

MEMORANDUM

TO: Council, SSC and AP Members  
FROM: Clarence G. Pautzke  
Executive Director  
DATE: April 15, 1999  
SUBJECT: Halibut Charter GHL

ESTIMATED TIME  
4 HOURS

**ACTION REQUIRED**

Review GHL/moratorium discussion paper and give staff direction for analysis.

**BACKGROUND**

In December 1997, NMFS notified the Council that its GHL approved in September 1997, could not be implemented without companion measures to control halibut charter catches. The Council then formed the GHL Committee to develop measures that would be triggered once the GHL was exceeded. The Council approved the committee's recommendations with minor revision in April 1998 and requested a discussion paper from staff. The committee reviewed the discussion paper on January 12, 1999, and revised the alternatives, which now incorporate a new proposal from the State of Alaska, and other staff recommendations.

There have been several iterations of alternatives. On page 5-6 in the discussion paper is the Council's list from April 1998. Page 20 has a suggested revision. The GHL Committee minutes of January 12, 1999 have further revisions. The most current set of alternatives, that we will use as a point of departure at this April 1999 meeting, is that recommended by the AP in February and sent out with the newsletter as attachment 2. That list, along with comments of the AP and SSC, directly follows this action memo as Table 1. Item C-1(a) has the remaining materials from February including the discussion paper, committee minutes, State of Alaska proposal, preliminary results from the 1998 charter vessel logbook program, and public comments .

The Council needs to review the above materials, and the IPHC comments under Item C-1(b), and then decide which alternatives to analyze. Initial review is scheduled for October and final action in December. The Council needs to give staff direction on the following issues.

Best Available Data

In its October 1997 approval of the GHL, the Council recommended developing a halibut charter logbook to collect information that was unavailable in the original charterboat analysis. In 1998, ADF&G Sportfish Division instituted a charter vessel logbook program for a variety of saltwater fish, including halibut. The 1998 logbook program results are summarized in Item C-1(c), which is in your supplemental folders. Tables 3, 5, 8, and 9 are particularly relevant to the GHL/moratorium discussion.

To keep the timeline for initial review in October 1999, the Council may choose to recommend using 1998 logbook estimates or 1997 statewide harvest survey (SWHS) estimates in the analysis. The 1998 SWHS results

will not be available until September 1999. Insufficient time is available to compare the 1998 logbook and SWHS, prepare the analysis using the data set identified as being the best estimator of charter removals, and send the document out for initial review in October.

The Sportfish Division intends to complete three years of comparisons between logbook data and independent estimates provided by the division's creel surveys and SWHS project before reaching any conclusion about the accuracy of the logbook reports. The first step in this process of validation of participation and harvest values will not be completed until fall 1999 when the estimates from the SWHS project will be completed. Until the division has completed three years of comparisons, information from the logbooks should be used with some caution.

For the analysis, ADF&G staff recommends that the Council use the 1998 logbook data as the best information available (the only data currently available for 1998) and reevaluate the GHM program as the data are revised. Following the Council's current timeline, validation of the 1998 logbook data will not occur until after our initial review of the GHM analysis in October 1999. A comparison of the two survey vehicles may be possible between initial review and final action; however, it is unlikely that the alternatives could be completely re-analyzed by the December 1999 meeting. It should be noted that the two surveys may differ enough to significantly alter the outcome of the analysis. The Council may find itself faced with final action on an analysis of one set of data and possibly inconsistent results from the two surveys.

The issue of best available data could be resolved by allowing sufficient time for logbook data validation to be made prior to development of the analysis. ADF&G staff could report to the Council in October on the results of the comparison. Preliminary results of the 1999 logbook program may also be available then. Two additional State reports prepared this summer could also be incorporated into the analysis. A draft report of the recreational halibut fishery in Southcentral Alaska (Area 3A) that summarizes the harvest composition from the 1994-97 fisheries will be available in August 1999; the last published report was for the 1993 season. Additionally, vessel-specific harvest and effort information from the on-site creel survey could be compared with individual vessel logbooks.

Initial review and final action could be scheduled for December 1999 and February 2000. This schedule will not impede the ability of NMFS to implement the necessary regulations for 2001. It has been the Council's previously stated intent that any management measures necessary to keep the charter harvests under the appropriate GHM become effective only at the beginning of a season.

Should the Council decide to proceed with analysis over the summer, it may wish to consider the following pros and cons to using each data set in the context of the GHM and moratorium analyses.

#### 1998 Charter Vessel Logbook

- Pro:
- is recommended by ADF&G staff to be the only current data to provide an accurate estimate of harvest, in the absence of the 1998 SWHS results.
  - may be able to compare with 1998 mail survey results prior to final action in December 1999.
- Con:
- first year of data collection may have some start-up problems.
  - may not have captured all known (via CFEC licenses, IPHC licenses, etc.) licensed charter operators.
  - estimates have not been compared with SWHS results.

### 1998 Annual Mail Survey

- Pro: • will provide the most current estimate of harvest using a data set consistent with the collection methodology that was the basis for the Council's 1997 decision.
- Con: • data not available until September 1999.

### 1997 Annual Mail Survey

- Pro: • uses the same data collection methodology as was used to determine catch in 1995; less sampling bias.
- Con: • using 1998 data may be more appropriate; however that would require rescheduling initial review to December 1999.

### 1995 Annual Mail Survey

- Pro: • is the basis for the October 1997 Council decision to approve the GHL.
- Con: • no longer the most current information available upon which to base an allocation.
- current charter landings, based on 1998 logbook data, may exceed the GHL in Area 2C.

A second data issue arises once the comparison between the SWHS and logbook occurs and the decision is made as to which data set to use. The original charterboat analysis is based on estimates from the 1995 SWHS. A decision to use the 1998 logbook estimates to measure the charter harvests against the GHL may introduce sampling bias (mixing apples and oranges). As stated above, we don't yet know whether using the logbook estimates against the SWHS-based GHL is appropriate. However, updating the GHL concept to use the 1998 logbook data as the base year may require additional analysis. If ADF&G decides to monitor the halibut harvests under a GHL using logbook data in the future, it may be best to base the initial allocation on the same data collection methodology (i.e., the 1998 logbook data). This additional analysis could be incorporated between now and October or December 1999.

### Separation of Moratorium from Other Harvest Controls

As you will recall, the Council approved a control date of April 27 last year and, based on recommendations from the GHL committee and in public comments, added a proposed moratorium to the list of alternatives. The control date of June 24, 1998, was finally published as an Advanced Notice of Proposed Rulemaking in the Federal Register on that date.

The moratorium may help address overcapitalization in the long run, but in the near to mid-term, it will do little to control charter vessel harvests. Therefore, the staff suggests that the Council consider making any proposed moratorium, area-wide or local, a stand-alone alternative (#5), and remove it from the other alternatives. Local moratorium options are being considered by the Board of Fisheries on a different schedule. Additionally, separating the moratorium would simplify and speed the analysis of the remaining alternatives.

The moratorium issue is further complicated by the State of Alaska's opposition to state-wide or area-wide moratoria. The State has indicated its support of local moratoria in the local area management plan process. An issue of whether an area-wide or LAMP-level moratoria would have precedence remains unresolved and further complicates any moratorium analysis. The State LAMP process is on hold while the Council debates area-wide moratoria, and the Council development of a moratorium is confounded by the separate Board of Fisheries initiative.

One issue involving best available data as discussed above is affected by the Council's recommendation on the moratorium issue. The main qualification criteria in the current list of proposed alternatives for a moratorium

require a 1998 logbook as a minimum qualification criteria. The 1998 logbook report identified approximately 1,250 vessels that were licensed in Southeast Alaska in 1998 by CFEC, but ADF&G issued logbooks to only 910 vessels, and 607 logbooks were returned indicating "active" vessels. Similarly, in Southcentral Alaska, approximately 1,320 vessels had 1998 CFEC licenses, but only 655 vessels were issued logbooks, and 515 logbooks were returned. While active sport charter vessel owners were required by ADF&G to obtain logbooks, staff has concerns about public notification and the potential for appeals by owners of vessels who did not contact ADF&G for a logbook, as required by regulations for sportfishing guides. We continue to receive calls from both active and inactive (in 1998) charter vessel owners regarding this criterion.

To finalize the preliminary 1998 data, ADF&G imposed a cutoff of January 7, 1999, for receiving 1998 logbooks; there are 1998 logbooks that have been submitted but are not included in the ADF&G report. This cut-off also serves to discourage late-reporting or speculation by truly inactive vessel owners. A deadline of January 15, 2000 is now listed on the 1999 logbooks. Staff has concerns about falsification of logbooks, slightly upwards (one logbook could potentially qualify an inactive vessel in a proposed moratorium) and downwards (from under-reporting halibut harvests from active vessels misreporting to keep the fleet under the GHL). Resolution of the State vs. Federal moratorium issue and the development of an adequate database upon which to make such a decision may be to separate the moratorium analysis from the GHL analysis entirely since they address two separate management issues.

TABLE 1

Halibut Charter GHL Management Alternatives

As recommended by the Advisory Panel

February 1999

**Alternative 1:** Status quo. Do not develop regulations to implement a halibut Guideline Harvest Level.

**Alternative 2:** Convert the GHL to an allocation.

The guided sport halibut fishery would be allocated 12.76% of the combined commercial and guided sport halibut quota in area 2C, and 15.61% in Area 3A. The commercial fishery would be allocated 87.24% and 84.39% of the combined quota in Areas 2A and 3C, respectively. Under a GHL as an allocation, the guided sport fishery would close when that sector reached its allocation.

Option A: Area-wide moratorium

Sub-option: Prohibit new charter licenses upon attainment of the GHL.

Option B: Local moratorium

**Alternative 3:** Convert the GHL to an allocation range.

The allocation range will have an upper and lower limit and would be a fixed amount expressed in numbers of halibut. The allocation range would be set by IPHC Areas 2C and 3A. Some or all of the management measures listed below would be implemented up to 2 years after attainment of the GHL (1 year if data is available), but prior to January 1 for industry stability. If the guided sport halibut harvest exceeds the upper limit of the range in a year, the guided sport fishery would be restricted to reduce the harvest back within the allocation range using management actions listed below. If the guided sport halibut harvest is restricted and the harvest is reduced below the lower limit of the range guided sport fishery management measures would be liberalized to increase the harvest back within the allocation range.

- line limits
- annual angler limit
- vessel trip limit
- super-exclusive registration
- sport catcher vessel only area
- sportfish reserve

*New Specific* / *Bag limit adjustments*  
Option A: The upper limit of the allocation range would be set at 125% of the 1995 guided sport halibut harvest. The lower limit of the allocation range would be set at 100% of the 1995 guided sport halibut harvest.

Sub-option 1: Reduce the guided sport halibut allocation to a target range of 75-100% of base year amount during times of significant stock decline. This reduction would be IPHC area specific and would occur in any year that the guided sport allocation exceeds a specified percentage of the combined commercial and guided sport TAC. Percentages to be analyzed should include:

- a. 15%
- b. 20%
- c. 25%

Option B: The upper limit of the allocation range would be set at 125% of the 1998 guided sport halibut harvest. The lower limit of the allocation range would be set at 100% of the 1998 guided sport halibut harvest.

Sub-option 1: Reduce the guided sport halibut allocation to a target range of 75-100% of base year amount during times of significant stock decline. This reduction would be IPHC area specific and would occur in any year that the guided sport allocation exceeds a specified percentage of the combined commercial and guided sport TAC. Percentages to be analyzed should include:

- a. 15%
- b. 20%
- c. 25%

Option C: Moratorium (applies to all of the above)

- a. area-wide
- b. local

**Alternative 4:** Under a GHL, apply a range of management measures listed below to curtail catch rates of guided anglers once GHL is attained.

The GHL functions as a cap. Apply management measures up to 2 years after attainment of GHL (1 year if data is available, but prior to January 1 for industry stability).

- line limits
- boat limit
- annual angler limit
- vessel trip limit
- super-exclusive registration
- sport catcher vessel only area
- sportfish reserve
- rod permit

Option A: Area-wide moratorium

Sub-option: Prohibit new charter licenses upon attainment of the GHL.

Option B: Local moratorium

**Alternative 5:** Moratorium (2C and 3A).

Option A: area-wide moratorium

Option B: local moratorium

The criteria for an area-wide halibut charter moratorium under Alternatives 2, 3, 4, and 5 are:

Years of participation

- Option 1: 1995, 1996, and 1997 IPHC licenses and 1998 logbook
- Option 2: 2 of 3 years (1995-97) plus 1998 logbook
- Option 3: 1 of 3 (1995-97), plus 1998 logbook
- Option 4: license or logbook in any one year (1995-98)

Owner vs Vessel

- Option 1: owner/operator or lessee (the individual who has the license and fills out logbook) of the charter vessel/business that fished during the eligibility period (based on an individual's participation and not the vessel's activity)
- Option 2: vessel

Evidence of participation

- mandatory:
  - IPHC license (for all years)
  - CFEC number (for all years)
  - 1998 logbook
- supplementary:
  - Alaska state business license
  - sportfish business registration
  - insurance for passenger for hire
  - ADF&G guide registration

enrollment in drug testing program (CFR 46)

Vessel upgrade

- Option 1: license designation limited to 6-pack, if currently a 6-pack, and inspected vessel owner limited to current inspected certification (held at # of people, not vessel size)
- Option 2: allow upgrades in Southeast Alaska (certified license can be transferred to similar sized vessel)

Transfers

- will be allowed

Duration for review

- Option 1: tied to the duration of the GHL
- Option 2: 3 years
- Option 3: 5 years (3 years, with option to renew for 2 years)

AP Minutes: February 1999

**C-5 Halibut Charter GHL**

The AP requests the Council move forward with the Halibut Charter GHL analysis with the following revised list of alternatives and options (see Table 1 under this tab).

The AP recommends the analysis include discussion of the feasibility and mechanism available to allow rollover of uncaught IFQ to the guided sport halibut harvest. The analysis should also include a list of the communities in 2C and 3A developing tourism related charter industry businesses, communities with LAMPs in process, and a discussion of the impacts of the five listed alternatives on those communities. Motion carried 22/1.

The AP further recognizes the need to facilitate and move LAMPs forward as quickly as possible and requests the Council respectfully request the Board of Fisheries facilitate and expedite this process. Motion carried unanimously 23/0.

SSC Minutes: February 1999

**C-5(a) HALIBUT CHARTER GHL**

Jane DiCosimo provided the SSC with an overview of a discussion paper that will lead to the development of an EA/RIR for a GHL and moratorium for halibut charters. In addition to issues raised in the discussion paper, the SSC suggests that the analysis address the following:

- (1) The tradeoff between profits earned by charter operators and net benefits obtained by charter customers. For example, while an appropriately specified moratorium may conserve or increase profits for charter operators, it may constrain or reduce the net benefits obtained by charter customers.
- (2) The distribution of risk associated with alternative specifications of the GHL. For example, if the charter fishery is allocated a fixed tonnage or number of halibut rather than a fixed percentage of the TAC, the commercial fishery will absorb reductions (increases) in the TAC.
- (3) The sensitivity of exvessel demand (elasticity) for halibut and the sensitivity of demand (elasticity) for halibut charters.
- (4) Differences in the regional economic impacts of commercial and charter fishing.



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# INTERNATIONAL PACIFIC HALIBUT COMMISSION

ESTABLISHED BY A CONVENTION BETWEEN CANADA

AND THE UNITED STATES OF AMERICA

AGENDA C-1(b)  
APRIL 1999

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APR - 5 1999

N.P.F.M.C

Dr. Clarence Pautzke, Executive Director  
North Pacific Fishery Management Council  
605 W. 4th Ave, Suite 306  
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Dear Clarence:

I have had several recent discussions with Jane DiCosimo of your staff concerning the GHL initiative and I want to outline for you the implications of the GHL program to the Commission's halibut management.

The Commission has participated in the development of the discussion paper produced by the Council's GHL committee and applauds the initiative to provide an effective allocation framework. This discussion paper clearly identifies the data needs and the options for managing the charterboat fishery to a GHL. The Commission is fully supportive of the Council's efforts to achieve its allocation objectives and is also working with several Alaskan groups in the development of local area management plans.

The Council has stated its intent to manage the guided sport fishery to not exceed 12.76% of the combined commercial and guided sport halibut quota in IPHC Area 2C, and 15.61% in Area 3A. The GHL rates were calculated so that the guided sport fleet could receive a maximum of 125% of their 1995 catch, if future commercial quotas were set at the same level as 1995. The Commission can accommodate the concept of a GHL, provided the underlying data collection and monitoring mechanisms are in place. At present, we account for sport catch using the previous year's reported catch as the deduction for the coming year (in most cases the previous year's catch is actually a projection from the catch data two years previous). Under a GHL framework we would need accurate accounting of both the guided and unguided sport catch in order to calculate the level of the GHL for the coming year. The unguided catch must be subtracted from the total available yield (CEY) prior to calculating the GHL and setline CEY. If we do not know this unguided catch, we cannot calculate the GHL.

Calculation of setline CEY and GHL, in principle, does not present a problem. The Commission would follow a procedure similar to our present procedure of subtracting other removals from the estimated total CEY, but with the change that Sport Removals in our usual table would be only the unguided sport catch. This would leave a combined CEY for guided sport catch (to which the GHL would apply) plus commercial setline catch. Using Area 3A and some example figures for the split between guided and non-guided sport, the process might have looked something like this for 1999:

Total CEY	31.80 Mlb
<u>Other Removals</u>	
Legal-sized bycatch	1.49
Legal-sized wastage	0.16
Personal use	0.07
Non-guided sport (e.g. only)	<u>2.70</u>
TOTAL	4.42

Combined guided sport (GHL) and commercial CEY =  $31.80 - 4.42 = 27.38$

If the GHL was, for the 3A example, 15.61% of the combined guided sport and commercial quota (x), then the calculation would look like:

$$0.1561x = 4.27 = \text{GHL}$$

$$(1 - 0.1561)x = 23.11 = \text{Setline CEY}$$

So, using this example, we would have calculated a commercial setline quota of 23.11 Mlb and a GHL of 4.27 Mlb for Area 3A in 1999.

The issue of when the GHL is likely to be limiting on catch by the guided sport sector may not be clear to all participants. In the above example, the calculated GHL is 4.27 Mlb. The total sport catch estimated for 1998 was 5.41 Mlb and, if the unguided catch were actually 2.70 Mlb, then the guided sport catch would have been estimated at 2.71 Mlb. Under these assumptions, the GHL would not have been reached and the Commission would have proceeded as it has historically, by simply subtracting the total sport catch (guided + unguided) from the total CEY and then calculating a setline CEY. Halibut stocks are presently at historic high levels and the GHL does not represent a constraint. However, as the total halibut CEY declines with natural stock fluctuations, so will the GHL, until it does become limiting. *This could well happen at a level lower than that which generated the initial GHL levels identified in the document (i.e., 125% of the 1995 catch) and is an automatic result of managing the total halibut yield. In other words, the value of 125% of the 1995 sport catch is NOT the minimum value at which a GHL would apply. It is not clear that this is fully understood in the discussion of the GHL options.*

We also note that if the unguided catch is not limited when the GHL becomes a constraint on guided catch, there would then be a reallocation of the harvest from both charterboat and commercial fisheries to the unguided sport fishery. Allocation among user groups is the business of the Council rather than the Commission, however we suggest that the Council might also wish to consider limiting measures for the unguided sport fishery, when it considers implementation of a GHL program. Naturally, the Commission staff will continue to assist you in whatever way we can.

Best regards,



Bruce M. Leaman  
Executive Director

cc: IPHC Commissioners

## **Proposed Halibut Guideline Harvest Level (GHL) Management Measures Discussion Paper**

prepared by staff  
**North Pacific Fishery Management Council  
National Marine Fisheries Service  
Alaska Department of Fish and Game  
International Pacific Halibut Commission**

### **Introduction**

At its October 1997 meeting, the Council approved two actions affecting management of the halibut guided sport fishery, culminating more than four years of discussion, debate, public testimony, and analysis.

1. Recordkeeping and reporting requirements. In 1997, the Council approved recording and reporting requirements for the halibut sport charter fishery operating in Alaska. To comply with this requirement, the Alaska Department of Fish and Game, Sport Fish Division, under the authority of the Alaska Board of Fisheries, implemented a Saltwater Sportfishing Charter Vessel Logbook in 1998. Information collected under this program includes: fish landed and/or released, date of landing, location of fishing, hours fished, number of clients, residence information, number of rods fished, ownership of the vessel, and the identity of the operator.

2. Guideline Harvest Levels (GHL) in IPHC Areas 2C and 3A. The Council adopted GHLs for the halibut guided sport (charter) fishery in International Pacific Halibut Commission (IPHC) Regulatory Areas 2C and 3A. A GHL was not set in any IPHC area west of 3A. Under this action, the Council stated its intent to manage the guided sport fishery to not exceed 12.76% of the combined commercial and guided sport halibut quota in area 2C, and 15.61% in Area 3A. The GHL rates were based on the guided sport fishermen receiving 125% of their 1995 catch. In taking this action, the Council stated its intent that the guideline harvest levels would not shut the fishery down, but instead would be used as a gauge to trigger other management measures in years following attainment of that harvest level. The Council intends that the halibut charterboat industry will be managed to maintain a stable charter season of historic length, using statewide and zone specific measures. When end-of-season catch data indicate that the guided sport industry will likely reach or exceed the GHL in the following season, NMFS would implement the pre-approved measures to slow down guided sport halibut harvest. Based on the Council analysis (NPFMC 1997), this approach is not expected to come into play for several years. Management measures will be developed by the Council in cooperation with the Alaska Board of Fisheries (BOF), the charter industry, and other members of the public.

In addition to the specific actions outlined above, the Council also adopted a framework for developing local area management plans (LAMPs) using the joint Council/BOF protocol. Local area plans would be submitted through the BOF proposal cycle, but portions of the plans pertaining to halibut would ultimately require Council approval for implementation. Lastly, the Council scheduled a review of halibut charterboat management for October 2000.

### **Purpose and Need for Action**

At its December 1997 meeting, NMFS notified the Council that implementation of the GHL without accompanying regulations was problematic and, therefore, could not be submitted to the Secretary at that time. Instead, the NMFS published the Council's intent of managing the halibut charter fishery under a GHL as a notice of inquiry in the Federal Register on March 10, 1998. NMFS recommended that the Council develop possible management alternatives for analysis that would be triggered by the GHL. The Council announced the formation of a GHL Committee to recommend possible management measures that would keep the halibut charter fleet under the GHL. The committee met twice in early 1998 to develop management alternatives for the Council to consider. Due to the difficulty in scheduling a meeting of the GHL Committee, the discussion paper was mailed to the committee and individual comments were addressed in preparation of this final report.

In April 1998, the Council initiated a regulatory amendment to analyze a suite of management alternatives to manage the halibut charter industry to maintain the fleet below the GHL. The alternatives will be analyzed to determine their effectiveness under a GHL in addressing the following problems identified by the Council.

### PROBLEM STATEMENT

The recent expansion of the halibut charter industry, including outfitters and lodges, may make achievement of Magnuson Act National Standards more difficult. Of concern is the Council's ability to maintain the stability, economic viability, and diversity of the halibut industry, the quality of the recreational experience, the access of subsistence users, and the socioeconomic well-being of the coastal communities dependent on the halibut resource. Specifically, the Council notes the following areas of concern with respect to the recent growth of halibut charter operations, lodges and outfitters:

1. Pressure by charter operations, lodges and outfitters may be contributing to localized depletion in several areas.
2. The recent growth of charter operations, lodges and outfitters may be contributing to overcrowding of productive grounds and declining catches for historic sport and subsistence fishermen in some areas.
3. As there is currently no limit on the annual harvest of halibut by charter operations, lodges, and outfitters, an open-ended reallocation from the commercial fishery to the charter industry is occurring. This reallocation may increase if the projected growth of the charter industry occurs. The economic and social impact on the commercial fleet of this open-ended reallocation may be substantial and could be magnified by the IFQ program.
4. In some areas, community stability may be affected as traditional sport, subsistence, and commercial fishermen are displaced by charter operators, lodges, and outfitters. The uncertainty associated with the present situation and the conflicts that are occurring between the various user groups may also be impacting community stability.
5. Information is lacking on the socioeconomic composition of the current charter industry. Information is needed that tracks: (1) the effort and catch of individual charter operations, lodges, and outfitters; and (2) changes in business patterns.
6. The need for reliable catch data will increase as the magnitude of harvest expands in the charter sector.

This discussion paper is an interim step to further clarify Council intent for management and any regulatory impediments with the management alternatives approved for analysis. The current Council schedule for development of the regulatory amendment package to manage the halibut charterboat fishery is for initial review in February 1999 and final action in April 1999. These dates may change as a result of staff tasking to meet the requirements of the American Fisheries Act. If the Secretary of Commerce approves a moratorium under the 1999 timeline, implementation could occur in 2001. A minimum of one year would be necessary to allow development of the database, submission and appeals of qualification criteria, and issuance of moratorium permits. Other management measures could be implemented in 2000, if necessary, with Secretarial approval.

#### Background

The Council has discussed the expansion of the halibut charter industry and concerns of localized depletion of the halibut resource and the potential reallocation from the IFQ longline fishery since 1993. A surge in guided charter effort in the early 1990s in some small communities (e.g., Sitka) fueled Council concern. A two-prong approach was endorsed by the Council to resolve the perceived impacts of increased guided charter halibut fishing. The first was establishment of guideline harvest limits for Area 2C and 3A halibut charterboat fisheries; the second was a process to establish local area management plans for coastal communities.

