures are analyzed in combination since each action changes the fishery environment for the CGOA trawl sector - all of which reduces flexibility for the fleet to operate within the regulatory environment.

- (1) *GOA Chinook salmon PSC limits (implementation mid-2012):* The Chinook salmon bycatch cap will shut down the pollock fishery if reached. Chinook salmon bycatch rates are higher with mid-water gear and lower when fished with bottom gear. Lower halibut bycatch caps may preclude bottom gear for pollock harvest yet the Chinook salmon cap may preclude pollock mid-water fishing when Chinook salmon bycatch is high. The two actions in combination put the GOA pollock fishery at risk.
- (2) *GOA Pacific cod sector split (implementation 2012):* As noted earlier, higher cod allocations for the WGOA trawl sector in combination with the race for fish increased halibut bycatch usage for the 2012 A season fishery. The two actions in combination put the GOA trawl cod fishery at risk.
- (3) *Central Gulf of Alaska Rockfish Program (implementation 2012):* Halibut PSC allowances were reduced by 12.5% of the historical levels and in addition any halibut savings were taxed at 45% (only 55% of the saving rolls to the limited access trawl fisheries). The analysis of the alternatives (section 4.6) is a retrospective analysis that compares actual halibut PSC usage, to actual groundfish catches and first

wholesale gross revenues for the years 2003 to 2010. The analysis does not consider the halibut PSC reduction due to the new treatment of halibut PSC within the new rockfish program for future years. Table one shows the retrospective tax for the pilot program (2007 – 2011) and the removal of halibut PSC from use for the trawl fisheries for the 2007 to 2011 time period. If halibut savings are similar in the new rockfish program then halibut PSC available for use will be reduced by 80 to 93 mt. The two actions in combination will further diminish first wholesale value for the trawl sector since halibut PSC available for use is less than 2,000 mt for future years. The problem statement suggests that the GOA trawl caps have not changed since 1989; this statement is misleading and misinforms the public.

Table 1. Retrospective tax for the CGOA rockfish pilot program

	Total RPP (CV and CP) Annual (MT)				
	2007	2008	2009	2010	2011
Allocation	176	171	170	209	208
RPP Usage	50	36	27	60	73
Remaining	126	135	143	149	135
Rollover Amount	128	135	139	149	135
Pre-Tax - (12.5%)	22	21	21	26	26
Post Tax - (45%)	58	61	63	67	61
Total Retrospective Tax:	80	82	84	93	87

- (4) *Observer program restructuring (implementation 2013):* The restructured observer program will allow NMFS to deploy observers randomly to reduce bias caused by 30 percent vessels ability to choose when and where to take observers to a new system in which NMFS is responsible for distributing observers among vessels using statistically robust methods. The new system will also fill in holes for those fishing sectors that previously did not carry observers (groundfish vessels less than 60 feet and the commercial IFQ halibut sector). The potential changes in PSC halibut estimations will affect groundfish fisheries that currently have a large amount of effort from 30 percent or unobserved vessels. Estimates of halibut discards within the commercial halibut fishery will be based on actual fishery performance for the very first time instead of a proxy based on the halibut longline survey. More precise halibut bycatch and wastage estimates will benefit the management of the halibut resource; however impacts to groundfish catches and impacts to available halibut CEY for directed halibut users due to the newly derived halibut wastage estimates are unknown.
- (5) *Tanner Crab bycatch measures – eastside of Kodiak (implementation 2013 / 2014):* The bottom trawl closure in the Marmot area will further restrict the trawl fleet and reduce flexibility for halibut bycatch avoidance.
- (6) *CGOA Trawl sweeps for flatfish target fishing (implementation 2013 / 2014):* The CGOA CV trawl fleet will need to invest capital and undergo the necessary learning curve to adjust to the gear restrictions for flatfish fishing.

AGDB believes that an environmental impact statement (EIS) is necessary for the Council to understand the cumulative impacts of prior regulatory actions in combination with this action on the trawl sector, their associated processors and communities.

IMPACTS TO THE DISTINCT TRAWL SECTORS, PROCESSORS AND COMMUNITIES SHOULD BE ANALYZED

It is impossible to understand the impacts of this action on groups of discrete groundfish harvesting and processing operations, and the associated dependent communities based on the present analysis. The retrospective analysis looks at groundfish closures for the trawl sector as a whole and combines impacts for the CP sector and CV sectors and for both WGOA and CGOA regulatory areas in combination. It also combines impacts across trawl fisheries, shallow and deep water complex fisheries, which makes it difficult to understand impacts by fishery – pollock, cod, rockfish, arrowtooth, rex sole, and shallow flatfish - or by regulatory area (see table 4-22 and 4-23, tables 4-68 and 4-72). The addition of section 4.6.6 gives a sense of the different fleets and affects; however, it does not come out and directly say which operations are at risk. As the analysis notes, the proposed reduction in the halibut limit, historically has had minimal impacts on the first season shallow complex fisheries (page 194) which means that the WGOA CV fleet will most likely not be affected by this action since this fleet typically only participates in the A season cod fishery and harvests pollock with mid-water gear (shallow complex fisheries). For the Non- exempt AFA fleet, given that the halibut PSC limit sideboard usage is, in most cases, well below the applicable current sideboard limits, the halibut PSC reduction options would appear to have the potential to minimally constrain the fleet, assuming current fishing practices continue (page 203). For the CVs and CPs that participate in rockfish fisheries, halibut PSC will be available for CGOA rockfish fishery due to the rockfish program. Most likely the WGOA and WYAK rockfish fisheries will be held harmless due to the third season halibut allocation and structure. Thus, the vessels that will feel the brunt of this action are the six unique A-80 CP vessels that participate in the GOA flatfish fisheries and the 34 CGOA non-AFA and AFA-exempted vessels that operate out of Kodiak and participate in the year round flatfish and B season cod fisheries. Of these 40 vessels, those individual operations that are most at risk are those that are entirely dependent on the GOA groundfish fisheries and do not have revenue from other fisheries such as IFQ halibut/sablefish, A-80, Pacific whiting or AFA.

AGDB continues to believe that this action warrants an Environmental Impact Statement (EIS) that would include a broader set of alternatives than in the present Environmental Assessment (EA). The industry letter that was submitted by AGDB, AWTA, GF, PSPA, and UCB on January 24, 2012 provides several ideas for possible alternatives that would allow for changes in the halibut PSC bycatch caps but would be much more creative than “just lowering the caps” and potentially minimize the economic harm to groundfish participants.

AGDB contends that NMFS and the NPFMC is required to prepare a full EIS because: (a) the proposed action involves significant social or economic impacts interrelated with natural or physical environmental effects for the effected region, (b) the effects on the human environment are highly controversial; and (c) the effects on the human environment are highly uncertain if implemented in combination with all prior regulatory actions.

REDUCING THE HALIBUT BYCATCH CAPS WILL DO LITTLE FOR HALIBUT DIRECTED USERS BUT WILL RESULT IN DRAMATIC ECONOMIC PAIN FOR GROUND FISH TRAWL HARVESTERS (MUCH PAIN FOR LITTLE GAIN)

The analysis assumes that reduction of halibut bycatch for the portion of the catch greater than 26 inches will become available to the directed halibut users in that year. Since there is no trawl halibut bycatch that occurs in area 2C and halibut migration is not predictable, all benefits are assumed to accrue to IPHC regulatory areas 3A and 3B. When reformulating the data across multiple tables the relative economic benefits to halibut users and groundfish harvesters can be gleamed. For individual IFQ holders at the maximum 15% trawl cap reduction, net benefit for the first year of the reduction is the highest at \$1,322 per holder in area 3B, and for sport charter permit holders in area 3A at tier 1 is the highest at \$550 per holder. Losses to the core 40 historical trawl groundfish vessels would be \$211,250 per vessel (See table 2 parts A - C).

Table 2. Estimated first wholesale value of anticipated increased CEY for directed halibut users by IPHC regulatory area compared to estimated first wholesale value losses of trawl groundfish harvests based on table 4-44, p. 174, table 4-45, table 4-47 & table 4-48 p. 176, table 4-70 p. 192, table 4-74 p. 195, and table 3-4 p. 46.

Part A. Increase to IFQ holders in first wholesale value (annual) – higher IFQ price, tier 2 CSP (Table 4-44, p. 174). Increase per IFQ holder assumes 5%, 10% or 15% decrease in trawl PSC.

% trawl PSC reduction	2C	3A	3B
5%	\$0	\$438,000	\$218,000
10%	\$0	\$877,000	\$435,000
15%	\$0	\$1,315,000	\$653,000
IFQ QS holders	1,130	1,431	494
	\$0	\$507,000	\$244,000
	\$0	\$615,000	\$289,000
	\$0	\$919,000	\$432,000

Part B. Increase to guided sport permit holders in first wholesale value (annual). Increase per individual permit holder assumes 5%, 10% or 15% decrease in trawl PSC.

% trawl PSC reduction	2C	3A (T1)	3 A (T2)
5%	\$0	\$90,238	\$82,034
10%	\$0	\$180,475	\$164,068
15%	\$0	\$270,713	\$246,102
# Sport businesses	447	492	492
	\$0	\$40,500	\$36,750
	\$0	\$81,000	\$73,500
	\$0	\$121,500	\$110,250

Part C. Decrease to trawl vessel owners in first wholesale value (annual): Decrease per individual permit holder assumes 5%, 10%, and 15% decrease in trawl halibut PSC. The impacts are focused on the 6 CPs and 34 CGOA CVs that will be most affected by the action versus all trawl licensed participants.

% trawl PSC reduction	Deep	Shallow	All Groundfish
5%	\$730,000	\$1,020,000	\$1,750,000
10%	\$2,490,000	\$2,740,000	\$5,230,000
15%	\$3,350,000	\$5,100,000	\$8,450,000
Trawlers (no.)	40	40	40
	\$18,750	\$25,500	\$33,750
	\$62,250	\$83,500	\$109,750
	\$93,750	\$127,500	\$163,250

Typically, economic data only reports seafood wholesale value and does not investigate benefits of economic activity within coastal communities for the individual fisheries. Volume fisheries create elevated economic activity that support working waterfronts by creating demand for processing infrastructure, demand for support businesses such as fish packaging, fish transportation, fuel supply and the need for a large processing labor workforce. Communities also build infrastructure to support these high volume activities to meet

electrical, water, sewage needs as well as build infrastructure to support containerized shipping. This type of economic tradeoff should not be ignored in this action.

As the GOA Halibut PSC Community Analysis and the EA notes, "Kodiak would be the Alaska community most vulnerable to adverse impacts resulting from proposed GOA halibut PSC revisions due to widespread engagement in all of the relevant regional groundfish fisheries over the course of an annual cycle. For some individual operations, however, especially within the Gulf groundfish trawl sector in Kodiak and those processing operations in Kodiak substantially dependent upon Gulf groundfish trawl deliveries of flatfish in particular, adverse impacts may be felt at the operational level, particularly if the fleet cannot effectively modify behavior to reduce historical halibut PSC rates...the potential beneficial impacts to the various halibut fisheries would be spread more widely among communities than would be the potential adverse impacts to the groundfish fisheries."

Below is a set of tables that show the gross revenue of halibut used as bycatch compared to catching the halibut as a retainable adult fish in the IFQ fishery. Table 3 assumes that 10,000 pounds of trawl halibut mortality would be used to prosecute one of the four different flatfish target fisheries, however, flatfish is harvested as a multi-species fisheries environment and not one flatfish species at a time. Note that the values of the flatfish harvests do not include incidental species such as skates and pollock and cod (subject to MRA's) which can be substantial. As table 6 shows, IFQ halibut value in terms of ex-vessel price and labor cost would be \$46,125 compared to halibut mortality value for flatfish catch which would range from \$55,856 to \$186,702, depending on the flatfish target fishery. For a processing crew halibut landings equate minimal processing and thus a skeleton processing crew while a large flatfish delivery requires the processing facilities full processing crew for a 24-hour period. In terms of economic benefit to the nation, halibut usage as bycatch has 1.2 to 4 times the value of IFQ halibut.

Table 3. Halibut IFQs ex-vessel value – 10,000 pounds caught vs. 7,500 pounds delivered as H&G fish

	lbs. Hal	Price/lb	Value
IFQ Halibut	7,500	\$6.00	\$45,000

Table 4. Halibut mortality ex-vessel value for underutilized flatfish - 10,000 pounds whole halibut

Species	Hal rate*	Mort rate	Flatfh lbs.	Price/lb	Value
Rock Sole	0.077	0.71	164,624	\$0.24	\$39,510
Flathead Sole	0.052	0.65	266,272	\$0.16	\$42,604
Arrowtooth	0.037	0.72	300,300	\$0.06	\$18,018
Rex Sole	0.047	0.64	299,202	\$0.36	\$107,713

* Based on annual Halibut bycatch rates in 2011 for the catcher vessels in the CGOA

Table 5. Net benefit to Community – Labor cost for work force – IFQ halibut vs. trawl flatfish catch

Species	purchased lbs.	PRR*	Product	Finish prdt lbs.	Labor cost lbs.	Total Labor cost
IFQ Halibut	7,500	n/a	H&G	7,500	\$0.15	\$1,125
Rock Sole	164,624	0.28	IQF/shatters	46,095	\$0.80	\$36,876
Flathead Sole	266,272	0.27	IQF/shatters	71,893	\$0.80	\$57,515
Arrowtooth	300,300	0.63	H&G w/o tail	189,189	\$0.20	\$37,838
Rex Sole	299,202	0.33	IQF/shatters	98,737	\$0.80	\$78,989

PRR* - Product Recovery Rate. Assume major product for Halibut is shipped as Fresh/Frozen Headed and Guttled fish
Assume major product for flatfish is shipped frozen shatter pack fillets or Individual quick frozen fillets

Table 6. Total value: ex-vessel and labor (excludes overhead cost benefits such as electricity, water, taxes, profits for processors, supplier revenues)

Species	ex-vessel value	labor costs	Total value
IFQ Halibut	\$45,000	\$1,125	\$46,125
Shal Flats (rock sole, butter sole)	\$39,510	\$36,876	\$76,386
Flathead Sole	\$42,604	\$57,515	\$100,118
Arrowtooth	\$18,018	\$37,838	\$55,856
Rex Sole	\$107,713	\$78,989	\$186,702

STATUS OF THE HALIBUT STOCK

The directed halibut fleets have seen their quotas drop significantly over the last decade and from a public perspective there is concern about the sustainability of the halibut resource. However, stock status indicators suggest that the stock is healthy but changed. The unfished female spawning biomass ($B_{unfished}$) is at B42% for 2012 which is at a higher level than many other commercially important stocks in the GOA. For example, in 2012 for pollock and cod, unfished female spawning biomass is at B34% and B46% respectively. Sablefish, the other GOA IFQ fishery, is at B37%.

The halibut fishery quotas have been dependent on the strength of the celebrated 1987, and to a lesser extent 1988, year classes over the last decade. While recruitment was low for the period 1989 to 1997, the current assessment indicates that three large year classes – 1998, 1999, and 2000 – have entered the exploitable biomass and should be large contributors to the exploitable biomass and commercial catches (figure 24, p. 39). Presently, all three year classes are estimated to be larger – in terms of numbers – than the 1987 and 1988 year classes but their strength still remains somewhat uncertain.

While both spawning stock size and recruitment are both positive, harvest rates continue to decline. Presently (2012), coastwide exploitable biomass is estimated to be 260 million pounds while female spawning biomass is estimated at 319 million pounds. It is extremely unusual to have exploitable biomass less than female spawning biomass. Intuitively, this explains why directed catches are down yet stock indicators suggest a healthy fishery stock.

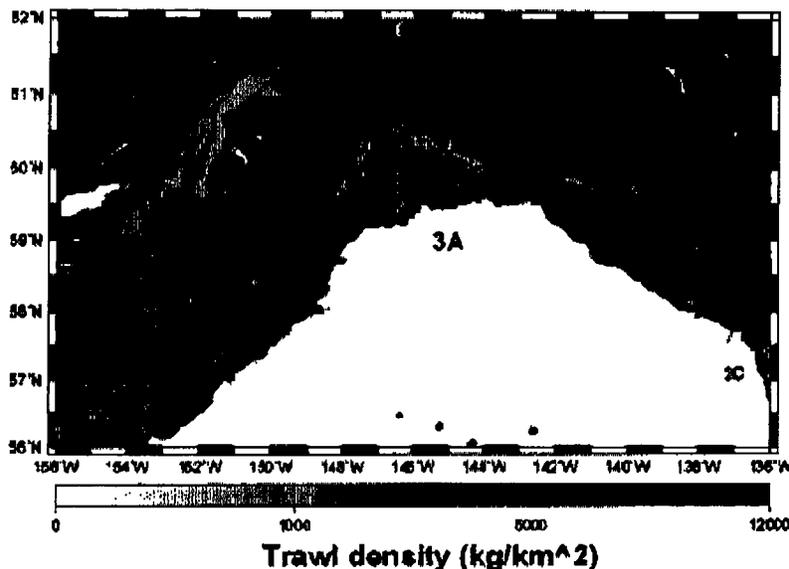
According to the EA, while exploitable biomass estimates of halibut have declined by 50 percent since the late 1990's, estimates of total biomass of halibut have continued to increase. Total biomass is up while exploitable biomass is down because halibut growth rates have declined to levels that have not been seen since the 1920's. For example, in the northern GOA, an 11-year-old female halibut weighed about 20 pounds in the 1920's, nearly 50 pounds in the 1970's, and now again about 20 pounds. In the late 2000s, 15 year old female halibut in the central GOA have averaged 28 pounds – a decline of 70 percent in 30 years. The fish are simply not recruiting to the fishery. According to the best available science, the main hypothesis for why halibut are growing slower is that halibut are competing with themselves for food (too many halibut in the system) and/or competing with other flatfish, especially Arrowtooth flounder, for resources.

Other halibut users suggest that they are bearing the conservation burden since their halibut quotas have been cut while bycatch caps have remained the same since 1989 for trawl and 1995 for longline. However, the ability of the groundfish fleets to reduce bycatch is directly related to the biomass of the bycatch you are trying to avoid along with how that bycatch species is distributed across the fishing grounds. If quotas and biomass

were trending in the same direction for the coast wide halibut stock and across the fishing grounds then bycatch would be expected to be easier to reduce, but, the two indices are diverging – quotas trending down while biomass and number of halibut trending up.

For the CGOA it is especially troubling for bycatch users since Area 3A sits at the current center of halibut distribution. The biomass remains by far the largest of any of the regulatory areas. The recent 2011 bottom trawl survey shows high halibut biomass centered on Kodiak Island (see figure 1).

Figure 1. Trawl halibut density in Area 3A in kg/km²



Reducing halibut PSC is not going to appreciably change the halibut constant exploitable yield (CEY) for directed halibut users. For the component of the bycatch that is over 26 inches (62.5% for trawl and 72.5% for longline by weight) there is no expected effect on female spawning biomass since this portion would be taken by the directed halibut fishery. If there was truly a conservation concern, this fish would be left in the water versus reallocated across user groups; for the directed halibut users, the gains are small in comparison to the loss to the groundfish users.

The portion of the stock that is less than 26 inches would contribute to the spawning biomass (at one pound of bycatch to two pounds of spawning biomass for trawl); however it would take 30 years before the entire 2 pounds would be realized. The uncertainty of the benefit of bycatch reduction is large when considering the size at age issue and knowing that the best scientific information suggests that the reduced size at age is most likely due to too many halibut in the ecosystem. As Hare notes in his analysis of the effects of bycatch reduction, "given the myriad of difficulties with the stock model structure and inputs, attempting to project actual levels of catch or spawning biomass are, at best, of questionable value and likely to be counter-

productive. Recent history illustrates that even short-term projections of halibut biomass and yield are problematic and can be unreliable. Reasons for unreliable projections are numerous, but include the following: retrospective behavior of the halibut stock assessment, ongoing changes in size-at-age, variable recruitment, changes in accounting for under-32 (U32) inch halibut, changes in target harvest rate, poor harvest control of sport fisheries, and uncertainty over bycatch mortality estimates”.

Lastly, the amounts of fish reallocated to the IFQ and charter sectors from a trawl PSC reduction amount to a tiny fraction of the GOA 2011 harvest and GOA biomass estimates which suggest lots of pain on the groundfish side with no gain on the halibut side (See table 7).

Table 7. Comparison of halibut biomass, IFQ catch and trawl PSC amounts in the GOA, all values in net pounds

2011 GOA Halibut			Trawl PSC reduction			
Biomass*	IFQ Catch**	Trawl PSC limit	5%	10%	15%	
614,988,877	24,315,000	3,306,934	103,400	206,700	310,100	Gain to IFQ and charter sectors
			0.43%	0.85%	1.28%	% of 2011 IFQ catch
			0.02%	0.03%	0.05%	% of 2011 Biomass

* Estimate from 2011 GOA bottom trawl survey

** Areas 2C, 3 A, 3B

IFQ HALIBUT FISHERY

The fisheries that have the largest impact on the halibut resource are the directed halibut fisheries themselves. From a trawler fishermen's perspective, it is disingenuous for the halibut fishermen to believe that all the problems that they face with regards to decreasing exploitable biomass and reduced size at age are the trawlers fault and will be solved by reducing halibut bycatch. The halibut fishery is a size selective fishery that requires all halibut to be discarded if less than 32 inches. Because halibut are growing slower and so much of the stock is less than 32 inches, the fishery management structure has created a high grade fishery with a substantial amount of regulatory discards. Currently, a large fraction of males never reach the minimum size limit and thus never enter the exploitable biomass. Because of the differences in size by sex, the majority of the commercial IFQ catches are females. The IPHC has considered reducing the size limit to a lower limit (i.e. 26 or 29 inches) because of the present stock structure but have not yet done so due to the concerns of potential high grading by fishermen as well as market issues related to smaller fish.

Wastage versus Bycatch: The commercial halibut fishery does not have “bycatch” but instead has halibut “wastage”. Wastage refers to halibut killed, but not landed in the commercial halibut IFQ fishery (due to lost gear, capture of undersized fish, sand fleas, whale predation, etc.). Halibut wastage in the directed halibut fishery has increased 181% from 1995 – 2011 (figure 2). Halibut wastage was almost equal to trawl halibut bycatch in 2010 (in weight) (figure 3). It is important to note that wastage estimates and discard mortality rates in the commercial fishery are extrapolated from the IPHC longline survey since no actual fishery data is available due to lack of observers and/or electronic monitoring. The discard mortality rate of 16% is based on “ideal” conditions in the IPHC longline survey and does not incorporate the use of crucifiers or non-compliance with the required careful release. The mortality rate of 16% is based on a single capture of a fish which is not realistic since it would seem likely that fish are re-caught numerous times due to the slow growth issue. The more times a halibut is captured, the higher the mortality.

Female versus male catch composition: In the 2011 fishery, using the IPHC longline survey as a proxy, the commercial harvest of females by regulatory area was estimated to be above 70% in area 2 and 60% and above in area 3 (see figure4). Actual sex distribution within the fishery is unavailable since all halibut delivered to processors are in headed and gutted form.

Monitoring: The US IFQ halibut fishery is the only catch share program that has absolutely no monitoring requirements—observers, electronic monitoring or vessel monitoring systems. This situation will change with the implementation of the restructured observer system in 2013, but currently, the lack of monitoring creates problems for fishery managers since actual fishery data is unavailable to determine sex distribution of catch, wastage, or compliance monitoring (catches by regulatory area, careful release requirements, halibut retention requirements and seabird streamer line deployment). Additionally, there are no reliable estimates of incidental catch within the halibut fishery to understand impacts to other groundfish species (e.g. cod, sharks).

The U32 proportion of wastage is calculated for the unobserved halibut fishery by extrapolating from the IPHC longline survey to the fishery (using the top one-third WPUE survey sites).

The assumed discard mortality rate (DMR) is 16%.

The O32 proportion of wastage represents lost or abandoned gear (that is extrapolated from logbooks.)

Halibut wastage in the GOA halibut fishery has increased +181% from 1995 to 2011. In 2010, wastage in the halibut fishery was nearly equal to trawl halibut mortality.

GOA wastage, (mt, round weight) in halibut fishery (1995-2011)

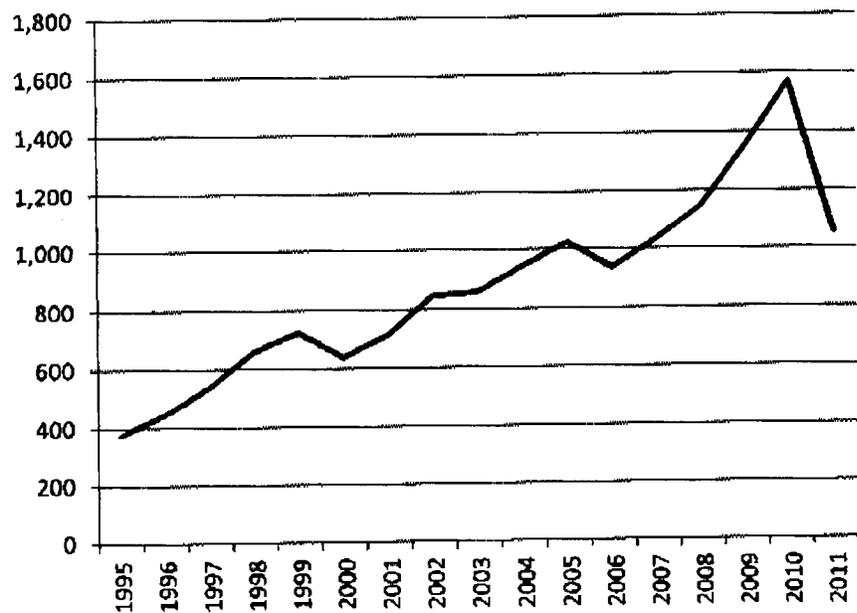


Figure 2. GOA wastage, (mt, round weight) in halibut fishery 1995 – 2011

**Wastage in the IFQ commercial fishery (IPHC Areas 2C, 3A, 3B)
vs. GOA trawl bycatch
(in metric tons round weight - from 2011 IPHC RARA)**

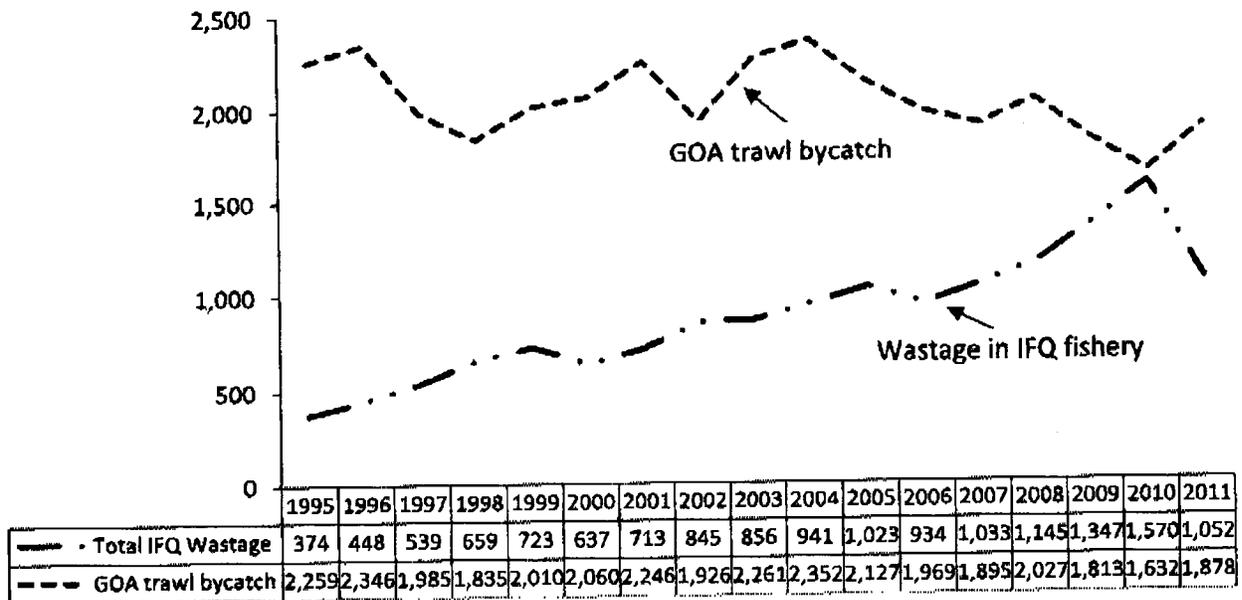


Figure 3. Wastage in the IFQ commercial fishery (IPHC Areas 2C, 3A, and 3B versus GOA trawl bycatch)

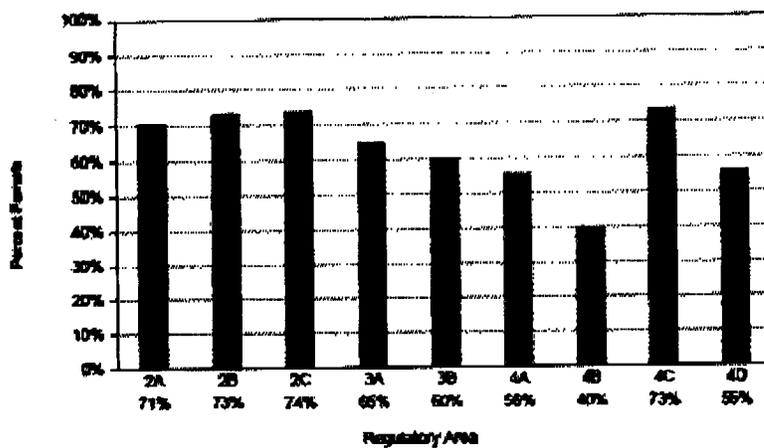


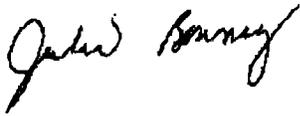
Figure 4. Percentage female of O32 fish, by regulatory area, from catches in the 2011 setline survey. Excludes catch from the pilot bait experiment. (Source 2011 RARA).

The final item to note is that the halibut bycatch caps do not fluctuate with upswings in CEY, biomass or ex-vessel value (which have doubled since 2006); nor do they increase when groundfish quotas go up. Fish policy should be set so that net benefit to the nation can be derived independently for groundfish species versus having all fisheries directly linked to the CEY of the halibut fishery.

In summary, AGDB supports removing the GOA halibut PSC limits from the annual harvest specifications process and establishing the GOA halibut limits in regulation. We do not support reducing the present halibut bycatch caps for either trawl or longline gear at this time. If the Council believes that halibut bycatch caps reductions are warranted then an EIS analysis is needed that investigates a wider set of alternatives that balance bycatch reductions to the extent practicable with the ability of the groundfish harvesters to meet optimal yield. The obvious best choice would to develop a catch share program that include individual vessel accountability and creates incentives for bycatch rate reductions for groundfish harvesters.

Thanks for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Bonney". The signature is written in a cursive, flowing style.

Julie Bonney
Executive Director
Alaska Groundfish Data Bank, Inc

George Kirk
F/V Arctic Wave
PO Box 2796
Kodiak, AK 99615
tel: 907-486-2781 / fax: 907-486-2781
May 27, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252

Dear Mr. Olson,

I have been commercial fishing halibut out of Kodiak for 30 years. I have also fished on draggers, and I know the negative impact that they have on the environment, and on the bycatch problem.

I ask you to please use the 15% reduction of drag-caught halibut bycatch that is under consideration for the draggers. While 15% is not enough of a reduction, it is a step in the right direction.

It's been 20 years since any action has been taken to reduce the draggers bycatch. In those 20 years that the Council has not taken any action to address the draggers bycatch problem, the draggers have been taking steroids, meaning that the drag boats aren't the boats that they were 20 years ago.

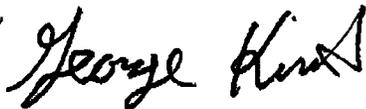
Most of the drag boats have now been sponsored. They can pack twice as much fish as they did 20 years ago, they have 2 or 3 times the horse power they had back then, and the gear that they are currently using is way stronger and more sophisticated.

The end result is that the environment is getting ripped up more, and faster.

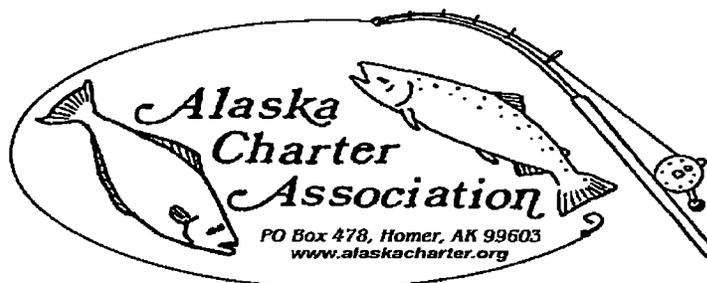
The halibut resource is in trouble, it needs to be protected. You must be aware of this. The destruction of the environment caused by drag boats must also be considered and addressed.

Whatever reduction plan is taken, please keep in mind also that the numbers don't mean much without good science and verification, and if they are inaccurate, 100% coverage is the only way to really understand the impact of the draggers bycatch on halibut. In addition to applying the 15% reduction to the draggers halibut bycatch, how about a pilot 100% observer coverage program so that you can finally get some good sound numbers?

Sincerely,



George Kirk



"To Preserve and Protect the Rights and Resources of Alaska's Sport Fishermen"

May 29, 2012

Mr. Eric Olson, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, Ak. 99501-2252

Re: C-1/Halibut Bycatch Reduction

Dear Chairman Olson,

The Alaska Charter Association (ACA) is a statewide organization representing over 150 charter and associated businesses. Its mission is to preserve and protect the fishing rights and resources necessary for the Alaska charter fleet to best serve the recreational fishery.

The ACA supports Alternative 2, Option 2, sub-option C to reduce halibut bycatch by 15% for the hook and line sectors and the trawl sector. Many in our industry feel that 15% percent reduction does not go far enough, but it is a good start. National Standard 9 of Magnuson-Stevens Act highlights the Council's responsibility to minimize bycatch. Of the options currently available, the 15% reduction best serves this Council's requirements and the resource.

