



UNITED FISHERMEN OF ALASKA

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August 26, 2013

Glenn Merrill, Asst. Regional Administrator
Alaska Region, NMFS
Attn: Ellen Sebastian
PO Box 21668
Juneau, AK 99802-1668

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

Dear Mr. Merrill,

United Fishermen of Alaska (UFA) is the statewide trade association representing 36 commercial fishing organizations from fisheries throughout Alaska and the federal Exclusive Economic Zone offshore.

UFA supports the catch sharing plan (CSP) for Pacific Halibut. This is a compromise solution that addresses identified problems by establishing a clear allocation between the charter and commercial setline sectors and creating a mechanism for market-based inter-sector transfers.

The CSP will replace the current Guideline Harvest Level (GHL) halibut charter management system. GHL management relies on end of season assessment of charter catch to trigger management adjustments, and has proven ineffective at controlling charter harvest to within the GHL (the Area 2C charter industry has exceeded its allocation from 2004). The CSP establishes a proactive and timelier management system while still meeting the charter industry demand for a continuous season of historic length and consistent bag limits throughout the season. The CSP assigns both charter and commercial sectors with percentage based allocations, ensuring that both sectors "share in the benefits and costs of managing the resource for long term sustainability." The CSP is a conservation-based management action designed to protect the resource from overharvest and balance the needs of all who depend on halibut for sustenance or livelihood.

The CSP allocation is fair and equitable based on a number of factors.

- The allocation sets a definitive allocation for each sector;
- The allocation is tied to the health and abundance of the resource so both sectors share equally in the burden of conservation in times of decline and times of abundance;
- The charter sector receives a higher percentage during times of very low abundance;
- The differences between Area 2C and 3A are recognized and the two areas are treated slightly differently as described in the analysis.
- The Council relied on historic catch information in setting the allocation split;
- The CSP provides for market-based inter-sector transfers of commercial quota into Guided Angler Fish (GAF). GAF can be harvested by charter clients and can be of any size.

The GAF program is the first step towards a fair compensated market-based reallocation between sectors and as such is supported by our membership. GAF fish would be used when the CSP management measures are restricted to less than two fish of any size. UFA appreciates changes from the 2011 Proposed Rule that require measurement of all fish retained as GAF and use the average weight of the GAF fish from the previous year for the conversion. The size and weight of halibut harvested in the GAF program is likely to be larger than halibut harvested from the common pool, and average sizes must be tracked separately.

United Fishermen of Alaska testified in October of 2008 to the NPFMC. At that time we stated, "*United Fishermen of Alaska (UFA) supports final action on the catch sharing plan.*

Action on the catch sharing plan meets the objective of the problem statement and meets three simple goals:

- *Establishes a clear allocation between charter and longline sectors with sector accountability,*
- *A responsive management system with proactive accountability measures.*
- *A mechanism for limited transfer of quota share between sectors."*

UFA believes that this plan still meets the three simple goals above that we testified to.

The Halibut Catch Sharing Plan meets the stated objectives of the Council and the International Pacific Halibut Commission to sustainably manage the halibut stock and provide a limited transfer of quota between the commercial and charter sectors. United Fishermen of Alaska supports the CSP and urges timely approval for 2014 implementation. We firmly oppose any further extensions of the comment period or efforts to further delay implementation.

Sincerely,



Julianne Curry
Executive Director