The most significant factor in the creation of the GHLs was the perceived impact to the directed IFQ fisheries in Areas 2C and 3A. Because charterboat catches are deducted from the IPHC calculation of allowable halibut removals, any increase in charter catches results in a lower quota for the commercial IFQ fishery. The GHLs were adopted to prevent the erosion of commercial quotas in Areas 2C and 3A above the recommended GHL levels.

The Council has also endorsed a regional approach, recommending the GHL only for Areas 2C and 3A. The Council considered and rejected more specific GHGs for ADF&G fishing zones, because it would have conflicted with IPHC management of halibut (e.g., area-wide stock assessments, recordkeeping and reporting requirements).

The impact on local communities is another prevalent rationale for the Council to regulate the guided halibut fleet. The Council decision to not impose a GHG west of Regulatory Area 3A is indicative of that intent. Some communities are seeking to limit the expansion of local halibut charter fleets (e.g., Sitka, lower Cook Inlet). Other local communities are only recently expanding and are encouraging the expansion of tourism opportunities, including halibut charter operations, in those areas (e.g., Unalaska/Dutch Harbor, Hoonah, Gustavus, Old Harbor, and Cheenga).

The Council has identified communities such as Sitka and lower Cook Inlet (Homer) as experiencing user conflicts over halibut. Members of those communities have proposed local solutions via LAMPs (BOF proposals have been submitted for Deep Creek and Kodiak and the Sitka Sound LAMP is awaiting implementation). The Sitka LAMP was designed to allocate the halibut resource via creation of user exclusion zones and did not place effort or catch limits on any sector, but emphasized a preference for the local non-guided sport and subsistence halibut fisheries. The Cook Inlet proposal for Deep Creek as submitted to the BOF in April 1998, consists entirely of a halibut charterboat moratorium. The Kodiak proposal is a placeholder proposal while community discussions continue.

LAMPs by design are flexible and can be designed to meet different objectives. As the problem in the halibut charterboat fishery is currently defined by the Council, it appears that individual LAMP proposals may address some of the Council's goals, depending on the individual LAMP proposal (Alternative 1). LAMPs will not, on their own, satisfy the third listed goal in the problem statement, such that LAMPs will not prevent the open-ended reallocation of halibut quota from the commercial to the guided sport sector

Development of LAMPs has the benefit of involving the Alaska Board of Fisheries and its advisory committees and ADF&G staff in the process of resolving local issues. This is beneficial given that some solutions may impact state managed fisheries and allows for consideration of these impact in the development phase of the LAMP. Alternatively, the Council may proceed with recommending measures to implement the Area GHGs and proposed moratoria (Alternative 3). Yet another approach would be somewhere in between these two. The Council could directly allocate the halibut resource between the commercial and guided sport sectors, leaving unguided halibut removals unrestricted, and implementing moratoria and other management measures within LAMPs (Alternative 2).

New reporting requirements must be weighed within the context of potential reporting biases. The charterboat logbook was implemented in the spring of 1998, and the first year rate of compliance is yet undetermined. As of July 1998, approximately two-thirds of logbooks issued in Southeast Alaska were being returned. Also, the information collected using the logbooks has yet to be verified using independent data. ADFG staff have recommended that the data be verified over a three-year period to assure its accuracy. The Council may not wish to base part of the moratorium qualifications on such preliminary information, but may instead prefer to build the database of participants, effort, etc. prior to a moratorium analysis. This is the ADF&G Sportfish Division staff recommendation, stating, in part, the Department's opposition to either a statewide or area-wide moratorium proposed under Alternative 3.

### **Review of impacts of the GHG**

The *major factors of uncertainty* which drive the impacts of the GHG are: (1) the actual biomass and quota for halibut in future years and (2) the actual growth rate experienced in guided sport fishery (demand function for trips). These two factors, in combination, will significantly determine the point at which a cap becomes constraining, and therefore significantly affect the economic impacts, relative to status quo management for the charter and commercial halibut sectors.

*Biomass* estimates for the North Pacific halibut stock were provided in the halibut charterboat EA/RIR (NPFMC 1997) and are not updated in this discussion paper. No significant changes to the halibut stock have been identified since the EA/RIR was prepared in 1997. A review of the status of the stock will be provided in the GHL EA/RIR. At present biomass levels, the biomass will not be constraining to the GHL for the next several years.

*Growth* in the number of resident sport licenses is correlated with the Alaska population which has grown since 1961 at 3.1 percent, but the relationship has not been constant (NPFMC 1997). Since 1961 the growth rate of licenses has been 6.6 percent annually, but over time that rate has fallen. Since 1985 the growth rate has been 3.4 percent, and since 1990, 2.9 percent. Since 1961, an average of 42 additional licenses resulted from each increase in population of 100. But the share of the population with licenses, which had been increasing until 1984, has fallen to 29 percent by the mid-1990s from its high of 34 percent. The reason for this decline may be due to the changing demographics of the population, but its cause is not clear.

It is important to note that the effectiveness of any management alternative the Council recommends to limit halibut charterboat operations may be minimized by increases in the growth of visitors to the State. Charter usage is demand-driven. The fleet is currently overcapitalized in some areas of the state with many full-time charter operations meeting their individual capacity and many part-time operators entering and exiting the fishery around other recreational and commercial fishing seasons. The Council analysis reported that consumer demand requires only about 600 (full time equivalent) vessels from over 2,000 IPHC licensed halibut charter vessels. Some actions, such as vessel moratoria, annual bag limits, trip limits, etc., may result in increased costs and stricter limitations on halibut removals by residents who use charter boats to catch fish for personal consumption.

A smaller number of resident anglers have higher avidity rates to attain larger numbers of halibut for their personal consumption. These anglers are more likely to take 2-day trips and attain multiple day bag limits. These fishermen are more likely to be impacted by proposed restrictions on the charter fishery. Many non-resident anglers, particularly those who sign up for a charter in combination with other tourist activities (e.g., cruise ship, Denali Park bus trip) may be satisfied with a fishing charter for either halibut, king salmon, sockeye salmon, etc. and may be combining the fishing experience with a marine sightseeing trip, etc.

Growth in the number of non-resident licenses is related to the growth in the number of visitors to the State. The percentage of visitors who obtain a sport fishing licence has remained fairly constant since visitor counts began, at about 20 percent. This is in spite of growth over time in the percentage of visitors who arrive by cruise ship, particularly in the last 5 years. During this most recent 5 year period the number of cruise ship passengers has grown at a 9.3 percent annual rate compared to 6.3 percent for visitors in total. In 1995, 24 percent of visitors were cruise ship passengers. The majority of charter trips in Southeast are cruise ship passengers and/or non-residents. Most of the cruise ship charters target salmon because greater distances and time are needed to reach halibut grounds.

Historical *visitor trends* indicate that visitor volume grew moderately in the late 1980s, followed by a period of rapid growth through the 1990s (McDowell Group 1998). Visitors to Alaska listing vacation/pleasure as the reason for their trip grew an estimated 6.7% between Summer 1996 and Summer 1997, totaling approximately 839,000 people out of 1.1 million total visitors (Figure 1). This growth rate is lower than the average annual growth rate of 9% between 1989-

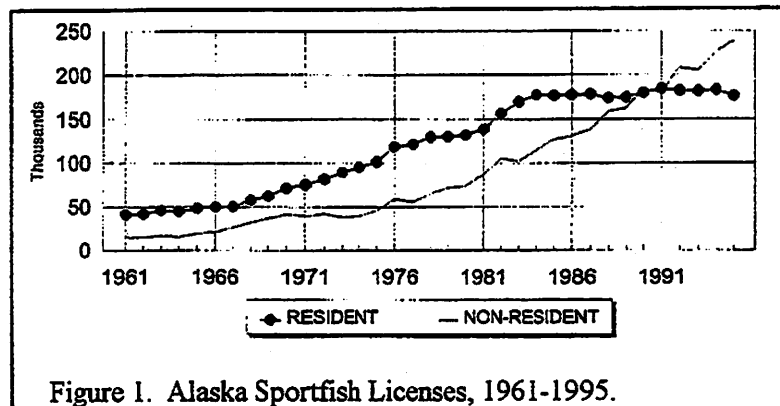


Figure 1. Alaska Sportfish Licenses, 1961-1995.

97, and totals more than 70% in that eight year time span. Since 1961 the growth rate of Alaska sportfish licenses has been 6.6 percent annually, but over time that rate has fallen (NPFMC 1997). Since 1985 the growth

rate has been 3.4 percent and since 1990, 2.9 percent. The percentage of visitors listing vacation/pleasure comprised 75% of all visitors. This pool of visitors supplies the charter fleet with customers.

During 1985-97, the growth rate of licenses issued to residents has been less than that of non-residents so that over time the share of licenses issued to non-residents has increased (Figure 2). Since the mid-1980s the number of resident licenses have not increased while non-resident licenses have continued to increase at 6.7 percent. After 1990, the number of non-resident licenses surpassed those of residents for the first time and since then the number of non-resident licenses has been an increasing majority of the total. Of the non-resident licenses the foreign share has remained fairly constant at about 7 percent.

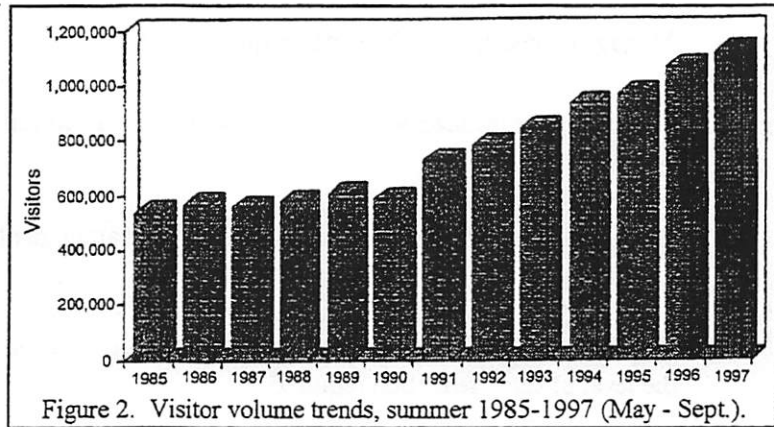


Figure 2. Visitor volume trends, summer 1985-1997 (May - Sept.).

### List of Management Alternatives

The following list of alternatives was approved for analysis by the Council in April 1998. The Council added a rod permit program and a control date of June 24, 1998 to the analysis.

#### MANAGEMENT ALTERNATIVES

##### Alternative 1. Status quo. Do not develop regulations to implement a halibut Guideline Harvest Level.

- Instead, develop local area management plans as quickly as possible for areas with documented problems, through facilitation, etc., if possible.
- Employ the following six tools within a local area management plan (LAMP) to curtail catch rates of guided sport anglers: (1) line limits on boats, (2) annual angler limits, (3) vessel trip limits, (4) super-exclusive registration of charter vessels, (5) moratorium, and (6) sport catcher vessel only area (SCVOA) to address gear conflicts. These tools could be employed, as well as others not listed, within a LAMP framework to curtail guided sport catch rates.

##### Alternative 2. Under a GHL,

- Retain GHL at specified levels and convert the GHL to an allocation.
- Manage the guided sport fishery under status quo or according to LAMPs approved by the Council.
- Consider moratorium in the LAMPs.
- Bank uncaught halibut from the sport fishery to provide extra fish to sport fishery during subsequent years of low quota to provide stability to guided sport fishery.



### Alternative 3. Under a GHL,

- Manage guided sport fishery status quo.
- Apply range of management measures listed above to curtail catch rates of guided anglers once GHL is attained.
- Apply management measures up to 2 years after attainment of GHL (1 year if data is available, but at the beginning of a year for industry stability).
- Employ combination of management measures (e.g., line, boat, annual and/or trip limits) depending on the level of catch reduction required.
- Include a moratorium under this alternative.

Alternative 1 recommends no additional action to implement the GHL and substitutes the LAMP process for halibut management for all users groups. The list of management measures addressed in this paper would be among those that could be incorporated in LAMPs. IPHC staff have suggested adding a seventh option within LAMPs to create fishing zones for different user groups.

The Council/Board LAMP protocol ensures that proposals for LAMPs will occur with or without the halibut GHL. The LAMP protocol is not strictly limited to halibut, and in fact, anticipates that affected groundfish and non-groundfish (salmon, lingcod, etc.) be considered in development of a LAMP. The protocol additionally expects that all user groups (commercial sport, charter, and subsistence) be involved as active participants in providing management recommendations contained within a LAMP. It is not expected, however, to be a speedy process. The Sitka Sound LAMP has been hailed as the prototype for development of additional LAMPs. Community members discussed different aspects of the plan for three years before reaching consensus. The Council and Board are on record as recommending that all LAMP proposals achieve consensus among the user group participants prior to submission for Council analysis and approval. Under the protocol, the Board agreed to take the lead in developing LAMPs. The Council also reserved the right to approve in total, reject outright, or modify the halibut provisions of a recommended LAMP given adequate biological or legal rationale.

It appears that Alternative 1 may not address the problem statement since, as a general concept, the LAMP may do nothing to restrict landings per se. However, some actions taken as part of a LAMP may in fact reduce effort and thus harvest. For example, limits on multiple day trips or restrictions on guide harvest could reduce effort and thus harvest. However, some communities may not wish to enact harvest restrictions as part of a LAMP unless other communities within the GHL affected area also enact harvest restrictions. A mechanism to encourage development of LAMPs would be to subdivide the area-wide GHL into community GHLs.

It is important to note that the LAMP process does not conflict with the problem statement or the GHL, except for the moratorium provision. LAMPs would act as a complementary action, but not a necessary one. Should the Council modify its original intent for implementing the GHL, individual LAMPs may be developed to meet the same management objectives under this alternative approach.

Alternative 2 recommends that the GHL be converted to an allocation and that management measures to manage halibut, including a moratorium, be implemented through LAMPs. It would also include the use of LAMPs to manage the halibut charter fishery. Management actions such as a moratorium, annual angler limits, vessel trip limits, and/or super-exclusive registration would be developed within a LAMP. A reserve that would bank unused quota of an allocation, and likely nullify the original GHL concept, is also included under this alternative.

The conversion of the GHL from a target that triggers management actions to an allocation departs from the Council's original intent in its development of the GHL, but merits review. Halibut charter representatives have argued that the industry requires two things to remain viable: a two-fish bag limit and its traditional fishing season. The Council has concurred with these two points (see above problem statement). The reserve concept discussed above addresses this concern.

The GHL analysis has pointed out that under current assumptions of biomass, tourism, and industry growth the GHL annually assigned to the charter fishery would not be met by the fleet until the later years of the projections in the charterboat analysis. The fleet, through its representatives on the Council's GHL Committee, has not requested a more liberal bag limit or other measures that would allow the charter sector to reach its de facto share of halibut. Instead, it has requested consideration of two changes to the Council's approach of managing the halibut charter industry.

I. It recommends that the GHL be converted from a target or trigger to an *allocation*. Conversion of the GHL to an allocation would then cap the commercial sector share since both the charter and commercial catches would then be under a direct allocation: 87.24% to the commercial sector and 12.76% to the charter sector of the combined commercial and charter catch limit. The current interpretation is that the GHL is a charter cap. Charter (guided) removals are combined with non-guided removals for an estimate of total sport removals determined by ADF&G Sportfish Division. Total sport removals for a given year are subtracted from the International Pacific Halibut Commission's (IPHC) projected annual catch limit to determine the commercial quota for the next year. Under the current understanding of the GHL, the commercial sector is not restrained from harvesting the unused portion of the GHL and it would be allowed to harvest all fish not harvested by the charter fleet. Under the proposed conversion to an allocation, the commercial sector would be constrained and the unused portion banked for later use by the charter fleet.

II. The charter industry proposes that under *either* the GHL as a cap or converted to an allocation, those halibut that the charter fleet is assigned under the GHL that are not harvested by them be assigned a credit in a conceptual manner. This would result in the charter sector being allocated a sufficient allocation to meet its minimum level of harvest to maintain the season length or bag limit in a year when the GHL would otherwise trigger reductions in either or both. The industry is explicit in not requesting an actual accounting of unused fish (pound for pound), but an acknowledgment in times of depressed halibut biomass that their minimum requirements need to be met to continue the charter fishery as a viable entity. The minimum is controlled by demand for halibut as evidenced by the number of clients. If client demand grows, the minimum would also increase.

On its face, this banking or as recently redefined as a *sportfish reserve*, appears to conflict with the Council's intent to cap the fishery under the GHL. The GHL would continue to represent a target, or benchmark, for the guided sport fishery. The minimum amount needed is the previous year's catch that did not result in triggering the GHL. But, the reserve effectively moots the GHL, in that the minimum amount of halibut guaranteed to the charter fleet under a reserve may exceed the cap in a given year.

To the charter industry, however, the reserve is a reward for forgoing harvesting halibut beyond their immediate needs in times of abundance. It is also a minimum amount needed, agreed to by the Council, to not decrease the charter season or bag limit in times of decreased halibut abundance. Additionally, the commercial sector accrues the unconstrained benefit of unused charter GHL during times of halibut abundance when the charter fleet does not reach the cap. Under the sportfish reserve, the commercial sector would be asked to sacrifice a disproportionately smaller amount of halibut in times of depressed stock abundance so that the charter sector could remain viable. The analysis concluded that a decrease in halibut, and corresponding revenues, for the charter fleet has a *proportionally* greater impact than a similar decrease in halibut (and revenues) to the commercial fishery, as it represents a much greater *percentage* change in overall revenues for the charter sector.

Alternative 3 recommends implementation of management measures to keep charterboat catches below the GHL. Implementation of an area-wide (2C/3A) moratorium is included under this alternative. As stated above,

development of LAMPs will occur with or without implementation of the GHL, so an area-wide (2C/3A) vs. local (LAMP) moratoria may require additional clarification. The current recommendation by the GHL Committee is that an area-wide moratorium would trump a LAMP moratorium, such that a LAMP could further restrict participation within a broader Area 2C or 3A moratorium. This aspect distinguishes Alternative 2 (moratorium within a LAMP) from Alternative 3 (area-wide moratorium), and requires further consideration. This issue is discussed further under the moratorium section of this paper. Remember again, that LAMPs with or without a moratorium will proceed on a separate course of action through the joint BOF/Council protocol.

## **Description of Individual Alternatives**

### I. Local Area Management Plans

While unguided sport fishing is growing, it is growing at a slower rate than the guided sport fishery, and accounts for about 3% of the overall harvest of halibut statewide. Problems for the non-guided fishery, as well as subsistence users, occur in the context of reduced local, or near-shore, availability of halibut. These localized depletions are due, in part, to increased catches by the charter fleets and by increasing catches of commercial IFQ in near-shore areas. Non-guided sport and subsistence users are forced to travel greater and greater distances to catch their halibut. Neither capping the charter fleet catch at current or increased levels, nor imposing a moratorium on new entry, even at regional levels, is going to address this type of problem. Localized depletions, and user conflicts, are occurring at current harvest rates. Local management plans, put together by the various user groups involved, appear to be a potentially effective way to address these issues, by reserving near-shore areas for unguided sport and subsistence users, for example.

Local Area Management Plans or LAMPs are a new management tool used by the Council to resolve user conflicts in communities competing for a common resource. In February 1998, the Council and Board of Fisheries adopted the following protocol to guide the successful development, processing, and implementation of local area fisheries management plans. Though the protocol covers development of local area management plans for all species of interest in a local area, the Council's main purview will be over halibut and those species covered by one of the Council's fishery management plans.

#### **SCOPE AND CONTENT OF PROPOSALS**

It is the expectation of the Board and Council that any proposals submitted for review will be well thought out and reflect the efforts and a high degree of consensus of representatives of all users of the fish species in the local area covered by the proposed plan. Local commercial, sport, charter and subsistence representatives, and others as appropriate should be involved in the development of proposals, preferably using a local advisory committee or task force approach. When submitting a proposal, users should be identified and their involvement in the process documented. During development, appropriate agency staff (NMFS, ADF&G, Council, Board, IPHC, etc.) should be contacted to provide guidance and legal limitations so that the proposal has a much higher likelihood of not facing difficulties in the review process. Proposals should encompass all shared fish stocks in the local area and should address as appropriate, catch and possession limits, gear types, effort limitation, closed areas, seasons and overall boundaries of the local area plan. Proposers should anticipate that the local plan, if approved, likely will be implemented for no less than three years before there will be another opportunity to revise it. They should also be aware that the schedule below spans over a year from the April deadline for proposals to implementation sometime in the spring or summer of the following year or longer. The first LAMP was approved in 1998 for Sitka Sound. Regulations for the Sitka Sound LAMP are not yet implemented, but it appears that the multiple user groups are voluntarily complying with the community-based agreement.

## II. Line Limits on Boats

This action would restrict the number of lines legally fished from a charter vessel. One option would limit the lines fished to the number of paying passengers. Line limits could prohibit the captain and crew from halibut fishing during a paid charter and result in possibly two fewer lines and four fewer fish being caught on each charter. A cursory examination of this proposed action suggests that boat limits may constrain total charter halibut harvests by 2-4 fish per fishing charter vessel for each day spent fishing. An estimate of average daily active charter vessels and number crew per vessel will be necessary to estimate the impact of this measure on halibut removals. Such a prohibition may result in a significant limitation on halibut removals and is generally supported by the charter industry as less onerous than some other possible management measures. The impact in terms of pounds of halibut saved would vary depending upon the area under consideration. In general, the saving would be greater in Area 3A than in Area 2C given current regulations.

In Southeast Alaska, a state regulation limits the number of fishing lines in the water for halibut to a maximum of six per boat. Most charter operators typically take 3-4 clients per trip. A Southeast charter owner serving on the GHL Committee requested that the Council consider grandfathering vessels who are Coast Guard qualified to carry more than six passengers. This latter suggestion would be problematic for the State since it might result in conflicting State and Federal regulations.

In Southcentral Alaska, the majority of halibut charters are licensed to carry six passengers, but some operate as headboats or military charters, primarily out of Kodiak, Seward, and Homer. These vessels can carry 16-20 passengers. In Seward, two operators had several boats capable of carrying 16-26 passengers. In Seward, the Air Force has three 43-foot boats that can carry 18-20 passengers for a variety of bottomfish and halibut. The Army has a 54 ft boat that can carry 20-22 passengers and a 40 ft boat that can carry 14 passengers that travel outside resurrection Bay where they can target halibut. In Kodiak, most charter vessels are 6-pack boats, perhaps six are 30 ft boats, and eight are 40-50 ft an can carry up to 18 passengers. The Valdez fleet consists mostly of 6-pack or smaller boats; six boats can take 8-12 passengers. Because of such differences, line limits may need to be approached on a community basis that recognizes differences in the existing fleet.

## III. Boat Limit

A boat limit would restrict the number of halibut legally landed on a halibut charter boat in a given day (midnight to midnight) based on individual bag limits and number of paying passengers. This action appears to have no additional impacts on constraining halibut charter removals beyond those included under line limits, when eliminating lines fished by captain and crew. Boat limits may conceptually limit the boat to a total of 10 fish, for example, but in practice would likely remain under a 2-fish/person/day limit by anglers voluntarily limiting the boat to five customers. Since an individual angler must catch his/her own fish (the boat catch cannot be shared/divided), a 10 fish boat limit for six anglers, would result in two anglers being allowed to harvest only one halibut. At the cost of a halibut charter, it is unlikely that anglers would pay this cost with their opportunity to harvest the allowable bag limit in question. Thus, boat limits do not appear to be an effective management tool for the purposes of reducing guided halibut removals.

## IV. Annual Angler Limits

Annual angler limits would restrict the number of halibut that can be retained annually by an individual angler. ADF&G and the Council have previously examined the issue of possession limits. Most charter clients take either two or four halibut in a year (Figure 3). A small percentage of avid anglers exceed four fish in a year. This information indicates that annual angler limits will have less impact on total halibut removals. It may result in significantly impacting the amount of halibut taken by a few fishermen, but have less impact on total removals because it does not address trip demand by anglers. In 1997, the Council decided to not pursue halibut possession limits as a separate action from charterboat management.

## V. Vessel Trip Limits

Vessel trip limits would prohibit vessels from making more than one trip each day. In Southeast, half-day trips for cruise ship passengers are common, but most trips target salmon. Roughly, <10 percent of South Central and Southeast halibut charters are multi-day trips. Thus, it is not expected that a vessel trip limit alone will have a significant impact on keeping the fleet below the GHL.

## VII. Super-exclusive Registration

Super-exclusive registration would restrict a charter boat registered in one community or LAMP from operating in another community or LAMP in the same year. This action would redistribute fishing effort and removals but would not be expected to constrain halibut removals. It may, in fact, increase effort and removals because overcapitalization and overcrowding may motivate a particular charter vessel to relocate into a less crowded port.

## VIII. Sport Catcher Vessel Only Area (SCVOA)

A Sport Catcher Vessel Only Area to protect locally designated areas for sport (guided and non-guided) use only does not appear to reduce halibut removals, but may be a valid management tool to be included within a LAMP. IPHC staff have suggested adding a similar alternative that would create specific fishing zones for different user groups. This approach could also be applied in the local area management plans.