"Decreasing the amount of halibut PSC in groundfish fisheries would have beneficial impacts on persons and businesses that harvest, process, or consume halibut, as well the halibut female spawning biomass.¹" The ACA could not agree more with this statement found in the Public Review Draft. The amount of bycatch in the Gulf of Alaska (GOA) exceeds the total sport catch in area 3A and the combined charter catch in areas 2C and 3A. This has detrimental effects on all other sectors that use the halibut resources and the resource itself. Although there was some economic information on how reductions would negatively impact the hook and line and trawl sectors, little information was provided on how the economics of the other user groups would be negatively impacted by *not* reducing bycatch. Without meaningful reductions in bycatch, all user groups, including the resource, will be negatively impacted.

¹ *Public Review Draft GOA Halibut PSC Limit, Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis to Revise Halibut Prohibited Species Catch Limits, dated 05/11/12, page 77.*

In addition to the 15% reductions, the ACA believes that this Council should require 100% observer coverage on all large commercial fishing vessels, and for all other commercial fishing vessels that cannot practically accommodate observers, Electronic Monitoring Systems (EMS) should be required.

Also, bycatch amounts should be tied to abundance and should be accounted for within the commercial sector. Currently it is set as a fixed amount to the detriment of commercial IFQ holders and charter fishing clients. Both of these groups' catch limits are linked to abundance and some have experienced substantial reductions. Thank you for your consideration on this very important issue.

Sincerely yours,



Gregory M. Sutter
President

May 29, 2012

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-1, Gulf of Alaska halibut bycatch

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

The North Pacific Fishery Management Council (NPFMC) and National Marine Fisheries Service (NMFS) must take action to reduce the overall amount of halibut—more than 5 million pounds of mostly young fish—killed each year as bycatch by the Gulf of Alaska groundfish fisheries. We urge you to select an alternative that would reduce the halibut prohibited species cap (PSC) by at least 300 mt and would reduce this bycatch by allocating less halibut bycatch to the dirtiest trawl fisheries.

As we have explained in our previous letters on this issue, NMFS's obligations under the law are clear. The Magnuson-Stevens Act explicitly requires that NMFS "to the extent practicable and in the following priority: (A) minimize bycatch; and (B) minimize the mortality of bycatch which cannot be avoided." 16 U.S.C. §1853(a)(11). This requirement is reinforced in National Standard 9, with which all Fishery Management Plans must be consistent, and which restates the requirement to minimize bycatch to the extent practicable. *See id.* § 1851(a)(9). When it added these provisions to the Act, Congress was very clear that its intent was to halt the "shameful waste" occurring in the nation's fisheries. 142 Cong. Rec. S10,794, at 10,820 (1996).

The waste of halibut is shameful. The Pacific halibut (*Hippoglossus stenlopiis*) is the largest fish in Alaskan waters (other than the largest sharks) and a great apex predator of the sea. Even though the spawning biomass of the stock has been on a declining trend, Pacific halibut are still abundant enough to support a major commercial fishery and a large commercial charter sportfishing industry. In addition to salmon, Pacific halibut comprise a substantial portion of the fish protein consumed by residents of Alaska.

Nonetheless the NPFMC and NMFS have allowed wasteful trawl fisheries to kill millions of pounds of halibut. From 2003-2010 a total of 15,984 mt (almost 36 million lbs) of halibut were killed as bycatch by GOA groundfish trawlers¹. No meaningful action has been taken in more than 25 years to address this problem.

In the 1970s and '80s, the NPFMC and NMFS put increasing restrictions on foreign trawlers with the intention of reducing the incidental bycatch of halibut and other species.² Fishery

¹ Table 4.20, Public Review Draft Environmental Assessment/Regulatory Impact Review/ Initial Regulatory Flexibility Analysis to Revise Halibut Prohibited Species Catch Limits, May 11, 2012 (hereinafter "Halibut EA").

² NPFMC. 2004. Amendments to the Fishery Management Plan for Gulf of Alaska Groundfish Fishery. Appendix D, Final Programmatic SEIS.

Management Plan amendments were made to encourage longlining over trawling, citing the selective nature of longline gear and the reduction of incidental catch³. When hard caps for halibut bycatch were first considered as a management tool, the trawl fleets were allocated small amounts of halibut. In 1979, for example, the halibut bycatch cap for the domestic trawl fisheries was 81 mt. In 1984, however, the NPFMC and NMFS greatly relaxed this trawl cap, increasing the limit to 1038 mt. By 1986, the cap had been increased further to 2000 mt. There has been no meaningful reduction in the trawled halibut bycatch cap since then, and the dirtiest trawl fisheries persist.

From 2003 to 2010, the worst bycatch trawl fisheries in terms of the estimated total weight of halibut killed were:

- Bottom trawling for shallow-water flatfish (4,695 mt of dead halibut)
- Bottom trawling for Pacific cod (3,994 mt of dead halibut)
- Bottom trawling for arrowtooth flounder (3,529 mt of dead halibut)
- Bottom trawling for rex sole (1,403 mt of dead halibut)⁴

Over the same time period, the estimated weight of halibut killed as a percentage of the targeted catch reveals the worst trawl fisheries to be:

- Shallow-water flatfish (7.4% halibut bycatch)
- Rex sole (5.9% halibut bycatch)
- Pacific cod (3.8% halibut bycatch)
- Arrowtooth flounder (3.0% halibut bycatch)⁵

The status quo operation of these fisheries simply can no longer be justified.

The rex sole (*Glyptocephalus zachirus*) bottom trawl fishery is not a large volume fishery compared to other Alaskan groundfish fisheries; the fishery retains less than 3,000 mt of rex sole per year on average.⁶ But the incidental cost to trawl up those rex sole is high. In 2010, it was estimated that the rex sole fishery discarded over two pounds of fish for every pound of rex sole retained⁷. That same year, one pound of halibut was killed as bycatch for every 8 pounds of rex sole retained⁸. In the last few years, the rex sole fishery has consistently trawled off the Shumagin Islands, and southwest tip and Cape Barnabas regions off Kodiak Island⁹. On average, only 4 factory trawlers and 3 catcher trawlers participate in this fishery¹⁰, and each trawler kills an estimated 25 mt of halibut.

³ NPFMC. 2004. Amendments to the Fishery Management Plan for Gulf of Alaska Groundfish Fishery. Appendix D, Final Programmatic SEIS. GOA FMP Amendment 3

⁴ Halibut EA at Table 4-20.

⁵ Halibut EA at Table 4-20 & 4-19

⁶ Halibut EA at Table 4-19

⁷ Table 6.20. Stockhausen, W.T., M.E. Wilkins, and M.H. Martin. Assessment of the Rex Sole Stock in the Gulf of Alaska, Dec 2011 (hereinafter "GOA rex sole assessment")

⁸ GOA rex sole assessment at Table 6.18 b

⁹ GOA rex sole assessment at Figure 6.2

¹⁰ Halibut EA at Table 4-22 & 4-23

The bottom trawl fishery for Pacific cod (*Gadus morhua*) is even more irrational. Currently NMFS and the NPFMC authorize bottom trawlers to kill over 500 mt of halibut when targeting Pacific cod even though we know that Pacific cod can be profitably harvested with pots, longlines, and jigs. All of those gear types have less impact on seafloor habitat than bottom trawls¹¹, are more selective in harvesting the target species, and have a greater chance of releasing bycatch species alive¹². There would be less halibut killed as bycatch if the entire Gulf of Alaska Pacific cod quota was caught with pots, longlines, and jigs.

The “shallow-water flatfish” fishery, however, is the worst offender. In the shallower areas of the Gulf of Alaska shelf, home to nursery areas for juvenile fish and crab, this fishery uses bottom trawls to try to target rock sole and butter sole. Between 2003 and 2010, it retained an average of 6,335 mt of those species¹³. To catch that 6,335 mt of flatfish, an estimated average of 1,115 mt of bycatch was discarded, injured or dying¹⁴. Most wastefully, 587 metric tons of that bycatch, on average, was dead Pacific halibut¹⁵.

In 2010, the “shallow-water flatfish” fishery included 24 trawl catcher vessels¹⁶. Each of those 24 boats, on average, delivered 231 metric tons of flatfish. Along the way, each also killed an estimated 18 metric tons of halibut, most of which was juvenile fish. In 2010, each shallow water trawl vessel killed an estimated 5,000 juvenile halibut (assuming an average size of 8 lbs). Those juvenile halibut were killed before they could become spawners or contribute to the commercial, personal use, subsistence, tourism charter boat, or sport catch. The effect of this bycatch on the halibut stock is that it reduces recruitment, spawning biomass, and yields from the other halibut fisheries.

The shallow-water flatfish fishery just does not make economic sense. A typical ex-vessel value paid for the shallow-water flatfish complex was less than \$0.22/lb¹⁷, making the average ex-vessel value of the catch \$3,080,077. To make that catch, 1,297,270 lbs (587 mt) of halibut were killed as bycatch. The 2010 ex-vessel value for halibut was \$4.80/lb¹⁸, giving a rough estimate of wasted halibut value of \$6,225,896.

The true extent of the bycatch in these fisheries, including the estimate of halibut mortality, is not known exactly. The estimates are based on an imperfect system of voluntary logbook reporting, catch deliveries, and limited observers. In 2010, less than 1% of the shallow-water flatfish catch

¹¹ National Research Council. 2002. Effects of Trawling and Dredging on Seafloor Habitat.

¹² Williams, G. 2011. Incidental catch and mortality of Pacific halibut, 1962-2011. IPHC Report of Assessment and Research Activities 2011.

¹³ Turnock, B., T. A'mar, and T. Wilderbuer. 2011. Assessment of the Shallow-water Flatfish Complex in the Gulf of Alaska for 2012. Table 4.2

¹⁴ Unpublished data obtained from NMFS

¹⁵ Halibut EA at Table 4.20

¹⁶ Halibut EA at Table 4.23

¹⁷ Table 19, Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis for Proposed **Amendment 86** to the Fishery Management Plan for Groundfish of the Bering sea/Aleutian Islands Management Area and **Amendment 76** to the Fishery Management Plan for Groundfish of the Gulf of Alaska, Dec 2010.

¹⁸ http://www.adfg.alaska.gov/static/fishing/PDFs/commercial/10exvessel_byspecies.pdf

was sampled by observers¹⁹. This observed proportion of catch appears to be low compared to most other groundfish fisheries. It is difficult to gauge the error around the bycatch estimates for this fishery but it is possible that the bycatch could be much higher than is reported. There are changes in vessel behavior in some fisheries when an observer is on board, particularly if having a fisheries observer on board was a rare or infrequent event for the fishery²⁰. Clearly, the trawl fisheries need to be better observed, and we urge the Council to address this issue during the upcoming restructuring of the observer program. In the meantime, the NPFMC should reduce the halibut PSC as a precautionary measure and assume that the bycatch estimates are minimum estimates that may be biased downwards.

The shallow-water flatfish, rex sole, and Pacific cod bottom trawl fisheries on average take up to 65% or more of the halibut prohibited species trawl allocation for the entire Gulf of Alaska groundfish trawl fishery. To be most cost-effective, the halibut prohibited species cap reductions should come out of these dirtiest fisheries that are killing the most halibut per unit of targeted catch, particularly the shallow-water flatfish fishery and rex sole fishery and the Pacific cod trawl fishery since more selective gears exist.

In general, vessel owners who live in communities on the Gulf of Alaska tend to own hook and line vessels. Alaskans own 83.4% of the groundfish hook and line vessels²¹ but only 35% of the groundfish trawl vessels²² in the Gulf. Whether cost, opportunity, or sense of stewardship drives these community choices is unknown. The number of trawl vessels trawling in the Gulf of Alaska has decreased substantially in recent years, from 113 vessels in 2003 to 77 vessels in 2010²³. However, there has not been a corresponding decrease in halibut bycatch; the remaining vessels just catch more.

A 300 mt reduction in the halibut prohibited species cap would not significantly affect communities and shows that the NPFMC can take action to reduce halibut bycatch while minimizing economic impacts to the groundfish fishery. As described in the EA RIR/IRFA: *In general, adverse community-level impacts are not likely to be significant for any of the involved communities and the sustained participation of these fishing communities would not be put at risk by any of the proposed Gulf halibut PSC revision alternatives being considered... Additionally, there is the potential for community-level beneficial impacts to result from the proposed Gulf halibut PSC reductions.*²⁴

Even these economic costs and forgone groundfish catches analyzed in this EA may be overestimated. The analyses assume no change in behavior of the trawl fleet if the trawl fleet was given a lower bycatch cap. They assume the trawl fleet will trawl in the same areas and tow

¹⁹ Turnock, B., T. A'mar, and T. Wilderbuer. 2011. Assessment of the Shallow-water Flatfish Complex in the Gulf of Alaska for 2012, Table 4.A.2.

²⁰ Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis for Proposed **Amendment 86** to the Fishery Management Plan for Groundfish of the Bering sea/Aleutian Islands Management Area and **Amendment 76** to the Fishery Management Plan for Groundfish of the Gulf of Alaska, Dec 2010.

²¹ Halibut EA at Table 4-103

²² Halibut EA at Table 4-101

²³ Halibut EA at Table 4-23

²⁴ Halibut EA at Pg. 240

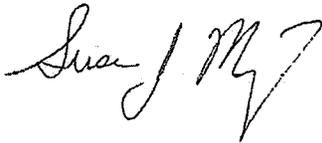
Mr. Eric Olson, NPFMC
Dr. Jim Balsiger, NOAA Fisheries
May 29, 2012
Page 5 of 5

for the same amount of time and catch halibut at the same rate as when they had a higher cap. As noted in the EA RIR/IRFA: *Consequently, the historical analysis of the timing of closures, based on the proposed limits and recent empirical fishing data, could be inaccurate to the extent that fleets would have modified their behavior to avoid reaching the reduced limit*²⁵.

In the short term, we urge the Council to select an alternative that would reduce the halibut prohibited species cap in the Gulf of Alaska by at least 300 mt. 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, reducing the halibut prohibited species cap in the Bering Sea/Aleutian Islands must be put on an expedited NPFMC timeline for action.

We look forward to continuing to work with you for healthy, sustainable fisheries that count, cap, and control wasteful bycatch.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Murray". The signature is fluid and cursive, with a large, stylized "M" at the end.

Susan Murray
Senior Director, Pacific
Oceana

²⁵ Halibut EA at Pg. 224

Subject: Halibut bycatch

From: Paige Simeonoff <funcmastap@hotmail.com>

Date: 5/29/2012 4:13 PM

To: <npfmc.comments@noaa.gov>

Dear Council,

It is my understanding that in the name of conservation this council wishes to decrease trawling vessel halibut bycatch....it is also my understanding that the halibut bycatch on trawlers is miniscule compared to the waste and unreported losses that occur on long-liner vessels. Long liners high-grade their catches all the time. Let's be honest, if your boat was almost full and you caught a legal sized halibut and then you caught another larger, more marketable fish...which one is going over and which one is going in the fish-hold? And, how many longliners are required to report entire sets of "whaling"? Miles and miles of hooks with only halibut heads....that's expensive whale food. What about the multiple species that a random baited hook will produce? Cod? Rockfish? Sharks? Who is conserving them? That is hardly a targeted species fishery. Why aren't long-liners required to have observers for halibut, but are required to have them for Sablefish?

The trawlers are constantly trying to improve on their practices. However, because they are required to gather data they become the target for "conservationists". Gather that data on other fisheries then determine the true culprit...really, because if the goal is conservation, don't we want to know where all the losses are in all fisheries?

It seems like the motivation here is really so that people feel like the halibut will be saved and longlining and sport fishing can go on- business as usual. But remember your trawlers are local, tourists are not, and Kodiak based vessels that deliver halibut to Homer do not help our economy. 60% of fish processed in Kodiak are trawl-caught. The Krab you enjoy so much in your sushi and roe on you rolls are brought to you courtesy of the trawl fleet.

So instead of basing a decision that could devastate many of your neighbors and threaten their livelihoods on ill-informed public petition, base it on facts. Or, even better, postpone this decision until all the numbers are in.

Sincerely,
Paige and Cy Simeonoff

May 29, 2012

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

Re: Agenda Item C-1(b) GOA Halibut PSC

Dear Chairman Olson and Council members:

We, the undersigned commercial fishermen, sport fishermen, subsistence fishermen, coastal residents and stakeholders request the Council take final action to **reduce halibut bycatch in the Gulf of Alaska by at least 15%—the maximum reduction being considered at this time.**

Commercial and sport fishermen have experienced dramatic cuts in their harvests over the last decade. The limit on halibut bycatch in the Gulf of Alaska, on the other hand, has not been significantly changed since 1989. Currently there is a halibut bycatch limit of 2,300 metric tons (mt) in the GOA—or just over 5 million pounds.

At the same time the exploitable biomass—the portion of the halibut population that is available for harvest—has declined by 58% over the past decade. The state of the halibut stock is uncertain; previous assumptions regarding strong incoming year classes are now in doubt. While everything else—commercial and charter limits and the stock itself—have gone down, the bycatch limit has stayed relatively constant. It is time for the Council to address this inequity by reducing halibut bycatch NOW. All sectors must do their part to conserve and rebuild the halibut stock.

Cuts in catch limits have and will continue to have dramatic effects on our fisheries, businesses, economies and communities that depend on the halibut resource. Each halibut caught as bycatch has a direct effect on the spawning biomass and yield of halibut available to other sectors now and in the future. **It is critical that the Council take meaningful final action now by reducing Gulf of Alaska halibut bycatch by at least 15%.**

Sincerely,

See attached list of 1570 names

Cc: Sean Parnell, Governor
Cora Campbell, Commissioner, ADF&G
Lisa Murkowski, U.S. Senator
Mark Begich, U.S. Senator
Don Young, U.S. House Representative

Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska

	FIRST NAME	LAST NAME	ADDRESS	CITY	STATE	ZIP	OCCUPATION
1	Shawn	Dochtermann	PO Box 866	Kodiak	AK	99615	Commercial Fisherman
2	Steve	Branson	1310 Rezanof	Kodiak	AK	99615	Fisherman
3	Gloria	Roe	11542 Women's Bay Dr.	Kodiak	AK	99615	Student
4	Mike	Carlson	1713 Mission Rd	Kodiak	AK	99615	Lodge owner
5	Walter	Sargent	183 Mission Rd.	Kodiak	AK	99516	F/V Major, Halibut, Tanner Crab, Cod, etc.
6	Frank	Miles	3618 Sharitan Rd.	Kodiak	AK	99615	Commercial Fisherman
7	Laine	Welsh	315 High St	Kodiak	AK	99615	Fisheries Media
8	Jason	Boyle	1711 Larch St.	Kodiak	AK	99615	US Coast Guard
9	Brian	Cleary	Po Box 18	Kodiak	AK	99615	Fisherman
10	Fred	Sargent		Kodiak	AK	99615	Commercial Fisherman
11	Jorg	Schmeisser	3189 Peninsula Rd.	Kodiak	AK	99615	Longliner
12	Megan	Smith	324 Seabreeze Cir.	Kodiak	AK	99615	Fisheries Biologist
13	Jeramay	Young	324 Seabreeze Cir.	Kodiak	AK	99615	Commercial Fishermen
14	Eric	Fricero	916 Mission Rd.	Kodiak	AK	99615	Student
15	Peter	Hannah	1225 W. Kouskov	Kodiak	AK	99615	Fisherman
16	John	Able		Kodiak	AK	99615	USCG
17	Ian	Ivanoff	1327 Mountain View Dr.	Kodiak	AK	99615	Fisherman
18	Morris	Anderson		Kodiak	AK	99615	Retired Fisher
19	Larry	Ward	328 Shellkof	Kodiak	AK	99615	Fisherman
20	Margaret	Bosworth	1225 W Kouskov St.	Kodiak	AK	99615	Fisherman/Homemaker
21	Joseph	O'Donnoghue	1042 sargent creek rd.	Kodiak	AK	99615	
22	Molly	Miller		Kodiak	AK	99615	Commercial Fisherman
23	Dana	Reid	Box 8935	Kodiak	AK	99615	IFQ holder, sport fishing
24	Steven	Horn	1210 Mission Road	Kodiak	AK	99615	Commercial Fisherman
25	Kip	Thomet	Box 3258	Kodiak	AK	99615	Sport, commercial, subsistence,coastal resident
26	Frank	Peterson	Box 8868	Kodiak	AK	99615	Sport, commercial, subsistence,coastal resident
27	Scott	Detones	1225 Sellef Apt.#2	Kodiak	AK	99615	Sport, commercial,subsistence, coastal resident
28	Dale	Wirkus	2768 Thurston Lane	Kodiak	AK	99615	Sport
29	Randy	Boskofsky	2815 Woody Way Apt. 107	Kodiak	AK	99615	Coastal resident, subsistence
30	Theodore	Panamaroff	810 Hillside	Kodiak	AK	99615	Lifetime resident,fisherman, subsistence user
31	Darryl	Wilson	Box 1454	Kodiak	AK	99615	Coastal resident
32	Ron	Monigold	112 Birch	Kodiak	AK	99615	Sport
33	Jeff	Stephan	Box 2917	Kodiak	AK	99615	United Fishermen Marketing Association
34	J. Alan	Seale	594 Von Scheele	Kodiak	AK	99615	Hatchery manager
35	Chris	Berns	814 Tagura	Kodiak	AK	99615	Fisherman
36	Audrean	Aroo	Box KKB	Kodiak	AK	99615	
37	Wallace	Fields	Box 1691	Kodiak	AK	99515	Fisherman IFQ Owner

Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska

38	Gary	Watson	Box 3077	Kodiak	AK	99615	Manager
39	Iver	Malutin	Box 8501	Kodiak	AK	99615	
40	Chris	Sannito	Box 104	Kodiak	AK	99615	Commercial Fishermen
41	Kevin	Bundy	Box 2705	Kodiak	AK	99615	Commercial Fisherman
42	Larry	Dooley	Box 2175	Kodiak	AK	99615	F/V Rebel, owner, skipper, commercial halibut
43	Connie	Dooley	Box 752	Kodiak	AK	99615	Commercial Fisherman Co-Owner
44	Danielle	Ringer	11465 s. Russian Creek Road # 1	Kodiak	AK	99615	Coastal Resident, Family in Commercial Fishing
45	Marya	Halvorsen	Box 136	Kodiak	AK	99615	Coastal Resident, Family in Commercial Fishing
46	Marnie	Leist	214 E. Rezanof B	Kodiak	AK	99615	Coastal Resident, Sport Fisherman
47	Kathy	Druckrey	Box 2975	Kodiak	AK	99615	Coastal Resident
48	Carl	McLaughlin	Box 2578	Kodiak	AK	99615	Sport Subsistence
49	David	Anderson	215 Mision RD. Suffix 201	Kodiak	AK	99615	Coastal Subsistence
50	Stephan	Taufen	Box 714	Kodiak	AK	99615	Public Advocacy, vessel rep.
51	Tim	Gossett	Box 1277	Kodiak	AK	99615	Commercial Fishermen
52	Leonard	Carpenter	Box 1970	Kodiak	AK	99615	F/V Fishtale commercial fishermen
53	Celia	Carpenter	Box 1970	Kodiak	AK	99615	F/V Fishtale commercial fishermen
54	Mike	Rocksted	Box 1199	Kodiak	AK	99615	Resident
55	James	Deater	Box 1193	Kodiak	AK	99615	Resident
56	John	Boggs	Box 1199	Kodiak	AK	99615	Resident
57	Mackenzie	Peterson	1850 Three Sisters Way	Kodiak	AK	99615	F/V Patricia Sue
58	Thomas	Miller	Box 1931	Kodiak	AK	99615	F/V Glacier Bay, halibut boat
59	Alexus	Kwachka	326 Cope St.	Kodiak	AK	99615	F/V No Point
60	David	Pingree	Box UGI	Kodiak	AK	99615	Quartz Creek Lodge, F/V Silent Partner, cod
61	Ben	Millstein	523 Leta St.	Kodiak	AK	99615	Brewer
62	Harvey	Goodell	Box 3108	Kodiak	AK	99615	Eider Narrows setnetter
63	Daniel	Miller	Box 2865	Kodiak	AK	99615	F/V Anna D, halibut fisher
64	Arthur	Schultz	3580 Sitkinak	Kodiak	AK	99615	Commercial Fishing
65	Darius	Kasprzak	807 Jackson Lane	Kodiak	AK	99615	F/V Marona
66	Bob	Bowhay	2885 Pruitt Lane	Kodiak	AK	99615	F/V Moondance, commercial fishing
67	Bruce	Magnusson	Box 283	Kodiak	AK	99615	F/V Breanna Holly
68	Joe	Yarbrough	Box 2973	Kodiak	AK	99615	F/V Jireh
69	Chuck	McWethy	Box 8552	Kodiak	AK	99615	F/V Shiring Sea, commercial fish
70	Holland	Dotts	Box 8343	Kodiak	AK	99615	F/V Mythos, commercial
71	Dave	Kubiak	Box 193	Kodiak	AK	99615	F/V Mythos, owner/operator
72	Craig	Gustafason	Box 8573	Kodiak	AK	99615	F/V Providence, owner/operator
73	Oliver	Holm	Box 8749	Kodiak	AK	99615	F/V Sulina, commercial halibut fisher
74	Peter	Allan	Box 2160	Kodiak	AK	99615	F/V Orion, commercial
75	John	Schoof	Box 3022	Kodiak	AK	99615	F/V Moon Shadow
76	Christopher	Johnson	11905 S. Russian Creek Rd. # 1	Kodiak	AK	99615	F/V Sukhoi

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77	Curtis	Bollinger	Box 2024	Kodiak	AK	99615	F/V Sea Walker
78	Iver	Holm	Box 8938	Kodiak	AK	99615	F/V Cyclone, commercial
79	Marco	Patitucci	Box 1511	Kodiak	AK	99615	F/V Lady Kathryn, commercial
80	Ian	MacIntosh	910 Stellar Way	Kodiak	AK	99615	F/V Kittiwake, commercial
81	Robert	Carter	Box 2817	Kodiak	AK	99615	F/V Faith, commercial
82	Andrew	Lundquist	Box 589	Kodiak	AK	99615	subsistence halibut user, jig fisherman
83	Kathy	Jorritsma	3430 Antone Way	Kodiak	AK	99615	sport, subsistence
84	Michael	Ford	1897 L St. #13	Kodiak	AK	99615	sport, subsistence
85	Thelma	Mackey	1897 L St. #13	Kodiak	AK	99615	sport, subsistence
86	Julie	Miller	614 Hillside	Kodiak	AK	99615	Vessel Owner
87	Dale	Pruitt	Box 2278	Kodiak	AK	99615	commercial
88	Charles	Peterson	1850 Three Sisters Way	Kodiak	AK	99615	F/V Patricia Sue, commercial halibut fisher
89	Theresa	Peterson	1850 Three Sisters Way	Kodiak	AK	99615	F/V Patricia Sue, commercial halibut fisher
90	Sulua	Stager	Box 8243	Kodiak	AK	99615	F/V Lady Lu, commercial fishing, quota shares
91	Malina	Holm	Box 8798	Kodiak	AK	99615	Commercial fishing
92	Martha	McKinney		Kodiak	AK	99615	
93	Ryan	Burt		Kodiak	AK	99615	
94	Sue	Scott	2629 Beaver Lake Drive	Kodiak	AK	99615	
95	Peter	Haggelis	2629 Beaver Lake Dr.	Kodiak	AK	99615	Wildlife Photographer
96	George	Kirk		Kodiak	AK	99615	Fisherman
97	Rebecca	Bean-Mullan	3353 Monashka Bay Rd.	Kodiak	AK	99615	Fisherman
98	Norman	Mullan	3353 Monashka Bay Rd.	Kodiak	AK	99615	Fisherman
99	Perry	Nelson	PO Box 92	Kodiak	AK	99615	Fisherman
100	Wendy	Beck	2785 Dark Lake Road	Kodiak	AK	99615	Fisherman
101	Naomi	Beck-Goodell		Kodiak	AK	99615	Commercial fishing crew member
102	Celeste	Beck-Goodell		Kodiak	AK	99615	Commercial fishing crew member
103	Peter	Thompson		Kodiak	AK	99615	
104	Michael	Miller	PAE/CSSP, Camp Phoenix, APO, AE	Kabul	Afg.	9352	Judicial Advisor
105	Gary	Rozelle Sr.	Box 5033	Akhiok	AK	99615	sport, subsistence
106	Gary	Rozelle Jr.	Box 5033	Akhiok	AK	99615	Subsistence, sport
107	Nina	Phillips	PO Box 5005	Akhiok	AK	99615	resident of Akhiok
108	William	Davidson	Petersburg	Alaska	AK	99833	Commercial Fisherman
109	Bruce	Butterwick	PO Box 471	Anchor Point	AK	99556	Trophy King Lodge - Fishing Lodge Owner
110	Richard	Andersen	24715 Sterling Hwy	Anchor Point	AK	99556	
111	James	Mertzweiler	69360 Royce Dr.	Anchor Point	AK	99556	
112	Greg	Demers	36508 Fox Rd	Anchor Point	AK	99556	ADFG - Retired
113	Alicia	Clark	31150 Catch Up St	Anchor Point	AK	99556	
114	Brian	Carper	31150 Catch Up St.	Anchor Point	AK	99556	
115	Mike	Sizelove	31435 Sterling Highway	Anchor Point	AK	99556	Fisherman Charter boat

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116	James	Gorman	73608 Twin Peaks Loop	Anchor Point	AK	99556	Retired
117	denise	Lasswa		Anchor Point	AK	99556	
118	Dan	Estes	27025 Kazor Cir/ PO Box 669	Anchor Point	AK	99556	
119	Ken	Stone	31727 Whiskey Gulch St.	Anchor Point	AK	99556	Retired
120	Alex	Rodriguez	71520 Cape Nihilchik Ave	Anchor Point	AK	99556	Merchant Marine Engineering Officer
121	Russel	Chesser	P. O. Box 515	Anchor Point	AK	99556	Resident/Personal Use Sport Fish
122	Tom	Custer	37153 Old Sterling Hwy.	Anchor Point	AK	99556	Resident
123	Colter	Demers	36508 Fox Rd.	Anchor Point	AK	99556	Electrician
124	Ann	Bayes		Anchor Point	AK	99556	
125	Elizabeth	Neumann	42410 Old Sterling Hwy	Anchor Point	AK	99556	
126	Jason	Wier	3405 Woodland Park Dr.	Anchorage	AK	99517	
127	Ashley	Smith		Anchorage	AK	99517	
128	Carly	Wier	3405 Woodland Park Dr.	Anchorage	AK	99517	
129	Brita	Mjos	1725 E 24th Ave.	Anchorage	AK	99508	Commercial Fisherwoman
130	Jody	Mason II	11321 Via Appia	Anchorage	AK	99515	
131	Martin	Danny	6730 Dickerson Dr.	Anchorage	AK	99004	Owner, Charter, Marine Sales
132	William	DeAvilla	1824 Wickersham Dr.	Anchorage	AK	99507	Charter Business Owner
133	Alexis	Gillett	4221 Laurel St.	Anchorage	AK	99508	Marine Biology Student\ Fishing Counter Salesman
134	Thomas	Sorensen	5243 E 26th Ave	Anchorage	AK	99508	
135	Tracey	Marsh	3190 Bridle Lane	Anchorage	AK	99517	Student at UAA
136	Aleks	Pfaffe	1129 I Street	Anchorage	AK	99501	Restaurant Management
137	Lindsey	Hajduk		Anchorage	AK	99503	
138	Mark	Lipoma		Anchorage	AK	99516	
139	Tina	Robinson		Anchorage	AK	99501	
140	Victor	De Carli		Anchorage	AK	99508	
141	John	Glotfelty	14931 Snowshoe Ln.	Anchorage	AK	99516	F/V Mariah, Salmon & Halibut
142	Beth	Glotfelty	14931 Snowshoe Ln.	Anchorage	AK	99516	F/V Mariah, Salmon & Halibut
143	April	Leuzinger		Anchorage	AK	99516	Recreational Fisherwoman
144	Shasta	Anderson	6900 E. 12rh Ave,	Anchorage	AK	99504	
145	Alan	Welsh	13020 Foster Rd.	Anchorage	AK	99516	Commercial Fisherman
146	Michael	Kashevarof	11173 Bluff Creek Circle	Anchorage	AK	99515	Fisherman
147	Angela	Harris	4401 Woronzof Drive	Anchorage	AK	99517	
148	Karl	Ohls	PO Box 244482	Anchorage	AK	99524	Consultant
149	Carl	Wassilie	3724 Campbell Airstrip Rd.	Anchorage	AK	99504	Yupik Biologist
150	Chung	Ha	8701 Jupiter Dr.	Anchorage	AK	99507	
151	Brian	Duwe	5111 Riverton Ave.	Anchorage	AK	99516	Business Development Manager
152	Amy	Snider	3724 Campbell Airstrip Rd.	Anchorage	AK	99524	Marine Conservation
153	John	Schroeder	3309 Baxter Road	Anchorage	AK	99504	Boatwright
154	Stanley	Olsen	6620 E 11th Ave.	Anchorage	AK	99504	

