



Alaska Longline

FISHERMEN'S ASSOCIATION

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North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501

September 24, 2008

Dear Chairman Olson and Members of the Council,

I am submitting these comments to you on **Agenda Item C-1: 3A GHL Management Measures** on behalf of the Alaska Longline Fishermen's Association.

Recently released information indicates that the 3A charter fishery has now exceeded in guideline harvest level by 9.6%, triggering the need for immediate implementation of effective harvest restrictions to protect the resource and other halibut sectors from charter overharvest. As the Council is well aware, delaying action creates the explosive conflicts that are now tearing apart Southeast communities. Council action on this issue has been noticed to the public, discussed by the Council and now the Council must act.

In crafting management measures, ALFA urges the Council to clarify its intent to PREVENT future GHL overages by implementing effective and proactive management measure using the best available information and most timely and responsive process. It is also essential that the Council clarify that resource conservation and effective management depend on managing sectors to their allocations, and that allocation overages place at risk the resource and other fishermen who depend on the resource for food, sport or livelihood. The charter Plaintiffs from the 2008 2C GHL lawsuit have illustrated the extent (and the expense) to which they will go to overturn Council recommendations, seizing on technicalities that subvert Council intent. For this reason, it is imperative that the Council not only clarify its intent in taking action, but direct the staff to revise the 3A GHL analysis to correctly reflect this intent.

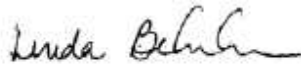
The management options indicated by a 10% overage include an annual limit and a limit on the size of the second fish. Because all charter indices establish that charter halibut harvest can be expected to increase unless restricted, the Council should also evaluate the need for measures that would accomplish a more significant catch reduction, such as the one fish bag limit for all or part of the season. The Council must also take into consideration that the size restriction on the second fish, which has been in place in 2C for the past two years, has been far less effective at limiting charter harvest than was projected. Either it fails as a management tool, or enforcement has been inadequate to

ensure its effectiveness. After hearing the staff presentations on the re-evaluated effectiveness of the various management options, we will provide the Council with our more specific recommendation.

In closing, ALFA supports the Council in its commitment to managing all commercial halibut sectors, setline and charter, to established catch limits and urges immediate action to implement effective charter harvest control measures in area 3A. We urge the Council to clarify that resource conservation and effective resource management depend on **preventing** annual catch limit overages and to direct staff to capture this intent in the analysis.

Thank you for the opportunity to comment.

Sincerely,

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

Linda Behnken
(Director, ALFA)