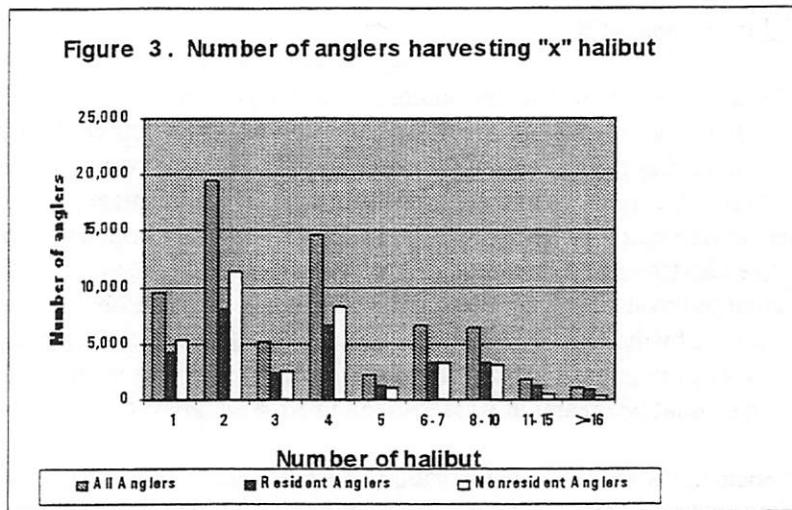
## IX. Convert the GHL to an Allocation

This option would convert the GHL to an allocation. In years when the allocation would be reached, regulatory measures would be enacted to constrain the charter fishery. However, in years when the allocation would not be reached, converting the GHL from a cap to an allocation would likely result in constraining commercial halibut removals (see earlier discussion of Alternative 2). The conversion to an allocation may result in (positive) biological/conservation impacts, such that reserved fish (those allocated to but not harvested by the guided sport sector) would be left on the grounds to further contribute to the biomass through growth and reproduction.

## X. Sportfish Reserve

The GHL Committee redefined the banking concept to more clearly define its intent. In years when the charter fleet would not catch the amount allowed under the currently defined GHL (as a cap under Alternative 3), this "surplus fish" would be *de facto* "granted" to the directed IFQ fishery in exchange for a possible future return grant to guarantee the guided sport season and bag limit for economic stability in the fishery. Under this action, unused allocations of halibut to the charter sector which is absorbed by the commercial sector would be conceptually reserved for future reallocations to the charter sector from the commercial sector in years of lower abundance when the GHL would be met. In such times, additional allocation to the charter sector would likely be reallocated from the commercial sector, so as not to allow removals above recommended levels.

The halibut sportfish sector has been limited to a 2 fish bag limit since 1974. Representatives of the guided sport fishermen maintain that their catch should not be reduced to lower than needed to maintain the bag limit and season even under decreased halibut abundance. It has been willing to maintain the current bag limit even in



times of greater abundance (as is currently the case). In return, the fleet is recommending that the Council implement the reserve to ensure the bag limit and season length during periods of decreased abundance. (Note that increased fishing effort also could result in the guided sector exceeding the GHL; this is discussed in greater detail earlier in this paper.) Effectively, the reserve is an alternative to the GHL concept since it eliminates the cap by 'reserving' previously unharvested fish. Under the GHL, the commercial sector would gain in high quota years, but would lose some allocation in low quota years. If and when the halibut stock abundance declines to historical lows, then both sectors would be reduced. It is possible that faced with conservation concerns, season length and bag limits might then be affected.

The sportfish reserve, which has been linked with Alternative 2, to convert the GHL to an allocation, may have negative biological impacts since it would be invoked to increase guided halibut removals likely during years of lower halibut quotas due to lower halibut abundance. However, this impact would be mitigated if the reserve amount were redirected from the commercial sector's allocation, and not in addition to the commercial and guided sport quota. IPHC staff strongly recommends against harvest in addition to the quota. Should the GHL be converted to an allocation of 12.76% of the combined commercial and guided sport halibut quotas for Area 2C as recommended, the commercial allocation would be 87.24%. If these specific allocations are set in regulation, the IPHC or the Council would be legally unable to deviate from these allocations and the sportfish reserve could not be coupled with the GHL as an allocation. However, the Council could recommend regulations with conditional allocations and set a formula for redirecting a portion of the commercial allocation to the guided sport sector, for the year(s) subsequent to when the GHL is exceeded.

The reserve concept recognizes that uncaught fish is not available as a unique quantity in future years. Instead, what is available is the yield associated with the uncaught biomass, i.e., some principal is being saved and what is available in future years is only the interest on that saved principal. If the stock biomass declines in future years, the available yield will decline in proportion and the yield forgone from previous years, when stock biomass may have been higher, will not be available as a simple add-on to the current year's yield. Specifically, no yield in excess of the present year's estimated total yield will be available for harvest. Changes in what is to be made available to a particular sector in a given year must come through reallocation. The IPHC staff will not recommend extra halibut harvest above the quotas set during its annual meeting. Thus, the reserve must come from the combined sport-commercial quota. The Council can set the allocations as fixed percentages, or floating percentages (conditional allocation), or can set an unallocated portion of the combined quota for reallocation. IPHC staff will not support an open-ended grant of halibut from the resource above the combined quota.

The GHL Committee recommended similar language to that in Alaska State regulations to define a salmon reserve to be applied to the halibut fishery. Such language might read, "If the guided sport halibut fishery falls short of the minimum needed to maintain the current bag limit and season length under the GHL, the subsequent year's commercial fishery quota will be adjusted down to allow the guided sport fishery to continue fishing."

## XI. Rod Permits

A rod limit is currently in State regulations for Southeast Alaska: 1 rod per person; 6 rods per boat; up to 6 lines/vessel; limited to the number of paying clients such that the maximum number of fishing lines that may be fished from a vessel engaged in sport fishing charter activities is equal to the number paying clients on board the vessel. Washington State has an angler permit program, which is based on an equation of length X breadth/factor. Based on this, a 6-pack vessel limited to 6 persons could have more than 6 rods. The GHL Committee identified perhaps 50 vessels that could upgrade under this type of program. The committee recommended that the Washington program would be a more useful management tool under license limitation. There is not a rod permit program in Oregon as had been earlier discussed in Council testimony. This alternative is complicated and has enforcement difficulties.

## XII. Moratorium

A moratorium would limit the number of guided sport fishing operations that could legally harvest halibut in an area. Only those operations that could prove they have a fishing history that meets the moratorium's minimum requirements would be permitted to operate a business that provides guided halibut fishing trips. New operations and those that do not meet the minimum criteria would not be allowed to enter the fishery until they were able to obtain a legal permit.

Remember that the guided halibut fleet developed because people are willing to pay someone to take them halibut fishing. This demand for halibut guides comes both from Alaska residents and visitors to Alaska. Should the number of people wishing to take a halibut charter increase and the number of seats available remain fixed by a moratorium, then the price of a charter will likely increase as clients compete for the available seats, and it is possible that demand could outstrip supply.

Information presented earlier in this document shows that the number of tourists visiting Alaska has increased each year since 1990. A corresponding table indicates that the number of fishing licenses sold to persons that are not Alaska residents has also increased during the 1990's. As of 1995, almost 250,000 sport fishing licenses were sold to non-residents. If tourists visiting Alaska feel that halibut fishing is an important part of their vacation, then limits on the guided sport fishermen, which restricts their access to the halibut fishery, may have adverse impacts in the State's tourism industry.

On the other hand, implementing measures that limit the amount of sport caught halibut may provide the commercial fleet protection against harvesting a smaller percentage of the quota in years with low quotas. However under the current TACs, which have increased fairly dramatically over the past two years, the commercial industry has shown some willingness to forgo quota, hoping instead that reducing the supply of halibut on the market will allow them to receive a higher ex-vessel price. On the other hand, commercial fishermen could not afford to forego quota in years of low halibut abundance.

It should be noted that ADF&G staff has indicated that the State would not support a moratorium for the 2C and 3A areas, whether the areas are combined or separated. ADF&G staff noted that there is currently no State constitutional authority for any form of limitation system or moratorium on recreational anglers, including the charter fleet. Thus, any proposed moratorium the Council implements for halibut must take into account the ripple effects on other species that would be targeted by the charter fleet. That concern, along with the concern that charter operations and facilities are in very different stages of development in areas across the State, would compel the State to oppose any form of state-wide or area-wide moratorium or license limitation system. The State could support a moratorium or license limitation system on a local level (as a LAMP component), given sufficient justification.

The State has indicated they would prefer to develop and implement any guided sport moratorium through LAMPs which are reviewed by the Board of Fish as well as the Council. This would allow the impacts on species other than halibut to be considered by the Board before any regulations were passed on to the U.S. Secretary of Commerce. They also felt that the diversity in the guided sport fisheries could best be dealt with at the local level. as a one size fits all approach might not be the best solution.

### How would the moratorium work under a GHL?

The purpose of the GHL was to slow the guided sport harvest the year after the harvest limit set by the Council is reached or exceeded. It is unlikely that a moratorium will slow the harvest rate of the guided sport fishermen once the GHL is reached. Measures included within the moratorium may, however, decrease the chances that the fleet would reach the GHL, or at least increase the length of time before the GHL is reached.

A moratorium may help prevent the fleet from reaching the GHL by stopping new vessels from entering the fishery, and by limiting participating vessel's harvesting capacity through other regulations. Limiting the number of boats that can operate in the guided halibut fishery may help slow the rate at which the guided fleet increases their harvest. This is of course depends on the number of vessels which are issued moratorium permits, and the latent capacity of those vessels.

If a moratorium limited the number of vessels to the current fleet, but the qualified vessels were operating at less than full capacity, then the annual harvest could increase. For example, let us assume that on average the charter fleet operates 5 days a week and carries an average of 5 clients per trip. In this example the fleet average would be 25 clients per week. However, if vessels are allowed to carry 6 clients and can operate 6 days a week, they could actually serve 36 clients in a week. The growth from 25 to 36 clients per week is a 44% increase. Given that the GHL allows a 25% increase in harvest (based on the 1996 fishery), then it is possible (at least under this scenario) that the latent capacity of the active charter fleet could allow the GHL to be exceeded. This assumes that catch rates per client, the size of halibut caught, and the season lengths remain constant. However if there is a large increase in client demand for halibut charter trips under a moratorium (i.e., there is no more latent capacity), then limiting the number of vessels will keep new guides from entering the fishery and may slow the rate at which catch increases.

If the number of vessels were limited by a moratorium, then the maximum pounds of halibut that could be taken is constrained by the size of halibut harvested, the number of clients a vessel could service in a day (maximum number of clients per trip times the number of trips per day), and the number of days a vessel could operate during the year. The activities that increase harvesting capacity (outside of the number of operations), could be controlled with or without implementing a moratorium. However, limiting the number of passengers a vessel could carry without limiting the number of vessels may not be effective in keeping the fleet from reaching the GHL.

The halibut quota will be an important factor in determining if the guided sport fishermen will reach the GHL in a year. If the quota declines significantly when compared to 1995 levels then the guided sport fishery may very well exceed the GHL even if their sector has not experienced any growth in terms of actual pounds harvested. Under this scenario, limiting the number of vessels that can participate in the fishery will provide the fleet little protection against reaching the GHL, because the catching capacity needed to harvest the GHL will likely qualify under any moratorium scenario.

#### How would an area-wide (2C and 3A) moratorium work with LAMPS which also contain moratoriums?

The Council is considering a moratorium for IPHC areas 2C and 3A. Some of the LAMPs that are currently under development also include a moratorium. It is possible that if both the area-wide and LAMP moratoria were put into regulation they would conflict. If there are conflicts, a plan will need to be developed that defines which moratorium would take precedence over the other. For example, if the qualification requirements differ and the Deep Creek LAMP moratorium is more restrictive, what would happen? Would only those persons that qualify under the LAMP be allowed to fish in the Deep Creek area, or would any one with a state permit be allowed to fish? If the area-wide moratorium has precedence what is the purpose of a LAMP moratorium? If the LAMP moratorium took precedence, would the area-wide permit holders that did not qualify under the LAMP be forced to fish only areas outside the LAMP, such as Old Harbor, and would this negate the goal of the Old Harbor LAMP? If the intent of the Old Harbor LAMP is to allow its residents to enter the charter fishery and benefit from increasing tourism in the area, then limiting the participants in the Old Harbor area to those that already hold an area-wide permit would do Old Harbor residents little good.

On the other hand, if an area-wide permit was more restrictive, could a person that qualified under a LAMP in Old Harbor fish within the local area but not outside? Or, would the permit holder that qualified for the local plan, but not the area-wide plan, not be allowed to fish anywhere covered under the larger moratorium? The issue



of which moratorium will take precedence over the other and how the moratoria would mesh together will need to be resolved before they are developed for both LAMPs and IPHC areas.

Problems that could arise if local and area-wide moratoria did not mesh well together go beyond who could fish in a given area. It also applies to all other aspects of the moratorium's structure. One moratorium could sunset after a given number of years and the other could be permanent. One moratorium could allow permit transfers and the other may not allow transfers. A permit for a larger vessel may allow the boat to carry more than six passengers under one moratorium but not the other. The hierarchy of which moratorium would take precedence over the other needs to be clearly established prior to implementation, or only one type of moratorium should be selected.

#### Structure of the Moratorium Based on the GHIL Committee recommendations.

A moratorium's design is based on several criteria. These criteria include who would be permitted to fish, what permit recipients are required to have done to qualify, and what they are allowed to do under the permit they are issued. The following discussion pertains to the proposed Area 2C/3A moratorium.

#### *Qualification Criteria*

When the Council considered a moratorium for the guided sport fleet (halibut charter vessels) in 1997, a major obstacle in the path of implementation was determining who were the actual participants. Several sources of data existed, but none were refined enough to allow an analyst to determine who actually operated a halibut charter service during a year. The logbook system, implemented by ADF&G in 1998, should help clarify who actually participated in that year. As discussed earlier in this document, the State has expressed concern over using these data in the first year of the logbooks existence. However, as the industry becomes more familiar with filling out these reports, the data quality will likely improve. This of course assumes that everyone in the industry is filling out the log book. ADF&G has expressed concern that, in their opinion, using the 1998 log books to verify participation may not be appropriate. They feel that before the log book system is used to determine who qualifies under a moratorium, additional checks on the data quality should be conducted.

The GHIL Committee has by consensus selected the option that would issue moratorium permits based on a person having held a 1995, 1996, and 1997 IPHC license and having filed a 1998 ADF&G logbook. Under this eligibility criteria, the person would need to have held an IPHC license in each year 1995-97 and submitted a legal ADF&G logbook, which reports halibut landings, to ADF&G during any week in 1998 to qualify for a permit.

The Committee's intent was to issue the permit to a person based on his/her participation, and not vessel activity. IPHC licenses are issued to vessels and are easily trackable by ADF&G number. Licenses are also signed by the captain and/or owner of the vessel, but no unique person identifier is included on the form (e.g., SSN) other than the signature. Therefore, it would be more difficult to match persons on IPHC licenses and ADF&G logbooks than vessels. Still matching the people from the two data sets is probably possible, though it will likely require more time checking the data and will result in a greater possibility for error.

#### *Required Evidence of participation*

The GHIL Committee divided the evidence required for qualification into two categories. The first category included the information that would be required for proof of qualification. These data included information from the IPHC license, CFEC permit files for sport charter vessels, and the 1998 ADF&G Saltwater Charter Logbook. Data that could be used to supplement the mandatory information could be derived from Alaska state business license files, sportfish business registration files, records of passenger for hire insurance, ADF&G guide registration files, and proof of enrollment in a drug testing program as is required under CFR 46. It is likely that the supplemental information would only be used in cases where there is doubt about a person's eligibility after reviewing the mandatory data sources.

The IPHC dropped the requirement that halibut sport charter vessel owners, operating in Alaska, apply for an IPHC license in 1998. The reason IPHC made this change was because the Commercial Fisheries Entry Commission (CFEC) implemented a sport charter vessel permit program in 1998, and the IPHC did not want to require vessel owners to file duplicate reports to the two separate agencies. Instead the IPHC plans to use the permit information collected by the CFEC and the logbook information collected by ADF&G to fill their information needs. The IPHC had discussed continuing licensing sport charter vessels for one more year in order to have a cross check between IPHC and CFEC files. Due to the time involved in issuing the permits and the limitations in knowing whether the IPHC license was active, the IPHC opted to discontinue licensing vessels in 1998.

Currently the ADF&G logbook data are not available for the 1998 fishery. Without those data, developing an estimate of the number of persons who would qualify for a moratorium permit is not possible. The information that is currently available comes from the 1995-1997 IPHC license files. Table 1 lists the number of annual IPHC sportfish licenses held by individual vessels and persons in 1995, 1996, and 1997, and those licenses that were held in all three years, 1995-97 (in the last column). The number of persons that held an IPHC sportfish license each year from 1995 through 1997 will likely overestimate the number of permits that would be issued based on the GHL Committee's preferred alternative, because that alternative will exclude persons that held an IPHC permit each year from 1995 through 1997, but did not file an ADF&G logbook with a halibut landing any week during 1998. These 1,300+ eligible individuals/vessels (without knowing yet how many filed logbooks with ADF&G), is still more than double the vessels needed to harvest the current GHL (NPFMC, 1997). Therefore if only the 1995, 1996, and 1997 IPHC license files were used to determine eligibility, the moratorium would likely not be very effective in keeping the fleet under the GHL.

Table 1. Number of IPHC Licenses

Number of IPHC Sportfish Licenses	Year			
	1995	1996	1997	License Held All Three Years
Vessels	2,334	2,615	2,099	1,321
People	2,334	2,615	2,099	Approx. 1,340

The number of persons that held a license each year are based on the minimum number of licenses held in any one year. As an example, a person was listed as the owner of three vessels in 1995, five vessels in 1996, and eight vessels in 1997, according to IPHC records. This person would have only been given credit for holding three licenses in each year 1995 through 1997.

Preliminary information, through mid July 1998, indicates that about 890 ADF&G Saltwater Logbooks were issued to vessels homeported in Southeast Alaska, and approximately 595 Saltwater Logbooks were issued to vessels homeported in Southcentral Alaska. Of the logbooks issued for vessels in Southeastern Alaska, 290 went to the Southern Southeast area, 70 to Petersburg/Wrangell, 200 to Sitka, 290 to Northern Southeast, 20 to Haines/Skagway, and 20 to Yakutat. In the Southcentral area 400 logbooks were issued to vessels from Cook Inlet, 120 to Prince William Sound, and the remaining 75 to the Kodiak/Alaska Peninsula area. Later this fall we hope to be able to provide an update on the number of logbooks that were completed and returned to the State.

*Who would be issued the moratorium permit?*

It was the committee's intent that permits be issued to persons and not vessels. They then defined the person as the business owner or lease holder. While it may be more difficult to track persons across different data sets, it does reduce the problems associated with people using different vessels at various times during the qualifying period. For example, the transfers of fishing history would not be an issue if a vessel is bought or sold.

The problems associated with when a person should be issued a license are numerous, but they can be overcome. Recall that the IPHC license has a field for the name of the vessel, the ADF&G vessel number, Coast Guard documentation number, the vessel owner's name, the captain's name, and the license type (sport only or both sport and commercial). The only field that has information in every observation is the license type. The other fields are blank some of the time. A few examples will illustrate some of the problems encountered after briefly studying the 1995, 1996, and 1997 IPHC license files.

1) In one case Fred Smith is listed as the captain on five IPHC vessel licenses during 1995 and 1996, but in 1997 is not listed as the captain on any licenses. During 1997 Kim Smith is listed as the captain of the same five vessels that Fred Smith captained during 1995 and 1996, but did not hold a license in either 1995 or 1996. No owner was listed on the IPHC license for any of these five vessels. The question is, should any licenses be issued if the requirement is that a person held an IPHC license each year between 1995 and 1997?

2) Toney Z. Smith was listed as the owner of a vessel in the IPHC license file during 1995, but not 1996 or 1997. However, a Tony Z. Smith was listed as the owner of the same vessel during 1996 and 1997, but not 1995. It is likely that this is the same person and he should be given credit for holding a license each year. Interestingly, Peter F. Smith is listed as the captain of Tony's boat each year. Peter is also listed as the owner of four other vessels (each year between 1995 and 1997). So according to IPHC files, Peter was the captain of Tony's boat and owned four boats of his own. So, Tony may qualify for one license and Peter, four.

3) Kelly Smith is listed in the IPHC vessel files as a vessel owner and captain in 1995 and 1996. In 1997 she is only listed as a captain. William Jones is listed as the owner in 1997. Should Kelly be issued a license based on participation in each year?

Other grey areas, in terms of who should be issued a permit, may be encountered. These situations are likely to be more pronounced when the IPHC data are joined with the ADF&G logbooks.

#### *Permit Transfers*

After initially discussing that transfers should not be allowed, the Committee selected only one option, and that was that transfers should be allowed.

#### *Vessel Upgrades*

Vessel upgrades considered by the committee dealt with the number of passengers that could be carried by a vessel. It was the consensus of the Committee that the permits would be limited to six clients per vessel. The other option listed in their minutes was to allow (grandfather) larger vessels from Southeast Alaska that are currently limited to six-pack licenses to upgrade and carry more than six clients at a time.

By limiting the number of passengers a charter could carry, upgrade restrictions like those placed on the commercial fisheries may not be needed. Recall that under the groundfish and crab moratorium there is a limit on vessel length increases (20% LOA). Other limits on increasing the vessels horsepower or changing gear were also considered for the commercial fishery, but may not make as much sense in the context of charter fisheries.

#### *Duration of the Moratorium*

The GHL Committee, by consensus, selected the option of keeping the moratorium in place as long as the GHL remains in effect. If the Council chooses this option, the moratorium and GHL would be permanent, and would require further Council action to amend the program before the moratorium would cease. It also means that the Council would need to take action to keep the moratorium, if they decide to drop the GHL in the future.

Other options recommended by the Committee were to sunset the moratorium after three or five years (three years, with an option to renew it for two additional years). These options would allow new entry even if the fishery were still operating under the GHL.

### *Other Provisions of the Moratorium*

Several other provisions were also considered as part of a moratorium. These included the concept of requiring a minimum number of days fished or a minimum number of pounds of halibut caught to qualify for a permit. This concept was rejected by the committee because they felt it would be difficult to separate salmon from halibut effort. However, the ADF&G logbooks break out effort, harvest area, fished for bottomfish (halibut) and salmon and will allow analysts to determine if a skipper fished for halibut on any given charter trip and where fish were caught. The logbooks list the number of days that halibut were caught on a charter. This does not necessarily mean the entire trip targeted halibut, it would only prove that halibut were harvested. It is also possible that a charter could have gone fishing with the intent of targeting halibut, but did not record any landings. That trip would not likely count towards qualification. Yet with some simplifying assumptions about what constituted a halibut trip in 1998, it may be possible to determine if the minimum number of days fished or the minimum number of halibut needed for qualification were harvested.

Linking a guaranteed season length to the moratorium was also considered by the committee. This means that if a moratorium is put in place, a definition of the fishing season would also be needed. This was also the Council's intent under the GHL. The Council stated when they passed the GHL that they did not intend to shorten season lengths. Their intent was to slow the pace of the fishery through other, though undefined, management measures and to maintain a fishery of traditional length.

The concept of a rod permit and a sportfish reserve were also considered as part of the moratorium. Both of those concepts have been discussed in earlier sections of this document and will not be discussed further here.

### **Implementation Issues**

#### **1. Regulatory Development**

Implementing a GHL for the guided sport fishery for halibut would require the development of regulations. These regulations would specify the GHL for each portion of the fishery that is to be managed under a GHL (IPHC regulatory areas 2C and 3A) and describe the management measures that would be employed if in fact those GHLs were reached. Typically, it will take about 6 months to develop regulations, from the drafting of the proposed rule to the effective date of the final rule. Since halibut is not a groundfish species specified in a fishery management plan (FMP), no FMP amendments would be necessary for this action.

#### **2. Annual Management of the GHL**

After completion of the regulations, enforcing the GHL would require annual management to monitor catch. If the volume of catch indicated that the GHL had been reached or exceeded, management measures would have to be employed in subsequent years to ensure that guided sport harvests of halibut remain below the GHL. Several methods may be used to employ these management measures. For example, several management measures may be specified in the regulations to be used if the GHL has been reached. Choosing the appropriate management measure(s) could be left to the discretion of NMFS. Alternatively, different management measures can be specified for use for different levels of catch above the GHL. Or, a single management measure can be specified. Whatever method is used, it is important to note that the management measure(s) will be employed after the season in which the GHL was attained.

#### **3. Management Measures**

Several management measures to curtail guided sport catch of halibut if the GHL is reached have been discussed by the GHL Committee. These alternatives include: (1) line limits on boats; (2) annual angler limits; (3) vessel trip limits; (4) super-exclusive registration of charter vessels; (5) moratoria; (6) sport catcher vessel only area; and (7) local area management plans. These alternatives could have different implementation impacts.

### Line limits on boats

This management measure would restrict the number of lines that can be fished from a boat. Currently, the State of Alaska has a rod limit of one rod per person. In Southeast Alaska, a further limit of 6 rods per boat is imposed. Other constraints, such as U.S. Coast Guard 6 Passenger for Hire License, also impacts the number of lines that can be fished from a vessel. Ensuring that persons conformed to line limits would require the participation of enforcement.

### Annual angler limits

This management measure would restrict the number of halibut retained annually by an individual angler. Currently, there is a daily bag limit for halibut but no overall annual limit. This action, like line limits on boats, can be imposed by regulations but will require the participation of enforcement to ensure compliance.

### Vessel trip limits

This management measure would restrict the number of trips a vessel could take during a specific time period (e.g., only one trip per day or four trips per week). This type of limitation would must likely require a method to monitor trips to ensure conformance to the requirements. For example, punch cards could be used to monitor the number of trips or a check-out/check-in requirement could be imposed.