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155	Bill	Heiberger		Anchorage	AK	99504	Concerned Sport Fisherman
156	Andrew	Malavansky		Anchorage	AK	99504	
157	Richard	Hanna		Anchorage	AK	99508	
158	Donald	Pohland	3800 W. 43rd Ave.	Anchorage	AK	99517	
159	Greg	Holt	222 West &th Ave.	Anchorage	AK	99513	Investigator
160	Mark	Lavallee	704 Sunset Dr.	Anchorage	AK	99501	Aviation
161	Jeff	Clapp	10740 Lulliad Circle	Anchorage	AK	99507	AIH Dir Supply Chains Ops
162	William	Gebtry	5402 Windflower	Anchorage	AK	99507	Charter Fisherman
163	Ross	Blaker	3453 Bobbie Cir.	Anchorage	AK	99515	
164	William	Fisherman		Anchorage	AK	99501	
165	William	Steele	2901 Rocky Bay Cir.	Anchorage	AK	99515	
166	Jim	Rogers	17445 Spain Dr.	Anchorage	AK	99516	Business Owner
167	Branden	Goulet		Anchorage	AK	99504	
168	Dave	Huycke	200 Eagle Street	Anchorage	AK	99501	Teacher
169	Richard	Snider		Anchorage	AK	99508	
170	Wade	Willis	1308 West 31 Ave.	Anchorage	AK	99503	Biologist
171	Richard	Andrews	12621 Saunders Rd.	Anchorage	AK	99516	
172	Megan	Sharkey	4252 Reka Dr.	Anchorage	AK	99508	
173	Jeffrey	Bassett	5000 East 98th Ave.	Anchorage	AK	99507	Teacher
174	Doug	Stephens		Anchorage	AK	99507	
175	Karla	Dutton	717 O St. #3	Anchorage	AK	99501	State Durector of a non-profit
176	Tom	Maccchia	1540 Medfra	Anchorage	AK	99501	Physician Assistant
177	Patrick	Crowley	12601 Estuary Cir.	Anchorage	AK	99516	
178	Cherylynn	Dahmann	2710 Pelican Dr.	Anchorage	AK	99502	
179	Rae	Woodsum	400 E Manor Ave.	Anchorage	AK	99501	Guide
180	Francesca	Busick	8944 Blackberry St. Apt #603	Anchorage	AK	99502	LeSea Charters
181	Phil	Cutler		Anchorage	AK	99502	
182	Ray	Starzec		Anchorage	AK	99504	Sport & Commercial Fisher
183	Loni	Levy	13003 Atherton Road	Anchorage	AK	99516	Attorney
184	Ron	Tomblinson	5906 Fiji Street	Anchorage	AK	99507	Chef
185	Matthew	Lund	3041 Rosalind Loop	Anchorage	AK	99507	
186	Michael	Flynn	2320 Tagalak Drive	Anchorage	AK	99504	AKANG
187	Paul	Russell	3956 Eastway Loop	Anchorage	AK	9504	
188	Carlton	Russell	5017 Garland Cir.	Anchorage	AK	99508	Retired
189	Lisa	Jacobson	3015 Brittany Place	Anchorage	AK	99504	Nurse
190	Terrance	Bancroft	1300 w. 75th	Anchorage	AK	99518	
191	William	Bancroft	4327 James Dr.	Anchorage	AK	99504	Retired
192	Jim	Lee	8340 E. 11th Ct.	Anchorage	AK	99504	Owner-Swelltime Charters
193	Joseph	DiBenedetto	2435 Marian Bay Circle	Anchorage	AK	99515	

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194	Cameron	McFarlane	9201 Arlene St. #G5	Anchorage	AK	99502	
195	Wayne	Humbert	1941 Bragaw Square Pl.	Anchorage	AK	99508	Boat Captain
196	Ben	Persinger		Anchorage	AK	99507	Finance
197	Greg	Markson	2411 Tradewind Dr.	Anchorage	AK	99516	
198	Rich	Horn	7511 Chad St.	Anchorage	AK	99518	Engineer
199	Jason	Ricke		Anchorage	AK	99504	
200	Baylee	Davis		Anchorage	AK	99515	
201	Timothy	Riddle	4223-A Femoyer Ave.	Anchorage	AK	99506	
202	Arthur	Miller	15731 Stanwood Circle	Anchorage	AK	99516	
203	James	Sterling		Anchorage	AK	99504	
204	Gary	Bartelson	10241 Betula Drive	Anchorage	AK	99507	Telecom Engineer
205	Kimberly	Russell	3956 Eastway Loop	Anchorage	AK	99504	SOA-HSS-DJJ
206	Bradley	Lindstrom	5901 Lake Otis	Anchorage	AK	99507	
207	Douglas	Hope		Anchorage	AK	99504	
208	Carol	Woody	6601 Chevigny St.	Anchorage	AK	99502	Fisheries Scientist
209	Diane	Hirshberg	3813 Hampton Dr.	Anchorage	AK	99504	Researcher
210	Jennifer	Davis		Anchorage	AK	99507	DoD
211	Toya	Winton	5547 Penn Circle, Apt B	Anchorage	AK	99504	
212	Kenneth	Jenkins		Anchorage	AK	99507	
213	Todd	Hansen		Anchorage	AK	99518	
214	Daniel	Winter	9111 Sahalee Dr.	Anchorage	AK	99507	Engineer
215	Kevin	Degler		Anchorage	AK	99501	
216	Stephen	Jordan	200 W. 34th Ave. #547	Anchorage	AK	99503	Electrician
217	Cory	Crowlus	2240 Chandalar Dr.	Anchorage	AK	99504	Fishing Guide, Kvichak River, Bristol Bay
218		Alaska Inter-Tribal Council	445 E. 5th Ave.	Anchorage	AK	99501	Alaska Inter-Tribal Council
219	Mack	Nowlin	12700 Foster Rd.	Anchorage	AK	99516	
220	Norman	Stadem	1826 East 26th Ave.	Anchorage	AK	99508	Retired Economist/Bristol Bay Salmon
221	Dennis	Gann	943 W 19th Ave.	Anchorage	AK	99503	Former Commercial Fisherman
222	Stephen	Aikey	Hill Side	Anchorage	AK	99507	
223	Craig	Kasemodel	3813 Hampto Drive	Anchorage	AK	99504	
224	Patti	Greene		Anchorage	AK	99501	Crew person / tender
225	Joseph	Griffo		Anchorage	AK	99516	
226	Andrew	Andersin	545 N Street	Anchorage	AK	99501	Sport Fishing Guide
227	Kate	O'Brien		Anchorage	AK	99503	
228	Jessica	Tullius	Tullius	Anchorage	AK	99501	
229	Leo H.	Barlow	3121 Spinnakon	Anchorage	AK	99516	Coastal resident, subsistence user
230	Robert	Hume	3101 Brookside	Anchorage	AK	99517	Resident
231	John	Sturgeon	4450 Shoshoni Ave.	Anchorage	AK	99516	Sport
232	Evelyn	Mullan	2541 E. 50th Ave	Anchorage	AK	99507	sport, subsistence

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233	Dave	Stephens	10161 Ore Road	Anchorage	AK	99507	Commercial
234	Melissa	Bent	1529 Primrose St.	Anchorage	AK	99508	Sport
235	Daniel	Gosnell	8870 Cordell Circle	Anchorage	AK	99506	Sport
236	Luke	Mckinnon	6621 Hampstead Dr. #116	Anchorage	AK	99518	Coastal resident
237	Sonny	Haboc	2917 W. 32nd Ave.	Anchorage	AK	99517	Sport
238	Brian	Williams	520 West 6th Ave.	Anchorage	AK	99501	Sport
239	Lynn	Keogh	4778 Mills Dr.	Anchorage	AK	99506	Consumer, Charter Sport
240	Stacey	Lucason	1008 E 9th Ave.	Anchorage	AK	99807	Consumer
241	Tim	Lucason	1008 E 9th Ave.	Anchorage	AK	99807	Consumer
242	Jeff	Gorton	12131 Rainbow	Anchorage	AK	99516	Sport
243	Roger	Wilkins	205 E. Dimond Blvd. #547	Anchorage	AK	99515	Sport/Resident
244	Matt	Graham	16510 Centerfield Dr. Apt. B2	Anchorage	AK	99577	Sport
245	Scott	Anderson	P. O. Box 234225	Anchorage	AK	99523	Sport & Consumer
246	Jacob	Askren	3433 Alexander Ave.	Anchorage	AK	99508	Sport
247	Kevin	Tierney	8133 Lamplight Ct.	Anchorage	AK	99502	Sport
248	Richard	Tweet	2442 Forest Park Dr.	Anchorage	AK	99517	Sport
249	William	Scannell	9300 Jackin Ln	Anchorage	AK	99502	Sport
250	Shayne	Tuck	P. O. Box 212075	Anchorage	AK	99521	Sport
251	Richard D.	Ralls	7614 Boundary Ave.	Anchorage	AK	99504	Sport
252	Francisca	Ragu	100 Bunnell St. #14A	Anchorage	AK	99508	Sport/Resident
253	Don	Nuxall	9020 Lance Circle	Anchorage	AK	99502	Sport/Resident
254	Dennis	Moser	9044 King David	Anchorage	AK	99507	Sport/Resident
255	Stu	Graham	Box 4558	Anchorage	AK	99615	Sport/Resident
256	Denise	Schmidt	7721 Pleasure View	Anchorage	AK	99507	Fishing
257	Charles	Bingham	4005 Borland	Anchorage	AK	99517	Resident
258	Neal	Haglund	12510 Gander St.	Anchorage	AK	99516	Resident
259	Harold	Braspeningck	4242 Apollo Dr.	Anchorage	AK	99504	Resident
260	Scott	Magnus	2434 Colleen Cir	Anchorage	AK	99504	Sport
261	Bob	Magnus	P. O. Box 243524	Anchorage	AK		Sport
262	Gary	Cannon	5639 Kenai Fjords Lp.	Anchorage	AK	99502	Sport Charter
263	Robert	Braun	8521 Paine Rd.	Anchorage	AK	99516	Sportsman
264	Rick	Horton	3007 Arctic Blvd. #79	Anchorage	AK	99503	Sport
265	Bill	Steele	2901 Rocky Bay Cir.	Anchorage	AK	99515	Sport
266	Travis	Smith	3808 Sycamore Loop	Anchorage	AK	99504	Sport, Resident, Consumer
267	Brian	Williams	520 West 6th Ave.	Anchorage	AK	99501	Sport
268	Peter	Hardy	806 W. 88th Ave	Anchorage	AK	99515	Sport
269	Corey	Tiedeman	3101 Horizon Street	Anchorage	AK	99517	Sport
270	Robert	Brewer	6436 Homer Dr.	Anchorage	AK	99518	Resident
271	Sandra	Amlong	5800 Lake Otis Pl W #331	Anchorage	AK	99507	Sport

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272	Bill	Moehr	6951 Baxter Terrace Circle	Anchorage	AK	99504	Sport Fish
273	Art	Racicot	1929 E 58 Ave.	Anchorage	AK	99507	Sport Fishing Aircraft Mechanic
274	Craig	Cornichuck	4933 Wesleyan Dr.	Anchorage	AK	99508	Sport Fishing Sales
275	Phil	Brna	5601 E. 98th	Anchorage	AK	99507	Sport
276	Allen	Tigert	14820 Elmore Rd.	Anchorage	AK	99516	Sport
277	Andrew	McNair	7016 Weimer Rd. #6	Anchorage	AK	99502	Sport
278	Ryan	Schryver	1935 Karluk St. Apt. 4	Anchorage	AK	99501	Sport/Consumer
279	Art	Tronholme	3701 B Yount St.	Anchorage	AK	99508	Sport/Consumer
280	Joan	Sheridan	1532 Rosemary St.	Anchorage	AK	99508	Sport/Consumer
281	Aiden	Leddy	1575 Columbine	Anchorage	AK	99508	Sport/Consumer
282	Richard	McMahon	1315 Virginia Ct.	Anchorage	AK	99501	Sport
283	Jay	Heazlett	P. O. Box 112594	Anchorage	AK	99511	Sport Fish & Resident
284	Jean	Hulbert	5226 Strawberry Rd.	Anchorage	AK	99520	Consumer
285	Barbara	Wild	11421 Willene Dr.	Anchorage	AK	99516	Like to halibut sport fish
286	Fred	Sorensen	11421 Willene Dr.	Anchorage	AK	99516	Sport fish halibut and salmo
287	Chris	Breest	3137 BettlesBay	Anchorage	AK	99515	Sport
288	Leslie	Breest	3137 BettlesBay	Anchorage	AK	99515	Sport
289	Adam	Breest	3137 BettlesBay	Anchorage	AK	99515	Sport
290	Jim	LaBau	2951 Admiralty Bay Drive	Anchorage	AK	99515	Sport
291	Jim	Thiele	34601 Mans	Anchorage	AK	99507	Sport
292	Christopher	Carlos	6432 Spruce St.	Anchorage	AK	99507	Sport Consumer
293	Bawb	Pickett	500 W. 34th Ave.	Anchorage	AK	99503	Sport
294	Jeff	Hyde	111 W. Ship Creek	Anchorage	AK		Sport
295	Joe	Vesely	8531 Raintree Circle	Anchorage	AK	99507	Sport
296	Darrell	Farmen	12800 Ridgewood	Anchorage	AK	99516	Sport/Resident/Consumer
297	Emily	Johnson	1300 W. 46th Ave.	Anchorage	AK	99503	Sport/Consumer
298	Timothy	Pate	1900 E. 72nd #9	Anchorage	AK		Resident
299	David	Hren	2538 Porter Pl.	Anchorage	AK		Resident King Angler
300	Lindsay	Saetre	7901 Ladasa Pl.	Anchorage	AK	99507	Resident, Sport
301	Eric	Saetre	7901 Ladasa Pl.	Anchorage	AK	99507	Resident, Sport
302	Jeanne	Devon	6520 Italy Circle	Anchorage	AK	99516	
303	William	Nye	2612 Sprucewood St.	Anchorage	AK	99508	
304	Amanda	Cash		Anchorage	AK	99517	
305	Mary	LaFever	815 West 19th Ave.	Anchorage	AK	99503	
306	Lisa	Wedin	3521 Scarlet Pl.	Anchorage	AK	99517	
307	Sheri	Whitethorn		Anchorage	AK	99508	
308	Diana	Bauman	1326 B St.	Anchorage	AK	99509	Retired Fisherman
309	Jan	Welt	1216 S Street	Anchorage	AK	99501	Motion Picture Industry
310	Jeanne	Friedman	1534 D St.	Anchorage	AK	99501	

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311	Nick	Moe			Anchorage	AK	99503	
312	Kelly	Harrell	5701 E 104th Ave.		Anchorage	AK	99507	Halibut consumer
313	Severin	Mara	3120 E. 144th Avenue		Anchorage	AK	99516	
314	George	Kapolchok	360 K St. #100		Anchorage	AK	99501	Attorney
315	Shannon	Kuhn	1014 W. 16th Ave.		Anchorage	AK	99501	
316	Alison	Arians	12900 Badger Lane		Anchorage	AK	99516	
317	Nora	Gecan			Anchorage	AK	99503	
318	Ariel	Brown			Anchorage	AK	99507	
319	Vivian	Brantley			Anchorage	AK	99511	
320	Anthony	Torgramsen	PO Box 10040		Anchorage	AK	99510	consumer
321	Ole	Olsen	7929 Highlander Drive		Anchorage	AK	99510	sport fisherman, consumer, coastal resident (Kodiak)
322	Cynthia	Bourdon	2304 McRae Road Lot 5		Anchorage	AK	99517	consumer
323	Raymond	Bourdon	2304 McRae Road Lot 5		Anchorage	AK	99517	consumer
324	Jennie	Inga	9920 Grange Drive Unit C		Anchorage	AK	99515	Old Harbor Native Corp
325	Kim	Fraser	1720 Bartlett Drive		Anchorage	AK	99507	Old Harbor Native Corp
326	Billie	Christiansen	7051 Chad Street		Anchorage	AK	99507	
327	Cynthia	Lopez	3754 Chaffee Circle		Anchorage	AK	99517	coastal resident from Old Harbor
328	Carl	Gatter	3240 E 42nd Ave		Anchorage	AK	99508	coastal resident from Old Harbor
329	Carl	Mars	2239 Sorbus Way		Anchorage	AK	99508	CEO Old Harbor Native Corp
330	Brenda	Collinge	PO Box 232862		Anchorage	AK	99523	coastal resident of Old Harbor
331	Emil	Christiansen	8211 Debarra Road		Anchorage	AK	99504	F/V Carla Rae
332	Annie	Lewis	PO Box 230544		Anchorage	AK	99925	coastal resident
333	Don	Lewis	PO Box 230433		Anchorage	AK	99923	consumer
334	Jesse	Smith	9336 Blackberry Street #11		Anchorage	AK	99502	consumer
335	Cheryl	Christiansen	9336 Blackberry Street #11		Anchorage	AK	99502	consumer
336	Mary	Christiansen	8211 Debarra Road		Anchorage	AK	99504	commercial
337	Anesia	Kvasnikoff	6329 E 32nd Ave #3		Anchorage	AK	99504	consumer
338	Jenee	Ashouwak	2607 West 31st #2		Anchorage	AK	99517	coastal resident
339	Sheila	Tapia	1621 Elcadore Drive #3		Anchorage	AK	99507	coastal resident from Old Harbor
340	Kathleen	Kvasnikoff	6329 E 32nd Ave #3		Anchorage	AK	99504	coastal resident from Old Harbor
341	Robert	Inga	616 N Bragan Apt 1		Anchorage	AK	99508	coastal resident from Old Harbor
342	Julia	Horvatn	3957 Lunar Drive Apt 1		Anchorage	AK		resident
343	Mary	Inga	5000 Taku		Anchorage	AK	99508	coastal resident from Old Harbor
344	Ron Sr.	Berntsen	1200 W Dimond		Anchorage	AK		resident, fisherman of Old Harbor
345	Betty	Berntsen	1200 W Dimond		Anchorage	AK		resident from Old Harbor
346	Ron	Berntsen	8010 Duggan Ct		Anchorage	AK	99502	resident, consumer
347	Annette	Gatter	3240 E 42nd Ave		Anchorage	AK		resident of Old Harbor
348	Ann	Riddle-Bernsten	8010 Duggan Ct		Anchorage	AK	99502	resident, consumer
349	Carrie	Bernsten-Chu	1604 Woodcutter Ct		Anchorage	AK	99507	resident of Old Harbor

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350	Kenneth	Chu	1604 Woodcutter Ct	Anchorage	AK	99507	resident from Old Harbor
351	Janet	Tunohun	2616 N Tahiti Lp.	Anchorage	AK	99507	resident from Old Harbor
352	Diane	McEachern		Bethel	AK	99559	
353	Melvin	Grove	PO Box 520575	Big Lake	AK	99652	Charter Operator
354	Joyce	Cash	Mmile 79 Glen Hwy.	Chickaloon	AK	99674	
355	Sara	Lowden		Chickaloon	AK	85742	
356	Susan	Baker		Chiniak	AK	99615	Wife of a Fisherman
357	John	Smart	19911 Quiet Way	Chugiak	AK	99567	Charter Captain
358	James	Glynn	23605 Fallon Circle	Chugiak	AK	99657	Sport
359	Tim	Erion	P.O. Box 526	Clam Gulch	AK	99568	Halibut Charter owner/operator
360	Michael	Yoder	200 A St. Stop 61	Clear AFB	AK	99704	Sport Consumer
361	Chris	Solis	200 A St. Stop 274	Clear AFB	AK	99704	Sport Consumer
362	David	Otness	311 Browning Ave.	Cordova	AK	99574	Retired commercial fisherman, mercahnt mariner
363	Scott	Van Vallin	PO Box 1174	Craig	AK	99921	Lodge Owner/ Guide
364	Nani	Van Vallin	P O Box 1174	Craig	AK	99921	Lodge Owner is SE Alaska
365	Sharon	Van Vallin	PO Box 1164	Craig	AK	99921	Retired
366	Robert	Andrews	PO Box 1072	Craig	AK	99921	
367	Jesse	Cummings		Delta Jct.	AK	99737	
368	Verner	Wilson III	PO Box 905	Dillingham	AK	99576	Bristol Bay Fishermen
369	Apayo	Moore		Dillingham	AK	99576	
370	Kate	Troll		Douglas	AK	99824	
371	Kimberly C.	Peterson	Box 240102	Douglas	AK	99824	Coastal resident
372	Dennis	Bell	Box 64	Douglas	AK	99824	commercial, retired
373	Barabara	Bell	Box 64	Douglas	AK	99824	commercial, retired
374	Jaime	Isaak	Box 240275	Douglas	AK	99824	subsistence, commercial
375	John	Isaak Jr.	Box 240275	Douglas	AK	99824	commercial
376	Michael	Holman	176 Lear Rd.	Dutch Harbor	AK	99692	Public Safety
377	PJ	Bell	11723 Old Glenn Hwy	Eagle River	AK	99577	
378	John	Rathert Jr.	12041 Lugene Ln	Eagle River	AK	99577	
379	Greg	Jerich	10801 Splendor Loop	Eagle River	AK	99577	
380	Bryce	Myers		Eagle River	AK	99577	
381	Robert	Bentler	11009 Gulkana Circle	Eagle River	AK	99577	
382	Gerad	Neely	20407 Granite Park Cir.	Eagle River	AK	99577	
383	Guy	Sachette		Eagle River	AK	99577	
384	Bryson	Wright	18620 Second St.	Eagle River	AK	99577	State Employee
385	Matthew	Bradbury		Eagle River	AK	99577	
386	David	Persinger	11527 Targhee Loop	Eagle River	AK	99577	
387	Cory	Kittle	8420 Ruth Dr.	Eagle River	AK	99577	Air Force
388	Brian	Wight	9716 Revilla Circle	Eagle River	AK	99577	Dentist

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389	Robert	Coyner		Eagle River	AK	99577	
390	Jack	Frost	P. O. Box 770347	Eagle River	AK	99577	BLM
391	Scott	Fredrickson	9726 East Chichagof Loop	Eagle River	AK	99577	DA Civilian
392	Kristen	Labrecque	1920 Mt. Kiliak Circle	Eagle River	AK	99577	Sport Saltwater Excursions LLC
393	James	Lauchef	17316 N. Juanita Ln.	Eagle River	AK	99577	Resident
394	Ben	Wedin	20840 Icefall Dr.	Eagle River	AK	99577	Sport
395	Bill	Rome	16924 Kitona Dr.	Eagle River	AK	99577	Willard Erland Video
396	Don	Remer	12313 Crested Butte Dr.	Eagle River	AK	99577	Sport
397	James	Yassick	P. O. Box 770343	Eagle River	AK	99577	Sportsman
398	Mary	Remer	12313 Crested Butte Dr.	Eagle River	AK	99577	Resident
399	Chris	Launer	10846 Delta Cir.	Eagle River	AK	99577	Sport
400	Karen	Launer	10846 Delta Cir.	Eagle River	AK	99577	Sport
401	Deborah	Gonzales	PO Box 772244	Eagle River	AK	99577	
402	Dennis	Meier	PO Box 72	Elfin Cove	AK	99825	self employed
403	Reb	Adkins		Ester	AK	99725	
404	Naomi	Herbeck	3294 Riverview Dr.	Fairbanks	AK	99709	UAF Student
405	Gerald	Colp	651 11th Ave	Fairbanks	AK	99701	
406	Grady	Brown	1586 Taroka Dr.	Fairbanks	AK	99709	Contractor
407	Cheryl	Corrick	4075 Teal Avenue	Fairbanks	AK	99709	Certified Direct-entry Midwife
408	Dana	Brown	1586 Taroka Dr.	Fairbanks	AK	99709	Midwife
409	Allen	Barrette	380 Peger Rd.	Fairbanks	AK	99709	
410	Odin	Miller	PO Box 750241	Fairbanks	AK	99775	Science Technician
411	Justin	Johnson	2750 Dale Rd.	Fairbanks	AK	99709	University of Alaska - Staff
412	Daniel	Glass	2780 Goldhill Rd	Fairbanks	AK	99775	
413	J.	Gregg		Fairbanks	AK	99709	
414	Bruce	Chapman		Fairbanks	AK	99701	
415	Eric	Meffley	1524 Husky Way	Fairbanks	AK	99709	
416	Art	Strauss	2088 Becker Ridge Rd.	Fairbanks	AK	99709	MD
417	Gina	Strauss	2088 Becker Ridge Rd.	Fairbanks	AK	99709	
418	Bill	Folsom	1769 Old Pioneer Way	Fairbanks	AK	99709	
419	Bob	Hilleman	PO Box 82542	Fairbanks	AK	99708	
420	Joe	Talcott	1495A Alaska Way	Fairbanks	AK	99709	Heavy Equipment Mechanic
421	David	Machacek	840 Pickering Dr.	Fairbanks	AK	99709	
422	Morgan	Duggar	P. O. Box 84451	Fairbanks	AK	99708	Sport Fishing/Consumer
423	Margaret	DeSpain	P.O. Box 82250	Fairbanks	AK	99708	Retired
424	Susan	Fox	142 Berkeley Ct	Fairbanks	AK	99709	
425	Daniel	Mann	PO Box 81826	Fairbanks	AK	99708	Teacher
426	Mark	Robl	PO Box 15003	Fritz Creek	AK	99603	Police Chief

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427	Josh	Brooks	P. O. Box 15394	Fritz Creek	AK	99603	Sport
428	Thomas	Huff	P. O. Box 15247	Fritz Creek	AK	99603	Sport
429	Mary Ann	Rowe	P. O. Box 15156	Fritz Creek	AK	99603	Halibut Fisher & Consumer
430	Debbie	Oudiz	P. O. Box 15232	Fritz Creek	AK	99603	Resident
431	George	Matz	P. O. Box 15182	Fritz Creek	AK	99603	Sport
432	Allen	Saxton	P. O. Box 15203	Fritz Creek	AK	99603	Consumer
433	Wes	Schacht	P. O. Box 15243	Fritz Creek	AK	99603	Tour Guide, Painter, Grunt Boy, Cook, eat, catch halibut for family & friends
434	Bev	Griffeth	P. O. Box 15304	Fritz Creek	AK	99603	Juliette, retired charter boat owner, p. s. I make a tasty halibut salad & chowder
435	Joseph	Zometsky Jr.	PO Box 1673	Gitlowood	AK	99587	
436	Dan	Foley	PO Box 57	Gustavus	AK	99826	
437	James	Proctor	PO Box 31	Gustavus	AK	99826	Commercial fisherman
438	Craig	Murdoch	PO Box 121	Gustavus	AK	99826	Fish biologist; subsistence
439	Ben	Stroecker	PO Box 52	Gustavus	AK	99826	F/V Glenmar
440	Jessica	Mulligan	PO Box 52	Gustavus	AK	99826	F/V Glenmar
441	Charlie	Rice	PO Box 52	Gustavus	AK	99826	Fisherwoman
442	Melissa	Senac	PO Box 155	Gustavus	AK	99826	F/V Tara
443	Miller	White	PO Box 177	Gustavus	AK	99826	Subsistence; coastal resident
444	Emily	Herman	PO Box 177	Gustavus	AK	99826	Subsistence; coastal resident
445	Anya	Maier	PO Box 162	Gustavus	AK	99826	Subsistence; coastal resident
446	Kathy	Lochman	PO Box 252	Gustavus	AK	99826	Subsistence; coastal resident
447	Ashley	Jacobs	PO Box 252	Gustavus	AK	99826	Subsistence; coastal resident
448	Karen	Colligan-Taylor	PO Box 85	Gustavus	AK	99826	Coastal resident
449	Mary	Hervin	PO Box 133	Gustavus	AK	99826	Coastal resident
450	Mike	Halbert	PO Box 314	Gustavus	AK	99826	Charter fisherman
451	Stephan	VanDerhoff	PO Box 240	Gustavus	AK	99826	Coastal resident
452	Hank	Lentfer	PO Box 162	Gustavus	AK	99826	Subsistence fisherman
453	Paul	Barnes	PO Box 155	Gustavus	AK	99826	F/V Tara
454	Daniel	Pratschner	PO Box 141	Gustavus	AK	99826	Merchant marine
455	Peter	Mickam	PO Box 266	Gustavus	AK	99826	Subsistence fisherman
456	Laurie	Ross		Gustavus	AK	99826	Coastal resident
457	Gregg	Streveler	PO Box 94	Gustavus	AK	99826	Coastal resident
458	Janet	Neilson	PO Box 268	Gustavus	AK	99826	Coastal resident
459	Sean	Neilson	PO Box 268	Gustavus	AK	99826	Coastal resident
460	Michael	Taylor	PO Box 85	Gustavus	AK	99826	Coastal resident
461	Andy	Martin	PO Box 279	Gustavus	AK	99826	Charter captain
462	Cheryl	Brown	31 State Dock Rd.	Gustavus	AK	99826	Charter fishing lodge owner
463	Alisa	Stoutsenberger	31 State Dock Rd.	Gustavus	AK	99826	Charter fishing lodge manager

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464	Jackson	Swanson	PO Box 192	Gustavus	AK	99826	Sport fisherman
465	Phoebe	Vanselow	PO Box 192	Gustavus	AK	99826	Sport fisherman
466	Jim	Mackovjak	PO Box 63	Gustavus	AK	99826	Subsistence
467	Ann	Mackovjak	PO Box 63	Gustavus	AK	99826	Subsistence
468	Eric	Syrene	PO Box 251	Gustavus	AK	99826	Resident
469	Chris	Keefe	PO Box 24	Gustavus	AK	99826	Resident
470	Maribeth	Jarvis	PO Box 358	Gustavus	AK	99826	Resident, IFQ Holder, Vessel Owner
471	Colleen	Stansbuk	PO Box 145	Gustavus	AK	99826	Resident
472	Bruce	Smith	PO Box 273	Gustavus	AK	99826	Resident, Vessel Owner, IFQ Holder
473	Brian	Sweet	PO Box 188	Gustavus	AK	99826	Resident
474	Steve	Petty	PO Box 202	Gustavus	AK	99826	Resident, Charter
475	Eric	Hart	PO Box 244	Gustavus	AK	99826	Resident, Fisher
476	Tom	McLaughlin	PO Box 73	Gustavus	AK	99826	Resident, Fisher
477	Diana	Berry	PO Box 105	Gustavus	AK	99826	Resident
478	Carole	Baker	PO Box 56	Gustavus	AK	99826	Coastal Resident, Fishing Family
479	Nathan	Borson	Po Box 211	Gustavus	AK	99826	resident/sport fishing
480	Paul	Berry	PO Box 204	Gustavus	AK	99826	AK resident
481	Hayden	Kaden	PO Box 138	Gustavus	AK	99826	resident
482	Marylou	Blakeslee	General Delivery	Gustavus	AK	99826	coastal resident
483	Vincent	Schafer	PO Box 172	Gustavus	AK	99826	F/V Eve, commercial fisherman, coastal resident
484	Judith	Brakel	PO Box 94	Gustavus	AK	99826	coastal resident, personal use fisher
485	Christine	Gabriels	PO Box 204	Gustavus	AK	99826	coastal resident, biologist
486	Bonnie	Kaden	PO Box 138	Gustavus	AK	99826	resident
487	Tim	Sunday	PO Box 257	Gustavus	AK	99826	resident
488	Mary	Cook	PO Box 257	Gustavus	AK	99826	resident
489	Janene	Driscoll	14 Mary's Road	Gustavus	AK	99826	resident
490	Kristine	Harder	121 Chestnut	Haines	AK	99827	Retail Store
491	Kristine	Harder	P.O. Box 136	Haines	AK	99827	Shop Owner
492	Marvin	Bellamy	PO Box 6426	Hailbut Cove	AK	99603	Commercial Fisherman
493	Annette	Bellamy	PO Box 6426	Hailbut Cove	AK	99603	Commercial Fisher & Artist
494	Sam	Beachy		Homer	AK	99603	Builder
495	Kathy	Rider	PO Box 807	Homer	AK	99603	
496	Dale	Seekins	1009 Mission Rd.	Homer	AK	99603	Sport Charter Operator
497	Clayton	Smith		Homer	AK	99603	
498	David	Longley		Homer	AK	99603	Fishing Charter Captain/Owner
499	Kathy	Smith		Homer	AK	99603	
500	Willy	Beachy	5243 Kachemak Dr.	Homer	AK	99603	Captain - Charter Boat
501	Jarl	Gustafson	496 Bonanza Ave.	Homer	AK	99603	Commercial Fisherman
502	Kathleen	Gustafson	496 Bonanza Ave.	Homer	AK	99603	

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503	Keith	Kalke		PO Box 1900	Homer	AK	99603	Charter Captain / Owner
504	Michael	Schallock		4453 Towne Heights Ln.	Homer	AK	99603	
505	Virginia	Tornes		POB 2497	Homer	AK	99603	Commercial Fisherman
506	Mari	Rimple			Homer	AK	99603	Accountant
507	David	Longley			Homer	AK	99603	Fishing Charter Captain/Owner
508	James	Lavrakas		PO Box 1459	Homer	AK	99603	Charter Captain
509	Ethan	Waldvogel			Homer	AK	99603	Merchant Marine Officer
510	Steve	Penley		1597 Saltwater Dr.	Homer	AK	99603	
511	Bob	Shavelson			Homer	AK	99603	
512	Gerald	Scholand		58856 East End Rd	Homer	AK	99603	B&B Owner
513	Laurie	Heston		141 W. Pioneer Ave.	Homer	AK	99603	Chiropractic Manager
514	David	Morris		3978 Homer Spit Road	Homer	AK	99603	Charter Operator
515	Cory	Loos			Homer	AK	58078	
516	Gary	Ault		P.O. Box 307	Homer	AK	99603	Charter Operator
517	Claudia	Caffee-Delapp		P.O BOX 846	Homer	AK	99603	B&B OWNER/OPERATOR
518	Margaret	Lockwood		Box 415	Homer	AK	99603	
519	Willia	Sowers			Homer	AK	99603	Fisherman
520	Ray	Marshall			Homer	AK	99603	Education
521	Brenda	Hays		P.O. Box 1828	Homer	AK	99603	Fisherman
522	Stephen	Nelson		702 Quiet Creek Dr.	Homer	AK	99603	Retired
523	Diane	Caso-Morris			Homer	AK	99603	Business Owner
524	Mo	Wilkinson			Homer	AK	99603	
525	Ron	Downing		1247 Bay Ave.	Homer	AK	99603	
526	Diana	Seekins		1009 Mission Rd.	Homer	AK	99603	Lodging owner/charter owner
527	Paul	Story		PO Box 1906	Homer	AK	99603	
528	Donald	Lane		1535 Lincoln St.	Homer	AK	99603	Commercial Fisherman
529	Jennifer	Bando			Homer	AK	99603	Veterinarian
530	Roark	Brown		210 Island View Ct.	Homer	AK	99603	Sport
531	Rick	Swenson		274 E. Danview	Homer	AK	99603	Sport
532	Nancy	Hillstrand		P. O. Box 170	Homer	AK	99603	Fish Processor, Commercial, Subsistence
533	Eileen	Mullen		Box 1934	Homer	AK	99603	Resident
534	Rebecca	Clarke		P. O. Box 3038	Homer	AK	99603	Coastal Resident/Consumer, Sportfishing, Care about Mother Nature
535	Gary	Lyon		61770 Skyline	Homer	AK	99603	Lodging, Retail Sport & Commercial Fish
536	Chuck	Piper		Box 15233	Homer	AK	99603	Commercial
537	Lee A.	Martin		P. O. Box 743	Homer	AK	99603	Sport Commercial Coastal Residential Consumer
538	Bob	Shavelson		P. O. Box 1498	Homer	AK	99603	Sport, Resident, Consumer
539	Jonathan	Flora		34710 Moonrise 82	Homer	AK	99603	Commercial Fisherman

