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December 31, 2010

International Pacific Halibut Commission
2320 W. Commodore Way Suite 300
Seattle, WA 98199-1287

Dear IPHC Commissioners,

As you are aware, Area 2C catch limits have been reduced by 58% over the past five years, with a staggering 47% reduction recommended for 2011. Area 3A catch limits have also been steadily reduced over the past three years, with an additional 23% reduction recommended for 2011. While the reductions have been economically devastating for many 2C and 3A fishermen, the commercial fleet has adhered to limits set by the Commission. The same is not true of the halibut charter industry in Area 2C, where the sector has exceeded its Guideline Harvest Level (GHL) every year since 2004 when 2C and 3A GHLs were implemented. In 2C charter operations have overfished the GHL by 22-115%. This chronic overharvest on a depressed stock is unacceptable.

The Halibut Coalition calls on the IPHC Commissioners to take effective action to restrict the 2011 2C halibut charter harvest to the domestically established GHL.

In 2004, the North Pacific Fishery Management Council (“Council”) approved a GHL that was 125% of the then existing charter harvest. The GHL was set after years of public testimony, stakeholder meetings, careful analysis, and Council debate. The Council stated: “It is the Council’s policy that the charter vessel fishery should not exceed the GHL.” Since then, the charter industry’s overharvest above its GHL in Area 2C has totaled 3.7 million pounds. In letters to the Council the IPHC has stated: “The lack of compliance with the GHL targets will exacerbate the present conservation problem.... The increased charter catch will delay the rebuilding of the Area 2C resource....” Yet the overharvest will continue in 2011 unless the IPHC recommends effective harvest control measures.

Alaska Longline Fishermen’s Association • Cordova District Fishermen • Deep Sea Fishermen’s Union •
Fishing Vessel Owners Association • Halibut Association of North America • Kachemak Bay Fisheries
Association • North Pacific Fisheries Association • Petersburg Vessel Owners Association • Sea Food
Producers Cooperative • Southeast Alaska Fishermen’s Alliance • United Cook Inlet Driftnetters Association
• United Fishermen’s Marketing Association • United Southeast Alaska Gillnetters Association

In 2008 the Council approved a Catch Sharing Plan (CSP) that established percentage based sector allocations that rise and fall with abundance. The CSP also contains additional harvest implementing the CSP, NMFS has indicated the CSP will not be in place until 2012. In the absence of additional restrictions, the charter sector can be expected to exceed the 2011 GHL by approximately 500,000 pounds. Coalition members remind the Commission that the estimated 2010 2C sport harvest (charter and unguided) is 2.54 million pounds; the staff's 2011 2C commercial catch limit recommendation is 2.33 million pounds. The resource CANNOT withstand another half million pound overharvest. On behalf of the Halibut Coalition's subsistence, sport, and commercial harvester and processor members, we urge the Commission to restrict 2C charter harvest to the GHL in 2011, and to urge NMFS to ensure the CSP is implemented no later than 2012.

Thank you for the opportunity to comment.

Sincerely,



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Cordova District Fishermen United



Buck Laukitis
North Pacific Fisheries Association



Jeff Stephan
United Fishermen's Marketing Association



Julianne Curry
Petersburg Vessel Owners Association



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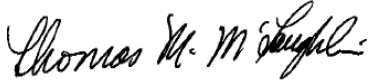
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