### Super exclusive registration

This management measure would limit the area in which a vessel could operate. Super exclusive registration could be season-long (i.e., once a vessel registers for an area, that could only be used in that area for the entire season) or only for the duration of the registration (i.e., a vessel can move to another area by changing registration area). Although this management measure may have some impacts on harvests, its primary function would be to prevent user conflicts.

### Moratoria

This management measure would limit the number of vessels by area. This defined area could be the entire regulatory area (e.g., IPHC Regulatory Area 2C) or a smaller area as defined by a LAMP. Previous experience with moratoria indicates substantial implementation and enforcement costs. Eligibility criteria must be developed based on participation in and dependence on the fishery. Applications for moratoria permits must be processed. Monitoring and enforcement must continue throughout the duration of the moratoria. Other design considerations include but are not limited to: (1) leasing of permits; (2) transferability of permits; (3) permit holder on board requirements; (4) ownership requirements (i.e., individual only or any legal entity); and (5) limit on the number of permits held by individual or other entity.

### Sport catcher vessel only areas

This option, similar to super exclusive registration, would impact user conflicts more than reductions in harvest. Enforcement and monitoring would be the primary implementation concerns with this management measure.

### Local area management plans

This management measure has potential for resolving local user conflicts and may be used to incorporate other management measures on a local basis. However, usefulness of a LAMP to maintain harvests under a GHF for an entire IPHC regulatory area may be limited unless there is significant coordination among other LAMPs within the same IPHC regulatory area. Implementing LAMPs require significant monitoring and enforcement costs, but

LAMPs do have the advantage of heightened local attention, especially if the LAMP was developed through community consensus.

### Conclusions

This preliminary examination of the problem statement for this fishery and the Council's proposed management measures initially suggests that many of the proposed measures will not keep the charter boat fleet under the GHL, since effort and removals are primarily demand-driven in an overcapitalized fleet. Simply, there are too many (double) charter vessels in the halibut fishery capable of taking far more paying passengers. This potential for increases in fishing effort overrides most of the proposed management measures the Council could recommend for limiting halibut removals. While the Council has previously stated it will not adjust the recreational bag limit or season length of the charter fishery, which appear to be among the few measures that would be effective at reducing guided sport halibut removals, it may reconsider this. Further examination of the effects of area-wide moratoria and LAMPs for addressing local depletion and overcrowding may indicate that these approaches may result in more success for addressing the problems of local depletion, overcrowding, and user conflicts.

The major conclusions from this discussion paper are:

- An area-wide moratorium may be effective in limiting the halibut catch taken by the guided sport fishermen at some point in the future, but likely well after the GHL has been exceeded.
- Implementation of both an area-wide moratorium and LAMP moratorium may result in regulations which conflict. If the Council prefers an area-wide moratorium on charter vessels, it may need to reconsider the inclusion of moratoria in LAMPs. A dual approach regarding moratoria will lead to a regulatory impasse. The Council/Board LAMP protocol ensures that proposals for LAMPs will occur with or without the halibut GHL. The issue of which moratorium will take precedence over the other and how the moratoria would mesh together will need to be resolved before they are developed for both LAMPs and IPHC areas.
- While moratoria may effectively address overcapitalization and crowding issues in the fleet, it may not address the stated goals of the GHL. Limiting the number of vessels that can participate in the fishery will provide the fleet little protection against reaching the GHL, because the catching capacity needed to harvest the GHL will likely qualify under any moratorium scenario.
- The Council should consider that the data are not yet available that would allow the Council to select a qualification criteria that could rationalize the fleet size (ADF&G Sportfish Division staff recommends verification of the 1998 logbook data before it is used to determine if a person qualifies for a moratorium).
- The ADF&G Sportfish Division staff have voiced strong opposition to an area-wide moratorium because the State constitution does not allow such a program to be implemented in other state-managed guided sport fisheries, and they are concerned about the anticipated ripple effects on those fisheries. The State has also expressed concern that communities are at different stages of development in terms of their involvement in the guided sport fisheries, and a broad moratorium may not meet each community's needs as well as LAMPs would. The State could support a moratorium or license limitation system on a local level (as a LAMP component), given sufficient justification.

Given these conclusions, the Council may wish to review a suggested revision of the approved management alternatives that staff believes clarifies Council intent and simplifies the language while eliminating apparent conflicts across and within alternatives. In addition to the structure of the management measures listed below, a committee member suggested that halibut charter boat moratorium be listed as Alternative 4 in addition to being listed as options under Alternatives 2 and 3. Staff would proceed with the analysis and the alternatives as structured on the next page, pending any Council redirection at this time.

## SUGGESTED REVISION OF PROPOSED MANAGEMENT ALTERNATIVES

**Alternative 1. Status quo. Do not develop regulations to implement a halibut Guideline Harvest Level.**  
Local area management plans would be developed on a separate track.

**Alternative 2. Convert the GHL to an allocation.** The guided sport halibut fishery would be allocated 12.76% of the combined commercial and guided sport halibut quota in area 2C, and 15.61% in Area 3A. The commercial fishery would be allocated 87.24% and 84.39% of the combined quota in Areas 2A and 3C, respectively. Under a GHL as an allocation, the guided sport fishery would close when that sector reached its allocation.

**Option A: Area-wide moratorium**

**Option B: Local moratorium**

**Alternative 3. Under a GHL, apply a range of management measures listed above to curtail catch rates of guided anglers once GHL is attained.** Apply management measures up to 2 years after attainment of GHL (1 year if data is available, but at the beginning of a year for industry stability).

- line limits
- boat limit
- annual angler limit
- vessel trip limit
- super-exclusive registration
- sport catcher vessel only area
- sportfish reserve
- rod permit

**Option A: Area-wide moratorium**

**Option B: Local moratorium**

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## Halibut GHL Committee Minutes January 12, 1999

The GHL Committee convened on January 12, 1999 at 9 a.m. Committee members in attendance were Chairman Dave Hanson, Joe Kyle, Ed Dersham, John Goodhand, Doug Ogden, Larry McQuarrie, Mike Bethers, and Bob Ward for Tim Evers. Mary Jo McNally and Robert LaGuire were absent. Staff in attendance were Jane DiCosimo, Chris Oliver, John Lepore, Earl Krygier, Rob Bentz, Kevin Delaney, Scott Meyer and Mike Beth. Eleven members of the public were in attendance.

The committee had provided comments on the October 12, 1998 draft GHL discussion paper directly to Council staff because of difficulties in scheduling a Fall 1998 committee meeting. The committee discussed the November 11, 1998 draft. A committee member objected to revisions that addressed comments that were submitted by non-committee members at the staff's request. Council staff discussed with the committee that the discussion paper is a Council document and may therefore not reflect the views of individual committee members.

Rob Bentz, ADF&G Sportfish Division, presented preliminary results of the 1998 charter vessel logbook program. He clarified that logbooks were issued to lodges but lodge logbook data cannot be separated from the total database. He also reported that outfitters cannot be managed by the State without direct authorization from the State Legislature. ADF&G staff will not be able to compare logbook results with the State-wide harvest survey for another 6-8 months, and will take at least three years to verify the accuracy of the logbook data. ADF&G staff clarified that it would recommend that the Council use the 1998 logbook data and reevaluate it as data is revised. Staff also reported on a steady decline in resident sportfish licenses and a 1% increase in 1998 non-resident licenses. Nearly all (97%) sport anglers in Southeast Alaska (Area 2C) were non-residents, while 67% were non-residents in Southcentral Alaska (Area 3A). The committee concluded that sportfish licenses do not specifically reflect halibut charter effort. Staff and the committee expressed concern on the validity of the logbook results since it has not yet been verified with the 1998 postal survey and its usefulness in evaluating participants in terms of the moratorium alternative may be limited. The fleet had been notified that non-compliance in returning logbooks would result in warnings in 1998 and citations in 1999. Bob Ward requested that logbook data be presented in terms of carrying capacity of the charter fleet.

Jane DiCosimo reviewed the discussion paper with the committee. The committee provided a number of corrections and clarifications that should be incorporated into the analysis of the various alternatives. The committee clarified that the discussion paper does not accurately explain the revised sportfish reserve concept or boat limits. The sportfish reserve would be triggered only in years of low halibut abundance when the bag limit and season length would be jeopardized. Boat limits would limit a boat to taking only one trip in 24 hours, but would not affect multi-day charters.

Kevin Delaney, ADF&G, reported on the status of the Alaska sportfish fishery. He reported that the State of Alaska is opposed to a statewide or area-wide halibut charter moratorium due to potential ripple effects of a halibut charter moratorium on other sportfish fisheries statewide, the need to provide room for economic activity in the recreational sector in many coastal communities in 2C and 3A, the lack of a halibut conservation issue, and the lack of constitutional authority for such a moratorium. The State recommends that user conflicts, and localized or seasonal depletion would be best addressed in LAMPs. Data and monitoring needs have been addressed by implementation of the Sportfish Charter Logbook. The remaining allocation issue would be best addressed by an analysis of GHL management alternatives.

Rob Bentz presented a revision of Alternative 3 and a new alternative to convert the GHL to a range for consideration by the committee. The committee concurred with the ADF&G proposal to change the GHL to a fixed allocation and to include this alternative in the analysis. They identified that the fatal flaw of the current



GHL approach is that it is tied to abundance; when abundance is high, the charter fleet can't take advantage of the full GHL and when it is low there is insufficient allocation to meet the industry's minimum needs for the bag limit and season length. A range for the GHL is necessary to recognize the lack of management precision, the difference in converting pounds to fish, the need to provide a 'floor' of allowed halibut removals for industry today and a 'ceiling' to allow for limited growth. The committee requested that ADF&G staff provide a more thorough presentation for the Council on the ramifications of its proposed alternative and the effects of using the preliminary 1998 logbook data instead of the postal survey results. Some members of the committee were concerned that the alternative did not include an area-wide moratorium. The committee further expressed concern that if the data used to calculate the GHL (equal to 125% of the 1995 charter catch based on the postal survey) might be replaced by more accurate data (1998 logbook), then the cap itself (125%) should be reexamined using the 1998 logbook data.

Ed Dersham provided a report on the status of the local area management plan process. Cook Inlet and Kodiak proposals were due in 1998, Prince William Sound and Southeast Alaska proposals are due in 1999. A workgroup is planned to develop the Cook Inlet LAMP proposal.

**The committee made the following recommendations to the Council:**

1. Update the Halibut Charter problem statement (developed in January 1995) to reflect revised halibut biomass estimates, changes in commercial halibut quotas, changes in resident and non-resident licenses, changes in visitor trends, and changes in fishing patterns as of 1998 to more clearly define the problem to be addressed by implementation of a GHL and/or charter moratorium. The statement could be further refined to remove those points that are being addressed by the Council/Board of Fisheries local area management process (#1 and #2) and the development of the Sportfish Charter Logbook Program (#5 and #6).
2. Add a new alternative to the analysis to address instability in the halibut charter industry due to an overcapitalized fleet and its latent capacity and the prospect of industrialized sportfishing in Areas 2C and 3A. The new alternative is an area-wide moratorium only, using the same moratorium criteria as stated in the June 1998 committee minutes.
3. Accept the revised list of alternatives by ADF&G (which incorporates the staff revisions) and modify Alternatives 2 and 4 to include: 1) an area-wide moratorium only, using the same moratorium criteria as stated in the June 1998 committee minutes; and 2) a prohibition on new licenses that would be triggered upon attainment of the GHL.
4. The GHL should be measured in numbers of fish (net weight) using the average weight of fish reported by area by ADF&G as a conversion factor.
5. The committee continues to affirm its recommendation that a halibut GHL is not needed. Necessary limitations on halibut charter removals or effort can be implemented through the joint Council/Board LAMP process on a community by community basis.

The revised list of alternatives as recommended by the committee to the Council is attached to the minutes.

The committee adjourned at approximately 5 p.m.

## REVISED LIST OF GHL ALTERNATIVES FOR ANALYSIS

**Alternative 1. Status quo. Do not develop regulations to implement a halibut Guideline Harvest Level.**

**Alternative 2. Convert the GHL to an allocation.**

The guided sport halibut fishery would be allocated 12.76% of the combined commercial and guided sport halibut quota in area 2C, and 15.61% in Area 3A. The commercial fishery would be allocated 87.24% and 84.39% of the combined quota in Areas 2A and 3C, respectively. Under a GHL as an allocation, the guided sport fishery would close when that sector reached its allocation.

Option A: Area-wide moratorium

Suboption: Prohibit new charter licenses upon attainment of the GHL

Option B: Local moratorium

**Alternative 3. Convert the GHL to an allocation range. (ADF&G proposal)**

The allocation range will have an upper and lower limit and would be a fixed amount expressed in numbers of halibut. The allocation range would be set by IPHC Areas 2C and 3A. Some or all of the management measures listed below would be implemented up to 2 years after attainment of the GHL (1 year if data is available), but prior to January 1 for industry stability. If the guided sport halibut harvest exceeds the upper limit of the range in a year, the guided sport fishery would be restricted to reduce the harvest back within the allocation range using management actions listed below. If the guided sport halibut harvest is restricted and the harvest is reduced below the lower limit of the range guided sport fishery management measures would be liberalized to increase the harvest back within the allocation range.

- line limits
- annual angler limit
- vessel trip limit
- super-exclusive registration
- sport catcher vessel only area
- sportfish reserve

Option A: The upper limit of the allocation range would be set at 125% of the 1995 guided sport halibut harvest. The lower limit of the allocation range would be set at 100% of the 1995 guided sport halibut harvest.

Option B: The upper limit of the allocation range would be set at 125% of the 1998 guided sport halibut harvest. The lower limit of the allocation range would be set at 100% of the 1998 guided sport halibut harvest.

**Alternative 4. Under a GHL, apply a range of management measures listed below to curtail catch rates of guided anglers once GHL is attained.**

The GHL functions as a cap. Apply management measures up to 2 years after attainment of GHL (1 year if data is available, but prior to January 1 for industry stability).

- line limits
- boat limit
- annual angler limit
- vessel trip limit
- super-exclusive registration
- sport catcher vessel only area
- sportfish reserve
- rod permit

Option A: Area-wide moratorium

Suboption: Prohibit new charter licenses upon attainment of the GHL

Option B: Local moratorium

**Alternative 5. Area-wide moratorium only.**

The criteria for an area-wide halibut charter moratorium under Alternatives 2, 4, and 5 are:

Years of participation

- 1995, 1996, and 1997 IPHC licenses and 1998 logbook (*committee preferred option*)
- 2 of 3 years (1995-97) plus 1998 logbook
- 1 of 3 (1995-97) plus 1998 logbook
- license or logbook in any one year (1995-98)

Owner vs Vessel

- owner/operator or lessee (the individual who has the license and fills out logbook) of the charter vessel/business that fished during the eligibility period (based on an individual's participation and not the vessel's activity) (*committee preferred option*)
- vessel

Evidence of participation

- mandatory:  
IPHC license (for all years)  
CFEC number (for all years)  
1998 logbook
- supplementary:  
Alaska state business license  
sportfish business registration  
insurance for passenger for hire  
ADF&G guide registration  
enrollment in drug testing program (CFR 46)

vessel upgrade

- license designation limited to 6-pack, if currently a 6-pack, and (*committee preferred option*)  
inspected vessel owner limited to current inspected certification (held at # of people, not vessel size)
- allow upgrades in Southeast Alaska (certified license can be transferred to similar sized vessel)

transfers

- yes (*committee preferred option*)

duration for review

- tied to the duration of the GHM (*committee preferred option*)
- 3 years
- 5 years (3 years, with option to renew for 2 years)

### HALIBUT CHARTERBOAT GHL DISCUSSION PAPER

The Department of Fish and Game is submitting one additional management alternative for Council consideration when reviewing the GHL discussion paper during their February meeting. The new alternative and amended language to alternative 4 are written in **bold underline**.

#### **Alternative 1. Status quo. Do not develop regulations to implement a halibut Guideline Harvest Level.**

Local area management plans would be developed on a separate track.

#### **Alternative 2. Convert the GHL to an allocation.**

The guided sport halibut fishery would be allocated 12.76% of the combined commercial and guided sport halibut quota in area 2C, and 15.61% in Area 3A. The commercial fishery would be allocated 87.24% and 84.39% of the combined quota in Areas 2C and 3A, respectively. Under a GHL as an allocation, the guided sport fishery would close when that sector reached its allocation.

**Option A: Area-wide moratorium**

**Option B: Local moratorium**

#### **Alternative 3. Convert the GHL to an allocation range.**

**This allocation range will have an upper and lower limit and would be a fixed amount expressed in pounds of halibut. The allocation range would be set by IPHC Areas 2C and 3A.**

#### **Options for Analysis:**

**Option A: The upper limit of the allocation range would be set at 125% of the 1995 guided sport halibut harvest. The lower limit of the allocation range would be set at 100% of the 1995 guided sport halibut harvest.**

**Option B: The upper limit of the allocation range would be set at 125% of the 1998 guided sport halibut harvest. The lower limit of the allocation range would be set at 100% of the 1998 guided sport halibut harvest.**

#### **Management Intent:**

**If the guided sport halibut harvest exceeds the upper limit of the range in a year, the guided sport fishery would be restricted to reduce the harvest back within the allocation range.**

**If the guided sport halibut harvest is restricted and the harvest is reduced below the lower limit of the range guided sport fishery management measures would be liberalized to increase the harvest back within the allocation range.**

**Alternative 4. Under a GHL, or an allocation range, apply a range of management measures listed below to curtail catch rates of guided anglers once the GHL or the allocation is attained.**

Apply management measures up to 2 years after attainment of GHL (1 year if data is available, but at the beginning of a year for industry stability).

- line limits
- boat limits
- annual angler limit
- vessel trip limit
- super-exclusive registration
- sport catcher vessel only area
- sportfish reserve
- rod permit

**Option A: Area-wide moratorium**

**Option B: Local moratorium**

**AREA 2C SPORT AND COMMERCIAL HALIBUT HARVESTS: 1995 - 1998**

YEAR	<u>SPORT CHARTER HARVEST</u>		<u>COMMERCIAL HARVEST</u>	
	# OF FISH	MILLIONS LBS.	MILLIONS LBS.	QUOTA
1995	47,338	0.94	7.79	9.00
1996	41,060	0.92	8.53	9.00
1997	42,206	0.86	9.64	10.00
1998*	63,852	1.78	9.66	10.50

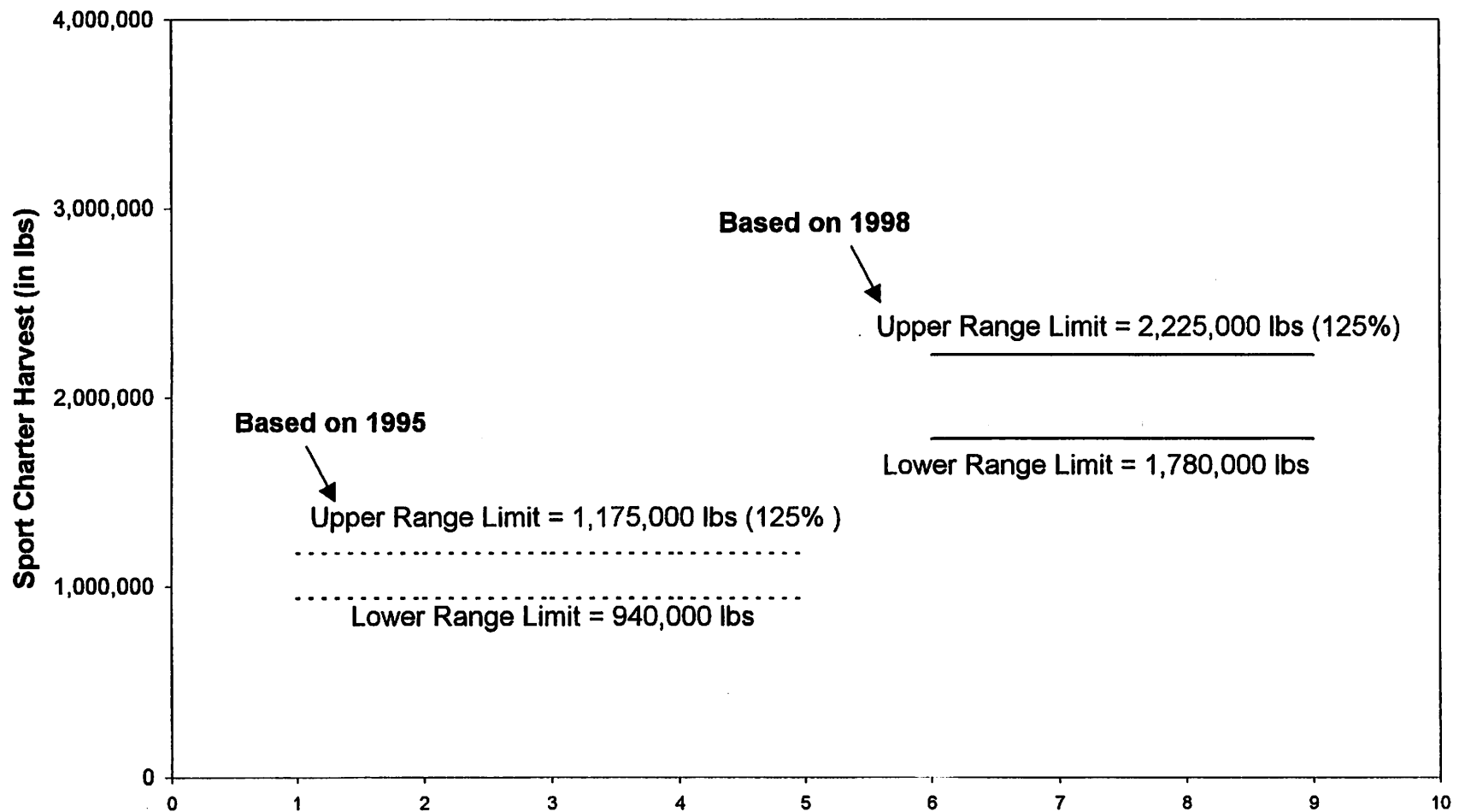
\*Charter harvest data in 1998 are based on preliminary results from the 1998 Saltwater Charter Vessel Logbook. The charter harvest data for 1995 - 1997 are from the annual Statewide Harvest Study report.

**AREA 3A SPORT AND COMMERCIAL HALIBUT HARVESTS: 1995 - 1998**

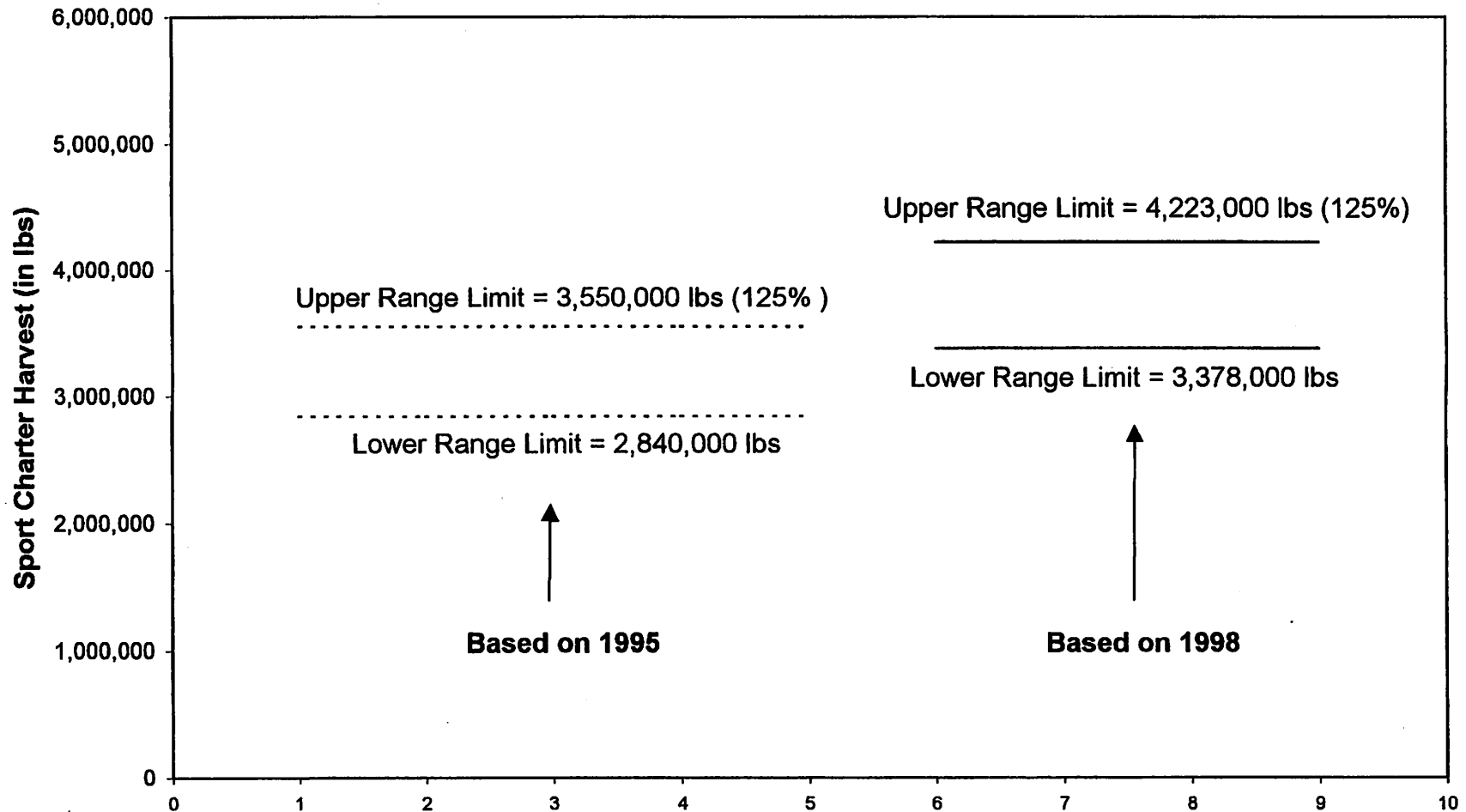
YEAR	<u>SPORT CHARTER HARVEST</u>		<u>COMMERCIAL HARVEST</u>	
	# OF FISH	MILLIONS LBS.	MILLIONS LBS.	QUOTA
1995	138,025	2.84	18.19	20.00
1996	146,066	2.86	19.69	20.00
1997	156,924	3.49	24.68	25.00
1998*	161,701	3.38	24.64	26.00

\*Charter harvest data in 1998 are based on preliminary results from the 1998 Saltwater Charter Vessel Logbook. The charter harvest data for 1995 - 1997 are from the annual Statewide Harvest Study report.