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540	Bryan	Zak	2525 Sterling Hwy	Homer	AK	99603	Accomodations
541	Mike	Flora	34710 Moonrise St.	Homer	AK	99603	Commercial Fisherman
542	Kyle	Lints	64900 Berry Pail Dr.	Homer	AK	99603	Gillnetting Salmon Longline Halibut
543	Diane	Borgman	P. O. Box 2992	Homer	AK	99603	Sport
544	Cindy	Detrow	P. O. Box 827	Homer	AK	99603	Resident
545	Debra	Wedin	P. O. Box 3353	Homer	AK	99603	Sport Fisher/Consumer
546	Gary	Harris	Box 3544	Homer	AK	99603	Sport
547	David B.	Cloud	Box 2756	Homer	AK	99603	Sport Charter
548	Richard	Baltzer	P. O. Box 895	Homer	AK	99603	sport/Charter
549	Bruce	Lozkar	Box 3383	Homer	AK	99603	Sport
550	Charles E.	Deal	Box 2584	Homer	AK	99603	Sport
551	David	Greiner	961 S. Larkspur Cir.	Homer	AK	99603	Captain Kachemak King
552	Bill	Overway	59805 Winter Wren Ct.	Homer	AK	99603	Sport
553	Diane	Hively	204 Ocean Drive Loop	Homer	AK	99603	Sport Consumer
554	Mike	Walls	P. O. Box 1695	Homer	AK	99603	Resident Consumer and Sport Fisherman
555	Monte	Davis	196 W. Fairview Ave.	Homer	AK	99603	Halibut Fisher & Consumer
556	Paula	Frisinger	P. O. Box 1900	Homer	AK	99603	Consumer
557	Nate	Geragotelis	P. O. Box 2659	Homer	AK	99603	Sport Fish & Resident
558	Teresa	Hurley	P. O. Box 1604	Homer	AK	99603	Sport
559	Ron	Hurley	P. O. Box 1604	Homer	AK	99603	Charter Operator & Sport Fisherman
560	Christine	Szocinski	436 Bonanza Ave.	Homer	AK	99603	Resident, Sport, Worker at Coal Point Trading
561	Michael	Szocinski	436 Bonanza Ave.	Homer	AK	99603	Resident, Sport and Work at Fish Processor
562	George E.	Smallwood	34960 Fox Barrowcliff Box 3371	Homer	AK	99603	Resident Sport Fisherman
563	Tim	Scott	4510 Early Spring St.	Homer	AK	99603	Resident Consumer Sport
564	Bernadine	Jagalski	Box 2488	Homer	AK	99603	Fish Administrator, Retail and Sport Process
565	Laura	Inglima	60210 Bear Creek Dr.	Homer	AK	99603	Resident
566	Rich	Kleinleder	P. O. Box 367	Homer	AK	99603	Biologist/Resident Sport and Commercial
567	James	Lunny	P. O. Box 3518	Homer	AK	99603	Sportfish for Food
568	Cindy	Bolognani	P. O. Box 1067	Homer	AK	99603	Consumer
569	Roberta	Highland	P. O. Box 2460	Homer	AK	99603	Resident Consumer, Environmentalist
570	Monica	Turner	61394 Ohlson Mtn. Road	Homer	AK	99603	Resident
571	Wendy	Noomah	57560 Windsor Ct.	Homer	AK	99603	Resident
572	Pat	Ahern	P. O. Box 3081	Homer	AK	99603	Resident Sport
573	Peggy Ellen	Kleinleder	P. O. Box 367	Homer	AK	99603	Resident Consumer
574	Julian	Massey	P. O. Box 2022	Homer	AK	99603	Resident Consumer, Boat Captain
575	Pauli	Ide	P. O. Box 3639	Homer	AK	99603	Resident
576	Jen	Beaudry	1295 Mission Road	Homer	AK	99603	Resident
577	Jana	Porter	P. O. Box 2172	Homer	AK	99603	Resident
578	Rachel	Almendinger	61374 Ohlson Mtn. Rd.	Homer	AK	99603	Resident

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579	Don	Ryan	P. O. Box 3196	Homer	AK	99603	Resident Sport
580	Ty	Gates	P. O. Box 4304	Homer	AK	99603	"Lip Ripper" Pleasure
581	Steve	Shank	704 Rangeview	Homer	AK	99603	Jackleg Pleasure
582	Charles C.	Johnson	P. O. Box 293	Homer	AK	99603	Resident
583	Patrick	Langdon	4296 Claudia St.	Homer	AK	99603	F/V Leah Kay Commercial
584	Ronald	Keffer	189 Island View Ct.	Homer	AK	99603	Sport, Coastal Resident
585	Richard C.	Olson	64615 Star Ct.	Homer	AK	99603	Food
586	Nicole	Arevalo	67795 Walter Thomas Rd.	Homer	AK	99603	Coastal Resident, Sport Fisherman
587	Cody	Wise	67795 Walter Thomas Rd.	Homer	AK	99603	Sport & Commercial Fisherman, Coastal Resident
588	Winslow	Hoffman	P. O. Box 1842	Homer	AK	99603	Commercial Fisherman, Coastal Resident
589	Michael	Glasgow	2147 Aspen Lane	Homer	AK	99603	Activist
590	Bjorn	Olson	Box 237	Homer	AK	99603	Wilderness Guide and Subsistence User
591	Maynard	Smith	Box 3099	Homer	AK	99603	Sport Fisher, Coastal Resident, Consumer
592	Bradley	Kloeckl	Box 2132	Homer	AK	99603	Human, Eater, Citizen, Subsistence User
593	Toby	Wheeler	P. O. Box 2289	Homer	AK	99603	Coastal Resident, Concerned Citizen of N. Pacific
594	Tim	O'Leary	403 Klondike	Homer	AK	99603	BioRegion
595	Lucas	Schneider	P. O. Box 667	Homer	AK	99603	Food
596	Thomas	Zitzman	579 Hidden Way	Homer	AK	99603	Food/Sport Fisherman
597	Evan	Brill	P. O. Box 2982	Homer	AK	99603	Resident
598	Shannon	McBride-Morin	P. O. 653	Homer	AK	99603	Commercial/Sport Fisherman
599	G. W.	Scholand	58856 East End Rd.	Homer	AK	99603	Boat Owner, Wilderness Guide, Lodge Manager, Sport Fisher & Guide
600	Lou	Detwiler	58856 East End Rd.	Homer	AK	99603	Fisher & Guide
601	Donna	Boss	275Mt. View Dr.	Homer	AK	99603	B&B
602	Tony	Clawson	52007 Old East End Rd.	Homer	AK	99603	Lodging
603	Sarah	LaQue	P. O. Box 2696	Homer	AK	99603	Sport
604	John	Mario	P. O. Box 5023 65983 Nikolaevsk Rd	Homer	AK	99603	Sport
605	William	Walters	P. O. Box 2224	Homer	AK	99556	Former Halibut Fisherman & Skipper/Owner
606	Dan	Boone	P. O. Box 1783	Homer	AK	99556	Consumer Resident Sport
607	Roger	Winton	East End Road	Homer	AK	99603	USCG Master Charter Sport
608	Lawrence	Radcliffe	52085 Abby Ave.	Homer	AK	99603	Coastal Resident/Consumer
609	Ben	Tillotson	233 E. Bunnell	Homer	AK	99603	Consumer/coastal resident
610	Brian	Warren	P. O. Box 1082	Homer	AK	99603	Consumer, Resident, Sport Fisherman, US Citizen
611	Greg	Sutter	P. O. Box 2702	Homer	AK	99603	Consumer
612	Erin	Knudtson	P. O. Box 3529	Homer	AK	99603	Consumer
613	Alex	Knudtson	P. O. Box 3529	Homer	AK	99603	Bicycle Mechanic/Coastal Resident
614	Yarrow	Jones	P. O. Box 3341	Homer	AK	99603	Sport
				Homer	AK	99603	Sport
				Homer	AK	99603	Food

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615	Adam	Keeley		P. O. Box 3035	Homer	AK	99603	Sportfish Guide, Sport, coastal resident, consumer
616	Kris	Holderied		P. O. Box 1617	Homer	AK	99603	Coastal Resident/Consumer
617	Catherine	Barth		905 Richardson Vista #147	Homer	AK	99603	Consumer/Rec Sport
618	Ray	Hatton		1874 Crepe Myrtle Rd.	Homer	AK	99603	Sport
619	Bobby	Johnson		1728 Mosser Lane	Homer	AK	99603	Sport
620	Shirley	Forquer		P. O. Box 1187	Homer	AK	99603	Sport Fisherman
621	Harry	Forquer		P. O. Box 1187	Homer	AK	99603	Sport Fisherman
622	John Graves	Sibley		Box 3051	Homer	AK	99603	Sport Fisherman
623	Paul	LaFord		171 Mountain View Dr.	Homer	AK	99603	Good times by all
624	Jack	Eisaman		232 E. Danview	Homer	AK	99603	Good times by all Sport
625	Adam	Lalich		Box 2583	Homer	AK	99603	Commercial Fisherman, Resident
626	Pat	Melone		385 E. Fairview	Homer	AK	99603	Sport
627	Corrie	Haigh		P. O. Box 2207	Homer	AK	99603	Resident
628	James	Simonson		P. O. Box 1042	Homer	AK	99603	Resident/Sport Consumer
629	Isaac	Wedin		10007 Crestwood Rd.	Homer	AK	99603	Sport & Consumer
630	William	Rich		135 W. Bay View	Homer	AK	99603	Sport Consumer
631	Robin	McAllister		152 W. Bay View	Homer	AK	99603	Sport Consumer Resident
632	W.	Tymirak		53845 Kilcher Rd.	Homer	AK	99603	Sport Fisherman/Long time resident
633	Emily	Lints		64900 Berry Pail Dr.	Homer	AK	99603	Gillnetting Salmon Longline Halibut
634	Jesse	Toubman		Homer Air	Homer	AK	99603	Environmentalist/Activist/Loving Hippie
635	Chris	Brown		P.O.Box 1168	Homer	AK	99603	Resident, sport
636	Janet	Flora		48250 East End Rd.	Homer	AK	99603	Farmer
637	Kelly	Stier		2183 Skyline Dr.	Homer	AK	99603	Fisherman
638	William	Sullivan			Homer	AK	99603	Halibut consumer
639	Theodore	Schmidt		1544 Highland Dr.	Homer	AK	99603	
640	Peter	Karwowski		910 Sterling Hwy	Homer	AK	99603	Lodge Owner/retired charter skipper after 27 years
641	Linda	Broadhead		PO Box 2514	Homer	AK	99603	
642	Cristy	Fry		468 Rainbow Ct.	Homer	AK	99603	
643	Gerry	Martin			Homer	AK	99603	Halibut Charter owner
644	Maureen	Moore		Po Box 15185	Homer	AK	99603	resident/sport/charter
645	James	Dybdahl		PO Box 47	Hoonah	AK	99829	commercial fisherman, coastal resident
646	Mariane	Buccione		HC-52 Box 8577	Indian	AK	99540	Consumer & Owner at Bear Cove/Alaskan View
647	Ed	Haney		8438 N Douglas Hwy	Juneau	AK	99801	
648	Art	Kolter		P.O. Box 20414	Juneau	AK	99802	
649	Art	Kulter		P.O. Box 20414	Juneau	AK	99802	
650	Adam	Lutchansky			Juneau	AK	99801	
651	Arthur	Bloom		4506 Prospect Way	Juneau	AK	99801	Commercial Fisherman
652	Stephen	Merli			Juneau	AK	99801	

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653	Olaf	Bartness	9025 Ninnis Dr.	Juneau	AK	99801	Retired
654	Chris	Conder	2817 Marsha	Juneau	AK	99801	Ship's Captain
655	Mitch	Roper		Juneau	AK	99801	
656	Mary Pat	Schilly	4435 N. Douglas Hwy.	Juneau	AK	99801	
657	Grantley	Moore	8507 Rainbow Row	Juneau	AK	99801	Charter business owner
658	Ben	Olson		Juneau	AK	99801	charter boat captain/ osv captain prudhoe bay
659	Jay	Watts	2575-4 Douglas Hwy.	Juneau	AK	99801	Teacher
660	Mark	Kaelke		Juneau	AK	99801	former charter, personal use/sport for halibut
661	Tracy	Balovich	Box 32495	Juneau	AK	99803	coastal resident
662	Kathleen	Collum	9446 Carrol Place	Juneau	AK	99801	coastal resident
663	Robert	Dela Cruz	Box 21989	Juneau	AK	99802	resident
664	Gema	Thomas	Box 33434	Juneau	AK	99803	resident
665	Alison	Riley Duncan	5690 Glacier Way #5	Juneau	AK	99802	resident
666	Stephanie	West	8477 Thunder Rd. #411	Juneau	AK	99802	resident
667	John	Evans	127 S. Franklin St	Juneau	AK	99801	resident
668	Kaysa	Korpela	4372 N. Douglas	Juneau	AK	99801	resident, ex-commercial fisherman
669	Richard	Farnell	PO Box 21756	Juneau	AK	99802	sport fisherman
670	Jack	Cannon	1007 Bonnie Doon	Juneau	AK	99801	
671	Rob	Bosworth	165 Behrends Ave	Juneau	AK	99801	Coastal Resident
672	Chelsea	Gagnon	26920 David Street	Juneau	AK	99801	resident/consumer/life-time Alaskan
673	Robert L.	Daniels	PO Box 20511	Juneau	AK	99802	
674	Bertha	Cavanaugh	8422 Valley Blvd	Juneau	AK	99801	Kake Tribal Group
675	Dave	Blossom	P.O. Box 313	Kasilof	AK	99610	Vessel Admin./ Charter
676	Dorothy	Baker		Kasilof	AK	99610	
677	Luther	Andersen	PO Box 1116	Kasilof	AK	99610	Guide
678	Terry	Harling		Kasilof	AK	99610	
679	Timothy	Berg II		Kenai	AK	99611	
680	Walter	Martin	1131 Walnut Ave.	Kenai	AK	99611	Fishing Charters
681	Bob	Standish	PO Box 1106	Kenai	AK	99611	Fishing Lodge Owner
682	Cody	Villa		Kenai	AK	99611	Fish Packer at local small processing facility
683	Gary	Kernan		Kenai	AK	99611	
684	Rodney	Small	53550 Rodney & Shellys Ave.	Kenai	AK	99611	Salmon Fishing Guide/Retired Game Warden
685	Michael	Bartert	528 Ash	Kenai	AK	99611	
686	Ronald	Bennett	304 Linwood Ln.	Kenai	AK	99611	Tour Vessel Operator
687	Vedran	Jukic		Kenai	AK	99611	
688	Gerald	Brookman	715 Muir Avenue	Kenai	AK	99611	Retired
689	Tom	Martin	1525 Toyon Way	Kenai	AK	99611	Sport
690	George	Bowen	P. O. Box 223	Kenai	AK	99611	Sport Fish & Resident
691	Courtney	Yeager	49820 Toloff Rd.	Kenai	AK	99611	Sport

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692	John C.	Dodge	Box 2532	Kenai	AK	99611	Resident
693	Tom	Weaver	P. O. Box 1244	Kenai	AK	99611	Sport
694	Cecil	Andersen	45674 Davison Ave.	Kenai	AK	99611	Sport
695	Carla	Szitas	P.O. Box 7696	Ketchikan	AK	99901	Charter Owner
696	Sam	Dalin	7937 Williams Rd.	Ketchikan	AK	99901	Guide & Commercial fisherman
697	Larry	McQuarie	PO Box 9618	Ketchikan	AK	99901	Sport Fishing Lodge Owner
698	Patty	Seaman	142 Misty Marie Lane	Ketchikan	AK	99901	General Manager - Sport Fishing Lodge
699	Jeff	Wedekind	119 Potter Road	Ketchikan	AK	99901	Lodge Owner
700	Edward	Stahl II		Ketchikan	AK	99901	Charter guide; hand troller
701	Gary	Souza		Ketchikan	AK	99901	
702	Michael	Troina	14492 North Tongass	Ketchikan	AK	99901	Self Employed
703	Carl	Porter	P.O. Box 7844	Ketchikan	AK	99901	Fisherman/Photographer
704	Becky	Moody	287 Cranberry Court	Ketchikan	AK	99901	Teacher's aide
705	Christy	Ruby	590 North Pt. Higgins	Ketchikan	AK	99902	Subsistant Hunter
706	Toby	Stubbs		Ketchikan	AK	99901	Boat Captain
707	Lorita	Leighton	PO Box 5175	Ketchikan	AK	99901	
708	Jay	Parris		Ketchikan	AK	99901	
709	Larry	McQuarrie	PO Box 8500	Ketchikan	AK	99901	Lodge owner/Charter captain for over 50 years
710	Ty	Vandergriff	412 d-1 Loop Rd.	Ketchikan	AK	99901	Charter Captain
711	Emmanuel	Vera	8229 N. Tong Hwy.	Ketchikan	AK	99901	ex comm fisherman /construction
712	George	Demmert	303 Spruce St.	Ketchikan	AK	99901	Commercial fisherman
713	Lynn	Shawback	Mile 13 AK Pen Hwy.	King Salmon	AK	99613	
714	Robert	Anderson	PO Box 116	Klawock	AK	99925	Self Employed Lodge owner
715	Kim	Hastings		Kupreanof	AK	99833	
716	Alex	Panamaroff Jr.	Box 6	Larsen Bay	AK	99624	Commercial, subsistence, sport
717	Stephan	Lee	Box 30	Larsen Bay	AK	99624	Processor
718	Gordon	Davis	71 Uyak Square	Larsen Bay	AK	99624	Lodge owner Fishing Guide/subsistence
719	Tim	Greene		Nanwalek	AK	99603	
720	Karen	Seater	PO Box 7114	Nikiski	AK	99635	Commercial Fisherman
721	Georgia	Mario	P. O. Box 5023 65983 Nikolaevsk Rd	Nikolaevsk	AK	99556	Consumer Resident
722	Paul	Warner	36431 Elizabeth	Ninilchik	AK	99693	
723	Roderic	Van Saun	PO Box 39622	Ninilchik	AK	99639	Guide/Basketball Coach
724	Joseph	Simpson	67035 Mahoney Way	Ninilchik	AK	99639	Fisherman
725	Timothy	Evers	16835 Sterling Hwy. South	Ninilchik	AK	99693	Retired
726	David	Kaffke	67400 Halibut Rd.	Ninilchik	AK	99693	Multiple business owner--charter captain
727	John	Baker	PO Box 39388	Ninilchik	AK	99639	Sport Fisher
728	Barry	Wright		Ninilchik	AK	99639	Halibut Charter owner/operator
729	Jodi	Evers	16835 Sterling Hwy.	Ninilchik	AK	99639	Kenai Peninsula business owner
730	Arthur	Schwartz	P.O. Box 39734	Ninilchik	AK	99639	Guide

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770	Ross	Elvehjem	Box 47	Old Harbor	AK	99643	
771	Tasha	Price	Box 63	Old Harbor	AK	99643	Subsistence, sport
772	Peter	Dunlap	Box 63	Old Harbor	AK	99643	Subsistence, sport
773	Almeria	Christiansen	Box 7	Old Harbor	AK	99643	
774	Wesley	Christiansen	Box 7	Old Harbor	AK	99643	
775	Georgene	Ingen	Box 123	Old Harbor	AK	99643	resident, sport, subsistence
776	Michael	Alexandroff	Box 54	Old Harbor	AK	99643	Subsistence
777	Lena	Amasom-Burns	Box 33	Old Harbor	AK	99643	Commercial, subsistence
778	Travis	Berns	Box 33	Old Harbor	AK	99643	Commercial, subsistence
779	Louisa	Andrewitch	Box 83	Old Harbor	AK	99643	Subsistence
780	Patrick	Andrewitch	Box 83	Old Harbor	AK	99643	Subsistence
781	Robin	Larionoff	Box 28	Old Harbor	AK	99643	Subsistence
782	Dorothy	Taylor	Box 18	Old Harbor	AK	99643	Subsistence
783	Sharon	Andrew	Box 91	Old Harbor	AK	99643	Subsistence
784	Peter	Larionoff	Box 8	Old Harbor	AK	99643	Subsistence
785	Marina	Larionoff	Box 104	Old Harbor	AK	99643	Subsistence
786	Darik	Larionoff	Box 189	Old Harbor	AK	99643	Subsistence
787	Geoff	Bechtol	Box 74	Old Harbor	AK	99643	Charter Captain, subsistence user
788	Gary	Alexandroff	Box 31	Old Harbor	AK	99643	Charter Captain, subsistence user
789	Conrad	Peterson	Box 29	Old Harbor	AK	99643	Subsistence
790	Amy	Peterson	Box 29	Old Harbor	AK	99643	Subsistence
791	Lorana	Rozele	Box 78	Old Harbor	AK	99643	Subsistence
792	Rick	Berns	Box 44	Old Harbor	AK	99643	F/V Melissa Rae, commercial/coastal resident
793	Darren	Muller	Box 85	Ouzinkie	AK	99644	Commercial
794	Gene	Anderson	Box 47	Ouzinkie	AK	99644	Commercial Fishermen
795	Barabara	Anderson	Box 47	Ouzinkie	AK	99644	
796	Dan	Clarien	Box 71	Ouzinkie	AK	99644	Resident
797	Devin	Skonberg	Box 70	Ouzinkie	AK	99644	Commercial Halibut
798	Sandra	Muller	Box 83	Ouzinkie	AK	99644	Retired Commercial Fisherman
799	Clifford	Panamarioff	Box 74	Ouzinkie	AK	99644	
800	Herman	Squartsoff	Box 189	Ouzinkie	AK	99644	Subsistence
801	Larry	Pestrikoff	Box 55	Ouzinkie	AK	99644	Subsistence
802	Joseph	Delgado	Box 61	Ouzinkie	AK	99644	subsistence, commercial
803	Arthur	C	Box 10	Ouzinkie	AK	99644	Fishermen
804	James	Skonberg	Box 70	Ouzinkie	AK	99644	F/V Lorena Marie Commercial Fisherman
805	Joan	Chichenoff	Box 8	Ouzinkie	AK	99644	Resident
806	Pete	Muller	Box 111	Ouzinkie	AK	99644	Resident
807	Katherine	Panamarioff	Box 74	Ouzinkie	AK	99644	Resident
808	Linda	Getz	Box 72	Ouzinkie	AK	99644	Resident

Haiibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska

809	Chris	Quick	Box 110	Ouzinkie	AK	99644	Resident
810	Michelle	Johnson	Box 66	Ouzinkie	AK	99644	Resident
811	Janel	Shanagin	Box 64	Ouzinkie	AK	99644	Resident
812	George L.	Shanagin Jr.	Box 37	Ouzinkie	AK	99644	Resident
813	Priscella	Kelly	Box 118	Ouzinkie	AK	99644	Resident
814	Flora	Shanagin	Box 21	Ouzinkie	AK	99644	Resident
815	Fredrick	Shanagin Jr.Box 86	Box 86	Ouzinkie	AK	99644	Resident
816	Peter	Shanagin	Box 86	Ouzinkie	AK	99644	Resident
817	George	Shanagin	Box 37	Ouzinkie	AK	99644	Resident
818	Melodi	Anderson	Box 112	Ouzinkie	AK	99644	Resident
819	John	Pestrikoff	Box 82	Ouzinkie	AK	99644	Resident
820	Debra	Garner	Box 68	Ouzinkie	AK	99644	Resident
821	Lilly	Pestrikoff	Box 55	Ouzinkie	AK	99644	Resident
822	Dan	Skonberg	Box 28	Ouzinkie	AK	99644	Resident
823	Ron	C	Box 42	Ouzinkie	AK	99644	Resident
824	Arthur	Hatchmuth	Box 1	Ouzinkie	AK	99644	Resident
825	Carl	Smith	Box 69	Ouzinkie	AK	99644	Resident
826	Georgia	Smith	Box 69	Ouzinkie	AK	99644	Resident
827	Amber	Panamarioff	Box 15	Ouzinkie	AK	99644	Resident
828	Travis	Sheppard	Box 12	Ouzinkie	AK	99644	Resident
829	John	Squartsoff	Box 117	Ouzinkie	AK	99644	Resident
830	Martha	Delgado	Box 84	Ouzinkie	AK	99644	Resident
831	Ethel	E		Ouzinkie	AK	99644	Resident
832	Jill	Boskofsky	Box 118	Ouzinkie	AK	99644	Resident
833	Gary	Boskofsky	Box 118	Ouzinkie	AK	99644	Resident
834	Raymond	Kelly	Box 118	Ouzinkie	AK	99644	Resident
835	Lori	Totemoff	Box 102	Ouzinkie	AK	99644	Resident
836	Robert	Katelnikoff	Box 56	Ouzinkie	AK	99644	Resident
837	Lorena	Wallace		Ouzinkie	AK		
838	Greg	Wallace		Ouzinkie	AK		
839	Irene	Wallace		Ouzinkie	AK		
840	Teresa	Squartsoff		Ouzinkie	AK		
841	Jackie F.	Muller	Box 41	Ouzinkie	AK	99644	
842	Antonio	Granillo	8900 East Kiva Way	Palmer	AK	99645	DoD civilian
843	Ron	Sopko	PO Box 3544	Palmer	AK	99645	
844	Matt	Knepper		Palmer	AK	99645	
845	Mark	Ouellette	P.O. Box 4158	Palmer	AK	99645	Security Officer (North Slope)
846	Daniel	Grant	2179 N Kelso Lane	Palmer	AK	99645	Military / Pilot / Executive Officer
847	Scott	Hutchings		Palmer	AK	99645	

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848	Brian	Ezzo	9871 E. Ortner Lp.	Palmer	AK	99645	
849	Dennis	Bowen	16883 E. Arctic Springer Loop	Palmer	AK	99645	Captain Denny B.
850	Jeff	Tomlinson	800 N. Helen Dr.	Palmer	AK	99645	Sport Fisher
851	Mary	Mounce	8957 E. Lexington	Palmer	AK	99645	Like to halibut sport fish
852	David P.	Werner	P. O. Box 3761	Palmer	AK	99645	Halibut sport
853	Patricia	Turner		Palmer	AK	99645	
854	Camilla	Pfeiffer	PO box 2090	Petersburg	AK	99833	F/V Sword, Halibut Longliner, Salmon Troller
855	Caven	Pfeiffer	PO Box 2090	Petersburg	AK	99833	F/V Sword, Halibut Longliner, Salmon Troller
856	Dennis	Rogers	PO Box 542	Petersburg	AK	99833	Vessel Owner
857	David	Beebe		Petersburg	AK	99833	Commercial Fisherman
858	John	Swanson	1400 North Nordic Drive	Petersburg	AK	99833	Commercial Fisherman - Longline
859	Donald	Kewan	214 Malina Street	Port Lions	AK	99550	Guide
860	Marvin	Nelson		Port Lions	AK	99550	Owner Charter Business
861	Phillip	Philemonoff	106 John Misikin Loop	Saint Paul Island	AK	99660	
862	Kristin	Priesman	774 15thAve.	San Francisco	AK	94118	
863	Karl	Kobler		Santa Rosa	AK	95472	
864	Walt	Sonen	Box 107	Seldovia	AK	99663	Resident IFQ Holder
865	Chris	Wheeler	Box 232	Seldovia	AK	99663	Commercial Resident
866	Sachiko	Scott	Box 15	Seldovia	AK	99663	Commercial Fisherman
867	Kamell	Allaway	PO Box 212 Bear Dr.	Seward	AK	99664	Sportfishing & Fish Processor , Commercial Sport
868	Dale	Wilhelm	535 Balline Blvd. (POB 1645)	Seward	AK	99664	Retired
869	Andrew	Billings	32515 Judan dr.	Seward	AK	99664	Mariner
870	Sue	Lang	PO Box 3334	Seward	AK	99664	Seasonal Lodging Proprietor
871	Jim	Hubbard	P.O. Box 3302	Seward	AK	99664	Commercial Halibut Harvester - Fixed Gear
872	Rhonda	Hubbard	P.O. Box 3302	Seward	AK	99664	Commercial Halibut Harvester - Fixed Gear
873	Zach	LaPerriere	2212 Sawmill Creek Rd.	Sitka	AK	99835	
874	John	Skeele	262 Kaagwaantaan St.	Sitka	AK	99835	Fisherman
875	Scott	Seaton		Sitka	AK	99835	Fisherman/Subsistence
876	Natachan	Sopow		Sitka	AK	99835	
877	Daniel	Dunn	623 De Groff St.	Sitka	AK	99835	Tender Operator
878	Juan	Schwantes	1408 Edgecumbe Dr.	Sitka	AK	99835	Commercial Fisherman
879	James	Hughes	507 Katlian St.	Sitka	AK	99835	Commercial Fishing
880	Scott	Irons		Sitka	AK	99835	Fisherman
881	Michele	Mork		Sitka	AK	99835	Nurse Coordinator
882	Daniel	Kilkeary	115 Anna Dr.	Sitka	AK	99835	Government
883	Lisa	Blankenship		Sitka	AK	99835	Commercial Fisherman
884	Natalia	Potrzenski		Sitka	AK	99835	
885	George	Eliason	102 Kuhnle Dr.	Sitka	AK	99835	Commercial Fisherman
886	Karen	Case	1604 Davidoff Street #4	Sitka	AK	99835	

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887	Kristen	Case		Sitka	AK	99835	
888	Christie	Jones	Box 2728	Sitka	AK	99835	resident, subsistence user
889	Charles	Bingham	404 Etolin Way, Apt. No. 1	Sitka	AK	99835	
890	Rebecca	Poulson	107 Jeff Davis St.	Sitka	AK	99835	subsistence, consumer, coastal resident
891	James	Poulson	1610 Saw Mill Creek	Sitka	AK	99835	subsistence user
892	John	Bahrt	PO Box 1654	Sitka	AK	99835	subsistence; commercial fisherman
893	David	Knapp		Sitka	AK	99835	sport fisherman
894	Eric	Hanson	3702 Halibut Point Rd.	Sitka	AK	99835	sport; subsistence fisherman
895	Kim	Hanson	3702 Halibut Point Rd.	Sitka	AK	99835	sport; subsistence fisherman
896	Jill	Hanson	3702 Halibut Point Rd.	Sitka	AK	99835	consumer; coastal resident
897	Marilyn	Knapp	308 Islander Dr.	Sitka	AK	99835	consumer; coastal resident
898	David	Coleman	PO Box 6082	Sitka	AK	99835	Commercial fisherman
899	Dewey	Torgason	4017 Halibut Point Dr.	Sitka	AK	99835	Commercial fisherman
900	Joseph	Schwantes	PO Box 2679	Sitka	AK	99835	F/V Kalliste
901	Juan Carlos	Schwantes	PO Box 2335	Sitka	AK	99835	F/V Kalliste
902	Alex	Schwantes	PO Box 2335	Sitka	AK	99835	F/V Kalliste
903	Brett	Zaenglein	403 Mills St.	Sitka	AK	99835	Commercial fisherman
904	Charles	Hailey	500 Lincoln St.	Sitka	AK	99835	Commercial fisherman
905	Jesse	Jeske	PO Box 996	Sitka	AK	99835	Commercial fisherman
906	Cindy	Edwards	10 B Maksoutoff	Sitka	AK	99835	Subsistence; sport fisherman
907	Kent	Barkhau	123 Riggs	Sitka	AK	99835	Commercial fisherman
908	Colette	Nelson	107 Finn Alley	Sitka	AK	99835	Consumer; coastal resident
909	Bert	Stromquist	1601 Sawmill Creek	Sitka	AK	99835	Commercial; sport; charter fisherman
910	Chad	Winnop	100 Kincroft Way	Sitka	AK	99835	F/V Myra
911	Ivan	Gruetter	??	Sitka	AK	99835	F/V Stingray
912	Joseph	Anselm	1615 Halibut Point Rd.	Sitka	AK	99835	F/v Runnin' Amok
913	Richard	Guhl	721 Sirstad	Sitka	AK	99835	F/V Juanderer
914	Forrest	Dodson	607 Etolin st.	Sitka	AK	99835	F/V Casino
915	Kent	Hall	500 Lincoln St.	Sitka	AK	99835	Charter fisherman
916	Ben	Lawrie	2015 Cascade Creek Rd.	Sitka	AK	99835	Commercial; subsistence fisherman
917	Randy	Myers		Sitka	AK	99835	Commercial fisherman
918	Michael	Litman	222 Smith St.	Sitka	AK	99835	Commercial fisherman
919	Grant	Miller	PO Box 6097	Sitka	AK	99835	Commercial fisherman
920	William	Stortz	PO Box 6198	Sitka	AK	99835	Retired fisherman
921	Joanna	Perenovich	506 Baranof St.	Sitka	AK	99835	Subsistence fisherman
922	Linda	Boord	111 Sharon Dr.	Sitka	AK	99835	Halibut handliner; subsistence
923	Don	Byrd	2701 Halibut Point Rd.	Sitka	AK	99835	Commercial; sport fisherman
924	Evans	Sparks	100 Donna	Sitka	AK	99835	Commercial fisherman
925	Don	Seesz	114 Harbor Mountain Rd.	Sitka	AK	99835	Commercial fisherman