## Area 2C Charter Harvest Allocation Range Using 1995 and 1998 Harvest Estimates



## Area 3A Charter Harvest Allocation Range Using 1995 and 1998 Harvest Estimates





## 1998 CHARTER VESSEL LOGBOOK PROGRAM

### PRELIMINARY RESULTS

The Division of Sport Fish initiated a statewide logbook reporting program for saltwater charter vessels in 1998. Over 100,000 daily records were received from charter vessel operators during the 1998 fishing season. About eight months of Administrative Clerk time was required to key the logbook information. The summaries from this data that are presented below should be considered very preliminary at this time.

#### SOUTHEAST ALASKA – IPHC AREA 2C

Approximately 1,250 vessels were licensed in 1998 with the Commercial Fisheries Entry Commission (CFEC) as charter vessels intending to operate in Southeast Alaska. ADF&G staff issued about 910 logbooks to fishing businesses with vessels homeported in the Southeast Alaska area. Of the logbooks issued for these vessels about 290 were in the Southern Southeast area (Ketchikan and Prince of Wales Island), 80 to Petersburg/Wrangell, 205 to Sitka, 300 to Northern Southeast (Juneau, Gustavus, Elfin Cove, Angoon, Hoonah) and about 20 each to both Yakutat and Haines/Skagway.

If ADF&G received at least one weekly logbook form that contained information from at least one charter trip that fished either exclusively for bottomfish or fished part of their trip for bottomfish the charter vessel turning in the form was considered an “active” charter vessel. We have identified 625 unique vessels that were active in Southeast Alaska in 1998.

These 625 active vessels conducted 17,326 charter fishing trips where clients fished either exclusively for bottomfish or fished part of their trip for bottomfish. The number of clients on these charter trips is estimated at 61,820; an average of four clients per trip. Only three percent of the clients were residents of Alaska. The clients on these charter trips harvested 63,852 halibut and caught and released an additional 28,673 halibut.

#### SOUTHCENTRAL ALASKA – IPHC AREA 3A

Approximately 1,320 vessels were licensed in 1998 with the Commercial Fisheries Entry Commission (CFEC) as charter vessels intending to operate in Southcentral Alaska. ADF&G staff issued about 655 logbooks to fishing businesses with vessels homeported in the Southcentral Alaska area. Of the logbooks issued for these vessels about 460 were issued to vessels from Cook Inlet, 120 to Prince William Sound, and the remaining 85 to the Kodiak/Alaska Peninsula area.

If ADF&G received at least one weekly logbook form that contained information from at least one charter trip that fished either exclusively for bottomfish or fished part of their trip for bottomfish the charter vessel turning in the form was considered an “active” charter vessel. We have identified 518 unique vessels that were active in Southcentral Alaska in 1998.

These 518 active vessels conducted 18,530 charter fishing trips where clients fished either exclusively for bottomfish or fished part of their trip for bottomfish. The number of clients on these charter trips is estimated at 97,671; an average of five clients per trip. Only 33 percent of the clients were residents of Alaska. The clients on these charter trips harvested 161,701 halibut and caught and released an additional 148,012 halibut.

#### ALASKA SPORT FISHING LICENSE SALES DECLINE IN 1998

The number of Alaska residents who purchased resident sport fishing licenses declined by over 3,100 people, a drop of nearly three percent from 1997 license sales. The number of nonresidents that purchased a sport fishing license increased by almost 1,900 people, an increase of one percent from 1997.

**RECEIVED**  
JAN - 4 1999  
N.P.F.M.C

To: Richard Lauber, Chairman, NPFMC  
From: Robert D. Schell, Board Chairman, Seafood Producers Cooperative  
Subject: Proposed GHL for Guided Sport  
Date: January 3, 1999

I am writing on behalf of the five hundred members of Seafood Producers Cooperative. We support the concept of a GHL for the guided sport fishery as outlined in alternative 3 of the discussion paper dated November 11, 1998. We certainly **DO NOT** endorse the conversion of the GHL to an allocation.

In reading through the discussion paper, it was quite apparent that much emphasis was given to the economic well being of the guided sport industry, but little discussion of the economic well being of the commercial industry.

With the onset of the IFQ halibut fishery and the subsequent ability of fishermen to deliver a fresh product to the market place over an eight month period, has come a concomitant need to change the way halibut is marketed and in the form in which it is processed for market. To this end, our cooperative has made a considerable investment in both staff and facility to better meet the needs of this changing market. A defacto allocation away from the commercial fleet to the guided sport industry would deal an economic blow to our members in the cooperative, the co-op employees, the co-op itself and to the community of Sitka, the city in which our plant is located.

IPHC staff has recommended a reduction in 2B and 3A halibut quotas with a slight increase in 2C. By reading the reports that led up to these recommendations, it is quite easy to infer that 2C will be seeing a suggested decrease in the year 2000. It appears that the areas form 3A south have seen their peak for the foreseeable future. It is critical for our survival that the commercial fleet does not see reductions in quote beyond that necessary for the biological success of the stocks.

As individuals, our members have drained savings, mortgaged permits, boats and homes to stay a participant or to become a viable participant in the halibut fishery. As cooperative members, they have taken on debt for facilities and staff to meet production and market needs. In short, they have invested in their fishery future-in this case the halibut fishery. As a council, you need to acknowledge this investment.

As an individual, I would certainly have been well satisfied with a 125% guarantee of my 1995 production- especially with out having to go out and purchase those additional pounds on the open market.

**RECEIVED**  
JAN 25 1999  
N.P.F.M.C

1/24/99

North Pacific Fishery Management Council  
605 West 4th Ave., Suite 306  
Anchorage, Alaska 99501-2252

North Pacific Fishery Management Council Members,

At our Port Alexander Fish and Game Advisory Committee meeting on Jan. 15th we voted unanimously to write the N.P.F.M.C.. supporting measures to limit the halibut guided sport fishery.

We have sent written comments in the past supporting the council to limit the halibut guided sport fishery.

We request that the Council identify measures for analysis that will effectively restrict the guided sport halibut fishery to the guideline harvest level.

Thank you for your time and consideration.

Respectfully Submitted,

*Marty Remund*

Marty Remund, Chairman  
Port Alexander Fish and Game Advisory Committee  
P.O. Box 8147  
Port Alexander, AK. 99836

PORT ALEXANDER ADVISORY FISH AND GAME COMMITTEE  
JANUARY 15, 1999 11:15 A.M.  
MEETING HELD AT LONGSTRETH RESIDENCE  
PORT ALEXANDER, ALASKA

MEMBERS PRESENT: LAURA RIDEOUT, SCOTT RIDEOUT, MARTY REMUND,  
CINDY LONGSTRETH, DEBRA ROSE GIFFORD

#### ORDERS OF BUSINESS

LAURA RIDEOUT CALLED THE MEETING TO ORDER.

ADVISORY COMMITTEE MEMBER FORMS WERE HANDED AND FILLED OUT.

OFFICER ELECTIONS FOLLOWED.  
CINDY LONGSTRETH NOMINATED MARTY REMUND FOR CHAIRMAN, LAURA  
RIDEOUT SECONDED. MARTY CONCURRED. ALL IN FAVOR.  
SCOTT RIDEOUT NOMINATED DEBRA GIFFORD FOR VICE CHAIRMAN, LAURA  
RIDEOUT SECONDED. DEBRA CONCURRED. ALL IN FAVOR.  
CINDY LONGSTRETH NOMINATED LAURA RIDEOUT FOR SECRETARY, MARTY  
REMUND SECONDED. LAURA CONCURRED. ALL IN FAVOR.  
ALL MEMBERSHIP FORMS COLLECTED.

LAURA OFFERED TO HELP MARTY CHAIR THE MEETING.

FEDERAL SUBSISTENCE BOARD  
LAURA BROUGHT UP THAT THE FSB IS TAKING APPLICATIONS FOR BOARD  
MEMBERS. DEAD LINE TO APPL. IS MARCH 26. IT WAS DECIDED TO  
PUBLICLY ANNOUNCE AND POST.

NEM MEMBERS  
LAURA SUGGESTED WE ANNOUNCE IF ANYONE IS INTERESTED IN BECOMING  
A MEMBER OF THE LOCAL ADVISORY BOARD TO CONTACT MARTY OR DEBE.

SE FINFISH AK. BOARD OF FISH  
LAURA WANTED TO REMIND PEOPLE THAT SE FINFISH MEETING WILL BE  
ON FEB. 16, 2000 IN SITKA. IF ANYONE HAD ANY PROPOSALS THAT  
THEY SHOULD BE THINKING ABOUT GETTING THEM IN.

BOARD OF FISH 98/99 PROPOSALS ( AREAS UP NORTH)  
WE DISCUSSED PROPOSALS #350. IT WAS FELT THAT SOLUTIONS TO ISSUES  
IN THESE AREA, SHOULD NOT EXTEND TO ALL AREAS.  
#125,126 DISCUSSION ON THESE CONCERNING CREATING HALIBUT  
MANAGEMENT AREAS.

LAURA PROPOSED OUR COMMENTS ON PROPOSAL # 67-391 BE ,THESE  
PROPOSALS ARE NOT IN OUR REGION AND WE WOULD LIKE TO SEE PROBLEMS  
RESOLVED BY PEOPLE IN THOSE REGIONS. WE SUPPORT THE CONCEPT  
ON REGIONAL/AREA MANAGEMENT.

#### → HALIBUT GUIDED SPORT MANAGEMENT

MARTY READ PART OF AN ARTICLE FROM AN ALFA NEWSLETTER ADDRESSING  
THE FACT THAT THE NATIONAL PACIFIC HALIBUT MANAGEMENT COUNCIL  
HAS BEEN DRAGGING THEIR FEET ON THE SLOW DOWN ISSUE OF THE

HALIBUT GUIDED SPORT FLEET. THIS SLOW DOWN IS TO HELP RESTRAIN THEIR ANNUAL CATCH TO MEET THE GUIDELINE HARVEST LEVEL, SET BY THE COUNCIL. IT IS FELT THAT THE ANALYSIS MEASURES RECOMMENDED WILL NOT BE ENOUGH TO ACCOMPLISH THE GOAL OF THE SLOW DOWN. DISCUSSION FOLLOWED. IT WAS DECIDED THAT WE SHOULD WRITE A LETTER SUPPORTING THAT MEASURES BE IDENTIFIED FOR ANALYSIS THAT WILL EFFECTIVELY RESTRICT THE GUIDED SPORT HALIBUT FISHERY TO THE GHL. ALL IN FAVOR. MARTY SAID HE WOULD WRITE LETTER. IT WAS SUGGESTED TO SEND A COPY OF THAT LETTER TO THE STATE BOARD OF FISH.

#### SEABIRD AVOIDANCE

MARTY BROUGHT IT TO OUR ATTENTION THAT ONLY TWO MORE ALBATROSS HAD TO BE CAUGHT TO POSSIBLY SHUT DOWN THE LONGLINE FISHERY. DISCUSSION FOLLOWED. IT WAS FELT ALASKA HAS SUCH A LARGE FISHING AREA THAT MAYBE AREAS SHOULD BE IDENTIFIED AND CATCH LIMITS OF ALBATROSS SHOULD BE ACCESSED ACCORDING TO AREAS. THE FISHERMEN PRESENT SAID THAT THEY HAD NO INCIDENT OF ALBATROSS CATCH AND THEY FELT IT WAS BECAUSE THEY SET SLOW AND WEIGHTED THEIR LINES.

#### FOREST SERVICE SALT WATER SHORELINE-BASED RECREATION CARRYING CAPACITY ANALYSIS

THE FOREST SERVICE HAS ASKED FOR COMMENTS ON THEIR PROPOSALS FOR SALTWATER SHORELINE BASED OUTFITTING AND GUIDING ON THE CHATHAM AREA AND THEIR RELATED RECREATION CARRYING CAPACITY ANALYSIS. COMMENT PERIOD WAS EXTENDED TO FEB. 4.

WE ARE IN UNIT 04-01 S.E. BARANOF. DISCUSSION FOLLOWED.

COMMENTS ON ANALYSIS-

SHORELINE ROS- SHOULD READ PRIMARILY PRIMITIVE, WITH AREAS OF PRIMITIVE NON-MOTORIZED USE

LAND USE DESIGNATION-SHOULD READ WILDNESS REMOTE RECREATION, WE QUESTION SEMI-REMOTE RECREATION. WE WOULD LIKE TO REMAIN REMOTE.

GROUPS A AT TIME- WHERE DID THE NUMBER 14 COME FROM ? HOW WAS IT ARRIVED AT ? YOU SAY A GROUP CAN CONSIST OF ONE TO MORE THAT 12. WE QUESTION THAT NUMBER. WE FEEL THAT THE NUMBER IN THE GROUP SHOULD BE AT MOST 4-6 AND THE NUMBER OF GROUPS AT A TIME SHOULD BE NO MORE THAN 7. ONE PERMIT PER ENTITY.

WE FEEL IT'S IMPORTANT NOT TO OVER UTILIZE AREAS, BUT TO BEAR IN MIND THE CAUSE AND EFFECT OF THE RURAL LIFESTYLE ALREADY ESTABLISHED IN THESE AREA. ALSO TO CONSIDER THE CUSTOMARY AND TRADITIONAL USE OF THE PEOPLE IN THE COMMUNITIES IN THIS AREA. WE SUPPORT CONTINUED MONITORING OF LOCATIONS FOR POTENTIAL IMPACT TO VEGETATION, WATER AND SOIL, WILDLIFE, AS WELL AS, THE IMPACT TO THE RURAL COMMUNITIES IN THIS AREA. WE WOULD LIKE TO SEE PREFERENCE GIVEN TO LOCAL GUIDES, THAT WOULD SUPPORT THE RURAL ECONOMY OF COMMUNITIES IN THIS AREA. ( WE WOULD LIKE TO SEE THIS ANALYSIS PROVIDE FOR THE SUSTAINABLE USE FOR RESIDENTS, SMALL BUSINESS AND OTHER DEVELOPMENT BENEFICIAL TO THE COMMUNITIES IN THIS AREA.)

IT WAS DECIDED TO CALL MARTI MARSHALL TO INQUIRE ABOUT HOW BEST TO COMMENT, IN PERSON OR BY LETTER. WE COULDN'T REACH HER. LEFT MESSAGE.

IT WAS DECIDED TO SEND THE FOREST SERVICE A COPY OF OUR MINUTES. SCOTT MOVED TO ADJOURN. SECONDED BY CINDY. ALL IN FAVOR MEETING ADJOURNED 12:15 P.M.

*Respectfully Submitted,*

*Laura Rideson*

# Alaska Sportfish Council

Post Office Box 32323 • Juneau, Alaska 99803 • (907) 789-7234 • Fax (907) 789-7235

January 26, 1999

Richard Lauber, Chairman  
North Pacific Fishery Management Council  
605 W4th Ave #306  
Anchorage, AK 99501-2252

RECEIVED  
JAN 26 1999  
N.P.F.M.C

Dear Rick,

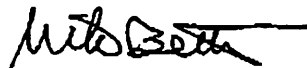
I've been involved in the North Pacific Fishery Management Council (NPFMC) since beginning of the sport/charter management issue and have always been impressed by the number of questions on sport fishing and guiding asked by the council. Not only is there a lack of sport fish representation on the council, there has always appeared to be a lack of understanding and knowledge of Alaska's sport fisheries, specifically the guided halibut sport fishery on which you may soon take action.

It's a given that if the NPFMC takes regulatory action on Alaska's halibut sport fishery, the council will be dealing in sport fishery issues more and more as time goes on and the need for information and understanding of Alaska's sport fisheries will only increase. In an attempt to provide information to the council members, I've drafted the following on Alaska's halibut sport fishery and concepts of the guided sport industry.

I'm not trying to get you to sell your dragger or IFQ's and take up chartering or even think like I do on this subject. Please just read the following, give it some thought and call me if you have any questions on sport fishing or guiding. There is a lot more that could be included in this discussion.

Thank you. I look forward to hearing from you.

Sincerely,



Mike Bethers  
Executive director

Please see that each council member receives a copy of this. Thank You.

## Halibut Sport Fishery

The North Pacific is the only place left in the world where an angler can expect a reasonable opportunity to catch a halibut and this attracts thousands of anglers to the sport fishery every year from both in and out of state. There are about 450,000 sport anglers licensed in the state as compared to about 4000 halibut IFQ holders. Probably one of the greatest differences between sport and commercial fisherman is in numbers of fisherman and in harvest. Commercial fisherman are very few in number but take a very high percentage of the resource while sport fisherman number in the hundreds of thousands however take only a very small percentage of harvest.

Commercial fishermen sell their catch to put groceries on the table and the more poundage they sell, the more groceries get put on the table. It is illegal for any sport caught fish taken in Alaska to be sold. However, most sport anglers fish halibut to put meat on the table. Halibut sport fishing provides a great amount of enjoyment for anglers. There are a lot of halibut caught and released, and anglers releasing halibut also keep a portion of their catch. There appears to be a tendency in some areas for anglers to release large females and retain smaller sized halibut.

Guided sport fishermen using charter boats often fish the same waters as non-guided anglers, however charter boats often run farther from population centers to offer clients better opportunity. In some areas there are actually more non-residents fishing unguided, than from charter boats.

Sport fishermen normally deal or talk in numbers of fish and commercial guys deal in pounds of fish.

Council members are probably more familiar with factors limiting one's commercial catch than with factors limiting sport catches. Many factors limit opportunity to sport catch halibut and these factors are different in different areas of the state. Factors that limit ones ability to sport catch halibut include

- A) gear limit, 1 rod/2 hooks maximum per angler
- B) daily limit of 2 fish, 4 in possession
- C) catch efficiency of sport gear
- D) weather
- E) short cruise range of sport boats
- F) availability of halibut in local area
- G) time available for sport fishing

The entire Alaska sport catch is said to be biologically insignificant by the IPHC. Non-guided anglers typically retain smaller halibut than anglers fishing in guided parties. The average sport caught halibut is normally 20-30 pounds with a good portion of fish being less than the 32-inch commercial limit. Many commercial fishermen have said that sport anglers should also have a 32-inch limit. However, if sport anglers were required to keep



only halibut over 32 inches it would reduce the number of fish over 32 inches that are now available to the commercial fishery.

Sport boats may anchor, drift or back troll to stay on position while fishing. Wind and tide are very important factors in how well one can fish and generally dictate how deep one can fish with sport gear on a given day.

Baited circle hooks are standard terminal gear, however some operators also use heavy jigs. Sinkers from 8 oz to 3-4 pounds are common.

Charter boats typically provide sport gear for clients to use. Rods are typically 5 to 7 feet in length and quite stout. Reels are large capacity and line test is usually 50 to 130 pound test. The price of a good rod and reel combo is similar to the cost of a skate or halibut gear rigged.

#### A Sport/Charter Boat Compared to a Commercial Vessel

A commercial vessel is rigged with gear designed to catch large numbers of fish very effectively and has tremendous harvest capability depending on size of vessel, while a sport fishing boat has absolutely no harvest capability. The harvest capability of a sport boat is dependent on the number of anglers fishing from the boat.

Just for comparison, one long liner with a 1000 hook set in the water would have the same number of hooks fishing as 125 charter or sport boats fishing four anglers with two hooks each (the maximum amount of gear).

Charter boats range in size from about 16 to 80 feet in length, with most boats being 20-36 feet long. In southeast all sport boats (charter included) are limited to no more than six sport lines in the water. Halibut charter boats average four clients per trip in southeast and five clients in south central. In southeast, larger certified boats can only fish six lines, however, in south central, certified vessels may fish more rods (up to their certified limit).

Charter boats vary in the amount of high tech equipment they carry, just like commercial boats. Most boats in my area carry radar, video sounders, g.p.s., and chart plotters are becoming common.

Charter boats are typically smaller and less rugged than commercial vessels. Charter boats are for the most part single purpose boats that are not adaptable to other commercial uses. There are a few charter boats in operation that have changed over from commercial fisheries and there is a handful of operators that participate in both sport charter and commercial fisheries.

## The Charter Business

The typical "charter business" is comprised of one boat capable of carrying six passengers (or less) which is operated by the owner. Some boats employ a deckhand and some don't.

Some boats/businesses are independent and attract clients themselves while other boats may work for brokers who act as middleman between client and boat operator. Independent boats typically spend more on advertising, communication and client transportation, etc. than boats working for brokers. Brokers typically do the advertising and incur more expense and thus pay less per client than the boat would get if working independently. Brokers often have a contract with a cruise ship or tour business to provide sport fishing for customers.

Some sport fishing lodges own their own fleet of boats and some lodges hire operators with their own boats. Lodges are often located where they are visible to commercial fishermen and are responsible for many perceptions of over harvest etc. by guided anglers. Sport fishing lodges are typically located near good fishing locations for the same reasons that commercial guys are there - there's good fishing to be had. Lodge harvest capability is dependent on the number of guests - just like a charter boat. A lodge worth ten million dollars - with 10 guests would be limited to 20 halibut per day for clients.

In south central, charter boats tend to be more single species, say halibut only. In southeast, more active boats tend to fish both salmon and halibut on a given day. Some boats also do whale watches, eco tours, hunter transport, freight delivery, kayak hauling, etc.

A very important concept of a charter fishing business is that this business is demand driven. If there aren't people willing to pay the price or wanting to go fishing - there won't be a charter business. Developing clientele is one of the most expensive and time consuming costs associated with professional sport fishing.

A typical "active" charter operator seriously trying to maximize his potential will probably need to carry at least 300 clients a season in order to keep his head above water. That's figuring about \$150.00 per client and no big breakdowns. Given that a charter boat has at least a 50% operating expense, you can see about the best an operator can hope for is adequate wages in the summer and good luck finding a winter job. You've heard commercial fishermen say that even though they don't make much money fishing that it is their "way of life". Sport fishing is exactly the same to many charter operators and fishing guides.

Commercial fishing vessels have particular safety regulations while charter boats have different requirements. Following are the requirements needed to run a charter boat.

- A) Business license
- B) Commercial vessel license
- C) Outfitter and/or guide license
- D) Sport fishing license
- E) USCG license to carry passengers
- F) USCG vessel registration or certification
- G) USCG required vessel equipment
- H) Proof of enrollment in random drug testing
- I) Local sales tax registration and payment
- J) Some brokers and business require minimum levels of insurance coverage

One difference between commercial fishing and chartering is the impact of missed fishing on these fisheries. Commercial long liners have from March 15 to November 15 in which to catch their IFQ. If a commercial fisherman missed fishing due to weather or other factors he can go out later in the season and catch the same amount of fish as he could have caught earlier and there would be no net loss.

Charter boats however, being people driven, need clients to haul and clients are available only during the short summer season. A charter boat is limited to a maximum number of clients per trip and if a trip or day is missed it cannot be recaptured later. You can't make more trips per day to make up and you can't make it up at the end of the season because clients are no longer available. Given the short summer season and availability of clients, downtime is devastating for a charter or guiding business.

Fishing seasons for most active established charter boats and lodges are booked prior to the beginning of the season. This is why the charter industry has stated that stability is so important in providing angling opportunity. Clients that have paid in advance for a fishing trip (angling opportunity) expect to receive what they were sold and paid for. This is why in season restrictive regulatory changes are devastating for sport fishing businesses.

Commercial fishermen often argue that Alaskan charter boats take too many non-residents as clients. Many Alaskan's often fish for themselves and there simply aren't enough resident clients available in state to operate a professional sport fishing industry. This is similar to the commercial fishing industry - how viable would Alaska's commercial fishing industry be if production had to be sold in state? It wouldn't work!

**RECEIVED**

JAN 26 1999

**N.P.F.M.C**

1/25/99

North Pacific Fisheries Management Council,

I'm writing in regards to the halibut guided sport management issue.

I've longlined for halibut in S.E. Alaska with my husband since the late seventies. My son and daughter fish with us also.

I've written in the past supporting the Council to limit the halibut guided sport fishery. I think it was a good move by the Council adopting the guideline harvest level for the halibut guided sport fishery.

I urge the Council to identify measures for analysis that will effectively restrict the halibut guided sport fishery to the guideline harvest level. Thanks for your time and consideration.

Sincerely,

  
Jean Remund

P.O. Box 8147

Port Alexander, AK, 99836

**Alaska Happy Bear Charters**

PO Box 1666  
Valdez, Alaska 99686  
(907) 835-2927

**RECEIVED**

JAN 27 1999

N.P.F.M.C

January 27, 1999

North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Ave., Suite 306  
Anchorage, Alaska 99501-2252

**Agenda Item C-5, Halibut Charter GHF**

Mr. Lauber and Council members.

I'd like to express my concerns on the Halibut harvest by guided charter operators. First, management plans for the Sport-fishery must be done by regions, IPHC area 3A works fine for management of the commercial fishery, however it is too large and offers too much diversity to manage as a collective fishery when sport-fish issues are included.

Second, I feel proposed years to qualify for the moratorium are too restrictive, as I fished 1987-1993 and have financially planned to return to the guided fishery in the near season.

The moratorium criteria as proposed by the GHF task force does not provide reasonable historical participation of the fishery. As proposed, I would be excluded from the fishery, which causes financial loss to myself.

Thank you for your time.

Greg Heuschkel  
Owner

**Agenda Item C-5, Halibut Charter GHL**

Submitted 27 January 1999

By: Seward Charterboat Association, Valdez Charterboat Association  
& Valdez Fish & Game Advisory Committee.North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Ave., Suite 306  
Anchorage, Alaska 99501-2252**RECEIVED**  
JAN 27 1999  
N.P.F.M.C

Dear Mr Lauber and Members of the Council

Per the discussion paper of the Charter GHL committee, the problem statement indicates the areas of the councils concerns with respect to the growth of halibut charter operations, lodges and outfitters. As expressed on page 1 of the GHL discussion paper, due to difficulty in scheduling a meeting of the GHL committee, the discussion paper was mailed to the committee members only and individual comments were addressed in preparation of the final report. The public process is not represented in this discussion paper. This letter is part of the public process and is written in regards to the councils expressed concerns as identified below in block caption, followed by response. Comments in regards to each proposed Alternatives as provided by the GHL committee follow.

**Expressed Council Concern #1**

*i. Pressure by charter operations, lodges and outfitters may be contributing to localized depletion in several areas.*

It is agreed that pressure by charter operations is contributing to localized depletion in several areas. Lodges and outfitters currently do not have any reporting requirements if they are operating in an un-guided role. The removals are unknown by these commercial entities.

Since the development of the Commercial IFQ system in 1995. The Prince William Sound region of area 3A has experienced a tremendous growth in near shore harvest based on IPHC harvest data.

In Prince William Sound, the 1998 sport-guided logbook data reflects guided Halibut harvest to be 859,767 pounds of Halibut removed from the IPHC statistical areas of 230, 232, 242 & 240. The IPHC reports that the 1997 IFQ halibut harvest from the same IPHC statistical areas at 4,636,000 pounds. The commercial harvest has increased by 2,078,000 pounds since 1995 to 1997. The first year (1995) of the IFQ harvest in these same statistical areas the harvest was 2,558,000 pounds. Obviously the localized depletion is not only the Sport-guided effort; the IFQ system has changed the traditional methods in the commercial halibut fishery. The near shore removals by the commercial harvest on the shared fishing grounds with the guided and un-guided effort during the same periods is creating increased gear conflict situations. The near-shore depletion is a problem shared by all users.

The guided and un-guided halibut sport-fishery is made up of vessels with limited mobility by range and time from their ports of origin, should no management measures be taken, local depletion could extend beyond the range of the guided and un-guided sport-fishery boats of this region. Adjacent (outside) areas of higher halibut abundance are not accessible to the majority of guided and un-guided sport-fishery boats.

#### **Expressed Council Concern #2**

*2. The recent growth of charter operations, lodges and outfitters may be contributing to overcrowding of productive grounds and declining catches for historic sport and subsistence fishermen in some areas.*

Currently this is not a known problem associated to the Prince William Sound; any management measures identified to address this part of the problem statement should come from the LAMP (Local Area Management Plan process)

Prince William Sound is on the verge of potential explosive growth; the road to Whittier will provide easier public access from Alaska's largest population community of Anchorage to Prince William Sound. Plans for infrastructure development are currently in progress to accommodate growth in the Whittier harbor. The three primary Sportfishing ports of Prince William Sound will be Valdez, Seward and Whittier. Of these three ports, the current slips accommodate 1284 vessels. The current collective waiting list of the same three ports is 1392. There are more vessels looking for slips to come into PWS than are currently here. This growth will contribute to overcrowding on productive grounds and PWS will experience declining catches from historic levels. Not just Sport-guided but equally in the historic sport fishing. The best approach to address solution options would again remain in the region associated with the problem. The Local Area Management Plan process would be the best solution.

#### **Expressed Council Concern #3**

*3. As there is currently no limit on the annual harvest of halibut by charter operations, lodges, and outfitters, an open-ended reallocation from the commercial fishery to the charter industry is occurring. This reallocation may increase if the projected growth of the charter industry occurs. The economic and social impact on the commercial fleet of this open-ended reallocation may be substantial and could be magnified by the IFQ program.*

Without any data to address annual harvest of the commercial lodges and outfitters operating in an un-guided role, the ability of the NPFMC to address these commercial users is not practical. It is recommended that a reporting program be implemented.

Due to geographic configuration of the IPHC area 3A, it is very clear that four independent regions exist: 1. Yakutat 2. Prince William Sound (includes Seward) 3. Cook Inlet (Upper and Lower) 4. Kodiak.

The State of Alaska's proposed "Alternative" offers a management concept that would resolve the open end reallocation, however to better manage under their proposed concept, regional issues remain un-answered and the LAMP process may be hampered in its ability to resolve issues from an area wide allocation. Using the States alternative concept, management action must reflect solutions down to the regional level. This would give the local area management plans the ability to function clearly within established objectives.

This regional alternative under the States concept is better defined under Alternative #3 in the following pages.

#### **Expressed Council Concern #4**

*4. In some areas, community stability may be affected as traditional sport, subsistence, and commercial fishermen are displaced by charter operators, lodges, and outfitters. The uncertainty associated with the present situation and the conflicts that are occurring between the various user groups may also be impacting community stability.*

For the very same reasons as outlined in the foregoing pages, impacts by users affecting community stability is a regional issue. The potential explosive growth in Whittier under a GHJ or allocation to the Sport-guided industry will impact community stability in adjacent communities of Cordova, Tatitlek, Chenega Bay, Valdez and Seward. The Charter industry as it now exists, will be negatively impacted by management restraints caused by future growth in new entries. Consideration must be given that any historical harvest data that is used to place restraints must equally apply to the same group that provided the data. Allowable growth is a major regional issue, how much growth is a public policy decision that must play out in the Council process. This growth question must take into account that some regions have communities that under a GHJ or allocation may already be over-capitalized (Valdez & Seward), however some neighboring communities of the same regions are under-capitalized (Cordova, Whittier, Tatitlek & Chenega Bay) The Local Area Management Plan process would again be the best approach to address these issues.

The traditional commercial fisherman that is referenced in sentence 1 of problem statement number 4 (above) has changed from their traditional fishing methods. The IFQ fishery of 1995 now provides this user group an eight month season. The growth in the near shore commercial harvest on shared fishing grounds with the other users is creating conflicts in certain areas. In reality, changes in the commercial halibut fishery is impacting community stability in a higher degree than reflected by the councils expressed concern. These recent commercial fishery changes are displacing the sport-guided and sport-fishing halibut users of Prince William Sound. The LAMPS would be the best approach to a favorable solution.



**Expressed Council Concern #5**

*5. Information is lacking on the socioeconomic composition of the current charter industry. Information is needed that tracks: (1) the effort and catch of individual charter operations, lodges, and outfitters; and (2) changes in business patterns.*

The logbook program for the sport-guided effort was implemented by the State of Alaska in 1998; this is a positive start in resolving part of this council concern in the problem statement. The State has provided testimony that cautions the NPFMC about using only one year of data to base decisions. The logbooks did not get out to the users in PWS region until May 98, yet the first reported harvest date in the program was 27 April 1998. Most of the April harvest of sport-guided halibut for 1998 is not reported in the logbooks. The PWS region did experience weather in 1998 that forced the fleet more weather down days than typical of a normal season. Given time, the annual data will reflect the information needed to best answer questions in regards to effort, harvest and business patterns of the PWS halibut charter fleet.

Information is still lacking concerning commercial lodges and outfitters that offer support to clients in an un-guided environment. I.e.: floating fly-in camps with small boats to support clients, boat rentals and shore side lodges with small boats for client use.

**Expressed Council Concern #6**

*5. The need for reliable catch data will increase as the magnitude of harvest expands in the charter sector.*

This statement is very misleading; the magnitude of harvest is by what comparison? Surely not in ratio of Sport-guided halibut removals to Commercial halibut removals in Area 3A or even in the regional areas as expressed above. The public use of the halibut resource by engaging the services of a charter company to provide a platform to access the fishery is key to this issue. The real questions are what legal alternatives are available to restrict the Halibut Charter removals that will satisfy the national standards as provided by the Magnuson-Stevens Act? Can the Charter fishing public be legally restricted in their ability to access the Halibut fishery? What public policy, limits growth to meet the public's demand for access and harvest? These questions are especially important due to the fact that each year increasing numbers of fisherman (resident and non-resident) seek to utilize the halibut resource.

The ADF&G Sport-guide logbook program is the best tool to catch data that would resolve this concern.

## PROPOSED ALTERNATIVES

Comments concerning the five alternatives that will be on the council agenda of the Feb 99 meeting with comments are listed below:

### ALTERNATIVE #1

Status quo - do not develop regulations to implement a GHL. Instead, local area management plans (LAMPs) could still be developed in areas with documented problems. Employ a variety of measures as needed within LAMPs, including line limits, annual bag limits, vessel trip limits, super-exclusive registration of charter boats, moratorium, etc.

This alternative is the best approach in resolving regional issues; this alternative does address solutions to the councils concerns as provided by #1, #2, #4, #5 and #6.

This alternative does not address a solution of the councils concerns expressed in #3.

This alternative will not address the open-ended reallocation as expressed by the councils concern in #3.

### ALTERNATIVE #2

Convert the GHL to an allocation (15.61% of the combined commercial and sport charter quota in Area 3A. Two additional options include are area-wide (e.g., Area 3A) or local moratoriums on charter vessels.

This alternative does address the councils concerns in #1, #2, #3, #5 and #6.

This alternative does not address a solution of the councils concerns expressed in #4.

This approach will not provide the charter industry a two fish bag limit and a traditional fishing season. This rise and fall of the assessed biomass does not align with the public needs for access and harvest. The public policy decision concerning the amount of acceptable growth remains unanswered.

This alternative does not address the communities and regions that are under capitalized and desire growth in the Charter industry. Communities that may be approaching over-capitalization may be negatively affected by the loss or limited Halibut Charter effort. The LAMP process would be the best action to address regional moratoriums.

### ALTERNATIVE #3

Convert the GHL to an allocation range with fixed upper and lower bounds expressed as numbers or pounds of fish. Separate ranges would be established for IPHC Regulatory Areas 2C and 3A. If the charter harvest exceeded the upper bound, management measures would be instituted as needed in the guided fishery up to 2 years later (1 year if data are available, but prior to January 1 for industry stability) in order to reduce the harvest to within the range. Likewise, if the charter harvest fell below the lower limit of the range, management measures could be liberalized to bring the harvest up into the range. Under this alternative, the longline fishery would receive a relatively larger allocation when the halibut stock abundance is high, and the charters would receive a relatively larger allocation when the stock is low.

This alternative does address the councils concerns as stated in #1, #2, #3, #4, #5 and #6.

### Alternative 3 (Continued)

The negative merits of the States alternative:

1. One region could negatively impact another region by increase in harvest.
2. Any regional increase in harvest by added effort could trigger management tools that would apply to all regions of the IPHC area.
3. Should the IPHC area reflect over-capitalization, the restrictive management tools will never be removed until the area wide triggers are modified to accompany entry harvest growth.

This alternative concept is good, however it must be applied to regions.

**NOT AREA WIDE.** The negative merits as specified, will be resolved using the regional approach as identified below:

This alternative (Broken down to regions) coupled with alternative #5, or with the LAMP's would resolve issues of the Charter industry that are currently in potential over-capitalized regions. The LAMP'S coupled with this regional approach without alternative #5 would be the best tool to address under-capitalized regions and communities.

**THIS REGIONAL APPROACH WAS NOT ADDRESSED OR DISCUSSED BY THE GHL COMMITTEE.** (Considering the State of Alaska did not bring this alternative to the committee until 12 Jan. 99)

Due to the current structure of the area 3A Halibut Charter fleet, it is very clear that there are four independent regions. 1. Yakutat 2. Prince William Sound (includes Seward) 3. Cook Inlet (Upper and Lower) 4. Kodiak

The State of Alaska's proposed Alternative offers a management concept that would resolve the open end reallocation. To better manage under their proposed concept, regional issues remain un-answered and the LAMP process may be hampered in its ability to resolve issues from an area wide allocation. Using the States alternative, this alternative would provide better management at the regional level. This would give the local area management plans the ability to function clearly within established guidelines. This regional alternative is a mirror image of the State of Alaska's GHL /allocation alternative, the harvest numbers used are from the 1998 sport guide logbook program. In light that the State will not support an area wide Moratorium but will support a regional moratorium in the LAMP process, this plan would aid in the development of regional LAMPS.

As reported by ADF&G staff, per the 1998 Sport-guide logbook data, 3,378,100 pounds of Halibut was reported as harvested from IPHC area 3A Halibut Charter vessels. The area wide average used to compile this weight from reported harvested fish was 21.12 pounds.

### Alternative 3 (Continued)

The IPHC 3A area is broken down by regional harvest as follows:

Area	Avg. Weight	# of Fish reported	Converted Weight
PWS	28.3	13,387	378,852
Seward	23.79	20,215	480,914
Yakutat	35.4	3,806	134,732
Cook Inlet	18.86	113,873	2,147,644
Kodiak	27.08	8,715	236,002
		<b>159,996 Fish</b>	<b>3,378,144 Pounds</b>

Like the proposed management alternative as provided to the NPFMC by the Department of Fish & Game (Alternative 3) using the IPHC 3A Charter Harvest Allocation Range of the 1998 Harvest. The States proposal triggers management measures at a lower range of 3,350,000 lbs. This needs to be changed to properly reflect 3,378,144 pounds. The States alternative proposal reflects an Upper Range limit of 4,187,500 lbs. which is intended to be 125% of the 3A Charter harvest. With the correction as identified above, this upper trigger should be corrected to properly reflect 4,222,680. The State should validate this error.

With these corrections in place, this proposal would provide an Allocation range to be established down to the proper region as that of shared fisheries within the scope of the LAMP process. This would aid in the process of development in the local Area Management Plans to best address the regional concerns. Using the States logbook program as demonstrated by the States alternative, **it is requested that the following alternative be included in the NPFMC analysis process:**

Due to the shared fishery of the PWS and Seward, it is only obvious by harvest data that these Ports be inclusive in a single LAMP as is with the upper and lower Cook Inlet. The Kodiak and Yakutat areas are stand-alone fisheries. This clearly would reflect the make-up of the regions that may further their concerns in the Local Area Management Plan process.

For the same reasons that the ADF&G staff has indicated why they do not support any area wide Moratorium, the Charter Industry of the Prince William Sound cannot support an area 3A wide Charter harvest allocation. Should the regions pursue the development of a Sportfish management plan that would address the concerns as expressed by the State for these specific regions, then now is the time to allocate the guided effort in this direction. Given a direct regional allocation, with management triggers, the State concerns could be resolved within the regions involved. Per the GHJ discussion paper (page 12, para. 6) the State clearly stated **"the diversity in the guided sport fisheries could best be dealt with at the local level, as a one size fits all approach might not be the best solution."**

**ALTERNATIVE 3 (Continued)**

Using the same concept as expressed by the States Alternative; this proposal adopts a Regional Charter Harvest Allocation range using the 1998 harvest as follows:

**PWS & SEWARD**

Lower Range Limit at: 859,767 lbs.

Upper Range Limit at: 1,074,708 lbs.

**YAKUTAT**

Lower Range Limit at: 134,732 lbs.

Upper Range Limit at: 168,415 lbs.

**COOK INLET**

Lower Range Limit at: 2,147,644 lbs.

Upper Range Limit at: 2,684,555 lbs.

**KODIAK**

Lower Range Limit at: 236,004 lbs.

Upper Range Limit at: 295,004 lbs.

**This proposal provides a total Area 3A upper trigger weight of 4,222,682 lbs., which is 125% of the 1998 Guided harvest.**

To prevent industry drift from one region to another, a regional allocation must insure that all Halibut Charter Vessels conduct Sport-guided Halibut landings to their one Primary Port as reflected by the Sport Charter vessel license that is currently required by Alaska CFEC. Industry drift (Effort re-location that could address under-capitalization issues.) could be provided in the regional LAMP.

If the guided sport halibut harvest is restricted and the harvest is reduced below the lower limit of the regional range, guided sport fishery management measures would be liberalized to increase the harvest back within the allocation range.

Per this regional allocation range, a range of management measures listed below could be employed to curtail catch rates of guided anglers once the allocation is attained.

Management measures could be applied up to 2 years after attainment of the upper trigger allocation. (1 year if data is available, but not later than 1 Jan. of the year to provide industry stability)

- Line Limits
- Boat Limits
- Annual Angler Limits
- Vessel Trip Limits
- Super-Exclusive Registration
- Sport Catcher Vessel Only Area
- Sportfish Reserve
- Rod Permits

## ALTERNATIVE #4

Under a GHL, apply a range of management measures to curtail harvest by chartered anglers once the GHL is attained. Measures would be implemented up to 2 years after the attainment of the GHL (1 year if data are available, but prior to January 1 for industry stability) — no inseason measures are proposed. Management measures could include line limits, boat limits, annual bag limits, vessel trip limits, super-exclusive registration of charter boats, sport catcher vessel only areas, sport fish reserve, and rod permits. Again, two additional options would be area-wide or local moratoriums.

This alternative does address the councils problem statement concerns as expressed in #1, #2, #3, #5 and #6.

This alternative does not address a solution of the councils concerns expressed in #4. For the same reasons as expressed under alternative #2, this alternative offers doubt that it will be able to provide the Charter industry a two fish bag limit and a historical season. Any consideration of this alternative must address the public policy question concerning public need that requires allowable growth in charter harvest and the willingness of the managers to provide for it. Management measures placed on tourism driven industry that capitalizes from a resource must identify a balance between allowable resource yield and allowable participation. This alternative would cause fluctuation in allowable charter yield and make it difficult for the managers to provide for it without affecting the traditional season.

## ALTERNATIVE #5

Area-wide moratorium only.

This alternative does address the councils problem statement concerns as expressed in:  
#1 A moratorium will prevent new entries from adding pressure that would contribute to localized depletion.

#2 A moratorium would stop growth that may be contributing to overcrowding of productive grounds.

#4 A moratorium would provide fleet stability and potentially aid in offering solutions to conflicts between the various user groups in the LAMP process.

#5 A moratorium would provide a known and fixed group to users to receive management data from.

#6 A moratorium would provide reliable catch data as the harvest expands to existing charter potential.

This alternative does not address the councils problem statement concerns as expressed in #3. As stated and agreed in the conclusions of the GHL committees discussion paper, since effort and removals are primarily demand-driven in a potential overcapitalized fleet. (Considering the GHL) This potential for increases in fishing effort overrides most of the proposed management measures the Council could recommend for limiting halibut removals. (If the existing Halibut Charter vessels were operating at full potential, the harvest amount potential is far more than any of the proposed caps.)

Example: Given the 1998 Sport-guide logbook data of area 3A, if the reported 518 vessels that averaged 5 fishermen per trip at a 1.6 fish per average, and the average reported weight being 21.1 pounds per fish. (different from what the State reflects) A professional halibut charter operator operates at a traditional season average of 65 days. The harvest amount to support this total fleet effort would require 5,683,496 pounds.

The Prince William Sound Charter Industry supports an area wide moratorium, however it also requested, that a provision be added that will prevent effort from drifting between Regional areas covered by the Local Area Management Plans. The use of Super Exclusive Registration would resolve this issue.

### **SUMMARY**

The Charter industry has clearly requested a moratorium; the council should understand the economics effected of this request.

A stand-alone area wide moratorium does not address the open-ended reallocation from the commercial fishery.

### **Desires of the Prince William Sound Region Charter Industry:**

1. Provide an area wide moratorium with a provision that would prevent effort movement from one region to another (Alternative 5)  
**AND ALSO:**
2. Provide a regional fixed allocation as expressed by Alternative 3 in concept only that will support the regional existing charter fleet.
3. A regional fixed allocation with a fleet moratorium must address realistic effort and provide a reasonable operating season to meet the public's demand.

If the LAMP process is given this charge, the regional concerns as expressed by the State and the Charter Industry could be resolved, this process would ease the NPFMC schedule in dealing with each local fishery on a case-by-case basis, however, it still would be required.

This document is submitted and supported by the leadership and the members of the following Prince William Sound Regional Organizations:

Valdez Charterboat Association  
President: Bob Jaynes

Seward Charterboat Association  
President: George Hiller

Valdez Fish & Game Advisory Committee  
Chairman: Darrel Shreve

**Valdez Fish & Game Advisory Committee**

PO Box 2053  
Valdez, Alaska 99666

RECEIVED  
JAN 27 1999

N.P.F.M.C.  
27 January 1999

**Agenda Item C-5, Halibut Charter GHL**

North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Ave., Suite 306  
Anchorage, Alaska 99501-2252

Dear Chairman Lauber & Members of the Council

In Feb 98 concerning the councils joint meeting with the Alaska Board of Fish, a protocol was adopted for the Local Area Fishery Management Plan process.

In March 1998, the Valdez Charterboat Association approached the Valdez Fish & Game Advisory Committee with a concern in regards to their industry impacts as seen by potential implementation of the GHL.

From public comment to this committee, the following problem statement was developed and effort to address this problem has been an on-going process of this committee.

This document is provided as information of this committee's action to address the Prince William Sound regional problem statement, the original intent is per the LAMP protocol. However, some of this regional information might aid the council during the GHL analysis during the Feb 99 meeting.

**Problem:** During its' September 1997 meeting, the North Pacific Fisheries Management Council (NPFMC) implied the implementation of a Guideline Harvest Level (GHL) on halibut harvested by the charter fishing industry. A GHL was established at 125% of the 1995 harvest levels in regulatory area 3A. This action was initiated on the premise that the halibut charter fleet was increasing without restrictions, however, the NPFMC failed to address regulations or restrictions that would curtail new entries into the fleet. The GHL was intended to address, "displacement of unguided local sport and subsistence users and erosion of commercial quota share by the open-ended allocation to the charter fishery.", within area 3A. Without provisions to restrict increased industry participation, a potential of overcapitalization and economic distress looms over the entire halibut charter industry within area 3A, including those Charterboat owners within the Prince William Sound Region (PWSR). Due to a normally short fishing season and quite sizable investments, the PWSR charter owners are concerned about season stability. The current GHL design does not provide for a stable allocation to insure season stability. The rise and fall of halibut biomass and methods used to obtain the CEY does not align with the rise and fall of the Sportfishing season.

"The IPHC considers the halibut resource to be a single population. Egg and larval drift and subsequent counter migration by young halibut cause significant mixing within the halibut population. The IPHC sets halibut harvest in regulatory areas in proportion to abundance. This harvest philosophy protects against over-harvest of what may be separate, but known, genetic populations, and spreads

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fishing effort over the entire range to prevent regional depletion. Small-scale local depletion does not have a significant biological effect for the resource as a whole.

Ultimately, counter-migration and local movement tend to fill in areas with low halibut density, although continued high exploitation will maintain local depletion. However, **estimates of biomass and rates of local movement are not available to manage small areas.** Local depletion affects mainly vessels with limited mobility, which cannot move to adjacent areas of higher abundance. Options for managing local areas with high fishing pressure fall with two extremes: little or no restrictions that lead to maximum fishing opportunity, but low abundance and low catches; or severe restrictions with reduced seasons, bag limits, quotas, and participation that lead to high abundance and high catch rates for those allowed to fish." (Trumble, IPHC, 1997)

**In consideration of:**

- > Continued growth of new entries into the PWS region Sport-guided fishery.
- > IPHC stock assessment methods and the lack of data for small area biomass assessment & local movement.
- > The commercial IFQ harvest of the inside waters of the Prince William Sound has nearly doubled since the implementation of the 1995 IFQ system.
- > Growth in IFQ harvest of outside waters directly adjacent to the two primary entrances of the Prince William Sound is up to 4,031,000 net pounds for 1997.
- > The change from traditional commercial halibut harvest methods since the implementation of the IFQ is increasing effort and harvest of the near-shore shared fisheries.
- > Construction of the Whittier road and the added fishery participation brought with infrastructure development.
- > Impacts to other State managed fish stocks.

Without providing some immediate controls that effect these concerns may lead to local depletion thus requiring much stronger action for more restrictive management options that would apply to all PWSR halibut harvest efforts.

**What will happen if nothing is done?** Continued growth in the Prince William Sound Region Halibut Charterboat Industry will cause early season achievement of the GHL and added efforts to the near shore stocks. Over exploitation will cause local depletion, which will effect all PWS region halibut users that have limited mobility based on time or vessel size to access adjacent areas of higher abundance. Thus adding financial distress to the Halibut Charter businesses of the Prince William Sound region. Other fisheries will become targets for the guided fishery and due to this added effort with little or no restrictions will lead to other species low abundance and low catch rates that force restrictive management measures as reduced seasons, bag limits, or quotas.

In attempt the provide information from the Prince William Sound Charter boat industry to address this problem statement.

On 16 Nov. 1998 this AC mailed out a survey to each vessel that was Sport Charter licensed by the Commercial Fisheries Entry Commission for 1998 that indicated their primary Port as Valdez, Cordova, Whittier, Chenega Bay, Tatitlek or Seward. And that they engaged in the Salt-water fishery of Prince William Sound (Region 9) or the North Gulf Coast (Region 10). The CFEC d-base provided 245 vessels that licensed per these perimeters.