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926	Gerald	Gangle	302 Jarvis St.	Sitka	AK	99835	Sport fisherman
927	Gregg	Jones	4016 Halibut Point Dr.	Sitka	AK	99835	Commercial fisherman
928	Art	Forbes	401 Charteris	Sitka	AK	99835	F/V Glory
929	Nancy	Behnken	117 Jeff Davis St.	Sitka	AK	99835	F/V Dipper
930	Charlie	Wilber	705 Etolin St.	Sitka	AK	99835	Commercial fisherman
931	Lylan	Haley	500 Lincoln St.	Sitka	AK	99835	F/V Wilma Mae
932	Scott	Miller		Sitka	AK	99835	Sport & Commercial Fisher
933	Clayton	Nellis		Sitka	AK	99835	Sport & Commercial Fisher
934	Jason	Gjertsen		Sitka	AK	99835	Commercial fisherman
935	Travis	Conatser	1410 Johnston St.	Sitka	AK	99835	Commercial fisherman
936	Mark	Barhett	213 Lance Dr.	Sitka	AK	99835	Former Deckhand
937	Stuart	Weathers	PO Box 1734	Sitka	AK	99835	F/V El TI Baron, commercial longliner, resident
938	Gary	Koski	4610 Halibut Pt. Rd.	Sitka	AK	99835	Sport Fish, F/V Pipeliner
939	Rafe	Allensworth	PO Box 862	Sitka	AK	99835	F/V Alom, Commercial, resident
940	Paul	Blankenship	3208 HPR #23	Sitka	AK	99835	F/V Shackleton, Commercial, Subsistence
941	Jay	Stelzenmuller	PO Box 6173	Sitka	AK	99835	Subsistence
942	Cara	Lawne	2015 Cascade Creek Rd.	Sitka	AK	99835	
943	Joe	D'Arienzo	2219 Sawmill Creek Rd.	Sitka	AK	99835	Commercial Longline
944	Jerry	Dzagan	4319 Valhalla Dr.	Sitka	AK	99835	Sport, Consumer, Resident, Former Commercial
945	Andrew	Miller		Sitka	AK	99835	Coastal resident, Consumer
946	Mark	Howey		Sitka	AK	99835	F/V Osprey
947	Doug	White	PO Box 6174	Sitka	AK	99835	RN
948	Michael	Crawford	PO Box 2067	Soldotna	AK	99669	
949	Timothy	Berg		Soldotna	AK	99669	
950	Michael	Hopley	P.O. Box 4273	Soldotna	AK	99669	Professional sport fishing guide
951	Matt	Kopec	PO Box 293	Soldotna	AK	99669	Charter Operator
952	Travis	Keller	36275 Irons Ave.	Soldotna	AK	99669	Halibut Charter Operator
953	Mel	Erickson	PO Box 1127	Soldotna	AK	99669	Fishing Guide
954	Dohn	Cho	P.O. Box 1270	Soldotna	AK	99669	Lodge Manager/Guide
955	Jimmie Jack	Drath		Soldotna	AK	99669	Fishing Lodge Owner
956	John	Cho	230 North Brentwood	Soldotna	AK	99669	Lodgde Manager
957	Catherine	Latschaw	720 K-Beach Road	Soldotna	AK	99669	Office Manager
958	Ariel	Vail	33135 Echo Lake Rd.	Soldotna	AK	99669	
959	Marilyn	McLain	336 W. Katmai Avenue	Soldotna	AK	99669	Retired
960	Ian	Flannery	P.O. Box 1792	Soldotna	AK	99669	Fishing Guide
961	George	Stek		Soldotna	AK	99669	Fisherman
962	Michael	Hoply	P.O. Box 4273	Soldotna	AK	99669	Professional Fishing Guide
963	John	Dove	Claremore	Soldotna	AK	99669	Guide
964	Francis	Rosendale	45840 Retreat Court	Soldotna	AK	99669	

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965	Kenneth	Bingaman	PO Box 2163	Soldotna	AK	99669	Owner-Alaska's KingSize Adventures
966	Tina	Ozhuwan	PO Box 3304	Soldotna	AK	99669	Nurse, Central Peninsula Hospital ICU
967	Tom	Marok	29583 Wilson St.	Soldotna	AK	99669	Retired Forester
968	Ashley	Vail		Soldotna	AK	99669	Plant Manager of Seafood Processing facility
969	Matt	Vanhooose	34825 Poppy Wood St.	Soldotna	AK	99669	ToolPusher
970	Rebecca	Vanhooose	34825 Poppy Wood St.	Soldotna	AK	99669	Well Pad Operator
971	Michael	Garcia	35555 Kenai Spur Hwy #341	Soldotna	AK	99669	Retired
972	George	Walch	41300 Gerrard Ave.	Soldotna	AK	99669	Retired
973	Gary	Bennett	33542 Johnsons Dr.	Soldotna	AK	99669	Fisherman's wife & mother
974	Amber	Butafam		Soldotna	AK	99669	
975	Mike	Jensen		Soldotna	AK	99669	
976	Brad	Carver	304 W. Katmai Ave.	Soldotna	AK	99669	
977	Reubin	Payne		Soldotna	AK	99669	
978	Guide Associa	Kenai River Professional	PO Box 3674	Soldotna	AK	99669	Fishing Guides
979	Gary	Turner		Soldotna	AK	99669	
980	Rodney	Berg	266 Redwood Ct	Soldotna	AK	99669	Sport Charter
981	Randy	Berg	P. O. Box 4177	Soldotna	AK	99669	Resident/Sport "I Vote"
982	Timothy	Cashman	557 Pace St.	Soldotna	AK	99669	Resident
983	Kenny	Jones	48640 Jones Rd.	Soldotna	AK	99669	Sport
984	Shane	Peikert	36355 Corkline Dr.	Soldotna	AK	99611	Sport
985	Tom	Corr	35000 Poppy Ridge	Soldotna	AK	99669	Sport
986	Tony	Davis	173 Trumpeter Pl	Soldotna	AK	99663	Resident, Consumer, Sport Fishing Tackle Manufacturer
987	Nancy	Schaefer	P. O. Box 3618	Soldotna	AK	99669	Sport
988	Don	Schaefer	P. O. Box 3618	Soldotna	AK	99669	Sport
989	Mike	Dehlbam	49155 Charlie Brown	Soldotna	AK	99669	Sport
990	Jan A.	Slegers	35290 Rockwood Dr.	Soldotna	AK	99669	Sport Fisher
991	Zach	Schiel	P. O. Box 1514	Soldotna	AK	99669	Sport
992	Don	Adams	35150 Van Dyke	Soldotna	AK	99669	Sport
993	Curtis	Wallace	PO Box 3267	Soldotna	AK	99669	
994	Celia	Harrison	131 Shady LN #E1	Soldotna	AK	99669	
995	Kenneth	Marlow	PO Box 2465	Soldotna	AK	99669	Lodge Owner
996	Judith	Marlow	PO Box 2465	Soldotna	AK	99669	Lodge Owner
997	Byerly	Roger	36020 Stephan's Dr.	Sterling	AK	99672	Lodge owner
998	Roger	Byerly	PO Box 508	Sterling	AK	99672	Fishing Lodge Owner
999	Llyod	Palmer	PO Box 631	Sterling	AK	99672	
1000	David	Buerkel	38521 A Private Rd - 1409	Sterling	AK	99672	Retired Oil & Gas
1001	Terry	Buerkel	38521 A Private Rd - 1409	Sterling	AK	99672	Nurse
1002	Dan	Able		Sterling	AK	99672	

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1003	Jacqueline	Holland	37446 Dutch Landing Loop	Sterling	AK	99672	Solar Consultant
1004	Eric	Zuber	39880 Otter Trail	Sterling	AK	99672	Owners- fishing lodge
1005	Roger	Byerly	PO Box 508	Sterling	AK	99672	Owners- fishing lodge
1006	Marlene	Byerly	PO Box 508	Sterling	AK	99672	Tourism
1007	Neil	Marlow	38650 Moose River Dr.	Sterling	AK	99672	Resident
1008	Robert	Patterson	34048 Roy St.	Sterling	AK	99672	Resident
1009	Dave	Atcheson	Box 145	Sterling	AK	99672	Sportsman
1010	Peggy	Peterson		Sutton	AK	99674	Attorney/Retired Commercial Fisher
1011	Thomas L.	Jordan	29895 W. Glenn Hwy.	Talkeetna	AK	99676	Lodge Owner
1012	Paul	Bratton	PO Box 602	Tenakee Springs	AK	99841	Fishing Lodge Owner
1013	Christopher	Jacobson	504 Tenakee Ave.	Tenakee Springs	AK	99919	Lodge Manager
1014	Brad	Steuart	#1 Cook's Cove	Thorne Bay	AK	99919	Coastal Resident
1015	Brad	Steuart	#1 Cook's Cove	Thorne Bay	AK	99919	Coastal Resident
1016	Jay	Mar	#1 Cook's Cove	Thorne Bay	AK	99685	Teacher
1017	Carolyn	Thomason	PO Box 19209	Thorne Bay	AK	99685	Human Being
1018	Bill	Thomason	PO Box 19210	Thorne Bay	AK	99685	
1019	Chris	Price	Box 421	Unalaska	AK	99685	
1020	Augie	Kochuten	PO Box 625	Unalaska	AK	99685	
1021	Walter	Tellman		Unalaska	AK	99685	
1022	Brenda	Tellman		Unalaska	AK	99685	
1023	Robert	Jaynes		Valdez	AK	99686	Owner/Operator Delsbrat Charters
1024	Allen	Crume	PO Box 3186	Valdez	AK	99686	Retired Physicist, Sport Fisher
1025	Louis	Pyle	722 N. Moraine	Valdez	AK	99686	Business Owner Charterfishing
1026	Jim	Cummins	318 Birch Cl.	Valdez	AK	99686	Sport
1027	James	Moody	P.O. Box 1643	Ward Cove	AK	99928	Charter Fisherman
1028	James	Hill		Wasilla	AK	99654	
1030	Gary	Hessmer	3996 EW Country Field Cir	Wasilla	AK	99654	Retired
1031	Valerie	Rappleveya	1770 S Abby Blvd.	Wasilla	AK	99654	Nurse
1032	Bruce	Van Buskirk		Wasilla	AK	99654	
1033	Donals	Nardi	PO Box 870861	Wasilla	AK	99687	
1034	Jim	Swanson		Wasilla	AK	99687	
1035	Steven	Rasmussen	PO Box 873103	Wasilla	AK	99687	
1036	Gary	Yustat	4734 S Timberland Loop	Wasilla	AK	99623	Engineering Tech
1037	Paula	Groundwater	1660 E. Mary Red Circle	Wasilla	AK	99686	
1038	Robert	Ptaszkowski		Wasilla	AK	99654	
1039	Ken	Federico		Wasilla	AK	99654	Carpenter
1040	Kamie	Moran	5684 N Gooseberry Circle	Wasilla	AK	99654	
1041	Kyle	Lutz	5684 N. Gooseberry Cir.	Wasilla	AK	99654	
1042	Edward	Sullivan		Wasilla	AK	99687	

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1043	Alan	Ramos	1601 E. Valley Side Cir.	Wasilla	AK	99654	
1044	James	Roach	2409 N. Saddle Horse Dr.	Wasilla	AK	99654	Military
1045	Jeremy	Bon	4461 South Doubletree Rd.	Wasilla	AK	99654	LPN
1046	Garry	Kelley	510 E Mountain Ash Loop	Wasilla	AK	99654	Merchandiser
1047	Lisa	McAffrey	PO Box 875102	Wasilla	AK	99687	
1048	Greg	Strong	Box 875169	Wasilla	AK		Consumer, sport
1049	Terri	Trudeau	P. O. Box 874580	Wasilla	AK	99687	Sport
1050	Ross	Turner	P. O. Box 874580	Wasilla	AK	99687	Sport
1051	Tibor	Molnar	P. O. Box 871136	Wasilla	AK	99687	Visitation Charters
1052	Joshua C.	Blake	1815 Red Fox Dr.	Wasilla	AK	99654	Sport Fisher
1053	Ord	Anderson	1340 Indian Hills Cr. Apt. 2	Wasilla	AK	99654	Sport Fisher
1054	Robert	Wilson	P. O. Box 87072	Wasilla	AK	99687	
1055	Tina Marie	Buffington	590 Cindy Circle N.	Wasilla	AK	99687	
1056	Bonnie	Anderson	P. O. Box 870243	Wasilla	AK	99687	
1057	James	Hill	2496 Wanamingo	Wasilla	AK	99654	Sport Consumer
1058	Mercer	Welsh		Wasilla	AK	99623	
1059	David	Kennedy	3145 N Snow Goose Dr	Wasilla	AK	99654	consumer
1060	Anthony	Cook	10 Beach Rd.	Whale Pass	AK	99950	Teacher
1061	Charles	Crabaugh	100 Kenai St.	Whittier	AK	99639	Boat Captain
1062	David B.	Goldstein	P. O. Box 735	Whittier	AK	99693	"Eye of the Storm" Charter
1063	John	Norris	P. O. Box 625	Whittier	AK	99693	Sport Charter Operator
1064	June & Ken	Miller	P. O. Box 715	Whittier	AK	99693	Sport
1065	Kelly	Bender	P. O. Box 747	Whittier	AK	99693	Sport
1066	David	Pinguoch	P. O. Box 623	Whittier	AK	99693	Sport Charter
1067	Stephen	Runyan	PO Box 1223	Willow	AK	99688	Fishing Retail Industry
1068	Dick	Gunlokson	P. O. Box 193	Willow	AK	99688	Fun
1069	Marlin E.	Benedict	P. O. Box 301	Wrangel	AK	99929	Charter Capt/Yr Round Sport Fisherman/AK Resident
1070	Peter	Branson	PO Box 1259	Wrangell	AK	99929	
1071	Lee	Murrell	PO Box 419	Yakutat	AK	99689	Seafood Professional
1072	Rose	Poser	7364 E. Poser Pl.		AK	74019	
1073	Sven	Haakanson	818 Tagura Road	Kodiak	AK	99615	Coastal, subsistence
1074	Steven	Mathieu	1721 Mission Rd.	Kodiak	AK	99615	F/V Kahuna, commercial fisherman
1075	Ronald	Thompson	Box 567	Kodiak	AK	99615	F/V Norther Jaeger
1076	Leonard	Charliaga	Box 36	Ouzinkie	AK	99644	
1077	James	Witte	309 Singleton St	Auburn	AL	36830	University Professor/AK Fisherman
1078	Andrew	Silvernail	6600 Willowbridge Dr.	Fairhope	AL	36532	Fishing Guide
1079	Gary	Black	9780 Terrace Dr.	Fairhope	AL	36532	RF Engineer
1080	Bobbi	Walker	P.O. Box 2990	Orange Beach	AL	36561	National Assn. of Charterboat Operators

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1081	Jon	Perkinson	24411 Gulf Bay Rd.	Orange Beach	AL	36561	Grade 12 high school student
1082	Justin	Wood		Carvel	Alberta	TOE 0H0	
1083	Linda	Hunter	PO Box 123	Bergman	AR	72615	
1084	Chris	Husband		Glendale	AZ	85308	Owner - Water Conservation Company
1085	Marie	Barry	3717 w Potter Dr.	Glendale	AZ	86308	Vet Tech
1086	Lindsey	Haddock	2609 E. Billings St.	Mesa	AZ	85213	
1087	Frank	Gallagher	1601 W. Evans Dr.	Phoenix	AZ	85023	Retired/teacher
1088	Charles	Lopez	18543 E. Via Del Oro	Queen Creek	AZ	85142	
1089	Daniel	Thornton		Surprise	AZ	85379	
1090	Jack	Armitage	5652 North Placita Arturo	Tucson	AZ	85718	Sport Fishing
1091	Lyle	Pierce		Comox	BC	v9m1j7	Commercial Fisherman
1092	John	Loehr		Nanaimo	BC	V9S 2A1	Avid Sports Fisher
1093	Danny	Cheng	153 Nightingale Dr.	Aliso Viejo	CA	92656	
1094	Stephen	Goodwin		Alta Loma	CA	91701	
1095	Bob	Bonanno	4552 Wildcat Cir.	Antioch	CA	94531	F/V Night Train II
1096	Steve	Fukutaki		Arcadia	CA	91007	
1097	Trevor	Oudin	PO Box 5069	Avalon	CA	90704	Captain
1098	Willie	Reinmuth	2027 Melbourne Cr.	Banning	CA	92220	
1099	Joe	Lemelin	PO Box HK	Beaumont	CA	92223	
1100	Beth	Anderson	1700 W Oak St	Burbank	CA	91506	Entrepreneur
1101	Claydeen	Adams		Canyon Country	CA	91351	
1102	Justin	Harris	PO Box 3065	Cathedral City	CA	92235	
1103	Jim	Houtman		Chico	CA	95926	Firefighter
1104	Vincent	Polito	4781 Wilson St.	Chino	CA	91710	
1105	Allen	Williams	1203 Monterey Ave.	Chula Vista	CA	91911	Sport Fisher
1106	Curtis	Sanden	315 E Miramar Ave.	Claremont	CA	91711	Engineer
1107	Michael	Ellis	266 Rose Ln.	Costa Mesa	CA	92627	Sports Fishermen
1108	Howard	Frederick	PO Box 2281	Crestline	CA	92325	Accountant
1109	Hal	Leach	20 Deer Creek Lane	Danville	CA	94506	
1110	Bill	Bradberry	2187 Cumbre Place	El Cajon	CA	92020	Retired
1111	Steve	Adams		El Dorado Hills	CA	95762	Creative Director/Fisherman
1112	Jeff	Hanna	5621 Tamarindo Ln.	Elk Grove	CA	95758	Sport
1113	Brian	McArthur	20744 Elfin Forest Road	Escondido	CA	92029	
1114	Jack	Holt	3928 Monserate Terr.	Fallbrook	CA	92028	Sport
1115	Chris	Wheaton	2009 Raymer Ave.	Fullerton	CA	92833	
1116	Chad	Sasaki	15425 S. Wilton Pl.	Gardena	CA	90249	
1117	Bob	Young	19675 Stinson Rd.	Hidden Valley Lake	CA	95467	
1118	Cody	Gohlke	1141 Holly Ave	Imperial Beach	CA	91932	U.S. Navy
1119	Bakir	Silajdzic	132 Cherrybrook Ln	Irvine	CA	92618	Student

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1120	James	Lowell	2607 Lagoon Dr.	Lakeport	CA	95453	Consultant/Retired
1121	John	Pietka	4918 Auiry Ave.	Lakewood	CA	90712	
1122	Thomas	Michel	8590 palm St.	Lemon Grove	CA	91945	Retired
1123	Cory	Valdes	5450 E Flagstone St.	Long Beach	CA	90808	
1124	Hector	Arevalo	6441 St Louis Ave.	Long Beach	CA	90805	
1125	Cesar	Perez	4229 S Bronson Ave.	Los Angeles	CA	90008	
1126	Scott	Myers	3311 Stewart Ave.	Los Angeles	CA	90066	Writer
1127	Keith	Lambert	12618 Everglade St.	Los Angeles	CA	90066	
1128	Lloyd	Zastrow	30881 Young Dove St.	Menifee	CA	92584	Engineer
1129	Erik	Swarbrick	26211 Avenida Deseo	Mission Viejo	CA	92691	
1130	Matthew	Romaine	27636 White Fir Lane	Mission Viejo	CA	92691	Sportfishing Captain
1131	Berry	Lo	5093 Saddleback	Montclair	CA	91763	
1132	Neil	Henderson	11950 Loretta Dr.	Moorpark	CA	93021	
1133	Terry	Gonsalves	1150 Mt George Ave	Napa	CA	94558	Alaska Traveler, Sport Fisher
1134	Vincent	Gonzalez	1081 12th st	Oakland	CA	94607	
1135	George	Greg	741 Point Arguello	Ocean Side	CA	92058	
1136	Michael	Toler	542 Redwood St.	Oceanside	CA	92058	
1137	Brian	Leppke	334 S Glassell st. Apt C	Orange County	CA	92866	
1138	David	Kurtmen	3009 Forrest Way	Pebble Beach	CA	93953	
1139	Max	Starr	4761 Cartlen Dr.	Placentia	CA	92870	
1140	Kalan	Richards	PO Box 605	Placerville	CA	95619	Fishing Guide & Firefighter
1141	Sharon	Harris	71300 San Jacinto Dr # 402	Rancho Mirage	CA	92270	Tourism
1142	Peter	Houtman	6787 Riata DR.	Redding	CA	96002	Retired Teacher
1143	Jeff	Nabors		Redlands	CA	92374	bus mechanic
1144	Eva	Duran	5715 Yarrowrough Dr.	Riverside	CA	92505	
1145	Micharl	Chafe	16370 Singletree Ln.	Riverside	CA	92506	
1146	Francis	Kimney		San Diego	CA	92109	non-profit
1147	George	Kaye	6414 Corsica Way	San Diego	CA	92111	Oceanographer
1148	Ali	Hussainy		San Diego	CA	92123	Media
1149	Brant	Crenshaw		San Diego	CA	92109	
1150	Karl	Bendix	8405 Rio San Diego Dr. 5326	San Diego	CA	92108	Dockmaster
1151	John	Caldwell	4762 Karen Way	San Diego	CA	92020	
1152	Scott	Walters		San Diego	CA	92126	
1153	Jeff	Balint	2931 McCall St. #c	San Diego	CA	92106	
1154	Joan	Juster	2547 California St.	San Francisco	CA	94115	
1155	James	Holsonback	45 Gilbert St.	San Francisco	CA	94103	Recreational Fisherman
1157	Lee	Lee	9157 Leroy St.	San Gabriel	CA	91775	
1158	Evan	Yeh		San Gabriel	CA	91775	
1159	Erich	Kast		San Luis obispo	CA	93405	Student

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1160	Jim	Kehriotis	3230 Montecvideo Dr.	San Ramon	CA	94583	Alaska Sport Fisher
1161	Richard	Vantine	722 Union St.	Santa Barbara	CA	93103	Commercial Fisherman
1162	Kendrick	Guehr	339 High St.	Santa Cruz	CA	95060	Student
1163	Mark	Tuati	1633 Hopper Ave.	Santa Rosa	CA	95409	
1164	Daniel	Doyle	20097 Mendelsohn Lane	Santa Rosa	CA	95403	Physician
1165	Jesse	Hewson	612 Fremont Ave.	Saratoga	CA	95070	LA County Sheriff's Deputy
1166	Peter	Rutti	3947 Stevermark Ln.	Spring Valley	CA	91777	Trying to Catch a 100 pd. for 72nd Birthday
1167	Gregory	Richardson		Studio City	CA	91604	
1168	William	Brown		Sylmar	CA	91342	
1169	Juan	Eguia		Tarzana	CA	91356	Fisherman
1170	Alan	Concepcion		Torrance	CA	90505	Insurance Broker
1171	Hal	Stone		Trinidad	CA	95570	Student/Deckhand
1172	Graham	Hebson		Tulare	CA	93274	
1173	Ross	Ward		Tulare	CA	93274	
1174	Ted	Salyer		Tulare	CA	93274	
1175	Lew	Lloyd		Tulare	CA	93274	
1176	John	Martinez		Tustin	CA	92780	
1177	Michael	Wagner		Valley Center	CA	92082	
1178	Richard	Wells		Vista	CA	92081	Recreational AK Fisher
1179	Bob	Kubik		Whittier	CA	90607	
1180	Kelvin	Robertson		Wilmington	CA	90744	Retired
1181	Robert	Boening		Winchester	CA	92592	
1182	Matt	Uribe		Yucaipa	CA	92399	
1183	George	Billings		Aurora	CO	80011	BioTechnology
1184	Joe	Zaborsky		Aurora	CO	80013	
1185	Mike	Ryan		Centennial	CO	80122	Owner of a tackle store
1186	Holly	O'Hara		Centennial	CO	80122	Alaska Sport Fisher
1187	Matthew	Breest		Denver	CO	80204	Sport
1188	Brian	Roesler		Mead	CO	80542	Sport
1189	Danny	Stotler		Salida	CO	81201	
1190	Christy	Gum		Millsboro	DE	19966	Sport
1191	John	Podczerwinsky		Bonita springs	FL	34134	
1192	Marvin	Berger		Boynton Beach	FL	33472	Retired
1193	Peter	Huycke		Boynton Beach	FL	5398	retired
1194	Kevin	Saff		Bradenton	FL	34208	Charter captain - Gustavus, AK
1195	John	Freeborn		Deltona	FL	32738	
1196	Paul	Reynolds		Deltona	FL	32725	
1197	Allie	Tennant		Ft Myers	FL	33905	
1198	Justin	Parker		Ft. Myers	FL	33967	Charter captain - Gustavus, AK

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1199	Charles	D'angelo	6060 Shore Blvd S #1004	Gulfport	FL	33707	Captain
1200	Cory	Evers	12418 sw 266 Ln.	Homestead	FL	33032	Coast Guard
1201	John	Houpt		Islamorada	FL	33036	Fishing Guide
1202	Brandon	Pawlak	2714 48 th St. W	Lehigh Acres	FL	33971	
1203	Howard	Tanner	971 Scott Dr.	Marco Island	FL	34145	Resturant Owner
1204	Doug	Olander	7665 Clementine Court	Oriando	FL	32819	Editor
1205	Richard	Word	918 N. Church Ave.	Panama City	FL	32401	Sport
1206	Glenn	Rowe	50 Terry's Place	Cleveland	GA	30528	Master Merchant Marine Captain
1207	Robert	Whitten	1615 30th St.	Columbus	GA	31904	Sporting Goods
1208	Rick	Basinger	174 E. Georgia Ave.	Comer	GA	39629	Sportsman
1209	Christopher	Boyd	1178 Kolic Helmey Rd.	Guyton	GA	31312	100 Ton Master/Charter Captain
1210	Gretchen	McLeod	524 River Bend Rd.	Richmond Hill	GA	31324	Retired
1211	Scott	Poomaihealani	919 Ala Kopiko Pl.	Honolulu	HI	96818	Airline Manager
1212	Gary	Hudson		Kapaa	HI	96746	
1213	John	Phillips	P.O.Box 49 2545	Keaau	HI	96749	Charterboat Captain
1214	Terence	Murphy		Waikoloa	HI	96738	Fishing Guide
1215	Lorie	Crawford	2720 Dill Drive	Boise	ID	83705	Sports Fishing Booking Agent
1216	Fredrick	Houtman	5075 W. Alamosa St.	Boise	ID	83703	Retired
1217	Daniel	Perry	419 Bacon Dr.	Boise	ID	83712	Sea Kayak guide: Alaska
1218	Daniel	Perry	419 Bacon Drive	Boise	ID	83712	Sea Kayak Guide: Alaska
1219	Randy	Dayton	2240 Almaden	Meridian	ID	83646	
1220	Brent	Taylor		Middleton	ID	83644	
1221	James	Mullen	P.O. Box 585	Ponderay	ID	83852	Charter Boat Captain
1222	LeRoy	McLeod	112 S Linden St.	Post Falls	ID	83854	
1223	Thomas	Keegan	29 Nighthawk Ln.	Salmon	ID	83467	Regional Wildlife Manager, IDFG
1224	Christopher	White		Sandpoint	ID	83864	Fisherman
1225	Christopher	White		Sandpoint	ID	83864	Fisherman
1226	Ron	Mahoney	1055 Newell Rd	Viola	ID	83872	Forester
1227	Terry	Long	2425 East County Rd. 1760	Carthage	IL	62321	
1228	James	McGovern	10504 S Karlov Ave	Oak Lawn	IL	60453	CPA
1229	Jeff	Ollier	13 East george Street, Suite B	Batesville	IN	47006	
1230	Terry	Partridge	4771 Winterberry Place	Columbus	IN	47201	engineer
1231	Jesse	Kirkham	370 Kaymar Dr.	Danville	IN	46122	
1232	Justin	Nail		Mooreville	IN	46158	
1233	Andy	Orme		Malindi	Kenya	M1	
1234	James	Love		Shreveport	LA	71109	
1235	David	Atkinson	2015 Oriole St.	Slidell	LA	70460	
1236	Hani	Kayli	16 Irving St.	Boston	MA	2114	Sport
1237	John	Peimas	74 Roosevelt	Chic	MA	1013	

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1238	Alan	Trottier		Clarksburg	MA	1247	
1239	John	Pierce	424 Kingstown Way	Duxbury	MA	2332	
1240	Timothy	Fanikos		Lynnfield	MA	1940	
1241	Stephen	Curtis		Plymouth	MA	2360	
1242	Kathleen	McGrath		Watertown	MA	2472	
1243	Bradley	Donald		Baltimore	MD	21210	
1244	Jim	Persing	1839 Clark Blvd.	Halethorpe	MD	21227	Seafood Manager
1245	M	Wedin	10007 Crestwood Rd.	Kensington	MD	20895	Sport
1246	Mary	Depoutiloff		Harrington	ME	4643	
1247	Robert	Gregg		413 S 7th St.	MI	49829	Retired/sport fisher to AK
1248	Kevin	Dent	3550 S. 35 Rd.	Cadillac	MI	49601	Sport Fisherman/Consumer
1249	Wes	Eklund	481 Seminole Rd.	Norton Shores	MI	49444	CEO - Fleet Engineers, Inc.
1250	Paula	Schwerin	3265 Kaiser Rd.	Pinconning	MI	48650	
1251	Kevin	Gross	9225 131st Ave. SE	Becker	MN	55308	Sport Fisher in AK
1252	James	Davey		Grand Rapids	MN	55744	
1253	Scott	Gay		Moose Lake	MN	55767	
1254	Ron	Brown	1263 8th Ave. No.	St. Cloud	MN	56303	Non Resident Sport
1255	Jane	Brown	1263 8th Ave. No.	St. Cloud	MN	56303	Non Resident Sport
1256	Lance	Thomas		Stillwater	MN	55082	
1257	Matthew	Johnson	311 Oakwood Terrace	Vadnais Heights	MN	55127	
1258	Edward	Peters	1218 Heatehr Ln.	Waconia	MN	55387	
1259	Thomas	Lallier	3272 Hamlet Dr.	Woodbury	MN	55125	Attorney
1260	Gary	Krosch	15 Southmoor Dr.	St. Louis	MO	63105	
1261	Robert	Dill	5437 Smallwood Cove	Horn Lake	MS	38637	Retired
1262	Edward	Funchess	PO Box 7222	McComb	MS	39649	
1263	John	Bickenbach	8186 Elmwood Dr.	Olive Branch	MS	38654	Pilot
1264	Doug	Fulp		Bozeman	MT	59717	
1265	Joel	Price	8278 Huffline	Bozeman	MT	59718	Sport Fishing/keeping AK green with Dollars
1266	Stephanie	Spokas	15 Ohio Gulch Rd.	Clancy	MT	59634	
1267	Mike	Spokas	15 Ohio Gulch Rd.	Clancy	MT	59634	Commercial Fishing Captain
1268	Stephanie	Spokas	15 Ohio Gulch Rd	Clancy	MT	59634	Paralegal - Wife of AK Commercial Fisherman
1269	Joe	Murray	3742 Yuhas	Helena	MT	59602	Performance Audit Manager
1270	Audrye	Notarangslo	100 Cowboy Ln	Lewiston	MT	59457	Sport Fishing leaving dollars
1271	Gary	Slagel		Lewistown	MT	59457	Govt. employee
1272	Bruce	Reid	580 G Street	Lewistown	MT	59457	Forester
1273	Craig	Fientie	702 Farewell St.	Lewistown	MT	59457	Writer/editor
1274	Christian	Gold Stagg		Missoula	MT	59802	
1275	Joyce	Pusel	102 Emerald Circle	Durham	NC	27713	
1276	Rob	Robinson	274 Westwood Dr.	Fayetteville	NC	28303	Ginsmith

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1277	Robert	McCabe	1254 Nine Foot Rd.	Newport	NC	28570	Environmental Health Specialist
1278	Ryan	Lambert		Raleigh	NC	27607	
1279	Alan	Whitley	2517 Rolling Hill Rd.	Yadkinville	NC	27055	
1280	Dan	Szarkowski		Bismarck	ND	58503	
1281	Nathan	Baker	4005 19st. NE #209	Bismarck	ND	58503	HVAC Tech
1282	Brian	Frohlich		Riverdale	ND	58565	Fisheries Technician
1283	Kirk	Barnes	POB 656	Valentine	NE	69201	
1284	Cecil	Neeley	P O Box 521	Alton	NH	3809	Sportfishing Guide
1285	Mark	Foley	40 Glenwood Ave.	Dover	NH	3820	
1286	Ruth	Littlefield	373 Pleasant St.	New London	NH	3257	Educator
1287	Robert	Pugliese	373 Pleasant St.	New London	NH	3257	
1288	Chris	Aldrich	339 Old Post Rd.	Newbury	NH	3255	Self Employed Carpenter
1289	Bambi	Davis	PO Box 287	Newbury	NH	3255	Bookkeeper
1290	Jasmine	Homer	554 Bradford Rd.	Newport	NH	3773	
1291	Kenneth	Sawyer	554 Bradford Rd.	Newport	NH	3773	
1292	Robert	Sobriano	659 Fairview Ave.	Piscataway	NJ	8854	
1293	Patrick	Kane	9 Cherry Tree Rd.	Vernon	NJ	7462	State Trooper - Retired
1294	Henry	Salvacion	85 Lindys Dr.	West Milford	NJ	7480	
1295	Burstrom	Burstrom		Albuquerque	NM	87122	
1296	Lonnie	Hinders	34 Underwood Pl.	Elephant Butte	NM	87935	Retired
1297	Juan	Martin		Henderson	NV	89074	Physician
1298	Troy	Munnich	8225 Valley Stream Ave.	Las Vegas	NV	89131	
1299	Wayne	Reed		Las Vegas	NV	89128	
1300	James	Detting	10979 Willow Heights Dr.	Las Vegas	NV	89135	Physician
1301	Wagner	Layne	261 West Chester St.	Long Beach	NY	11561	Charter Boat Captain
1302	Sam	Robinson	68 Oregon Ave.	Medford	NY	11763	Retired
1303	Ronak	Mallik		New York	NY	10016	
1304	Stephanie	Choate		New York	NY	10009	
1305	Joseph	Perhauch	11 NeversinkDr.	Newburgh	NY	12550	
1306	Mike	Bianculli		Upton	NY	11973	
1307	Jeff	Pearlman		West Hempstead	NY	11552	
1308	Brian	Parsells	3963 Coneflower Lane	Maumee	OH	43537	
1309	Trisha	Gadbois	710 Lynn Street	Sidney	OH	45365	
1310	Barbara	Jackson		Troy	OH	45373	
1311	George	Slifcak	24702 Tricia Dr.	Westlake	OH	44145	
1312	Brian	Poser	7364 E. Poser Pl.	Claremore	OK	74019	
1313	Wade	Alexander	920 W. Chickasaw	Lindsay	OK	73052	
1314	Jeff	Hutchins	2460 N. 28th W. Ave	Sperry	OK	74073	Sport