Of the 245 vessels surveyed, 97 responses have been received as of this date. The PWSR Charter Companies that have participated are as follows:

Discovery Voyages  
Sound Experience  
AK Fish & Hunting beyond boundaries Inc  
True Life Adventures  
Mick's Adventures  
Sea Dancer Adventures  
Sound Eco Adventures  
Snowline Enterprises  
Miller's Landing  
C & G Inc.  
Hot Spot Fishing Adventures  
Prince William Sound Charters  
North Star Charters  
Glacier's Edge Sportfishing In  
Quarterdeck Charters & Lodging  
SL Adventures  
Silver Lining Charters  
Grey Eagle Charters Inc.  
Sudsy Charters  
Puffin Family Charters  
Arctic Wilderness Charters  
'But Kick'n Charters  
North Star Charters  
Empire Alaska Seafood's, Inc.  
Sea Star Charters  
Smarter Charter & Tours  
The Fish House  
Cra-Zee's II Charter  
Sandi-Kay Charters  
Pro Fish-N-Sea Charters  
Sablefish Charters  
Lesea Charters  
Crackerjack Sportfishing Charters  
Wild Iris Fishing & Sightseeing  
Adventure Charters  
Valhalla Charters  
Silver-lining Charters  
Alaska Angler Adventures  
Glacier Angler Charters

Alaska Whitewater Kings  
Northern Magic Charters  
Captain Brown's Charters  
First Bight Fishing Charters  
Blue Bayou Charters  
Sanity Charters  
Ivory Gull II Charters  
Cap'n Patty Charters  
Northern Comfort Inc.  
Luck of the Irish Charters  
Nuliaq Alaska Charters  
Something Fishy Charters  
Fishhawk Charters  
Alaska River & Sea Charters  
A-I Fishing Charters  
Aurora Charters  
Flat Fun Fishing  
Nundance Seaventures Inc.  
Arctic Accessory  
Alaska Charters  
Phantom Mountain Adventures  
Quarterback Charters  
This El-Do Inc.  
Captain Ron's AK. Adventure  
Bread & Butter Charters  
Sound Adventure Charters  
Alaska Walkabouts  
Aquabionics Inc.  
Prime Time Charters  
Sound Adventures  
Roe's Enterprises  
Alaskan Fishing Adventures, Inc.  
Capt Bob's Charters  
Choice Marine Charters  
Omni Enterprises, Inc.  
Wild Willy Adventures  
Cookie Jar Charters  
Goodhand Charters  
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Shoestring Charters  
Patty Anne Charters  
Leisure Fishing Charters  
Saltwater Safari Company, Inc.  
Share Alaska Charters  
Ace Charters  
Eagle Song Charters

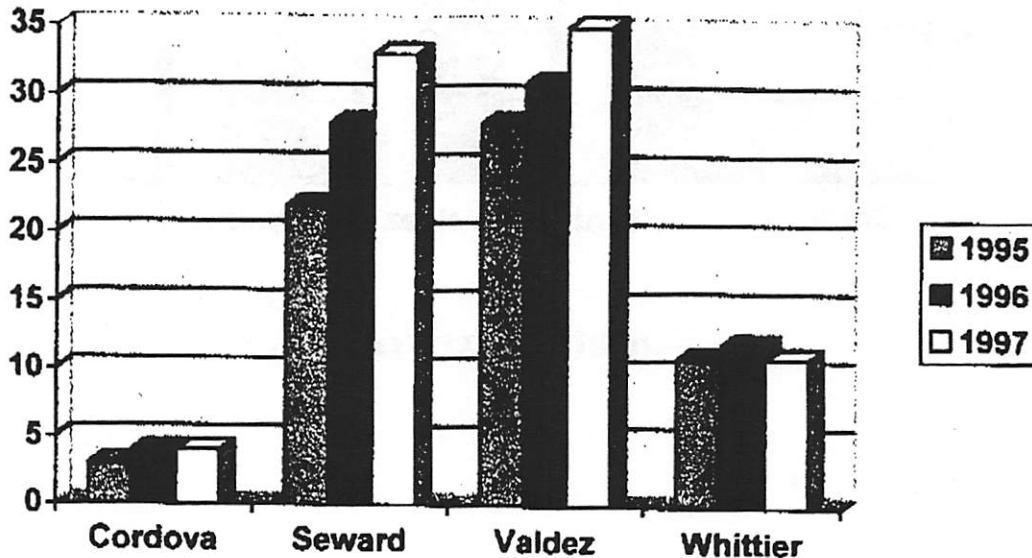
These companies represent 5 vessels from Cordova, 36 vessels from Seward, 43 vessels from Valdez and 13 vessels from Whittier. 5 Surveys have been returned due to a bad address.

In regards to the question of agreement or disagreement with the problem statement :

Port	# Agree	# Dis-agree	No-Comment
Cordova	3	0	2
Seward	26	2	5
Valdez	42	1	0
Whittier	12	0	1
<b>Total</b>	<b>86</b>	<b>3</b>	<b>8</b>

Of the returned surveys concerning State of Alaska CFEC license for 1995, 1996 and 1997. The table below reflects those indicating that they had a CFEC sport vessel license in the noted year for their vessel.

Port	# of surveys	1995	1996	1997
Cordova	5	3	4	4
Seward	36	22	28	33
Valdez	43	28	31	35
Whittier	13	11	12	11
<b>Total</b>	<b>97</b>	<b>64</b>	<b>75</b>	<b>83</b>

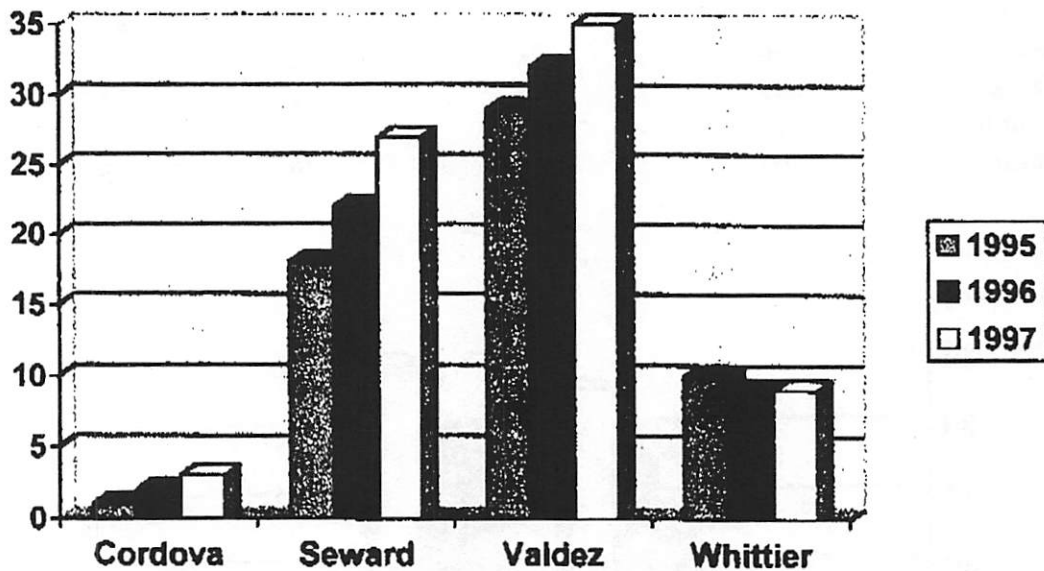


**PWS CFEC SPORT CHARTER VESSEL LICENSE BY PORT**

Of the returned surveys concerning IPHC license for 1995, 1996 and 1997. The table below reflects those indicating that they had an IPHC sport vessel license in the noted year for their vessel.

Port	#of surveys	1995	1996	1997
Cordova	5	2	3	4
Seward	36	21	27	32
Valdez	43	28	31	36
Whittier	13	9	10	10
Total	97	56	67	75

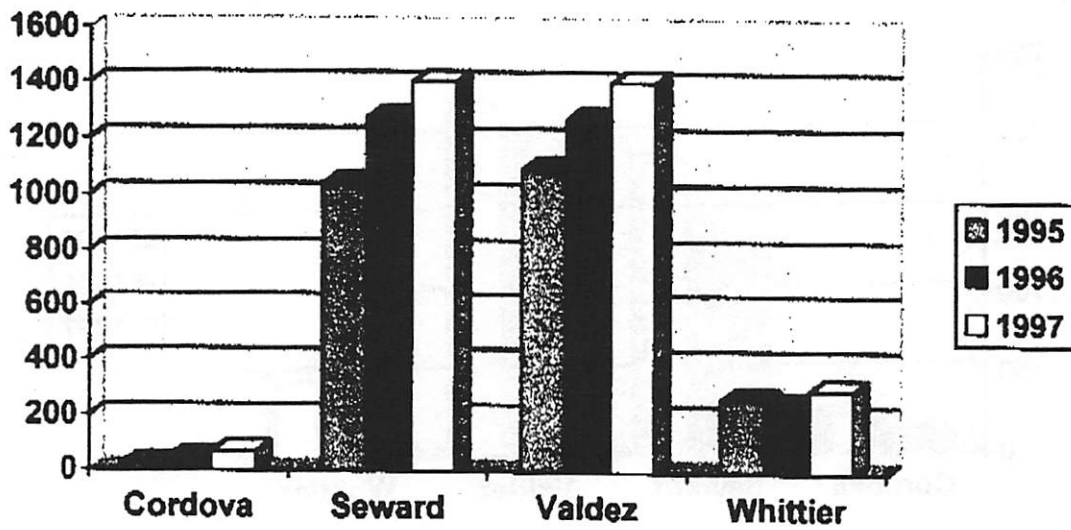
Of the returned 97 Surveys, the following figure reflects Halibut Charter vessels by port and by year.



**PWS Halibut Charter Vessels by Port**

Of the returned 97 returned surveys, the regional effort by Halibut daily fishing trips per year by Port follows:

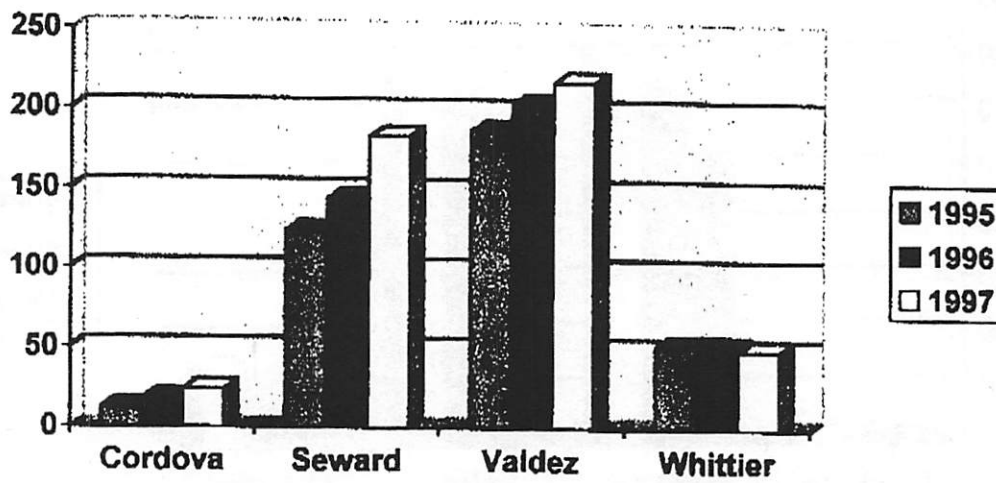
	1995	1996	1997
Cordova	20	40	66
Seward	1043	1276	1544
Valdez	1097	1270	1404
Whittier	264	248	299
<b>Total</b>	<b>2424</b>	<b>2834</b>	<b>3313</b>



**PWS Halibut Charter Seasonal Trip Effort by Port**

Of the returned 97 surveys, the daily regional fishing potential based on reported available fishing passengers seats.

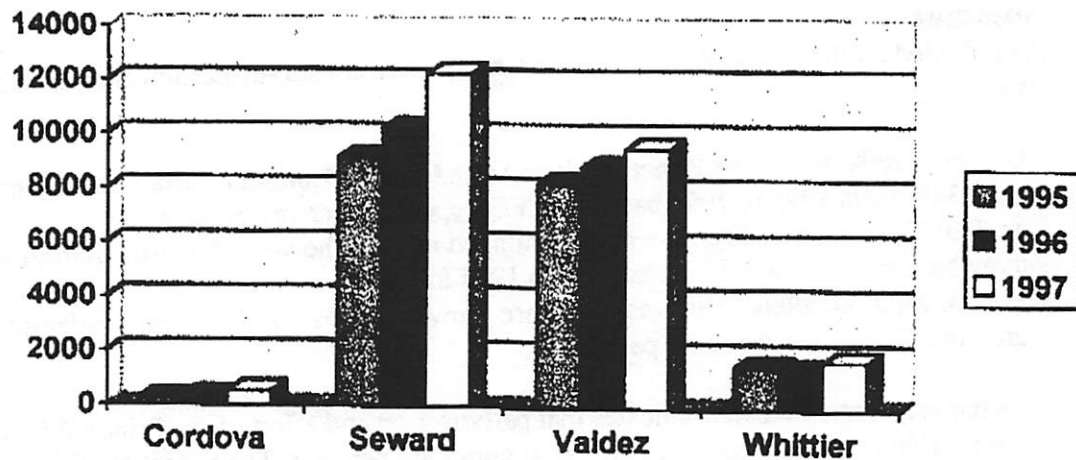
	1995	1996	1997
Cordova	12	18	24
Seward	124.5	144	183
Valdez	187	204	218
Whittier	52	52	50
<b>Total</b>	<b>375.5</b>	<b>418</b>	<b>475</b>



**PWS Halibut Charter Daily Seat Availability by Port**

Based on effort and seats, the 97 surveyed vessels of the PWSR supported the approximate number of fishing guests during the reported years.

	1995	1996	1997
Cordova	240	360	516
Seward	9115.5	10223	12222
Valdez	8203	8815	9485
Whittier	1568	1468	1750
<b>Total</b>	<b>19,126.5</b>	<b>20,866</b>	<b>23,973</b>



### PWSR Halibut Charter Clients by Port

Of the 97 vessels responding, the PWSR yearly season duration is reflected below:

	1995	1996	1997
less than 20 days	22	23	25
21 to 37 days	7	12	11
37 to 65 days	17	17	16
66 to 90 days	7	9	12
Over 91 days	5	5	6



ADF&G Staff notes: Preliminary data from the 1998 logbook program as reported by ADF&G staff:  
Prince William Sound reflected 101 distinct vessels returning logbooks with 86 reporting halibut landings.  
Seward reflected 97 distinct vessels returning logbooks with 74 reporting halibut landings.  
Prince William Sound vessels reflected 13,400 Halibut landed. With an average net weight of 28.3 pounds. (net weight) Note: since 1992 the average of the 7 years is 27.7 pounds (net weight)  
Seward vessels reflected 19,900 Halibut landed.

**Summary:**

As reflected by the Prince William Sound Charter industry survey participation as of this date:

The survey reflects that the Prince William Sound Region Halibut Charter industry has grown 34% from 1995 to 1998 based on CFEC sport charter vessel licenses.  
The IPHC Vessel Sport license was discontinued in 1997, however the growth from this survey base indicates a 25% increase from 1995 to 1997.  
Regional effort parallels IPHC vessel license growth at 26% and daily seat availability at a growth of 21% over the same period.

This industry survey clearly indicates that participation and effort of the Prince William Sound Halibut charter vessels is growing at about 8% per year. The potential of the Whittier harbor project could provide explosive growth in the future.

Should any questions or concerns in reference to this document should be addressed to the undersigned.

Darrel Shreve  
Chairman

**Goodhand Charters**  
P.O. box 218, Ester Alaska 99725 907-479-5562

RECEIVED  
JAN 27 1999

N.P.F.M.C  
1/26/99

Chairman Rick Lauber  
North Pacific Fishery Management Council  
605 W. 4th Avenue, Suite 306  
Anchorage, AK. 00501-2252

Dear Mr. Lauber,

As a member of the GHL committee, officer of the Valdez Charter Boat Association, and being very involved in the beginning development of a Prince William Sound LAMP, I have some concerns about the direction of this council.

First it becomes very obvious that industry desires a moratorium to relieve future growth. With the various harbors in my area of Prince William Sound, and Seward having some 1300+ people/boats on waiting lists for future slips, this waiting list is an increase of over 120% of current vessel slips in use. A moratorium is the only way to curb growth and insure any economic future at all for the charter industry. While the State of Alaska will say they are worried about "potential ripple effects" to other sport fisheries, this is purely conjecture and not substantiated. Most, but not all, charter companies can not make a living without halibut as a main stay, so the "ripple effect" will more than likely be very small. A moratorium that does not have a super-exclusive registration to stop movement from area to area right from the start, will not work. The LAMP process can adjust movement from port to port as needed within the LAMP region. If the NPFMC does not place a moratorium on new charter entrants please put participation requirements in (IPHC and CFEC license 1995, 1996, 1997 and 1998 log book) area wide, that LAMP's can use as a common tool, if and when charters hit an allocation limit.

The ADF&G proposed allocation idea of not being tied to the TAC is the best to insure a stable sport fishery. This would be best served by simply giving each area of 3A, in this case its own allocation. This would be easy for ADF&G to do as the numbers are gathered by port.

While this may sound like micro management too cumbersome for the NPFMC to deal with, I would point out that any management requests would go through a local area task force and local area advisory boards, then to joint BOF and NPFMC board for refinement, before the council would ever see an issue. Micro management is what sport fishing is about, LAMP's are the only way.

With an increase of 8% charter growth each year since 1995 in the Prince William Sound alone, a moratorium is the first step needed.

Thank You,  
John Goodhand

2038 Halibut Point Highway  
Sitka Alaska 99835  
January 18, 1999

RECEIVED  
JAN 22 1999  
N.P.F.M.C

Chairman Rick Lauber  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue Ste 306  
Anchorage Alaska 99501-2252

Dear Chairman Lauber:

My Husband and I have run a fishing charter business out of Sitka since 1979. We have seen the industry go from 3 charter boats to over 300 at the present time. Most of these boats are from out of state and are not Sitka residents. We have lived in Sitka for over 20 years and came here from Fairbanks.

The Halibut have disappeared in close and locals must go out past the cape to find a Halibut. The influence that the Charter boat operators that fish the cape is overwhelming reducing the stock.

We feel that there should be a moratorium on charter boats and that there should be a limit on the halibut that is taken. One fish per day is plenty and there should be a limit as to how many fish should be shipped out of here with the clients of charter boat operators. There is one operation in town that have 68 clients every day fishing their limits and more. We have had people tell us the fisherman comes up here catches many fish and then sells his catch when he gets back home to pay for his trip. We all know this is illegal however who is going to stop this madness???

We work exclusively off the cruise ships and are unable to travel to catch halibut one hour out on a 4 hour trip. We have found that the average tourist is thrilled to catch one fish and experience the Alaska Adventure.

Something needs to be done if we are going to have a resource left. I sincerely hope you will take this into consideration when making your decision. We need a Charter boat moratorium. We need a limit on Halibut. Please do something.

Sincerely yours

*Ticki Brown*

Enclosure: Picture of CATCH FOR ONE DAY FROM "BONE OPERATIONS"  
Kingfisher CHARTERS. TAKEN by Ray Northup AT CRESENT HARBOUR 1998

page 2

Vicki Brown  
2038 HPH  
Sitka Alaska  
99835



Cordova Charter Boat Association  
Box 903  
Cordova, Ak 99574  
(907) 424-5777 fax 424-5777 e-mail orcaron@cordovanet.com

February 2, 1999

ATT. Chris Oliver

Mr. Rick Lauber, Chairman  
North Pacific Fisheries Management Council  
605 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Ak 99501

Chairman Lauber and Council Members:

The Cordova Charter Boat Association has great concern about the GHL, LAMP, and the Moratorium issues. Given the short time we've had to address the issues put us at a bit of a loss. It is our concern that if an upper GHL is met in other areas that are already over capitalized would effect us as well. We would hope that you would not allow this to happen.

Perhaps if the GHL were split so to cover area by area then the charter fleet of the area that is over capitalized would take better action in the form of a Moratorium. Moratorium does give you a tool to stop over capitalization but we would hope that the council would see the damage of stopping community growth and further not allowing access for the public at large.

The issue of LAMP: We feel that the purpose of LAMP was to protect local access to near shore stocks for personal and community use and consumption, NOT to protect an over capitalized charter fleet.

We have NOT supported LAMP in PRINCE WILLIAM SOUND. If Cordova felt that there was a problem with stocks for near shore personal use in our area then we would entertain a LAMP for our area.

We don't think its right for other communities to try and use LAMP for monopolizing Prince William Sound.

The Cordova Charter Boat Association is NOT for Statewide moratorium. Perhaps an area registration would better suit the need for management tools. If you registered in one area for that given year then you may not fish other areas in the same year. (See dungenous crab area E and Icy Bay)

Thank you for your time on this matter. Please forward any actions or comments from your committee on these issues.

Sincerely,

Ron Horton  
Member  
Cordova Charter Boat Association

# Copper River/Prince William Sound Advisory Committee

P.O. Box 1558 • Cordova, Alaska 99574

February 2, 1999

Mr. Rick Lauber, Chairman  
North Pacific Fisheries Management Council  
605 W. 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501

Dear Chairman Lauber:

At our February 1, 1999 meeting, the Copper River/Prince William Sound Advisory Committee heard testimony and discussed issues important to our fledgling charterboat fleet. Of immediate concern to this committee and our local visitor industry are proposals before the Council, which address entry into and potential growth thereafter of the charterboat fleet. Additionally, a proposal outlining the establishment of a Prince William Sound Local Area Management Plan (LAMP) was submitted for our review.

Our local visitor industry and the charterboat fleet that services it are relatively new phenomena for the community of Cordova. Other communities around or adjacent to the Sound have long established and highly capitalized fleets which have developed as a result their favorable location on the road system and their access to large numbers of tourists. Cordova's entry into the Alaskan tourism marketplace is recent, but we expect it to become a vital component of our local economy in a very short time.

Some are suggesting that a moratorium on entry into and expansion of the burgeoning Alaskan charterboat fleet is an effective way of addressing serious conservation and allocation issues confronting managers of the halibut resource. That may be part of the solution, but from our perspective, limiting entry and growth of a young fleet such as Cordova's is an unfair restraint on our local operators and will result in the demand for charter services being filled by other, non-local services. Additionally, any form of moratorium that only addresses halibut will result in a shifting of charter effort to other species. The consequent conservation and allocation issues are no more attractive to those of us who live in close proximity to the resource than they should be to the Council.

In regards to LAMP's, the apparent scope and intent of a proposed management plan encompassing all of Prince William Sound *and including communities as far away as Seward*, appears at odds with stated purposes of the plans and the actual implementation of LAMP's in communities such as Sitka. Our understanding of the intent of LAMP's, is that development and implementation of such plans would help to insure that customary and traditional uses of marine resources in the near proximity to coastal communities would have a reasonable chance of continuing. They certainly were not intended to help a new and rapidly growing charterboat industry to secure portions of the guideline harvest level (GHL) or exclusive operating areas. Quite plainly, when this community feels the need for a LAMP, the request will come from here.

Although the Council process is a little distant from our usual advisory role to the Alaska Board of Fisheries, committee members felt that these issues were of great significance to the community and demanded our attention. Please keep us advised of Council action on these issues or any other ways in which our involvement would be helpful.

Sincerely,



George Covell  
Chairman (Fisheries)  
Copper River/Prince William Sound Advisory Committee

Cc: Alaska Board of Fisheries  
Valdez Advisory Committee

RECEIVED

FEB 12 1999

N.P.F.M.C

1/25/99

North Pacific Fisheries Management Council,

I'm a commercial halibut longliner.  
I've fished in Southeast Alaska, area 2-C  
for 25 years.

I'm writing in regards to the halibut  
guided sport management issue.

I've written in the past asking the Council  
to limit the halibut guided sport fishery.  
I was glad to see the guideline harvest level  
adopted by the council for the halibut guided  
sport fishery.

I urge the Council to identify measures  
for analysis that will effectively restrict  
the guided sport halibut fishery to the  
guideline harvest level. Thank you.

Sincerely,

Marty L. Remond

P.O. Box 8147

Port Alexander, AK.

99836



# ALASKA VISITORS ASSOCIATION

3201 C Street, Suite 403 • Anchorage, Alaska 99503

Tel: (907) 561-5733 • Fax: (907) 561-5727

e-mail: [ava@alaska.net](mailto:ava@alaska.net) • [www.visitalaska.org](http://www.visitalaska.org)

1998-99

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Waterfall Resort/Seabone Aviation  
Ketchikan, Alaska

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Holland America Westours  
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Alaska Airlines

**oni Walker**

Logistics

**Tina Lindgren**

Executive Director

January 27, 1999

Dear North Pacific Fisheries Council Members:

Thank you for the opportunity to comment on proposed alternatives to manage the halibut charter industry to maintain the fleet below a GHL (guideline harvest level) in regions 2C and 3A (Southeast- Juneau to Ketchikan, and Southcentral - Yakutat to Kodiak, respectfully). Sportfishing opportunities are a key component of many visitor trips and are a staple summer activity for many Alaska residents. The North Pacific Fisheries Management Council (NPFMC) decisions will play a critical role in the future predictability and stability of the halibut sportfishery. In turn, the sportfishery plays an integral part of the Alaskan visitor experience and provides a significant economic and employment contribution to these regions. As the major voice for the visitor industry, the Alaska Visitors Association (AVA) offers the following comments for your consideration.