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1315	Daryn	Dickey	5416 Deer Trail	Stillwater	OK	74074	Finance Mgr
1316	Donovan	Goforth	604 W. 6th St.	Stroud	OK	74079	Captain
1317	D.	Yakstis	PO Box 0834	Wagoner	OK	74477	Haiibut Fisher
1318	Judy	Little	807 South Mountain Avenue	Ashland	OR	97520	fisherman/ fish retailer
1319	John	Little	807 South Mountain Ave.	Ashland	OR	97520	Fisherman
1320	Eileen	Ystad	91605 Walluski Loop	Astoria	OR	97103	Cartographer
1321	Jaosn	Schurter		Beaverton	OR	97006	
1322	Steven	Cook	65425 85th Pl.	Bend	OR	97701	
1323	Richard	Wallis	1122 S Main	Blackwell	OR	74631	
1324	Jessica	Russell		Brookings	OR	97415	
1325	James	Pex		Coos Bay	OR	97420	
1326	James	Huson		Cornelius	OR	97113	
1327	Peter	Gaube	5549 SW Redtop Pl.	Corvallis	OR	97333	
1328	Randy	Rasmussen	PO Box 544	Creswel	OR	97426	
1329	Martin	Scott	12540 Beck Rd	Dallas	OR	97338	
1330	Seth	Ellis		Enterprise	OR	97828	Charter Boat Captain
1331	Zachary	Ellis	90063 Troy Rd	Enterprise	OR	97828	Fisherman
1332	Herman	Rudisill	PO Box 2008	Estacada	OR	97023	
1333	Cindi	Feldman		Eugene	OR	97408	
1334	Antar	Pushkara	85091 Larson Rd.	Eugene	OR	97405	
1335	Julia	Intravartolo	5545 Riverbanks	Grants Pass	OR	97527	Retired
1336	Stephen	Parr	2714 N.E. Beech Dr.	Gresham	OR	97030	
1337	John	Specht		Hillsborl	OR	97124	
1338	Beth	Gordon		Hillsboro	OR	97124	
1339	Chris	Worley		Junction City	OR	97448	
1340	Charles	Anderson	6525 Simmers Ave	Klamath Falls	OR	97603	Mill Wright
1341	Cliff	Bailey	14361 Edenberry Dr.	Lake Oswego	OR	97035	
1342	Dan	Hydychak		Newport	OR	97365	Sport fisherman
1343	John	Blanchard	66087 N Bay Rd	North Bend	OR	97459	Fisherman
1344	Joseph	Whitten		Oregon City	OR	97045	
1345	Sara	Stevenson		Portland	OR	97233	
1346	Steve	Marx	4805 SE Caruthers	Portland	OR	97215	Marine Conservation
1347	Stanley	Krajewski		Portland	OR	97217	Water Treatment
1348	James	Donaldson	4110 SE Hawthorne #442	Portland	OR	97214	Fishing Guide
1349	Candy	Hammond	PO Box 785	Rockaway Beach	OR	97136	
1350	Bryce	Taylor	Po Box 12247	Salem	OR	97309	
1351	Robert	Maxey	1270 Larkspur Ln NW	Salem	OR	97304	EE
1352	Chass	Thursson	92043 Spicer Ln	Springfield	OR	97478	
1353	Travis	Lara		Troutdale	OR	97060	

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1354	Nathan	Roth	1101 Mica Cir.	Bethlehem	PA	18017	Chef
1355	Fred	Sweeney	10 Barb Lane	Boyetown	PA	19512	
1356	Robert	Vial	2 Walnut Street	Danville	PA	17821	
1357	Daniel	Shively		Indiana	PA	15701	
1358	Dale	Must	527 Vine St Apt 205	Johnstown	PA	15901	Retired
1359	Dan	Hill		Leechburg	PA	15656	
1360	Karen	Barclay		Loysville	PA	17047	Law Enforcement
1361	Richard	Rogan		white haven	PA	18661	
1362	Dennis	Swanson	2209 Pigeon Point Road	Beaufort	SC	29902	Retired
1363	Jamie	Vesely	241 Ponderosa Dr.	Ladson	SC	29456	Sport
1364	Greg	Dent	P. O. Box 729	McCellanville	SC	29458	Sport Fisherman/Consumer
1365	Doran	Jeanne	4741 hwy 165	Meggett	SC	29449	
1366	Joel	Hair	1236 Old Fort Rd.	Moncks Corner	SC	29461	Sport
1367	George	Harkness	12 Cheehaw Dr.	Okatie	SC	29909	
1368	Kathie	Harkness	12 Cheehaw Dr	Okatie	SC	29909	
1369	Scott	Turbak	1618 7th St NE	Watertown	SD	57201	
1370	Lee	Patterson		Bury St Edmunds	Suffolk	IP300SP	
1371	Dale	McCray III	1311 Erwin Hwy.	GreenEville	TN	37745	
1372	Steve	Cook	10 Austin Circle	Oakland	TN	38061	Sport
1373	Patrick	Roberson	250 Ocoee Hill Farm Rd.	Pikeville	TN	37367	freelance communicator
1374	Dale	Carlson		Smithville	TN	37166	Retired
1375	Jason	Blunck	22406 CR 210	Angleton	TX	77515	
1376	Frank	Swietlik	27375 Mountain Meadow Rd.	Escondido	TX	92026	
1377	Daniel	Astalias	Box 1184	Fort Worth	TX	76101	Clinical Lab Scientist
1378	Roy	Jorgensen	4615 Shetland Lane	Houston	TX	77027	
1379	Patsy	Jorgensen	4615 Shetland Ln.	Houston	TX	77027	Retired geophysicist
1380	Edward	Futterer	6215 Chestnut Peak Ct.	Kingwood	TX	77345	
1381	John	Ogle	53 Evergreen Court	Lake Jackson	TX	77566	Owner, Bear Paw Adventure
1382	Treania	Stegall	2507 Cambridge	Lorena	TX	76655	Retird/recreational AK Fisher
1383	Warren	Thetford	1515 Texas Ave.	Lubbock	TX	79401	Cartographer
1384	Mike	Cooley	1871 W Frank	Lufkin	TX	75904	Small Business Owner
1385	Alan	Sloka	26626 Virgo Ln.	San Antonio	TX	78260	Education/retired
1386	Bobby	Wylie	13302 Winston Dr.	Santa Fe	TX	77510	BP
1387	Ronald	Ford	608 Wilder Way	Tyler	TX	75703	Retired
1388	Michael	Deming		Cedar City	UT	84720	Publisher
1389	Scott	Willard	762 w Lakeview Rd.	Linden	UT	84042	
1390	Brent	Betenson		Loa	UT	84747	
1391	Sonny	Jensen	51 W Center St #418	Orem	UT	84057	
1392	Kent	Huff	915 North State	Orem	UT	84057	Lodge Owner

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1393	Devan	Bigler	75 East 300 North	Payson	UT	84651	
1394	Kirk	Winward		Salt Lake City	UT	84124	
1395	Kent	Danjanovich	746 S. Covey Lane	Santa Clara	UT	84765	
1396	Gary	Curtis	1597 West 9775 South	South Jordan	UT	84095	
1397	Mike	Heath	145 W. Hilton Dr.	St. George	UT	84770	
1398	Bart	Colledge	522 Tamarack Dr.	Tooele	UT	84074	Millwright
1399	Anna	Goodwin		West Jordan	UT	84081	
1400	Les	Goodwin		West Jordan	UT	84081	
1401	Richard R.	Smith	9180 South 2700 West	West Jordan	UT	84088	Retired
1402	Gregory	Martin		West Jordan	UT	84088	
1403	Melvin	Hollowell	11 Titus Creek Lane	Carrollton	VA	23314	State Police Agent
1404	James	Ryan	2249 Haversham Close	Virginia Beach	VA	23454	
1405	John	Begala		Williamsburg	VA	23185	
1406	Scott	Witt	769 Falls Rd.	Shelburne	VT	5482	
1407	Josh	McNeal		Amboy	WA	98601	Fishing Guide and Student
1408	Jose	Aguilar	1315 28th Street	Anacortes	WA	98221	F/V Miss Palomar, commercial
1409	Gabriel	Aguilar	1315 28th Street	Anacortes	WA	98221	F/V Miss Palomar, commercial
1410	Marcelino	Aguilar	1315 28th Street	Anacortes	WA	98221	F/V Miss Palomar, commercial
1411	Scott	Baker	11824 Chappel Road	Arlington	WA	98223	
1412	Steve	Swanson	24826 112th DR NE	Arlington	WA	98223	Engineer
1413	Michael	Oberg	17218 Russian Road	Arlington	WA	98223	Marine Surveyor
1414	Less	Carlson	1402 22nd St. N.E. #265	Auburn	WA	98002	
1415	Jim	Nyberg		Auburn	WA	98092	Former Deckhand/Sitka
1416	Sarah	Odell		Bainbridge Island	WA	98110	
1417	Marcos	Lopez	10806 SE 16th Street	Bellevue	WA	98004	
1418	Derrick	Dittes	113 147th Ave SE #4	Bellevue	WA	98007	
1419	John	Jacobson	575 Whitecap Rd.	Bellingham	WA	98229	
1420	Will D.	Holland	1 Shetland Court	Bellingham	WA	98229	F/V Miss Palomar, commercial
1421	Walter	Wojcik		Bothell	WA	98011	
1422	Lee	Bryan	23626 45th Avenue SE	Bothell	WA	98021	Construction
1423	Matthew	Nugent	928 207th pl se	Bothell	WA	98012	
1424	Charles	Gauthier	10920 NW Holly Rd.	Bremerton	WA	98312	
1425	Dick	Bowen	915 South 137th St.	Burien	WA	98168	Lodge Owner and Operator
1426	David	Nieman		Chehalis	WA	98532	
1427	Spencer	Albright	981 Gibbs Lake Rd.	Chimacum	WA	98339	Engineer / Sport Fisherman
1428	Ed	Shiplely	3685 Casey St.	Clinton	WA	98236	Recreational Fisher
1429	Michael	Walsh	25342 163rd Ave SE	Covington	WA	98042	
1430	Ronald	Harris	28910 4th pl s	Des Moines	WA	98424	Distribution Center Manager
1431	Steve	Christensen		Duvall	WA	98019	

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1432	Dianna	Marchand	14310 Scott Turner Rd E	Eatonville	WA	98328	
1433	Don	Mooney		Edgewood	WA	98372	
1434	Cory	Simonson	631 5th Ave S # 3	Edmonds	WA	98020	Retired Commercial Fishermen
1435	Donald	Smith	22207 88th Ave W	Edmonds	WA	98026	
1436	Paul	Egashira		Edmonds	WA	98020	
1437	James	Fahy		Edmonds	WA	98020	
1438	Dan	Skeels		Edmonds	WA	98020	Insurance
1439	Mike	Thorpe		Edmonds	WA	98026	Electrician
1440	Kevin	Lanier	905 Bell St.	Edmonds	WA	98020	
1441	Thomas	Friedland	70 Majestic Heights Dr.	Ellensburg	WA	98926	Physician
1442	John	Brandt	47717 323rd Ave. SE	Enumclaw	WA	98022	
1443	Will	Koger		Everett	WA	98201	
1444	Blakee	Haug		Everett	WA	98206	Guide
1445	Bryan	Monsaas		Everett	WA	98203	
1446	John	Rogers	14917 58th Dr. SE	Everett	WA	98208	
1447	Stacey	King		Everett	WA	98201	Marine Hardware Sales
1448	Jeremy	Cummins	1508 Walnut St.	Everett	WA	98201	
1449	michael	Price	POBbox 1182	Forks	WA	98331	Guide
1450	Jack	Vander Waal	PO Box 463	Fox Island	WA	98333	Retired
1451	Dave	Martin	PO Box 818	Freeland	WA	98249	CFO
1452	Lisa	Newland	PO Box 1729	Gig Harbor	WA	98335	Commercial Fisherman
1453	David	Weister		Gig Harbor	WA	98329	
1454	Alicia	Worley	6320 Rosedale St NW	Gig Harbor	WA	98335	Student
1455	Megan	Worley	3825 38th Ave. nNW	Gig Harbor	WA	98335	Writer
1456	Ryan	Armstrong	3825 38th ave nw	Gig Harbor	WA	98335	Commercial Fisherman
1457	Troy	Oberg	8401 40th Street NW	Gig harbor	WA	98335	
1458	Brandon	Robichaux	P.O. Box 382	Hansville	WA	98340	Firefighter
1459	David	Johnson	7218 Preston-Fall City Rd SE	Issaquah	WA	98027	Technology
1460	D.J.	Steikunas		Kenmore	WA	98028	
1461	Dan	Stauffer	8635 NE 169th Pl.	Kenmore	WA	98028	Buyer
1462	Gordon	McCleary	705 W. 45th Ave.	Kennewick	WA	99337	
1463	Thomas	Tomfohr	27637 188th Place SE	Kent	WA	98042	Retired
1464	Arnold	Graham	22045 148th Ave SE	Kent	WA	98042	
1465	Joe	Dazey	8088 NE Bayberry Ln.	Kingston	WA	98346	F/V Diamond Lil
1466	Jesse	Morin		Kingston	WA	98346	
1467	Reid	Christensen	4411 22nd Ave SE	Lacey	WA	98503	
1468	Dino	DiMarco		Lake Stevens	WA	98258	
1469	Rusty	Fenrich		Lake Stevens	WA	98258	
1470	Brett	Simbe	2812 114th Drive NE	Lake Stevens	WA	98258	

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1471	Brian	Standow	21552 E Bitterroot Lane	Liberty Lake	WA	99019	
1472	Brent	Tugby	18407 61st Place W	Lynnwood	WA	98037	
1473	Benjamin	Stamm		Lynnwood	WA	98087	
1474	Karl	Kohagen	4410 144th Pl. SW	Lynnwood	WA	98087	Consumer
1475	Randy	Doucet	5420 0178th Place SW	Lynnwood	WA	98037	Charter Fisherman
1476	Dane	Fantz	23226 SE 262nd CT	Maple Valley	WA	98038	
1477	Dave	Opstad		Mill Creek	WA	98012	
1478	Chad	Minnick		Monroe	WA	98272	
1479	Daniel	Carney	17101 View Ave.	Mount Vernon	WA	98274	
1480	Russ	Heagle	6505 222nd ST SW	Mountlake Terrace	WA	98043	HVAC Tech
1481	Lisa	Eckhart	6505 222nd ST SW	Mountlake Terrace	WA	98043	Travel Agent
1482	Douglas	Butler	9512 59th Ave West	Mukilteo	WA	98275	Teacher
1483	Herb	Guttler		Mukilteo	WA	Mukilteo	
1484	Lori Dee	MacKenzie	P.O. Box 273	North Lakewood	WA	98259	
1485	Terrance	Baker		Oak Harbor	WA	98277	
1486	Nancy	Ludwig	360 Canal Drive NE	Ocean Shores	WA	98569	Golf Shop Attendant
1487	Curtis	Byre	9829 Johnson Pt Lp NE	Olympa	WA	98516	Computer Tech
1488	Jim	Schafer	4214 Shincke Rd	Olympia	WA	98506	Retired
1489	Eric	Swanson	3342 Libby Rd. NE	Olympia	WA	98506	
1490	Ken	Maxfield	5125 beverly Dr. NE	Olympia	WA	98516	
1491	Steven	Argeris		Olympia	WA	98501	
1492	Charles	Dunning	5122 N Ormond Road	Otis Orchards	WA	99027	Educator
1493	Terry	Bendock		Port Angeles	WA	98362	
1494	Dr. Pete	Rosko	2123 W. 16th St.	Port Angeles	WA	98363	Biologist / innovator
1495	John	Herrling	370 Misty Hollow Road	Port Angeles	WA	98363	Retired Police Officer
1496	Brady	Blake		Port Ludlow	WA	98365	Fisheries Biologist
1497	Chance	Blowers	4474 Long Lake Rd.	Port Orchard	WA	98366	
1498	Steven	Richardson	15294 Horseshoe Ave. SW	Port Orchard	WA	98367	
1499	Matt	Mccrea	3226 beach Dr. E	Port Orchard	WA	98366	Firefighter
1500	Mark	Buchmann		Puyallup	WA	98373	
1501	Dale	Volk		Puyallup	WA	98371	
1502	Rymond	Karlsvik	PO Box 288	Raymond	WA	98577	Retired Mariner & Fisherman
1503	Paul	Ellis		Renton	WA	98059	
1504	Robert	Tobeck	1003 N41st Pl	Renton	WA	98056	
1505	Austin	McCutchen		Renton	WA	98059	
1506	Daniel	White	1109 N. 30th St.	Renton	WA	98056	
1507	Ron	Conatser	3656 Beck Rd.	Rice	WA	99167	Commercial fisherman
1508	Richard	Engebretson	1217 Cottonwood Dr.	Richland	WA	99354	
1509	James	Nolet	18039 Wild Violet InSW	Rochester	WA	98579	

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1510	Jason	Alexander		Roy	WA	98580	
1511	Tim	Shultz	717 216th Ave NE	Sammamish	WA	98074	
1512	Lincoln	Ferris	5049 Pullman Ave. NE	Seattle	WA	98105	Business owner
1513	Alexis	Ege		Seattle	WA	98122	Legal Assistant
1514	Jennifer	Mitch	6827 Oswego Pl. NE #301	Seattle	WA	98115	
1515	Grant	Ferris	4747 Sandpoint Way NE, Apt 305	Seattle	WA	98105	Customer Service Rep.
1516	Evangelina	White		Seattle	WA		IPHC
1517	Michael	Hew		Seattle	WA	98133	
1518	Anthony	Warren		Seattle	WA	98109	
1519	Bryce	Aktepy	4124 Fremont Ave N Apt E	Seattle	WA	98103	
1520	Gordon	Ruth		Seattle	WA	98115	Retired
1521	Katina	Ruth		Seattle	WA	98115	
1522	James	Graham	1934 12th Ave W	Seattle	WA	98119	
1523	Stephen	Sintay		Seattle	WA	98013	
1524	Neal	Sommer	9000 4th Ave SW	Seattle	WA	98106	
1525	Martin	Gowdy		Seattle	WA	68136	Commercial; sport fisherman
1526	Luke	Lukehart	415 Rohrer Loop	Sedro Woolley	WA	98284	United States Navy
1527	Andrew	Upson		Sedro-Woolley	WA	98284	
1528	John	Teubner	51 Westgate Ln.	Sequim	WA	98382	
1529	Roy	McDennon Jr.		Sequim	WA	98392	Merchant Marine
1530	Gregory	Thomas		Sequim	WA	98382	
1531	Blain	Burgess		Shelton	WA	98584	
1532	Wayne	Hughes	1253 N 173rd St.	Shoreline	WA	98133	
1533	Kenneth	Knobbs	8120 NW Berry Ridge Lane	Silverdale	WA	98383	
1534	Doug	Campbell		Snohomish	WA	98290	
1535	Todd	Schwartz	14919 O.K. Mill Rd.	Snohomish	WA	98290	
1536	Tim	Stumpf		Snohomish	WA	98296	
1537	Pete	Wilson		Snohomish	WA	98290	
1538	Karen	Graham	627 169th Ave SE	Snohomish	WA	98290	
1539	Joe	Skeens	12605 58th Ave. SE	Snohomish	WA	98296	
1540	Rick	Rysemus	14421 Dubuque Rd.	Snohomish	WA	98290	
1541	Shannon	Hendrickson	18115 B St. E	Spanaway	WA	98387	Horse Trainer
1542	Melanie	Tuttle		Spokane Valley	WA	99212	
1543	Steve	Jangaard	5017 168th Pl. N.W.	Stanwood	WA	98292	Commercial Fisherman
1544	John	Risser	14521 70th Ave NW	Stanwood	WA	98292	
1545	Victor	Anderson	3801 N. 19th	Tacoma	WA	98406	Boeing
1546	Nathaniel	Schmidt	319 N Tacoma Ave Apt#506	Tacoma	WA	98403	
1547	Glen	Bayer		Tacoma	WA	98404	
1548	Kristie	Miller		Tacoma	WA	98444	

Halibut Prohibited Species Catch (PSC) Limits in the Gulf of Alaska

1549	Charles	Curtis		Tacoma	WA	98404	
1550	Dan	Purnell		Vancouver	WA	98684	Retired
1551	Bobi	McCune	3111 NE 88 St.	Vancouver	WA	98665	
1552	Rick	Cuillier		Wapato	WA	98951	
1553	Raymond	Phillips	4225 Fallon Dr Apt. 4	West Richland	WA	99353	Retired
1554	Bill	Foley	PO Box 392	White Salmon	WA	98672	Pilot
1555	Donald	Wardlow		Woodinville	WA	98072	Teacher
1556	Chris	Davis	19416 179th Ct NE	Woodinville	WA	98077	
1557	Mike	Devore	17267 NE 156th CT	Woodinville	WA	98072	
1558	Cyndee	Devore	17267 NE 156th CT	Woodinville	WA	98072	
1559	Brian	Fleming		Yarrow Point	WA	98004	
1560	Wayne	Thompson	14611 Mountain Vista Ln SE	Yelm	WA	98597	Sport Fisher
1561	Mike	Kassie	N12776 Meridian Ave	Colby	WI	54421	Farmer, AK Sport Fisher
1562	John	Tefankjian	8 Whalerman Cove	Brigantine	WV	8203	Manage Retail Seafood Market & Restaurant
1563	Dale	O'Driscoll	10 Virginia Ln.	Buffalo	WY	82834	Oil & Gas Industry
1564	Allen	Dodd	6061 W. Incline Rd.	Casper	WY	82604	Charter Boat Captain
1565	James	Borden		Jay Em	WY	82219	Commercial Halibut Fisherman
1566	Neale	Wortley	P.O. Box 5526	Haines Inct.	Yukon	Y0B 1L0	Forest Officer
1567	Hans	Donkersloot	Almere Flevoland	1357ED			Retired
1568	Ingeborg	Meijer	Breugel Village	5694 CB			telemarketer
1569	Kirk	Van Doren					Commerical fishermen
1570	Cody	Iverson	1006 Beach Court				consumer

North Pacific Fishery Management Council

209th Plenary Session — June 6-12, 2012 — Kodiak, AK

Submitted to npfmc.comments@noaa.gov

Tel: 907-271-2809 Fax: 907-271-2817

RE: C-1(b) GOA HALIBUT PROHIBITED SPECIES CATCH

Mr. Secretary John Bryson, Governor Sean Parnell, Chairman Olson & Council members:

I am a Kodiak Island resident who has fished the directed commercial halibut fishery for about 40 years. I currently fish halibut in the GOA and the Bering Sea.

I'd like the Council to take the following measures:

- 1) **Cutback the Halibut PSC across the board for all non-directed gear sectors by 50%.** If directed halibut fishermen have to take cuts over 50%, it is only fair that others should share in the economic pain in order to rebuild and readjust the dynamics of halibut stocks.
 - a. Lacking adequate science, the Council should exercise the Precautionary Approach. The trawlers should not be allowed to run amok with no reduction in PSC (bycatch mortality) while size & stock dynamics of halibut change so dramatically for the worse.
- 2) **Immediately begin one complete year of 100% trawl observer coverage** – the plan I have submitted to the Council for over six years, outlined once again in Appendix A.
 - a. The trawl fleet should not be trusted as to the calculation of economic losses and other issues absent good scientific evidence. Their behavioral record on tanner crab alone is reason not to give them faith-based credibility, especially when they know how to game the current observer system to hide the true levels of mortality on halibut among bad players.

Over the past 40 years I have participated in 30% of the halibut fisheries in the Gulf of Alaska. There were no draggers involved 30 years ago, as they were busy decimating the shrimp stocks. All of the sudden, they are now running the show, having extreme impacts on halibut grounds. Nobody felt sorry for our commercial halibut fleet when trawlers shifted their efforts and harmed us, and there is no reason today to feel sorry for them and allow an unwarranted slaughter of halibut PSC by trawlers.

Background:

The directed commercial Halibut fisheries are subject to the International Pacific Halibut Commission's (IPHC) powers. It's not an MSA fishery; therefore no Halibut Fishery Management Plan (FMP) exists with a set of primary objectives that must be followed.

Instead, the huge bycatch mortality due to "incidental takes" of Halibut are subjected to Prohibited Species Catch (PSC) management under the objectives of the Gulf of Alaska Groundfish FMP, which is under Council powers.

This causes many problems, not the least of which is that a highly valuable commercial fish species can be wasted in a fishery which destroys that value.

Twenty years ago, the shoreside plants were paying a mere 60 cents for commercial halibut, and today the ex-vessel prices are competitive at over \$6 a pound. Moreover, we never decimated any other stocks by long-lining for halibut. But today the trawlers kill millions of pounds a year of halibut, fish that could better serve consumer markets.

It is highly insulting to listen to their propaganda that somehow it is good to now have huge numbers of very small halibut, and their suggestion that it is good to have the trawlers killing a great deal of them because “halibut eating other halibut are the leading cause of destroying the species.”

Requirements of NS#9:

NS#9 specifies Councils must improve data collection and focus on management responses necessary to minimize bycatch and bycatch mortality to the extent practicable; and assess the impacts of minimizing bycatch.

The Council has ignored the 2005 Dochtermann (problem statement) proposal of one-year at 100% observer coverage aboard trawlers in the Gulf. By doing so, the Council has deliberately contributed to “limitations on the information available”.

To a reasonable man, that expresses a strategy to create “an absence of quantitative estimates” in order to allow the continued use of qualitative measures in order to serve the interests of one faction: the trawl fleet. Into that void creeps propaganda which displaces science.

If by now you would have created that baseline of complete data for one year, we’d all know a great deal more about why some vessels are able to fish clean while others decimate halibut stocks, what (how low) the levels of bycatch when fully observed can be, how bycatch can be avoided, and the answers to other questions. The Council would be making decisions based more on quantitative information than guesswork.

Let’s refocus on what “the Council must” do under National Standard guidelines:

- (1) *“Promote development of a database on bycatch and bycatch mortality in the fishery to the extent practicable.***
- (2) *For each management measure, assess the effects on the amount and type of bycatch and bycatch mortality in the fishery.***
- (3) *Select measures that, to the extent practicable, will minimize bycatch and bycatch mortality.***
- (4) *Monitor selected management measures” (evaluate them routinely)***

Regarding the first two goals, if the trawlers want to argue that any cutback in PSC limits will cost them millions, then they could have acted responsibly and already done a fully observed one-year and back up their propaganda with facts.

Regarding the third goal, “the Council must” now select the highest cutback percentage possible to minimize bycatch and mortality. 15% is inadequate for trawl fisheries, as in my

directed halibut fishing during recent years I have averaged a 50% drop in pounds, and others have suffered more. Trawlers should not be in control of the alternatives, and this disproportion is a strong example of how bad things go when they overly influence the Council process.

Let's also focus on a reminder that: (under NS#9 Bycatch (d)(3) factors A-J)

“ii) **The Councils should adhere to the precautionary approach** found in the Food and Agriculture Organization of the United Nations (FAO) Code of Conduct for Responsible Fisheries (Article 6.5), which is available from the Director, Publications Division, FAO, Viale delle Terme di Caracalla, 00100 Rome, Italy, when faced with uncertainty concerning any of the factors listed...”

It is precisely because the GOA Trawl fleet refused to agree to and support the 100% one-year observer proposal that leaves the Council without sufficient data. That forms the basis for masking this situation with the face of uncertainty, bringing about the reason to exercise the Precautionary Approach to its maximum extent possible. Trawlers have only themselves to blame, but they choose to use propaganda and self-determined non peer reviewed “science” and weave stories to cover up their faults. Unchecked, they will bring about the decimation of ocean bottom species.

We need to reject the agenda-driven faith-based agenda of the large Trawlers’ fleet. As professor Ray Hilborn of the University of Washington School of Aquatic and Fisheries Sciences states,

“I suggest the fisheries community needs to look at itself and question whether there is not within our own field a strong movement of faith-based acceptance of ideas, and a search for data that support these ideas, rather than critical and skeptical analysis of the evidence.”

“This faith-based fisheries movement has emerged in the last decade, and it threatens the very heart of the scientific process.”

Trawlers would have the Council see the presence of a larger number of smaller fish as a reason to do nothing. It is like a global expert on AIDS once said about keeping silent: *“Silence speaks very loudly. It says nothing important is going on. But when something really important is happening, silence becomes the lie.”* Or, as Martin Luther King said, *“Our lives begin to end the day we become silent about the things that matter.”* Setting more restrictive levels of Halibut PSC really matters, and it is time to end the silence (delay).

The only thing worse is to allow false testimony and faith-based reasoning to prevail over credible science and the exercise of precaution, and to cast aside fairness and equitability.

Please cutback the trawl and other sectors’ Halibut PSC limits by 50%, and institute the 100% trawl observer proposal (submitted once again in D-2 Staff Tasking) as soon as possible.



APPENDIX A – 100% Trawl Observer Proposal

GOA GROUND FISH TRAWL SUBSECTOR OBSERVER PROPOSAL

Submitted Repeatedly for 6 Years
on the Official Record of NPFMC/NOAA Fisheries

C-1(a) Halibut PSC – Amendment 95 of GOA Groundfish FMP

Name of Proposer: Ludger W. Dochtermann

Date: (orig. June 1, 2005) June 4, 2012

Address:

P.O. Box 714

Kodiak, Alaska 99615

Telephone:

(907) 486-5450

Applying: NS#1 issues of 'rebuilding', optimum yield, preventing overfishing; NS#2 –best science & providing most current, comprehensive information; NS#3 'close coordinated management'; NS#7 minimize costs (damaged stocks, wasted fuel etc.) NS#8 sustained community participation & NS#9 minimize bycatch & mortality on non-targeted species. For multi-species management to maximize net national benefits from Kodiak area fisheries.

Brief Statement of Proposal:

Full (100%) Observer Coverage on All GOA Trawl Vessels for the Year 2012, and once in every 3 years, thereafter. By "Year 2012," I mean "year-1 deployment" – i.e., before any further Rationalization or Catch Share regulations are promulgated. So, inherent in this proposal is a halt to further action until the best (adequate) scientific data is made available.

Objectives of Proposal (What is the problem?):

To accurately evaluate the trawl fishery subsector's entire catch performance regarding the bycatch of non-targeted species and the on-board management conduct of the fishery's prosecution. There is a serious need to have years of full knowledge regarding bycatch for several reasons, not the least of which is for comparison with other years of reduced coverage where the Nation relies upon self-reporting during non-observer hauls.

Need & Justification for Council Action (Why can't the problem be resolved through other channels?):

Due to the nature of the extraordinary value of bycatch – often exceeding the value of targeted species, and due to the nature of massive discards when incidents of 'bad hauls' occur, NOAA Fisheries and the Council need a more accurate base, or first-data-year statistics. Absent the presence of constant recording cameras and other means of improved data collection — and given the need for human confirmation of such 'remote sensing' were it to occur — the 2012 fishery would be a first start in accurate measurement.

Human behavior in the interests of overwhelming economic rewards, absent effective comparison data and enforcement, commands that NOAA base its decisions on more accurate data, and confirm that behavior is not incorrectly reported when observer coverage is not at 100% levels. The Council and NOAA are also aware of the uselessness of GOA bycatch data. The OMB needs to review Compliance with the Data Quality Act in the self-reporting system.

The recent submittal of pictures of tanner crab bycatch in the Kodiak groundfishery at the June 2009 session clearly demonstrates the need for 100% observer coverage, full time for 1 base year. The pictures from Tholepin/blogspot simply reinforce this message. While some have historically

considered Bering Sea crab pod encounters to be rare, true or not, around Kodiak trawlers do fish shallow bays and other grounds that increase the likelihood of pod encounters or are simply dragging through crab abundantly concentrated on the ocean floor.

Foreseeable Impacts of Proposal (Who wins, who loses?):

The program would arguably be costly and operationally inconvenient to many vessels, however government could cover much of the costs in return for the knowledge gained. For the cost of not having full and complete knowledge – at least once every 3 years, and at least “once” (in 2012) – before creating any further arbitrary resource allocation (property rights shifting) regulations (such as “rationalization schemes”) may be a grave loss to society and regional economies as heavy-impact, intense methods of fishing – i.e. hard-on-bottom trawling – proceed unabated and unwatched.

The question of “who loses” has been answered — crab and halibut fishermen — unless a 100% observer program for 1 base year is put in place. Considering that Kodiak was once the “king crab capital of the world” and its restoration is severely harmed by trawl subsector bycatch incidents, the Council needs this base year to analyze such comparable losses.

The question of “who wins and who loses?” is also moot under the logic that the Public resource is an invaluable asset of the Nation, and no one loses when we all know “What are the true conditions of the prosecution of such fisheries?” Everyone wins when regulations are based on the best data, and when they follow the National Standards in the Magnuson-Stevens and Sustainable Fishery Acts, in their spirit and intent – esp. when the regulatory process proceeds on science, not politics and greed.

Are there Alternative Solutions? If so, what are they and why do you consider your proposal the best way of solving the problem?:

There is another means of keeping an eye on the prosecution of the fishery, but the cost of having numerous Coast Guard vessels on site, around the clock, along with ‘random-boarding’ (fair) observer coverage would be much higher than instituting a full-coverage year-stratification program that operates only once every 3 years.

Also, the Council could ban bottom trawling in state waters around Kodiak altogether.

Supportive Data and Other Information (What data are available and where can they be found?):

This is a complex matter, as NOAA has not had adequate budgets for better research. But the conduct of the trawl fishery and the witnessing of its highly destructive prosecution are well known among NOAA, Alaskan communities and fishing crews. The Council and NOAA have greater insight on data collection and statistical need, and that could all come out during the rapid discussion of this proposal were the Council to specifically to request NOAA goes forward with 100% observer coverage in 2012 (or 2013 – year-1 deployment).

I ask you to please take this into discussion in Groundfish issues, and to make your motion one for prioritization of a 100% observer coverage in Year-1 deployment, specifically in the GOA trawl sector.

Signature:

Ludger W. Dochtermann, F/V North Point, F/V Stormbird – Kodiak, AK



Subject: C-1/Halibut Bycatch Reduction
From: Holly Van Pelt <hvpmak@gmail.com>
Date: 5/29/2012 4:35 PM
To: npfmc.comments@noaa.gov

Mr Eric Olson, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Ste 306
Anchorage, AK 99501-2252

Re: C-1/Halibut Bycatch Reduction

Dear Chairman Olson,

I am writing to urge the Council to implement the largest possible bycatch reduction option possible. I believe that it is important to change the way that we are utilizing our declining Halibut resources. The continued waste of fish that occurs in the process of targeting a certain species is an unsustainable practice that must stop. There are proven methods that have been successfully employed in other countries that demonstrate the fact that prohibited species can be avoided while still allowing the commercial fishery businesses to thrive. Please implement a 100% observer program using either human observers or electronic methods as necessary on smaller vessels. I additionally urge you to set in motion the processes to allow for a larger than 15% reduction of bycatch. Please link allowable bycatch amounts to abundance levels and reduce the amount allowed at the same time.

Thank you for your consideration,

Sincerely yours,

Holly Van Pelt
PO Box 3309
Homer, AK 99603



Alaska Whitefish Trawlers Association

P.O. Box 991
Kodiak, AK
99615
(907) 486-3910
alaskawhitefishtrawlers.org

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605 W. 4th Avenue, suite 306
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Agenda Item c-1 (b) Halibut PSC

Dear Chairman Olson:

We support:

Alternative 2: “Amend the GOA Groundfish FMP to remove setting GOA Halibut PSC limits from the annual harvest specifications process. GOA halibut PSC limits would be established (and amended) in federal regulation.”

Option 1: “(Status Quo) Retain the existing 2,000 mt trawl and 300 mt hook and line PSC limits and write them into regulation.”

Suboption 3.3: “Allow available trawl halibut PSC in the second season deep water and shallow water complexes to be aggregated and made available for use in either complex from May 15th through June 30th. Halibut PSC sideboards for the Amendment 80 and AFA sectors would continue to be defined as deep water and shallow water complexes in the second season.”

The Alaska Whitefish Trawlers Association (AWTA) represents the majority of trawl vessels that deliver groundfish to shoreside processors in the Central Gulf of Alaska. The decision that the council will make regarding the allocation of halibut PSC to the trawl sector has the potential to have a profound negative impact on not only the catcher vessel fleet but on our GOA coastal communities, processors, processor workforce and vendors who support this industry. We urge the council to use caution since there is very little indication that the problems being faced by directed halibut users will be positively impacted by a reduction in trawl halibut PSC.

The focus, of this NPFMC action and that portion of the public clamoring for trawl halibut PSC reduction, is the fact that the PSC limit has remained unchanged since implementation in 1986. The fact that this allocation has remained unchanged does not, in any way, mean that it is set at the wrong level. The reduced allocations to the directed and other halibut users are not a result of trawl bycatch and taking halibut away from the trawl fleet will not fix their problems.

Trawl halibut PSC already reduced by almost 5%

The document states “Current halibut PSC limits concern the council because these limits have remained unchanged since their implementation in 1986 for trawl fisheries and revision in 1995 for the fixed gear fisheries”. The fact is trawl halibut PSC allocations have already been reduced by almost 5%. When the council established the new Rockfish program you took away 12.5 % of the halibut allocated to the program on the front end and then you created a tax of 45% of any halibut savings. If halibut savings remain similar to what they have been in the rockfish fisheries the result is that as much as 90+ tons of halibut has already been subtracted from the 2000mt cap.

The Halibut resource is not in jeopardy!!

- The best scientific data available from the IPHC, NMFS and the recent Halibut Workgroup clearly show that there are more halibut now than there has ever been since the IPHC Commission came into being in 1923. The combined total of halibut in the Gulf of Alaska/Eastern Bering Sea is the highest ever reported at 345 million fish.
- The analysis clearly states that “Projections based on the current estimated age compositions suggest that both the exploitable and spawning biomass will increase over the next several years as these strong year classes recruit to the fishable and spawning components of the population.”
- The population of Halibut continues to increase. The NMFS GOA trawl surveys show that between 1990 and 2009 the number of Halibut has increased by 224% and the total biomass has increased by 84%.
- BUT the **exploitable biomass**, the Halibut resource over 32 inches in length (O32) has decreased dramatically and this has caused reduced allocations to long-line and other Halibut fisherman. There are more halibut than has ever been recorded but they are small!
- At the recent Halibut workshop in Seattle, scientists reported that the most likely cause of the small average size of the halibut is due to there being too many halibut competing for food and habitat. The second most likely cause is competition with the enormous Arrowtooth Flounder biomass also competing for food and habitat.
- According to the 2012 NPFMC GOA SAFE report, the Arrowtooth Flounder biomass in the Gulf of Alaska is estimated to be 2,161,690MT. This is more than 4 Billion, 750 Million pounds. The NMFS surveys indicate that the halibut biomass in the Gulf of Alaska is estimated to be approximately 850 million pounds. This means that there are 5 ½ times more Arrowtooth Flounder than Halibut in the Gulf of Alaska, all of which are competing for food and habitat.

Since it appears that the primary cause for the struggles being faced by all users of the halibut resource is an overabundance of small halibut on the fishing grounds, as well as an enormous biomass of Arrowtooth flounder and other flatfish, making any regulatory decision that would reduce the fishing pressure on these stocks may be exactly the wrong thing to do.

All sectors have bycatch (or wastage)

IPHC data shows that from 1995-2011 wastage (*those halibut killed by the hook and line fishery that are too small to keep and are discarded*) has increased by +181%, largely due to the increasing abundance of under 32” halibut (U32) in the biomass. Currently the amount of

halibut wasted by the long-line fleet is approaching the amount of bycatch caught by the trawl fleet.

Halibut wasted by the long-line fleet is truly wasted. It is discarded with no economic benefit derived from its demise. On the other hand, while federal regulations require that a bycaught halibut in the trawl fishery also has to be discarded, there is tremendous economic benefit derived from its demise. Trawl bycatch results in thousands of tons of groundfish being delivered to shore-based processors every year, which provides revenues for city and borough governments, employment opportunities for our workforce and demand for goods and services from local vendors.

National Standards

The focus of this action is aimed at NS 9 “... minimize bycatch and ... minimize mortality of such bycatch” The management of bycatch in all, not just trawl, fisheries is very important. But focusing only on NS 9 and ignoring the other National Standards is bad policy.

Other standards that need to be carefully considered in this action include:

NS 1 – “Prevent overfishing while achieving the optimum yield from each fishery. “ The only sectors that can be held accountable for “overfishing” the halibut resource are the directed halibut industry which, through regulatory shortsightedness and faulty modeling were allowed to continually overharvest in area 2C, as well as the charter halibut industry that made it a habit, in the past, of exceeding their GH (Guideline Harvest Levels) for many years.

NS – 2 “Conservation and management decisions shall be based upon the best scientific information available.” Nowhere, in any scientific document, the RARA and Bluebook published by the IPHC, the information supplied in the NPFMC Public Review Draft for this action, or the report from the recent Halibut Workshop in Seattle, is there any information that points to the trawl sector being the cause of the reduction of allocations to halibut users. Reduced size-at-age of the halibut resource is the culprit. But, there is much scientific information that supports, and it is commonly known by all halibut users, that there are more small halibut on the grounds than have ever been seen. The halibut users openly state that since they are experiencing the pain of reduced allocations to their fisheries, it is only fair that the trawl sector experience some pain, too. That is not science! The NPFMC must use the best scientific data available.

NS – 5 “...no such measure shall have economic allocation as its sole purpose.” Since there is no scientific information that demonstrates a harmful impact on the halibut resource by the trawl industry, any measure taken to reduce trawl bycatch is simply a reallocation of this resource. There is no question that the goal of the halibut users impacted by the decrease in the exploitable halibut biomass is to reduce the halibut PSC allocation to the trawl sector so that they will hopefully see an increase in halibut allocations to themselves. This is contrary to this standard.

NS 8 – “...minimize adverse economic impact on such communities.” Taking \$8.45 million dollars away from the trawl industry in the GOA and replacing it with less than \$2 million dollars, will have a large negative impact. While Kodiak will bear the brunt of the \$8.45

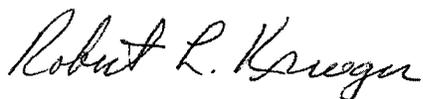
million dollar impact to the trawl sector, other communities that will receive a portion of the windfall derived from the directed and other users, will not experience a significant positive impact.

Observer Coverage

The trawl sector has experienced significant management decisions aimed at reducing our bycatch of Chinook salmon, Bairdi crab and now halibut. Because our vessels are observed our bycatch is made public and remains the center of controversy while other users, specifically the directed halibut sector, are able to have their “wastage” issues remain out of the public eye. The total lack of observer coverage in the directed halibut sector has given them the opportunity to fish without regard for their own resource while directing the council’s and public’s attention to trawl bycatch. We believe that when the restructured observer program is implemented accurate data will be accumulated for all sectors and at that time informed decisions can be made regarding how to best protect our valuable fisheries resources. Until this additional data is gathered the council should be very conservative in making bycatch management decisions that may prove to be entirely wrong.

The council and many others believe that the trawl sector is capable of performing miracles on an ongoing basis. We are expected to harvest the vast groundfish resources in the Gulf of Alaska with less and less bycatch to do so. We continue to operate in an open access race-for-fish that makes it extremely difficult to achieve maximum harvests of target species with minimum levels of bycatch. Until the time comes when trawl groundfish fisheries are conducted under programs that include individual accountability and the creation of opportunities for minimizing bycatch we urge the council to be very careful to not inflict unnecessary harm on the entire groundfish industry.

Sincerely,

A handwritten signature in cursive script that reads "Robert L. Krueger".

Robert L. Krueger, President
Alaska Whitefish Trawlers Association

Paul Olson, Attorney-at-Law
606 Merrell St.
Sitka, AK 99835
polsonlaw@gmail.com

May 29, 2012

Eric Olson, Chairman
North Pacific Fishery Management Council
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Anchorage, AK 99501-2252
Fax: (907) 271-2817
npfmc.comments@noaa.gov

Re: Agenda Item C-1 Halibut Bycatch

Dear Mr. Olson:

Thank you for the opportunity to comment on the North Pacific Fishery Management Council (NPFMC) decision to proceed with a review of Pacific halibut prohibited species catch (PSC) limits for the groundfish fishery of the Gulf of Alaska (GOA). The NPFMC is considering implementing PSC reductions that range from five to fifteen percent through Amendment 95 to the Fishery Management Plan (FMP).

I submit the following comments on behalf of The Boat Company (TBC). TBC is a tax exempt, charitable, education foundation with a long history of operating in southeast Alaska. TBC conducts multi-day conservation and wilderness tours in southeast Alaska aboard its two larger vessels, the 145' M/V Liseron and the 157' M/V Mist Cove. TBC's clients participate in a variety of activities as part of their visit that include environmental education, kayaking, hiking, beachcombing as well as sport fishing from smaller vessels. Some of these clients relish the opportunity to fish for halibut and as a result halibut fishing and long-term conservation of the halibut resource are important to TBC.

Additionally, TBC's tours operate in southeast Alaska communities that significantly depend on the access to the halibut resource in Areas 2C and 3A for commercial and guided sport fishing, unguided sport fishing and subsistence. The different user groups have shared the burden of significant declines in exploitable biomass in recent years. There has been considerable acrimony about how to share that burden within affected user groups. But the trawl halibut PSC limit has not changed since 1989. Further, the proposed PSC reduction levels in Alternative 2 are far less than the reductions faced by fishers in Areas 2C and 3A. Over the past decade, known halibut bycatch removals in the GOA exceed the directed fishery quota in Area 2C.

Therefore, TBC supports the Alternative 2 sub-options that establish 15 percent PSC limit reductions. However, the NPFMC also needs to ensure that bycatch reductions are proportional to long-term conservation concerns and proportional to reductions in directed fisheries deemed necessary for conservation. Amendment 95 needs to incorporate a binding plan for further PSC reductions that are proportional to the cuts faced by other resource users. It is unfair to allow current bycatch levels to continue while all other sectors bear the considerable cost of conserving the resource. The proposed reduction levels do not correspond to the rate of decline of the exploitable biomass. They also do not respond to significant uncertainties regarding how the removals in the western and central GOA affect the long-term viability of the Area 2C and 3A commercial, sport (guided and unguided) and subsistence halibut fisheries. These uncertainties range from the effects to juvenile

migration, size at age, ocean acidification to questions about the accuracy of existing observer data.

I. The NPFMC Should Recommend that NMFS Accelerate the Implementation Schedule or Address PSC Limit Reductions as Part of Establishing Annual Groundfish Catch Limits

As an initial matter, the executive summary indicates that current PSC limits are likely to remain in place through at least the end of the 2013 season. Under the current FMP, the NPFMC apportions PSC limits at the October meeting based on estimates from the GOA Groundfish Plan Team.¹ The FMP delineates a procedure for setting the limits and provides a list of factors for the NPFMC to review in setting annual limits, including impacts on halibut fisheries, stocks, seasonal allocations, and other factors.²

Using this procedure, the NPFMC has recommended that NMFS maintain a halibut PSC limit of 2,000 metric ton (mt) for trawl gear and 300 mt for hook and line gear for GOA groundfish fisheries in 2012 and 2013. The trawl limit is allocated as follows:³

	Shallow Water Trawl	Deep Water Trawl	Total
January 20 – April 1	450	100	550
April 1 – July 1	100	300	400
July 1 – September 1	200	400	600
September 1 – October 1	150	Remainder	150
October 1 – December 31			300

The existing GOA limits have been in place for trawl fisheries since 1989. Fifteen years have elapsed since Congress enacted the Sustainable Fisheries Act and mandated that the councils and NMFS reduce bycatch. Over the past decade, the exploitable biomass has declined by over 50% and the growth rate of halibut has declined dramatically over the past thirty years. The impact on directed fisheries has been substantial. Yet already this year the deep and shallow water complex trawl fisheries have exceeded their limits and discarded more halibut than the thousands of Americans who visit southeast Alaska for guided sport fishing will have the opportunity catch.⁴

It therefore does not seem appropriate to defer opportunities to reduce GOA halibut PSC until 2014. In light of the significant uncertainties and conservation burdens borne by other fishers, the NPFMC should seek to ensure immediate action on PSC limit reductions whether by accelerating the proposed amendment or by directing action at the annual TAC setting process. NMFS's reasons for the delay are unsatisfactory.⁵ The agency has already

¹ GOA FMP at 41.

² *Id.* at 41-42.

³ 76 Fed. Reg at 79631-32 (December 22, 2011).

⁴ See www.fakr.noaa.gov/2012/car150_goa_halibut_mortality.pdf

⁵ NMFS. 2012. Public Review Draft, Environmental Assessment/Regulatory Impact review/Initial Regulatory Flexibility Analysis to Revise Halibut Prohibited Species Catch Limits Amendment 95 to the Gulf of Alaska Groundfish Fishery Management Plan Alaska Region Office, Juneau, AK at 234 (citing concerns about the level of needed analysis, contentiousness and the analytical package needed to implement annual harvest specifications).

produced considerable analysis on the costs of PSC limit reductions to trawl fisheries. The agency's concern with increased contentiousness at the TAC setting process is not a valid reason to further defer action required by federal law. TBC submits that NMFS and the Council must consider a mechanism that minimizes bycatch sooner rather than later. If the implementation of Amendment 95 must wait for several years then it would be appropriate for the NPFMC to provide some direction on incorporating reduced PSC limits as part of the TAC setting process this year.

II. The Council Should Adopt 15 Percent PSC Reduction Levels and Consider More Conservative PSC Limits so That Trawl Fisheries Share the Conservation Burden

The overall purpose of the MSA is to prioritize fisheries conservation over short-term economic interests. In 1996, Congress amended the Magnuson-Stevens Act (MSA) in order to add ecological concerns to the fishery management process. In particular, Congress added bycatch reduction provisions to stop the "inexcusable amount of waste" associated with bycatch and bycatch mortality in our nation's fisheries.⁶ National Standard (NS) 9 thus provides that "[c]onservation and management measures, shall, to the extent practicable, (A) minimize bycatch, and (B) to the extent bycatch cannot be avoided, minimize the mortality of such bycatch."⁷

In evaluating bycatch, the NPFMC must consider the net benefits to the Nation which include "[n]egative impacts on affected stocks, incomes accruing to participants in directed fisheries in both the short and long-term; incomes accruing to participants in fisheries that target the bycatch species; environmental consequences; non-market values of bycatch species, which include non-consumptive values of bycatch species and existence values, as well as recreational values; and impacts on other marine organisms."⁸ The regulations also direct fishery managers to consider how bycatch increases uncertainty about total fishing mortality and how bycatch precludes other more productive uses of fishery resources.⁹ These two issues are particularly pertinent to this PSC limit process.

The proposed action provides for an amendment to the GOA Groundfish FMP that would establish a regulatory process to setting halibut PSC limits.¹⁰ Under Alternative 2, there are two options. Option 1 would retain the existing 2,000 metric ton (mt) trawl PSC limit but write the limit into regulation.¹¹ Option 2 includes several sub-options that reduce PSC in trawl and hook and line fisheries between 5 and 15 percent.¹² Option 1 does not meet the NPFMC's obligation to minimize bycatch. Of the available Option 2 sub-options, TBC supports those that achieve 15 percent reductions as the most responsive to NS-9. However, TBC urges the NPFMC to consider this as an interim measure and ensure that there is a plan to further minimize trawl bycatch in particular. Such a plan would more accurately reflect NS-9's directive to give careful consideration to negative impacts on affected stocks, short and long-term impacts to directed fisheries and recreational values.

⁶ 142 Cong. Rec. S10810 (daily ed. September 18, 1996)(statement of Sen. Stevens).

⁷ 16 U.S.C. § 1862(a)(1); 50 C.F.R. § 600.350(a).

⁸ 50 C.F.R. § 600.350(d).

⁹ 50 C.F.R. § 600.350(b).

¹⁰ NMFS. 2012 at 9.

¹¹ *Id.*

¹² *Id.*

A. Negative Impacts on Affected Stocks: Biological Uncertainties Regarding Stock Size and Strength and Ecological Uncertainties Warrant a 15 Percent Reduction and Plan to Buffer Against Future Contingencies

The GOA FMP states that “bycatch in the groundfish fisheries is principally not a conservation problem, although it can be an allocation problem.”¹³ In light of marked changes over the past decade, that statement is no longer accurate. Bycatch is a conservation issue with allocative implications. The NPFMC has recognized significant conservation concerns pertaining to the long-term sustainability of the halibut resource:

Since the existing GOA halibut PSC limits were established, the total biomass and abundance of Pacific halibut has varied and in recent years the stock has experienced an ongoing decline in size at age for all ages in all areas. Exploitable biomass has decreased 50 percent over the past decade. In recent years, the directed halibut catch limits in regulatory areas 2C, 3A and 3B have declined steadily. From 2002 to 2011 the catch limit for the combined areas 2C, 3A and 3B declined by almost 50 percent and the Guideline Harvest Level (GHL) to the charter halibut sector in Area 2C has been reduced by a similar percentage.¹⁴

The decline in directed fishery harvests shows that PSC limit reductions are necessary for conservation purposes. Groundfish fisheries typically take close to the existing limits but the total estimates are imprecise and likely understated. The negative impacts on the stock biomass and reduced reproductive potential exacerbate the reduced short and long-term yields to directed fisheries.

TBC therefore requests that the NPFMC consider resource uncertainties by selecting the 15 percent reduction level and amending the proposed action with a commitment to further reductions. Magnuson Stevens Act (MSA) regulations mandate that NMFS adhere to a precautionary approach. The regulations reference Article 6.5 of the FAO Code of Conduct for Responsible Fisheries: “[t]he absence of adequate scientific information should not be used as a reason for postponing or failing to take measures to conserve target species, associated or dependent species and non-target species and their environment.”¹⁵

Similarly, NS 6 requires that management measures take into account and allow for variations among, and contingencies in, fisheries, fishery resources, and catches. The implementing regulations provide for a management regime “that includes some protection ... against uncertainties.”¹⁶ The regulations explain that “[b]iological uncertainties and lack of knowledge can hamper attempts to estimate stock size and strength, stock location in time and space, environmental/habitat changes and ecological interactions.”¹⁷ Therefore, fishery managers need to buffer against environmental changes and provide for flexibility to address contingencies such as unexpected resource failures or environmental catastrophes.¹⁸ The public review draft indicates that “[a]ll of the proposed alternatives appear to be consistent with this standard.”¹⁹ TBC disagrees; the status quo certainly does not provide a buffer and even the 15 percent reduction falls well short of measured biomass decline.

¹³ FMP at 87-88

¹⁴ NFMS 2012 at 3.

¹⁵ 63 Fed. Reg. 24212, 24227

¹⁶ 50 C.F.R. § 600.335(b).

¹⁷ 50 C.F.R. § 600.335(c).

¹⁸ 50 C.F.R. § 600.3335(c), (d).\.

¹⁹ NMFS. 2012 at 258.

1. Biological Uncertainties, Environmental Changes and Ecological Interactions: the NPFMC Should Adopt 15 Percent PSC Reductions and Plan for Contingencies

The analysis in the EA identifies significant environmental changes and resource depletions in some areas that are on the verge of failure in terms of maintaining even low levels of sustainable directed fishery harvests. The EA identifies problems such as reduced yield due to reduced recruitment and mortality of adults, out of area or “downstream” impacts where halibut removals in one area reduce recruitment and yield in another area and reduced spawning biomass and egg production.²⁰

One of the most significant questions identified in the EA is the depressed halibut growth rate.²¹ The EA acknowledges that the slow growth rate dynamic has increased the significance of PSC mortality.²² Although density dependence may be the leading cause, it is not clear whether the decline is the result of internal density dependence, the result of density dependence from other flatfish, or whether other environmental factors such as prey changes or depletion and temperature and ocean current changes play a significant role.²³ There are reasons to believe that ongoing research on diet is necessary to better understand the growth rate decline. There is some evidence that there has been a significant dietary shift in the proportion of pollock consumed by halibut.²⁴ The impact of ocean acidification on prey species favored by juvenile halibut is unknown but may be of considerable importance because juvenile halibut rely on calcifying organisms such as shrimp and crab at sensitive early life stages. While depressed growth rates have occurred in the past, there is not enough research to inform when or if there will be a reversal of this current trend.

A related concern pertains to juvenile removals. Nearly three-fourths of the trawl removals (in terms of fish numbers) are less than 26 inches long.²⁵ The risks are significant - the EA acknowledges that “localized reductions of young female halibut can have potentially serious recruitment ramifications.”²⁶ The loss of spawning stock biomass per recruit “has become a more significant portion of the impact of bycatch mortality as halibut size at age has decreased over the past decade.”²⁷ On the other hand, there are significant potential benefits to reducing bycatch of juvenile halibut because increases in total female spawning halibut would double the value of any trawl PSC reduction.²⁸

For these reasons, a PSC limit reduction of 15 percent and a plan for future reductions are necessary buffers until further research produces a more thorough evaluation of the roles of density dependence and other environmental factors in the decline of size at age. The establishment of conservative PSC limits also would work as a buffer by ensuring that more juvenile females mature into the spawning biomass.

²⁰ *Id.* at 62.

²¹ *Id.* at 16.

²² *Id.* at 62.

²³ *Id.* at 16-17,

²⁴ *Id.* at 102.

²⁵ Hare et al. 2011. Potential yield and female spawning biomass gains from proposed Pacific halibut prohibited species catch limit reductions in Gulf of Alaska groundfish fisheries. Int. Pac. Halibut Comm. Report of assessment and Research Activities 2011: 233 - 254.

²⁶ NMFS. 2012. at 59.

²⁷ IPHC Staff. Item 1. Effect of reducing bycatch limits in the Gulf of Alaska on the halibut exploitable biomass and spawning potential, including downstream effects from halibut migration. March 2011 at 2.

²⁸ Hare et al. 2011.

2. Biological Uncertainties and Contingencies in Fishery Resources: A 15% Reduction Will Help to Address Migration Effect Concerns But the NPFMC Should Plan for Further Spatial Proportionality

The NPFMC has recognized the significance of the recent 50 percent decline in the exploitable biomass over the past decade as part of the reason for this action. Directed IFQ fisheries in Areas 2C, 3A and 3B have reduced harvests by nearly 50 percent between 2002 and 2011 in order to meet resource conservation needs.²⁹ The charter fishery in Area 2C has borne a similar burden.³⁰ As shown in the following table, the 2012 harvest is even less and shows a cut of nearly 75 percent for area 2C since 2006 and a 50 percent cut in area 3A since 2008. The point is to further illustrate the NPFMC’s concern with declining harvests because levels of trawl bycatch in the GOA have not declined in any meaningful way over this time period and typically exceed 3 million pounds.³¹

TABLE: DIRECTED FISHERY HARVEST DECLINES

	Sport 2C	Sport 3A	Direct 2C	Direct 3A
2004	2.9	5.6	10.2	25.2
2005	2.8	5.7	10.6	26
2006	2.5	5.3	10.5	25.7
2007	3.	6.3	8.5	26.5
2008	3.1	5.6	6.2	24.5
2009	2.4	4.8	5	21.8
2010	2.0	4.3	4.5	20.5
2011	1.3	4.5	2.4	14.5
2012			2.6	11.9

These figures imply a serious conservation concern and support the decision to impose more stringent PSC limits. The abundance indices for Areas 2C, 3A and 3B further depict steep declines.³² The proposed 15 percent reduction is a good start. However, in order to provide an adequate buffer against resource uncertainties, the NPFMC should plan to recommend limits that are proportional to IPHC reductions in the directed fisheries.

TBC suggests that the NPFMC consider uncertainties about the coast-wide distribution of the halibut resource in establishing PSC limits. National Standard 3 provides that “[t]o the extent practicable, an individual stock of fish shall be managed as a unit throughout its range, and interrelated stocks of fish shall be managed as a unit or in close coordination.”³³ The purpose of the standard is “to induce a comprehensive approach to fishery management” that is not jeopardized when fish live in the waters of more than one jurisdiction.”³⁴ “The geographic scope of the fishery, for planning purposes, should cover the entire range of the stock(s) of fish, and not be overly constrained by political boundaries.”³⁵

²⁹ NMFS, 2012 at 3.

³⁰ *Id.*

³¹ *Id.* at 194.

³² *Id.* at 23 – 25.

³³ 18 U.S.C. 1851(a)(3).

³⁴ 50 C.F.R. 600.320(b).

³⁵ 50 C.F.R. 600.320(b).

It is now known that halibut are a highly migratory stock - in general, juvenile and adult halibut migrate east and south - some for distances of up to 2,000 miles.³⁶ Migration is not simply a harvest issue; it is relevant to the overall coastal distribution of the species. The GOA is the current center of halibut distribution.³⁷ This means that GOA bycatch affects halibut distribution in other areas. TBC attended the April 2012 workshop and at this point it appears that relevant factors such as the full extent of the biomass redistribution and how it will change over time and vary depending on the age and size of the population are unknown. Because Area 3A has a critical role in migration, it is important that the Council consider uncertainties in downstream impacts and adopt conservative PSC limits to buffer against impacts to the coast-wide distribution of the resource.

B. Declines in Resource Availability to Directed Fisheries: NPFMC Should Consider PSC Reductions In Light of Changes in the Economic, Social, and Cultural Value of Downstream Fishing Activities and Changes in the Distribution of Benefits and Costs.

One of the primary flaws of the analysis in the EA was that it minimized economic and social effects on downstream fisheries by failing to take migration into account. TBC therefore requests that the NPFMC consider the economic analysis a work in progress pending further research and decide on PSC limits based on the understanding that the EA's methodology for economic analysis underestimates losses to downstream users.

Instead, the NPFMC should make its decision on PSC limits based on the recognition that the latest migration modeling "indicate[s] considerable impact of out of area U32 mortality on areas eastward of whether the catch occurs."³⁸ For example, in Area 2, upstream PSC mortality has a much greater effect on lost yield than local U32 mortality.³⁹ The recent declines in harvest in these areas have had significant negative economic effects. The NPFMC has had to repeatedly address divisive and destabilizing allocation battles that have compounded the negative economic effects on community stability.

But the consideration of economic impacts in the EA does not squarely address this problem. Instead, it assumes that downstream users "are not affected by the status quo or options that reduce the PSC limits."⁴⁰ TBC's concern pertains to uncertainties regarding how halibut bycatch may impact multi-sector fishery harvests in Areas 2C and 3A and the stability of affected communities. Overall, the current biomass level for Area 2C is the lowest on record and 60% lower than the highest level.⁴¹ For charter operations, regulations have reduced a two fish bag limit of any size, to a one fish limit of any size to a one fish limit of less than 37 inches over a period of just five years.⁴² Even the subsistence harvest has steadily declined.⁴³ Yet the EA minimizes these impacts by specifically excluding migration from its methodology while measuring potential losses to the trawl fleet in the millions of dollars.⁴⁴

In sum, the EA failed to adequately consider downstream impacts of trawl bycatch. It seems highly possible that the current high PSC limit for the trawl fishery is part of the reason TBC clients who enjoy sport fishing for halibut may only catch one small fish. It also seems

³⁶ NMFS. 2012 at 18.

³⁷ *Id.* at 60.

³⁸ *Id.* at 27.

³⁹ *Id.* at 59.

⁴⁰ *Id.* at 61

⁴¹ *Id.* at 51.

⁴² *Id.* at 55

⁴³ *Id.* at 56.

⁴⁴ *Id.* at 62 - 63..

highly possible that the high PSC limit bears some responsibility for the allocation issues that negatively impact community stability. In sum, the NPFMC's effort to take on halibut PSC should involve the development of a better understanding of downstream migration. Until NMFS can prepare a fair assessment of these impacts, the NPFMC should plan to manage trawl PSC cautiously in the interim as a matter of conservation to ensure coast-wide distribution of the halibut resource and as a matter of equity to other halibut resource users.

III. Economic Impact: The Council Should Take a Broader View of the Economic Impacts of the Alternatives and Incorporate Costs to Other Halibut Resource Users

The amendment process should also involve a more thorough analysis of economic impacts that fully incorporates realized and prospective losses by other halibut resource users. TBC finds it necessary to address the economic analysis in both the EA and the Regulatory Impact Review (RIR) in order to reinforce the serious concern that high levels of halibut PSC in the trawl fisheries have already accounted for millions of dollars in losses to affected communities. The explanations given in the EA and RIR for ignoring this issue were not satisfactory and the NPFMC and NMFS need to develop a means to account for real losses to other sectors as you move forward with the PSC limit process.

In general, both the economic impact analysis in the EA and in the RIR measure the cost of the PSC limits to GOA groundfish fisheries in terms of significant foregone gross revenues through a retrospective analysis. But conversely, the discussion seems to marginalize benefits to other resource users in terms of prospective halibut "savings" and entirely ignores the real costs of reduced access to the resource. These measurements yield an unfair comparison of impacts to the respective user groups and further rely on a number of unsupported assumptions.

In particular, the underestimation of costs to other resource users is a significant flaw. There may be uncertainty about who would benefit from savings in actual numbers of halibut and where those savings occur. Despite these uncertainties, reductions in bycatch mortality accrue directly to the directed fisheries. As measured in the EA, each pound of trawl bycatch results in a directed yield gain of .625 pounds.⁴⁵ This means that a 15 percent reduction transfers roughly \$1.8 million to other fisheries based on IFQ fishery values alone.

This is only part of the story. The other 37.5% of trawl bycatch – the U26 component – does not count even though future contributions are greater than their weight when taken as bycatch which deprives the female spawning biomass of 2.2 pounds for every pound taken.⁴⁶ This means a 15 percent PSC reduction could add an additional 418,000 pounds to downstream users – more than the immediate gain from the larger fish. The failure of the EA to measure past, present and prospective foregone revenues to downstream resource users is unfair and inexcusable and skews the analysis toward smaller limits. This one of the reasons TBC requested alternatives that proposed higher PSC reductions in its previous letter – a 50 percent reduction, for example, translates into several million pounds and tens of millions of dollars worth of foregone revenues when measured by IFQ and sport fishery values. The comparisons are not misleading. Directed fisheries have suffered and continue to suffer foregone revenues because the trawl fishery is intercepting a migratory stock.

The RIR shared the EA's fundamental flaw of failing to account for migration modeling and long-term yield gains associated with reduced U26 bycatch. An RIR should be an objective

⁴⁵ NMFS 2012 at 58.

⁴⁶ *Id.*

assessment of costs and benefits of regulatory measurements in terms of both quantifiable and qualitative measurements. But overall, the RIR did not demonstrate a concerted effort to recognize and quantify the lost opportunity costs to sport and directed fisheries that have occurred and continue to occur as a result of GOA halibut removals.

IPHC staff cautioned that Area 2C benefits were understated due to the failure to account for migration.⁴⁷ The RIR stated that it would take additional work to develop models that would determine the value of lost fishery opportunities to IFQ holders and guided sport sectors in Area 2C.⁴⁸ As a result, the RIR also marginalized Area 2C economic impacts to the point of irrelevancy. It then cautioned against making direct comparisons “between potential revenue increases in direct halibut fisheries and projected gross revenue foregone in the groundfish fishery because the estimates were made using different methodologies and assumptions.”⁴⁹

The chosen methods of comparing significant costs to one fleet with minimal benefits to another created a bias toward allowing for high PSC limits for GOA groundfish fisheries. This was unfair and the “additional work” needed to determine lost fishery opportunities to guided sport sectors and directed commercial fisheries must be done. Without this information, it is impossible to make a fair decision because the economic analysis provided compares millions of dollars in losses to the groundfish sector with gains of a few hundred thousand dollars to a portion of the directed fisheries. Because the economic impacts analysis arbitrarily skewed the impacts to other users, the NPFMC should consider PSC limits with the real and substantial economic losses to other fisheries in mind. Because the economic impacts cancel each other out, the NPFMC does not need to accord undue weight to trawl fishery or for that matter any economics in its decision. The NPFMC simply needs to consider whether it is acting under the MSA’s conservation mandate and decide accordingly.

IV. Community and Recreation Impacts

TBC recommends that the Council consider National Standard 8 with specific reference to impacts to halibut dependent communities in deciding on the various sub-options and recommending further reductions. National Standard 8 requires that “[c]onservation and management measures shall, consistent with the conservation requirement of this Act (including the prevention of overfishing and rebuilding of overfished stocks), take into account the importance of fishery resources to fishing communities by utilizing economic and social data based on the best scientific information available, in order to (a) provide for the sustained participation of such communities, and (B) to the extent practicable, minimize adverse economic impacts on such communities.”⁵⁰ To the extent that the Council considers NS-8 with regard to communities with active trawl fisheries, it is important to point out that the statutory text and implementing regulations make clear that conservation efforts are to be the priority and that a focus on economic consequences should not subordinate conservation goals.⁵¹

The EA indicates that NMFS primarily considered adverse economic impacts with regard to vessels constricted by PSC limits and that otherwise, community level impacts would not be discernible.⁵² However, because the economic analysis failed to fully account for impacts to

⁴⁷ NMFS. 2012 at 169.

⁴⁸ *Id.*

⁴⁹ *Id.* at 197.

⁵⁰ 16 U.S.C. § 1851(a)(3).

⁵¹ 50 C.F.R. 600.345(b)(1).

⁵² NMFS 2012 at 258.

sport and directed fishery sectors, there is not enough information to assess the extent to which the Council and NMFS have considered National Standard 8 as it applies to communities that range from Homer to Sitka.⁵³ The programmatic analysis done for the groundfish fishery has not previously considered the groundfish fishery to be detrimental to halibut-dependent communities.⁵⁴ The IPHC has reduced both the harvest rate (Area 3B) and the Area 3A and 3B catch in part because “the inadequate knowledge of bycatch mortality in this area is a primary source of uncertainty in understanding stock dynamics and determination of appropriate yield.”⁵⁵ The NPFMC should not consider adverse impacts to trawl dependent communities as paramount in making its decision on PSC limits. These adverse impacts are offset by adverse impacts to halibut dependent communities. Again, the key criteria for PSC limit reductions should be the need for conservation in light of uncertainties about the long-term sustainability of the halibut population.

Finally, TBC specially notes that the RIR’s refusal to account for migration effect or the yield loss from juvenile removals obscured the value of the guided sport fishery to affected communities. The economic and intrinsic value of sport fishing opportunities must be considered and balanced against the value of a fishery that discards these valuable fish. Congress specifically required fishery management to provide the greatest overall benefit to the nation with particular reference to food production and recreational opportunities with specific recognition for the quality of the sport fishing experience.⁵⁶ There is ample material in the record to support the conclusion that trawl fishing should be curtailed for sociological and environmental reasons and that the amendment would be beneficial to the nation as a whole even though it may cause hardship on the vessels participating in the arrowtooth flounder and sole fisheries.

With this guidance in mind, it is worth pointing out that TBC’s clients spent \$4.5 million in 2011 visiting southeast Alaska and caught 149 halibut with an average weight of 13 pounds. This equates to a value of over \$2,000 per pound, meaning that at this rate the discarded 2000 mt of halibut from the trawl fisheries could represent a loss of hundreds of millions to local economies. Even a more conservative approach yields losses that mirror the prospective losses incurred by the trawlers as a result of higher PSC limits. The charter harvest has dropped by over a million pounds in Area 2C over the last two years, or roughly 50,000 fish. NMFS has previously valued a halibut charter trip at \$225 per day. This translates into \$11,250,000 in economic activity.

It is important to add that visitors to southeast Alaska spend thousands of dollars individually as part of a trip before a halibut is caught. Similarly, commercially caught halibut generates income well beyond its ex-vessel value in ripple effects and benefits several economic sectors before it reaches the dinner plate of a consumer. In essence, the sport fishery generates millions in visitor expenditures before a fish is even caught and the directed commercial fishery generates millions in consumer expenditures after it is caught. When halibut are caught as trawl bycatch, they generate no value before or after capture.

In sum, the NS 8 determination failed to appropriately balance the resource needs and economic contributions of halibut dependent communities. Again, TBC requests that the

⁵³ See 50 C.F.R. 600.345(b)(2)(defining a fishing community).

⁵⁴ 50 C.F.R. 600.345(c).

⁵⁵ IPHC Staff. Item 1. Effect of reducing bycatch limits in the Gulf of Alaska on the halibut exploitable biomass and spawning potential, including downstream effects from halibut migration. March 2011 at 2.

⁵⁶ 50 C.F.R. 602.11(e)(2).

NPFMC consider these interests to the same extent that it considers the interests of communities that receive economic benefits from the trawl fishery in making its decision.

V. Comparison with Other Bycatch Programs: What is Practicable?

NS 9 requires reducing bycatch to the extent practicable. TBC urges the Council to review other bycatch reduction programs that have adopted more ambitious goals. Other trawl fisheries have shown the ability to reduce halibut bycatch well beyond the GOA proposal. Canada set a 1 million pound halibut bycatch mortality cap for its trawl fleet.⁵⁷ It sets bycatch mortality caps by vessel, and vessels that exceed their individual bycatch cap are, with some minor exceptions, restricted to mid-water trawling for the remainder of the fishing year.⁵⁸ Bottom trawl fisheries in British Columbia have averaged just a quarter of a million pounds of halibut bycatch from 2002 to 2011.⁵⁹ The B.C. fishery also changed its fishing practices and achieved a substantially lower discard mortality rate.⁶⁰

The cap for the Pacific Northwest trawl fisheries was a 50 percent reduction and the fleet was able to achieve an 87 percent reduction last year from 2009 estimates.⁶¹ Amendment 80 vessels in the Bering Sea achieved a 40 percent reduction.⁶² Yet in the GOA, the bycatch rate went from 1.95 pounds per metric ton in 1985 to 22 pounds per metric ton in 2008 – a tenfold increase.⁶³ Amendment 95 does not represent the same level of commitment to reducing trawl halibut bycatch as the other programs which raises questions about whether Amendment 95 truly minimizes bycatch to the extent practicable.

TBC thus requests that action on Amendment 95 includes direction to NMFS to conduct a specific analysis of trawl fisheries with the highest bycatch rates and develop specific tools to achieve further reductions on an accelerated schedule. In any given year, target fisheries for arrowtooth flounder (43% of trawl bycatch since 2007), shallow water flatfish (29% of trawl bycatch in 2010) and yellowfin sole can account for over half of the trawl bycatch.⁶⁴ The shallow water flatfish fishery in particular wastes over six million dollars worth of halibut per vessel in order to generate an average ex-vessel value of \$1.3 million. This does not make sense from either an economic or ecological perspective. The EA provides enough information to assess each different fishery according to its levels and rates of bycatch both spatially and temporally. This information should lead to fishery specific bycatch reduction targets. It may be appropriate to consider a broader range of reduction measures such as closed areas, gear modifications and incentives for gear that produces less bycatch.

VI. The Council Should Establish Significant PSC Reductions Because of the Absence of Accurate Data Regarding Past Trawl Halibut Removals and Because the Restructured Observer Program Does Not Adequately Address Specific Coverage Needs

TBC requests that the NPFMC consider the adequacy of existing bycatch data and limitations of the restructured observer program in setting PSC limits. The IPHC believes that current data underestimates actual bycatch levels and the restructured program does not meet

⁵⁷ Fisheries and Oceans Canada, 2011. Pacific Region Integrated Fisheries Management Plan at 38.

⁵⁸ *Id.*

⁵⁹ *Id.*

⁶⁰ NPFMC IPHC Workshop. 2012.

⁶¹ *Id.*

⁶² *Id.*

⁶³ *Id.*

⁶⁴ *Id.*

standards set for trawl fishery observer coverage by other fishery managers. Consequently, the NPFMC should adopt the 15% PSC reduction and plan for further reductions until there is adequate assurance that bycatch data is sufficiently precise to measure impacts.

A. The North Pacific Groundfish Observer Program Has Not Acquired Reliable, Accurate Bycatch Data

Currently, the North Pacific Groundfish Observer Program generally covers vessels greater than 60 feet in length overall (LOA).⁶⁵ Vessels larger than 125 feet must have constant observer coverage and vessels between 60 feet and 125 feet LOA must carry observers on 30 percent of their fishing days.⁶⁶ The majority of the vessels fishing GOA groundfish fit within the 30% observer coverage category.⁶⁷ The EA indicates that information obtained from the observer program is currently the only reliable method for collecting halibut bycatch data.⁶⁸ Further, this data “is assumed to be representative” of vessel activity.⁶⁹

NMFS has identified significant problems with the existing program: “... under the status quo, NMFS cannot determine when and where to deploy observers in the sectors with less than 100% coverage requirements, coverage levels are fixed in regulation, and data gaps exist for sectors without any coverage.”⁷⁰ The current program incentivizes fishing at non-representative locations and times and the length based program incentivizes altering vessel size to address coverage rates.⁷¹ NMFS has recognized that there is significant uncertainty associated with PSC estimates and that there is a significant bias that arises from non-representative distribution of observed catch.⁷² The statistical reliability of the current catch accounting system is undermined by the current non-random observer placement.⁷³

As a result, IPHC scientists have explained that “estimates for these fisheries can be considered to be only a minimum estimate of total halibut mortality.”⁷⁴ The IPHC’s recent harvest rate reductions in area 3B reflect an inadequate knowledge of bycatch mortality as a source of uncertainty in understanding stock dynamics and determining appropriate yield.⁷⁵ In 2010, less than 1% of the shallow-water flatfish catch was sampled by observers.⁷⁶ These data deficiencies create a source of uncertainty in understanding stock dynamics and

⁶⁵ NMFS 2012 at 112.

⁶⁶ *Id.*

⁶⁷ Initial Review Draft, Environmental Assessment/Regulatory Impact review/Initial Regulatory Flexibility Analysis to Revise Halibut Prohibited Species Catch Limits (hereinafter EA/RIR/IFRA). Amendment 95 to the Gulf of Alaska Groundfish Fishery Management Plan May 11, 2011 at 108.

⁶⁸ NMFS 2012 at 248.

⁶⁹ *Id.* at 112.

⁷⁰ NMFS, 2011. Secretarial Review Draft; Proposed Amendment 86 to the Fishery Management Plan for the Bering Sea Aleutian Islands and Proposed Amendment 76 to the Fishery Management Plan for the Gulf of Alaska. Alaska Region Office, Juneau, AK at 141.

⁷¹ *Id.* at 151.

⁷² *Id.*

⁷³ *Id.*

⁷⁴ Williams, G. 2011.

⁷⁵ IPHC, 2011. Effect of reducing bycatch limits in the Gulf of Alaska on the halibut exploitable biomass and spawning potential, including downstream effects from halibut migration at 2-3. March 2011.

⁷⁶ Turnock, B. et al. 2011. Assessment of the Shallow-water Flatsfish Complex in the Gulf of Alaska for 2012, Table 4.A.2.

determining appropriate yield.⁷⁷ The IPHC has specifically sought improved estimation of halibut bycatch mortality in the GOA because of the high ratio of halibut mortality to groundfish catch.⁷⁸

B. The Proposed Restructuring Does Not Provide a Sufficient Level of Observer Coverage to Address Uncertainties Regarding Halibut Bycatch

Monitoring halibut bycatch requires a commitment to coverage levels that provide reliable estimates.⁷⁹ The level of precision needed to measure halibut bycatch is quite high because of resource uncertainties. To address this issue, Areas 2A (Washington, Oregon and California coasts), 2B (British Columbia) and 4 (Bering Sea/Aleutian Islands) all implement 100 percent observer coverage for trawl fisheries.⁸⁰ For example, Canada has a comprehensive, industry funded 100 percent port monitoring program and a joint-industry/Department funded at-sea observer program – 100 percent observer coverage is required except for mid-water hake trips.⁸¹

Amendment 76 to the Gulf of Alaska (GOA) FMP proposes to restructure the observer program to improve the quality of catch data. The Amendments would implement a funding system for observer coverage based on ex-vessel value fees and change existing observer coverage requirements.⁸² Under the Amendments, NMFS would “determine when and where to deploy observers according to management and conservation needs.”⁸³ This approach does not specifically address adequate coverage levels and mandate specific measures to account for the bycatch of halibut. There are also concerns about the feasibility of the funding mechanism. Amendment 76 thus falls short of establishing a standardized reporting methodology that will provide sufficiently accurate data or meet the applicable requirements for a Fishery Management Plan (FMP).⁸⁴ The restructured program incorporates a broader range of catcher vessels but still only provides for partial coverage.⁸⁵ The restructured program sets a desired performance standard (30% coverage) but fails to mandate any particular level of coverage for fisheries with high levels of halibut bycatch.

Chosen levels of coverage “must ensure that the total bycatch estimate is sufficiently accurate and precise for assessment and management purposes.”⁸⁶ The precision of the estimate is function of the size of the sample, the size of the fishery, and the variability of the

⁷⁷ International Pacific Halibut Commission, 2011. Effect of reducing bycatch limits in the Gulf of Alaska on the halibut exploitable biomass and spawning potential, including downstream effects from halibut migration at 2-3. March 2011.

⁷⁸ IPHC 2011 at 2.

⁷⁹ See, e.g. 68 Fed. Reg. 11,510, 11504 (2003).

⁸⁰ Williams, G. 2011.

⁸¹ Fisheries and Oceans Canada, Pacific Region Integrated Fisheries Management Plan, Groundfish, February 21, 2011 to February 20, 2013 at 35 - 37.

⁸² 77 Fed. Reg. 15019.

⁸³ *Id.*

⁸⁴ 16 U.S.C. § 1853(a)(11)(providing that FMPs must “establish a standardized reporting methodology to assess the amount and type of bycatch occurring in the fishery and include conservation and management measures that, to the extent practicable and in the following priority (A) minimize bycatch; and (B) minimize the mortality of bycatch which cannot be avoided”); see also 50 C.F.R. § 600.350(d)(requiring that the agency implement a “review, and where necessary, improvement of data collection methods, data sources and applications of data must be initiated for each fishery to determine the amount, type, disposition and other characteristics of bycatch and bycatch mortality”).

⁸⁵ 77 Fed. Reg. 15020.

⁸⁶ Babock, E. & E. Pikitch. 2003. How Much Observer Coverage is Enough to Adequately Assess Bycatch. Oceana, Washington D.C. at 5.

bycatch. 100% coverage is necessary for trawl fisheries because there are sophisticated in-season management measures that require accurate and timely data about catch and bycatch and because halibut support an important target fishery.⁸⁷ Observers can affect decisions about where to fish, what to target, how to deploy gear and discard practices. This means that bycatch rates from observed trips may not accurately reflect overall bycatch rates and can bias estimates.⁸⁸ The random sampling approach of the restructured program will help to reduce the bias in terms of trip selection, but the bottom line is that observers change fishing behavior. At 100 percent coverage, observers actually then help to minimize bycatch. At 30 percent coverage, even randomized, the data is suspect.

TBC understands that Amendment 76 involves an ongoing and separate process. But its shortcomings are essential to decisions on PSC limits because there is not reliable data on current bycatch levels and the restructured program provides no assurance that it will adequately monitor PSC in the future. It sets no specific coverage level for trawl fisheries with high bycatch rates and relies on a diminishing resource – halibut – as a funding mechanism.⁸⁹ The restructured program does not provide assurance that the total bycatch estimate will be sufficiently accurate to address uncertainties about halibut bycatch levels. Therefore, conservative PSC limits are necessary.

VI. Conclusion and Closing Points

TBC supports efforts by the Council to move forward with addressing the PSC limit but submits that the environmental analysis does not adequately discuss the full costs and benefits to each user sector. As a result, the alternatives considered do not provide the public with the opportunity to review more stringent PSC limits that appropriately respond to uncertainties about the halibut resource, impacts to downstream users and the requirements of the MSA. The issues pertain primarily to conservation but have an allocative element.

The primary concern with trawl bycatch pertains to conservation. However, it has also increasingly become an allocative issue as the stock has dwindled to the point where GOA bycatch levels exceed the harvest of several other user sectors. This decline means that the current PSC limit does allocate fishing privileges to trawl fisheries at the expense of charter, IFQ and subsistence fisheries. NS 4 “sets forth three requirements that must be met whenever an FMP allocates fishing privileges: (i) the allocation must be fair and equitable; (ii) it must be reasonably calculated to promote conservation; and (iii) it must not allocate an excessive share of privileges to any particular group.”⁹⁰ The regulations recognize that every allocation involves some advantage and disadvantage to different user groups and allocations may impose hardships on one group if outweighed by the total benefits received by another group.⁹¹ The key factor in all cases is whether the regulation is designed to promote conservation.⁹² TBC requests that the NPFMC recognize that it is allocating an excessive share of fishing privileges to the trawl fisheries simply by allowing the current limit to remain

⁸⁷ Babcock et al, at 12 (citing Karp and McElderry 1999).

⁸⁸ *Id.* at 7.

⁸⁹ The program will be funded in large part by the halibut IFQ fishery. The average harvest from this fishery went from 65.3 million pounds in 2005 – 2008 to 41.6 million pounds in 2009 – 2012. This creates considerable uncertainty regarding whether basing observer days on ex-vessel revenues would under-fund the program and means there is doubt as to whether even the 30% performance standard would be attained.

⁹⁰ 50 C.F.R. 600.325(a).

⁹¹ 50 C.F.R. 600.325(c)(3)(i)(A), (B).

⁹² *See Factory Trawlers v. Baldrige*, 821 F.2d 1456 (1987); 50 C.F.R. 602.14(c).

in place or by settling for minimal reductions. Therefore, NS-4 strongly favors an approach that reduces existing PSC limits to the greatest extent feasible.

With regard to conservation, NS 2 requires that all FMPs and plan amendments “be based on the best scientific information available.”⁹³ Scientific information “includes, but is not limited to, information of a biological, ecological, economic or social nature.”⁹⁴ In a March 2011 report by IPHC staff, staff explained that the existing “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.”⁹⁵ TBC requests that the NPFMC heed this advice, implement 15 percent reductions and plan for further reductions until existing scientific information is adequate to more thoroughly review the biological, ecological, economic and social impacts of trawl halibut bycatch.

Further, TBC questions the decision to prepare an EA for trawl bycatch rather than an EIS because there has not been an effort to update programmatic findings with respect to the significant changes in the halibut resource. The 2004 PSEIS considered direct, indirect and cumulative effects of the groundfish program on halibut mortality and reproductive success to be insignificant.⁹⁶ The 2007 EIS for the groundfish fishery deferred analysis of impacts to halibut to the TAC setting process. But since 2004, there have been substantial biological and ecological changes, important scientific research on migration and changes in fishery intensity and effort. NEPA documents require supplementation when “[t]here are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.”⁹⁷ The decision to produce an EA was limited to the proposed action but NMFS needed to consider the need for a full analysis of bycatch impacts. TBC suggests that the NPFMC engage NMFS in a discussion of ways to remedy this issue through a supplemental information report or other documentations as part of the Amendment 95 process.

Under these circumstances, in the near term, the Council and NMFS should work to achieve an immediate reduction in the halibut PSC limit for 2012 and 2013. With regard to long-term guidance, the Council should move forward with the 15 percent reductions but should improve the Amendment with a plan for more stringent limits pending the acquisition of a more complete picture of baseline bycatch data and additional scientific research that addresses some of uncertainties regarding the halibut resource.

Sincerely,

Paul Olson

⁹³ 18 U.S.C. 1851 (a)(2).

⁹⁴ 50 C.F.R. 600.315(b)(1).

⁹⁵ IPHC 2011 at 3.

⁹⁶ PSEIS at 4.9-163.

⁹⁷ 40 C.F.R. § 1502.9(c)(1).

Subject: Halibut bi catch
From: Brian and Sue Bochat <chezbochat@gmail.com>
Date: 5/30/2012 6:58 AM
To: npfmc.comments@noaa.gov

Hello,

I was a commercial fisherman in Alaska for over 20 years. Fishing the Bearing sea mostly on draggers and trawlers. I also long lined the gulf, and fished Bristol bay.

The Halibut bi catch in the Bearing sea, specifically around Akutan, is (or, was) outlandish. It was one reason I quit commercial fishing. My back muscles bulged after 4 months of shoveling juvenile halibut and countless other young flat fish over the side dead. It was our biggest job on the dragger I was on. Sometimes taking hours. We are talking a lot of dead flat fish on every haul. 30-40 thousand pounds, 3-4 times a day. Multiply that by the fleet size and We were in a fleet of around 65 boats. (+- 1995). We were reeking havoc on a nursery area of the Bearing sea. How can a resource take on that kind of assault? How, as a fisherman and conservationist, could I rationalize destroying so many young fish. The crab bait theory only goes so far. So, I quit. Cold turkey. Haven't been back since.

I also worked the factory trawlers in the Bearing sea. They run a pretty clean fishery, except when it comes to Chinook salmon. We would catch Chinook in almost every haul back. Sometimes only a few, or even one. But, multiply that by the size of the fleet, and here you have another serious bi catch problem.

I fished Bristol bay for 19 seasons. Back in the old days (early 80's), we would catch a lot of Kings. Sometimes thousands of pounds during an opening. Now, there seems to be hardly any Kings.

I spoke with a friend currently fishing in Prince William sound, and he has seen very few Kings this season or last.

As cook on the boat, one trick was to feed the NFMS observer a prohibited species the very first haul back. At least then we could eat fresh halibut and Chinook on the boat. Most were so sea sick they could barely function.

I have fairly good journals of that time and over 20 years of fishing. If I can be of any assistance, please let me know.

Sincerely, Brian Bochat

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: David Kreiss-Tomkins <d_kreiss-tomkins@riseup.net>
Date: 5/29/2012 2:33 PM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

When I was young I remember my father and I were able to go out and catch halibut for our freezer. Occasionally, we caught one of those huge ones. Now there is no halibut for the freezer, not to mention no excitement in bringing home and filleting a big fish. I had always heard about the conflict between charter and commercial halibut fisheries, but not about trawling bycatch. Why hasn't this been addressed earlier?

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

David Kreiss-Tomkins
805 Charles St.
Sitka, AK 99835

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Thomas Henehan <tom.henehan@alyeska-pipeline.com>
Date: 5/25/2012 9:00 AM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Thomas Henehan

AK 99508

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: KC Elliott <Writingtoclarity@gmail.com>

Date: 5/25/2012 9:00 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

KC Elliott
2151 w 80th ave
Anchorage, AK 99502

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Stanley Kaneshiro <stanleykaneshiro@yahoo.com>
Date: 5/25/2012 9:00 AM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely, Stanley Kaneshiro, Kenai

Stanley Kaneshiro
404 Jefferson St
Kenai, AK 99611

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Kiril Basargin <fv.oceanranger@gmail.com>

Date: 5/25/2012 9:01 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 42 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 42 percent.

Sincerely,

Kiril Basargin
P.o Box 2395
Homer, AK 99603

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Larry Casey <icsteelhead@gmail.com>

Date: 5/25/2012 9:12 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Larry Casey
12428 Winter Park Circle
Eagle River, AK 99577

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Elvira Paschke <Verapaschke@hotmail.com>
Date: 5/25/2012 9:13 AM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Elvira Paschke
2401 Redwood St.
Anchorage, AK 99508

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Brian Hewitt <hewittbm@yahoo.com>

Date: 5/25/2012 9:35 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Brian Hewitt

Fairbanks, AK 99708

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: De Patch <depatchalaska@gmail.com>

Date: 5/25/2012 9:43 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

De Patch
39042 Cannonball Cir
Homer, AK 99603

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: floyd elterman <floyd.elterman@yahoo.com>
Date: 5/25/2012 9:44 AM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

floyd elterman
690 keeling road
north pole, AK 99705

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: bonnie bromley <comatose tomatoes@yahoo.com>

Date: 5/25/2012 8:47 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

bonnie bromley
827 peterson st
ketchikan, AK 99901

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: "Dorothy E. Cuadra" <cuadra@gci.net>

Date: 5/25/2012 10:02 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

I live in Juneau and like to be able to buy one halibut from a local fisherman each summer, for my freezer and family food. I am not related to anyone in the charter fishing business. I just want your help to decrease the terrible waste of fish including halibut.

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent at least.

Sincerely,

Dorothy E. Cuadra
P.O. Box 33678
Juneau, AK 99803

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: John Sharrer <jsharrer@gmail.com>

Date: 5/25/2012 8:52 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

John Sharrer
35521 n fork road
anchor point, AK 99556

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Connie Newman <canewman@hotmail.com>

Date: 5/25/2012 8:56 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Connie Newman
Box 56
Pelican, AK 99832

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Rivkah Stansfield <s.rivkah@gmail.com>

Date: 5/25/2012 8:59 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Rivkah Stansfield
322 Muldoon rd.
Anchorage, AK 99567

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Renae Thompson <renaejthompson@yahoo.com>
Date: 5/25/2012 10:07 AM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Renae Thompson
9731 Vanguard Dr Apt 16
Anchorage, AK 99507

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: April Warwick <awarwick@ak.net>

Date: 5/25/2012 10:14 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

April Warwick
5716 Kennyhill Drive
Anchorage, AK 99504

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Deborah Voves <dkvoves@gci.net>
Date: 5/25/2012 10:22 AM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Deborah Voves
13231 Mountain Pl.
Anchorage, AK 99516

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Lynn Wilbur <kalei.lw@gmail.com>

Date: 5/25/2012 10:43 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Lynn Wilbur
617 Katlian Street
Sitka, AK 99835

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Mim McConnell <sheltercovepublishing@gmail.com>
Date: 5/25/2012 10:44 AM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Mim McConnell
215 Smith St Apt G
Sitka, AK 99835

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Jeanne Friedman <jeannefriedmanak@gmail.com>
Date: 5/25/2012 10:42 AM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

I STRONGLY support reductions in the Gulf of Alaska halibut bycatch.

As a long-time Alaskan resident, I urge you to take action and support this petition request. Our Alaskan waters are a VERY precious resource which contain a very valuable ecosystem.

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

While it is critical that the Council take meaningful final action now and reduce Gulf of Alaska halibut bycatch by at least 15%, I highly recommend the bycatch amount be reduced by 25%.

Thank you.

Jeanne Friedman

Jeanne Friedman
1534 D St.
Anchorage, AK 99501

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Hayden Kaden <kaden@prodigy.net.mx>
Date: 5/25/2012 10:49 AM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Hayden Kaden
P.O. Box 138
Gustavus, AK 99826

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Jef Harvey <wrogn@yahoo.com>

Date: 5/25/2012 11:08 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Jef Harvey
13145 S Old Glenn Hwy
Palmer, AK 99645

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Charles Bingham <Cbingham@ptialaska.net>

Date: 5/25/2012 11:21 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Charles Bingham
404 Etolin Way, Apt. No. 1
Sitka, AK 99835

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Lynnda Strong <lynndastrong@gmail.com>

Date: 5/25/2012 11:31 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Lynnda Strong
2309 Halibut Point Road, #34
Sitka, AK 99835

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Will Files <will@wfiles.us>

Date: 5/25/2012 11:33 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Will Files
59835 Tern Ct
Homer, AK 99603

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: william h <elektrikbill@yahoo.com>

Date: 5/25/2012 12:25 PM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

william h
pob 877979
wasilla, AK 99687

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: D Roy Mitchell IV <droymitchell@gmail.com>

Date: 5/25/2012 1:00 PM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

D Roy Mitchell IV
4820 Topaz Ave #3
Anchorage, AK 99502

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Laurie Smith <laurie_smith@hotmail.com>

Date: 5/25/2012 1:16 PM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Laurie Smith
Lawrence
Grand Blanc, MI 48439

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Gage Dierkes <gage@dierkes.net>

Date: 5/25/2012 1:21 PM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

I strongly support reductions in the Gulf of Alaska halibut bycatch. Allowing trawling style fishing is not sustainable and very irresponsible in terms of fishery management.

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protecting local jobs.

Again I urge the Council to reduce the halibut bycatch by 15 percent at least. Please support local Alaskan fisher people and help them stay afloat despite the pressures of the cannery style fishing boats.

Sincerely,

Gage Dierkes
53989 Kilcher Rd.
Homer, AK 99603

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Inger MacRae <ingermacrae@mac.com>

Date: 5/25/2012 1:46 PM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Inger MacRae
9331 Shorecrest Drive
Anchorage, AK 99502

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Ken Gibb <kengibb@gmail.com>

Date: 5/25/2012 2:00 PM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Ken Gibb
11160 Vosikof Place
Anchorage, AK 99507

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Stan Stephens <stan@stephenscruises.com>

Date: 5/25/2012 2:04 PM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Stan Stephens
342 Robe River Drive
Valdez, AK 99686

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: robert bell <dpagester@gmail.com>

Date: 5/25/2012 2:46 PM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,
robert bell

robert bell
box 115
elfin cove, AK 99825

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Elizabeth Dalgetty <elizabeth.dalgetty@gmail.com>
Date: 5/25/2012 2:51 PM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Elizabeth Dalgetty
South Street
Houston, AK 99501

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Tina Brown <ZeroBridgeWon@aol.com>

Date: 5/25/2012 3:49 PM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Tina Brown
19400 Beardsley Way
Juneau, AK 99801

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Mo Nolan <maureenolan@hotmail.com>

Date: 5/25/2012 5:25 PM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Mo Nolan

AK 99752

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Giovanna villani <giovannaprimatas@yahoo.com.br>
Date: 5/25/2012 5:28 PM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Giovanna villani
sao paulo
sao paulo, WY 23029

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Yarrow Crewdson <blackravenflower@hotmail.com>
Date: 5/25/2012 5:39 PM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Yarrow Crewdson
1357 Elmore
Anchorage, AK 99501

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Megan Sharkey <megan.sharkey@gmail.com>
Date: 5/25/2012 5:42 PM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Megan Sharkey
4252 Reka Dr
Anchorage, AK 99508

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Walter Kloepfer <w.kloepfer@yahoo.com>
Date: 5/25/2012 5:42 PM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Walter Kloepfer
1210 Gull Road
Fairbanks, AK 99712

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Paul Rioux <fellswoop@hotmail.com>

Date: 5/25/2012 6:15 PM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Paul Rioux
211 Kimsham St
Sitka, AK 99835

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Joanie Merritt <merritt.joanie@gmail.com>

Date: 5/25/2012 6:30 PM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Joanie Merritt
413 3rd Ave.
Seward, AK 99664

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: "Peter J. Keiser" <peterjkeiser@yahoo.com>
Date: 5/25/2012 7:09 PM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Peter J. Keiser
North Douglas I.
Juneau, AK 99802

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Patrick Baron <pat2com@gmail.com>
Date: 5/25/2012 7:54 PM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Patrick Baron

Montreuil, AK 99901

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: "M.J. Lord-Wild" <mjlw@hughes.net>

Date: 5/25/2012 8:31 PM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989. It is time for them to share in the conservation of halibut

Reducing bycatch is critical to conserve and rebuild the halibut resource, and preserve the fishermen of small Alaska villages like mine.

Again I urge the Council to reduce the halibut bycatch by at least 15 percent.

Sincerely,

M. J. Lord-Wild

M.J. Lord-Wild

Elfin Cove, AK 99825

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Robert chevalier <workisart@yahoo.com>

Date: 5/25/2012 8:45 PM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Robert chevalier
2101 Valley Rd #8
Sitka, AK 99835

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: John Schwartz <jschwartz@compustar.com>
Date: 5/25/2012 9:30 PM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

John Schwartz
801 E. 82nd Ave D1
Anchorage, AK 99518

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Jason Mears <lunaticraven@hotmail.com>
Date: 5/25/2012 11:08 PM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Jason Mears
126 B Wolff Drive
Sitka, AK 99835

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Miriam Dunbar <jumpmelody@yahoo.com>
Date: 5/26/2012 5:34 AM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Miriam Dunbar
219 Princess Dr.
Fairbanks, AK 99701

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: susan bright <sbright40@hotmail.com>

Date: 5/26/2012 6:53 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

susan bright
2246 maudest pl
anchorage, AK 99508

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Charles E Wilber <cwilber@gci.net>

Date: 5/26/2012 7:26 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Charles E Wilber
705 Etolin
Sitka, AK 99835

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Brian Vincent <brianinalaska@gmail.com>

Date: 5/26/2012 8:16 AM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Brian Vincent
2323S.Gray Birch Cir.
Wasilla, AK 99654

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Amy Peloza <Amy.peloza@gmail.com>
Date: 5/26/2012 10:17 AM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Amy Peloza
4431 Edinburgh Drive
Anchorage, AK 99502

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: joann varner <shmu@mtaonline.net>

Date: 5/26/2012 12:46 PM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

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Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

joann varner
po box 3336
palmer, AK 99645

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: rudy wittshirk <fromtheland@mtaonline.net>
Date: 5/26/2012 2:47 PM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

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Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

rudy wittshirk
mile 11 Hatcher Pass rd
w, AK 99688

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Jennifer LaRoe <jalaroe@yahoo.com>
Date: 5/26/2012 2:52 PM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent. Be fair to the fishermen and women of my community and make reductions equitably to all involved in a fishery reduction.

Sincerely,

Jennifer LaRoe
5134 Glacier Hwy
Juneau, AK 99802

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Amy Peloza <Amy.peloza@gmail.com>
Date: 5/27/2012 11:58 AM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

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Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Amy Peloza
4431 Edinburgh Drive
Anchorage, AK 99502

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: NINA GONDOS <ninaninettev@hotmail.com>
Date: 5/27/2012 3:19 PM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

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Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

NINA GONDOS
27 STRAWBERRY RD
ANCHORAGE, AK 99502

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Rebecca Goodrich <scribing@hotmail.com>
Date: 5/27/2012 4:30 PM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

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Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Rebecca Goodrich
9607 Musket Ball Circle
Anchorage, AK 99507

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Ruth Sheridan <ruth.sheridan@hotmail.com>
Date: 5/27/2012 4:32 PM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

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Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Ruth Sheridan
4704 Kenai Ave.
Anchorage, AK 99508

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Laurie Heckman <laurie.heckman@gmail.com>
Date: 5/27/2012 8:29 PM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

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Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Laurie Heckman
po box 182
valdez, AK 99686

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Clint Johnson <kaiwik@hotmail.com>
Date: 5/28/2012 10:00 AM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

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Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Clint Johnson
1210 E Rezanof
Kodiak, AK 99615

Subject: Reduce the Gulf of Alaska halibut bycatch cap

From: Sue Johnson <scjohnson@gci.net>

Date: 5/28/2012 4:52 PM

To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Sue Johnson
2131 Belmont Drive
Anchorage, AK 99517

Subject: Reduce the Gulf of Alaska halibut bycatch cap
From: Angelika Fey-Merritt <afmge@earthlink.net>
Date: 5/28/2012 11:56 PM
To: npfmc.comments@noaa.gov

Dear Chairman Olson:

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

As you know, the halibut population has declined over the past decade. Because much of this decline is the result of bycatch from trawling, the Council should reduce halibut bycatch by 15 percent.

Gulf of Alaska commercial catch limits have been reduced 60% and Southeast charter catch limits have been reduced 34%, in order to help preserve stocks. But trawl bycatch caps have not been reduced since 1989.

Reducing bycatch is critical to conserve and rebuild the halibut resource, and protect Alaska's fishermen.

Again I urge the Council to reduce the halibut bycatch by 15 percent.

Sincerely,

Angelika Fey-Merritt
1600 Beaver Pl
Anchorage, AK 99504