AVA is very concerned about the NPFMC decision to pursue management alternatives to establish a guideline harvest level for the halibut charterboat industry. The original decision to pursue GHL's was based on projections that have not been realized. However, if the Council moves forward, the Alaska Visitors Association offers these comments on the alternative management measures.

- A. Alternative 1 - status quo - is the preferred AVA alternative. AVA supports conservation of the resource and supports development of local area management plans to address site specific issues. Additional support for this position is outlined in the latter portion of this letter.
- B. AVA has concerns about moratoriums on an area-wide and local basis which in essence create a limited entry fishery. Moratoriums, for species other than halibut, will require a state constitutional amendment and could have a number of unanticipated effects from increasing the cost of a halibut charter to reducing the fishing opportunity. In addition, moratoriums can destroy free market enterprise and result in financial benefits for a limited few.
- C. Management measures selected for further staff analysis should strive to ensure:
  - A stable and predictable halibut sport fish industry to sustain and provide growth for local businesses, provide regional economic benefits, and assist in diversifying the state's economy. Once the upper limit is reached in the GHL and allocation range alternatives, restrictive measures will be implemented. The measures need to ensure that halibut fishing will be open in August as well as June to ensure that visitors have equal opportunity to fish. The visitor industry has been diligently working to extend the visitor season; measures that reduce or constrain the fishing season will have deleterious effects.

Sportfishing is one of the primary attractions for people interested in visiting Alaska. State of Alaska visitor surveys show that 35% of visitors coming to Alaska go fishing.



For many of these anglers, fishing is their primary purpose. If they had not been able to fish, they would not have come.

The sportfish segment of the Alaska visitor industry supports a significant number of small businesses which provide financial benefits to the state and local economies. The small percentage of halibut caught by non-residents and residents supports a substantial number of local businesses from lodge owners to restaurants to bed and breakfasts, as well as charter boat operators.

Just as commercial fishing interests are working to ensure stability and the increase profits, the sportfishing industry should also be allowed the opportunity for growth.

- **A fair and equitable allocation of the resource in light of the demand, the economics, and the Magnuson-Stevens Act.** The current halibut allocation of about 91% commercial and 3-4% guided sport fleet needs to be carefully reviewed. The two regions under consideration for GHF's encompass the two largest sport fisheries in Alaska with the greatest sportfish demand. Region 3A is home to over half the state's population and the halibut charter industry serves an equivalent number of residents and non-residents. In Region 2C, where more residents have access to or own their own boats, the charter boat fleet is more dependent on visitors.

If the State of Alaska wants to encourage tourism and broaden the economic and employment base, then halibut allocations between commercial and sportfish interests need to be more equitable to ensure adequate public access to this important fishery resource for resident and visitor anglers. Further, the Magnuson-Stevens Act clearly defines parameters that must be considered in the allocation decision-making process.

- **The disproportionate economic impact on the commercial and guided sport fisheries is clearly quantified and addressed.** A small increase in the charter boat allocation will have a large economic impact on the sport fishery and the businesses that support it; whereas, a small decrease in the commercial allocation will have a negligible, or very small impact

As previously noted, AVA supports the status quo alternative and does not support the establishment of measures to limit the guided halibut sport fish charters. The primary reasons for this position are noted below and should be addressed in the analysis justifying guided halibut sport fish management measures.

1. **There is no quantitative, biological justification for this action.** For the last three years, the total allowable catch (TAC) has increased. Conflicts in localized areas, such as Sitka and Homer, in part are the result of the IFQ fishery which enables commercial boats to fish closer to home thereby increasing the pressure on halibut resources previously used by sport fishers.
2. **The problem the NPFMC is trying to resolve is "perceived impact" based on tourism growth and non-resident license sales.** While license sales between 1985-1997 for non-residents increased, Alaska Department of Fish and Game 1997 Statewide Harvest Survey data for salmon shows that non-residents have significantly fewer angler days (up to 45% less) and catch fewer fish than residents. This is likely true for halibut as well.

More recent 1998 data shows sport fish license sales dropped well below the 7% annual increase projected, raising serious questions about the impetus and need for GHL's. (Non-resident sales increased about 1% , resident sales decreased about 1%.) While non-residents support sport fisheries through significantly higher license fees, their voices are not heard in the NPFMC process.

3. **The effects of limits on the halibut charter fishery could displace sport fisheries to other areas and to other species.** For example, halibut charter boat operators report increased demand when salmon fisheries are closed. The effects on other fish species needs to be carefully considered.
4. **The commercial fishery has been allocated more halibut than they harvested. Since IFQ's have been in place, 5% or more of the total allowable commercial harvest has been left in the ocean.** The commercial fishery is being given more halibut than they care to harvest, yet measures to limit the guided sport fishery are under discussion. In 1998, the commercial harvest in region 2C was 4-5 million pounds less that the IPHC recommended harvest. This is two to three times more than the 1.7 million pounds harvested by the guided charter fleet. The "excess" or unharvested commercial allocation makes it difficult to understand the merits of management measures for guided sport fishing.
5. **A change or limit in the allocation quotas has a significantly disproportionate economic impact on the different fisheries.** The current allocations of 3-4% for the charter boat fleet and 91% for the commercial fleet are skewed significantly towards the commercial fishery. As a result, a small increase in the charter boat allocation will have a large economic impact on the sport fishery and the businesses that support it; whereas a small decrease in the commercial allocation will have a negligible, or very small impact.
6. **The Magnuson-Stevens Conservation and Management Act states that:**
  - **Allocation among fisherman be fair and equitable, and carried out in such a manner that no entity acquires an excessive share.** GHL's on 3-4% of the guided sportfish catch compared to 91% commercial catch is neither equitable or fair.
  - **Allocation decisions consider impacts to recreational fisheries and not negatively impact them.** Although the timeframe to enact management measures remains undefined, when the limit is reached, there will be a negative impact and public access to a public resource will be restricted.
  - **No measure shall have economic allocation as it's sole purpose.** The decision to pursue charterboat limits transparently favors and protects commercial fisheries economic interests over sport fisheries, given the current and projected future allocations.
  - **Reduction of commercial bycatch and waste should occur before recreational fisheries are restricted.** The poundage of the commercial bycatch is more than the sport fish poundage.
  - **Economic impacts to communities with healthy recreational fisheries be addressed.** While the Council has noted the economic value of the commercial and sport fisheries to the state, the jobs and community impacts (value to tourism) needs further analysis. In addition, the contribution of sport fisheries to diversify the state's economy should be considered.

The Alaska Visitors Association (AVA) is a private, nonprofit statewide trade association representing all facets of the tourism industry. Our mission is to recognize and promote Alaska's opportunities, emphasizing the importance of high quality visitor experiences. With over 650 member businesses, AVA is the largest, statewide visitor industry association representing a wide range of business interests from large air and cruise lines to small localized guiding services and charter boat operators.

The visitor industry is one of the top three industries in the state that:

- Provides a *direct* economic impact of nearly \$1 billion and a *total* economic impact of \$2.6 billion each year.
- Accounts for 18,900 full-time jobs and \$360 million in total earnings.
- Employs 78% Alaska residents, the highest percentage of all Alaska's key industries. One out of every eight private sector employees in Alaska works in the visitor industry.
- Contributes \$124 million each year to state and local governments (\$70 million to state, \$54 million to local treasuries) through taxes, fees and other assessments paid by visitors and tourism businesses.
- Is comprised of 90% small businesses.

These statistics, although not directly applicable to sportfishing, clearly state the economic and employment benefits that must be considered during allocative and management decisions.

Thank you for your consideration of the visitor industry perspective on this important issue.

Sincerely,



Ken Dole  
President



Tina Lindgren  
Executive Director

**Comments Received on Halibut Charter GHL  
Since February NPFMC Meeting**

# GLACIER ANGLER CHARTERS

## JUST FOR THE HALIBUT

**SUBJECT: Halibut Charter GHL**

16 February, 1999

North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Ave., Suite 306  
Anchorage, Alaska 99501-2252

RECEIVED  
FEB 19 1999  
N.P.F.M.C.

Dear Chairman Lauber and Members of the Council.

As an owner and operator of a Halibut Charter business in the Prince William Sound since 1982. It appears that the NPFMC does not understand the Halibut Charter fishery nor the community economic importance this industry provides. For this reason, I submit this letter to hopefully address major issues that are lacking in the GHL discussion paper and in the advisory panel minutes concerning this subject.

Over the past 16 years, I have seen many changes that have effected the Halibut Charter business. My primary Port of origin since 1982 has been Valdez. In 1982 the Valdez Halibut Charter fleet only consisted of about five vessels. From 1982 to 1989 the Halibut Charter business growth rate from Valdez was slow and by 1989 another 4 to 5 vessels entered the fishery. As you remember, March 1989 was when the Exxon Valdez hit the reef at Bligh Island. Due to the small vessel demands for oil spill clean up and the highly publicized daily rates paid, the requirements of small vessel support were fulfilled by people from across the country. This is when the Valdez Halibut Charter fleet took a major up change from the previous growth curve. After the clean-up contracts expired, many vessels with newly licensed captains were in need of continued work to justify their vessels. Halibut Chartering fulfilled their needs.

Since 1995, the Halibut Charter fleet in Valdez continues to grow at a rate of approximately 8% annually. This growth rate is caused by a number of factors; the Halibut Charter businesses are public demand driven. The Halibut Charter growth in Valdez is based on the infrastructure that has also been added to this community. The City of Valdez visitor related infrastructure now offers 5 RV parks, 34 bed & breakfast, 5 hotels, 3 sporting goods stores, 4 gas stations, 4 marine parts/ service facilities, 2 travel agencies and 9 restaurants. The public demand for access to the Halibut resource is driven by the visitor marketing effort of these businesses which is also enhanced by the Valdez Convention and Visitors Bureau, The Valdez Chamber of Commerce and the Alaska Visitors Association. Motor homes and Airplanes continue to come to this State, tourism is a vital industry that continues to grow and is equally desired.

The NPFMC must understand the effects on community economics in their decisions that effect near-shore Halibut management. The Charter boat GHL issue is a near-shore Halibut management decision.

CAPT. DARREL SHREVE  
P.O. BOX 2053  
VALDEZ, ALASKA 99686  
(907) 835-4734

Valdez has worked hard to become a visitor destination, the free enterprise system has invested in this community to meet the needs of the visiting public. This infrastructure development has brought added stability to the economic well being of this Prince William Sound community.

During the years of my Halibut Charter participation, I continue to witness the need to extend the distance from Valdez to the fishing grounds that offer reasonable daily harvest opportunity. In 1982, the distance of 25 miles was normal, in 1998 some were traveling 70 to 80 miles with many reflecting a daily one-way average of at least 55 miles. The IFQ fishery of 1995 is now creating gear conflicts on the shared fishing grounds. The Valdez Halibut Charter fleet is currently at their daily travel limits. These limits are defined as time remaining to provide the public reasonable opportunity to harvest and return to the port of origin by the day's end.

The NPFMC is currently considering management alternatives that will enforce a guideline harvest level of Halibut for the Charter boat industry. A GHL of 15.61% of the sport/commercial removals does not support the economic concerns to continue community stability as previously mentioned. The NPFMC would be providing a law that is totally directed at the visiting public that desires access to their public resource. The GHL is cleverly disguised as being directed to the Halibut Charter fleet, however Halibut Charter boats do not catch fish. Halibut Charter boats provide commercial transportation service to the public to access fishing opportunity of the public's Halibut resource. The GHL is directed truthfully against the public that uses the charter service. This resource should not be privatized to solely support the long-line fishery. 84% of the allowable Halibut harvest to the long-line fishery without consideration of community requirements is not in the public's interest. Halibut Sport fishing in Alaska is a major draw to Alaska's tourism; to restrict this portion of Alaska's tourism is unjustified.

The Council should direct their near-shore Halibut management goals to support the communities and the public. The net worth of the near-shore Halibut fishery for this community is far greater in the sport and sport guided fishery.

The Alaska Commercial Fisheries Entry Commission (Ref: CFEC Report 98-SPValdez-N) reflects that in 1997 only 34 3A Halibut Quota Shareholders were from Valdez, this report also reflects that these 34 QS holders hold 56,864 pounds of Halibut commercial shares. (1997 equivalent) Only 11 QS holders of this community fished halibut in 1997 with a total gross earning of \$59,793.00. The long-line IFQ fisherman is not a major stakeholder of this community, these gross earnings are only a small fraction of what this community experiences from the recreational halibut fishery net worth.

The IPHC (International Pacific Halibut Commission) reports that the 1997 IFQ total harvest from the Prince William Sound and the two statistical areas (230 & 240) that feed directly into the Sound has grown to over 4.6 million pounds. These removals are coming from the shared fishing grounds of the Sport and sport-guided fleet.

It is obvious that the bulk of these near-shore removals are coming from transit area 3A quota Shareholders that bring minimal value to the local communities.

The newly implemented State Charter logbook program of 1998 reflected that 376,390 pounds of Halibut come off of Charter vessels by sport fishermen in the Prince William Sound. This includes all PWS communities.

Since 1995 the harvest growth of near-shore commercial halibut IFQ has changed from the traditional Halibut harvest of the Prince William Sound area. This change has created a commercial Halibut season of eight months in duration with an increase of near-shore removals nearly doubled from traditional levels. The Commercial Halibut IFQ system is displacing the PWS guided and unguided Halibut sport-fishery. The growth in the near shore commercial harvest is eroding the PWS Sportfishing opportunity and impacting the sport-fisheries potential to harvest. The International Pacific Halibut Commission currently reports declining halibut biomass in area 3A. They also report that they lack information on the near shore halibut movement, local area population density and near-shore exploitable yield data.

The IPHC considers the halibut resource to be a single population. The IPHC sets halibut harvest in regulatory areas in proportion to abundance. These areas are entirely too large to address community sport fishing concerns. This harvest philosophy protects against over-harvest of the entire 3A area and spreads fishing effort over the entire range to prevent regional depletion. This harvest philosophy does not protect against small-scale local depletion. It is understood that small-scale local depletion does not have a significant biological effect for the resource as a whole. The adverse effects from small scale local depletion is experienced by vessels that do not have the ability to move to grounds of higher abundance.

The Prince William Sound Halibut sport-guided and sport-fishery vessels are constrained by time and distance from their ports of origin and do not have the mobility to move to adjacent grounds of higher abundance. The displaced guided and unguided sport-fishermen have and will continue to target on other State managed fish stocks.

The absence of management near-shore information to provide exploitable yield and the lack of controls to limit near-shore commercial Halibut removals on shared fishing grounds is causing near-shore depletion in the PWS region. Immediate changes must be adopted to address near-shore depletion. These changes must provide management alternatives that prevent the economic losses that will occur to the Halibut Sport-Guided businesses and to all PWS communities and businesses that provides the supporting infrastructure of the halibut sport fishery.

The NPFMC must establish management measures that support near-shore community stability based on near-shore participation of the Halibut harvest & user economic worth. Management guidelines that provide the best value of the publics fishery to the supporting communities and the State of Alaska must be paramount in the decision making process.

The new Halibut IFQ program is forcing the urgent need for a PWS near-shore Halibut management plan that directs management of effort & harvest to support the fishery priority that best provides economic stability for the affected communities. Such a plan must address the best interest of the owners of the Halibut resource (the public), the communities and the State of Alaska.

During the IPHC meeting in January 1999 at Prince Rupert B.C. , Chris Norosz stated while sitting in for Drew Scalzi on the Commission. "The distinction needs to be drawn between owners of IFQ and owners of the resource. As owners of IFQ we are harvesters, and very privileged harvesters at that, but we do not "own" the resource. The owners of the Halibut resource are clearly the United States and Canadian general public. Whether our quota was earned through historical catch or purchased, it is still only a privilege to harvest, and in these early years of the IFQ fishery we need to make that distinction and remind ourselves of that."

Sincerely

Darrel Shreve  
Owner & Operator



February 16, 1999

George E. Hiller  
18207 Clear Falls Circle  
Eagle River, Alaska 99577  
(907) 694-6688

North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Ave., Suite 306  
Anchorage, Alaska 99501-2252

RECEIVED

FEB 18 1999

N.P.F.M.C

Dear Chairman Lauber and Council Members:

As an officer of the Seward Charterboat Association I have been reading everything I can find regarding halibut and the Council process in an attempt to be knowledgeable of these.

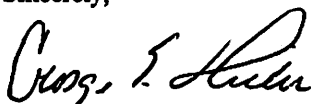
From my readings I find there are other Councils tackling fisheries issues all along our coastline. They all seem to have one common point, they are addressing depleting or over harvested fish stocks. The NPFMC is addressing halibut, expressly looking into the guided sportfishing fleet. Halibut are neither over harvested or are a depleted resource, yet you have chosen to accept a proposal that would place restrictions on the public's access to this resource. I say this because the charter fleet does not harvest many halibut, they provide commercial transportation enabling the public access to the resource. In May 1993, the Alaska Longliners Fishermen's Association (ALFA) submitted a proposal requesting the Council limit harvests taken by the guided sport halibut fishery. This is the same as asking the Council to restrict the public from the resource. The ALFA has a voting seat on the Council and as far as I can determine the ALFA continues to vote on this issue - this would appear to be a conflict of interest. There appears to be a halibut problem in the Sitka area, but the problem does not extend out of that region. The Sitka problem was addressed and a solution has been reached, so why escalate it further?

If there is a problem it is one of gear conflict. The Canadians on the International Pacific Halibut Commission (IPHC) informed their American counterparts that Canadian Individual Fishing Quota (IFQ) holders were taking more halibut in near coastal waters and not returning to their traditional grounds. From my personal observations and statistics provided by the IPHC this is also true of the waters in and near Prince William Sound. When these near coastal stocks are severely depleted the IFQ holders will more off shore and continue fishing leaving the halibut charter operators without a viable place to go. This will have severe economic repercussions for coastal communities that depend on sportfishermen. The IFQ program requires the development of a near-shore management plan due to the nature of the shared fishery.

As far as I can determine, the fisheries stock is a public resource. The commercial fleet is allowed to take part of this resource and distribute it to the public, yet they act like it is theirs. This appears much the same as the ranchers in the mid-west, they lease hundreds of thousands of public land for grazing, yet they want to restrict public access to this land.

The Council has a difficult task overseeing all the problems associated with fisheries and has not before attempted to address the sportfishing side. I ask the Council to review all the data and then ask themselves - is there really a problem with the sport halibut catch, or is it a matter of perception by the commercial side? I would hope that you find there is no immediate problem and table this issue until such time as a genuine problem presents itself.

Sincerely,



George E Hiller  
Grey Eagle Charters, Inc.

Mike Field  
c/o Alasking Charters  
1511 Turpin St.  
Anchorage, Alaska 99504

RECEIVED

MAR 10 1999

N.P.F.M.C

Richard Lauber  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501

March 7, 1999

Dear Mr. Lauber:

As we are approaching a time where it appears some kind of decision will be made concerning the Charter Halibut fishery, I feel compelled to write to you in order to voice my concerns. First of all, I'd like to explain my situation to you: I have been in Alaska most of my life having moved here when I was in grade school. I started guiding in the summers while still in high school and continued guiding into my thirties. I met my wife while working in a remote fishing lodge. In 1993 I decided to start my own charter service in Ninilchik (Alasking Charters). The point of relaying this history is to let you know that I am not someone who has just started doing this to make a quick buck and leave the state. Sportfish guiding has been a way of life for me and was literally my first job. I am a lifelong Alaskan who would have to be dragged from this state kicking and screaming.

Well as anyone knows who has started a fledgling business, those first few years can be tough; and they were. I made some mistakes, Alasking charters lost money I went into debt and was forced to get a "real" job to feed my family. In 1998, I sold my boats so that I could pay down more debt. However, I fully intended during this time, and still intend to return to the business that I love. I have kept my business license current and managed to purchase property in Ninilchik in 1995, which I have begun to develop. It is looking like I should be out of debt and ready to start again in 2000.

What concerns me is, while I believe that some kind of limit on the fishery may eventually be necessary, I feel that people that are in a position like mine (that have history and a vested interest in the fishery) will be left out just because they missed a season or two of operation due to hardship. As it is now written, three of the four options for years of participation under a moratorium include a 1998 logbook as mandatory. As you know I sold my boat in 1998 and did not operate that year. However, I have IPHC licenses for 1993 through 1997. I paid for insurance all those years; I kept my business, and AF&G licenses and registrations current. Am I out of the fishery because I did not operate in one year (1998)? That hardly seems fair.

Richard Lauber  
March 7, 1999  
Page 2

Unless there is a re-thinking of the requirements for participation so that people in my circumstance are not discriminated against, I cannot support a moratorium and would be for a continuation of the status quo.

I do not wish to be confrontational, however, there is no delicate way to voice my other concerns with this issue:

I question whether the guided sport industry should be lumped together with the commercial industry. My clients do not purchase their fish from me. Rather, they purchase the opportunity to catch fish from me. Unlike the commercial fishery, which is based solely on harvest, my income is not based on the pounds of fish my clients catch; it is based on the number of clients I serve. We are intrinsically a service industry.

Furthermore, my clients are required to purchase sport-fishing licenses. If they are participating in a commercial fishery, why must they purchase sport-fishing licenses? Are commercial fishermen required to purchase sport-fishing licenses?

I submit to you that my clients are sport fishermen who purchase their own sport-fishing license and hire me to transport them to the fishing grounds. If they did not (or could not) hire me, then they would either find some other way to get out there, in which case limiting my activities makes no difference in the harvest, or they won't come to Alaska to go fishing in which case you are limiting large numbers of sport fishermen and all the revenue they generate (in all aspects of the tourist industry who may not be represented in the council) so that a relative handful of commercial operators can harvest the lions share of the resource.

I would like my concerns to be addressed when this issue is scheduled to be discussed in the NPFMC's Agenda. Thank you for your time.

Sincerely,



Mike Field  
Owner, Alasking Charters



March 19, 1999

RECEIVED  
MAR 19 1999  
N.P.F.M.C.

Terry D. Garcia, Assistant Secretary  
U.S. Department of Commerce, NOAA  
National Oceanic and Atmospheric Administration  
14th & Constitution Ave. NW  
RM 5804, HCHB  
Washington, DC 20230

Dear Terry,

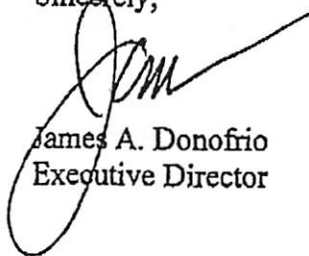
At this time the North Pacific Fisheries Management Council (NPFMC) is working to place a guideline harvest level (GHL) or cap on angler catch of halibut from charter boats in Alaska. If this GHL is adopted, reduced bag limits (anglers are currently allowed only two per day) and other restrictions could be imposed upon the recreational community beginning in the year 2001.

The proposed GHL is no more than an attempt by the commercial industry to PRIVATIZE a strong, abundant, and public resource.

Pacific halibut stocks are abundant. Since 1977, Commercial utilization of halibut has increased by 300%, while the sport angler bag limit has remained the same.

Recreational anglers must not be denied their rights to a public resource. I respectfully urge you to intervene on behalf of recreational anglers and the Alaska charter boat associations and protest the proposed GHL.

Sincerely,



James A. Donofrio  
Executive Director

Cc: Senator Ted Stevens  
Congressman Don Young  
Congressman Jim Saxton  
Clarence G. Pautzke, Executive Director, NPFMC

**ANC**  
**AFOGNAK NATIVE CORPORATION**

P.O. BOX 1277, 215 MISSION ROAD, SUITE 212, KODIAK, AK 99615 (907) 486-6014 FAX (907) 486-2514

March 17, 1999

**RECEIVED**  
MAR 22 1999  
N.P.F.M.C

Rick Lauber, Chairman  
North Pacific Fishery Management Council  
605 W. 4th Avenue  
Anchorage, Alaska 99501

RE: Halibut Charterboat Management Alternatives

Dear Chairman Lauber:

On behalf of the Afognak Native Corporation and the outlying communities of Kodiak Island, I am writing to request that you consider the following option concerning the pending Halibut Charterboat Management Alternatives.

One of the alternatives remains to consider an area-wide moratorium. In order for this alternative to be "laid to rest" so to speak, could you separate this alternative out from the other GHL (guideline harvest limits) considerations since the moratorium itself is not technically a "GHL" alternative?

Our position has been, and remains, that consideration of moratoria should be within specific local area management plans and NOT area wide. As you have heard before, we have many current and pending charter and lodge operations on the Island but we are certainly not in critical mass, like Kachemak Bay might be. Our economic development will be heavily dependent on our ability to create more opportunities within the charter industry. We are working aggressively toward consensus and resolution within our local management plans.

I think this separation might clarify the issue and put the other GHL alternatives in the proper perspective.

Thank you. Please feel free to contact me if you have any questions.

Sincerely,



Arnold "Ole" Olsen  
President

**COASTAL CONSERVATION ASSOCIATION VIRGINIA**

**2100 Marina Shores Drive, Suite 108**

**Virginia Beach, VA 23451**

**757-481-1226, fax 757-481-6910, e-mail [Ccavast@aol.com](mailto:Ccavast@aol.com)**

**March 23, 1999**

**RECEIVED**  
**MAR 29 1999**  
**N.P.F.M.C**

Terry D. Garcia, Assistant Secretary  
U. S. Department of Commerce, NOAA  
National Oceanic and Atmospheric Administration  
14<sup>th</sup> & Constitution Ave. NW  
RM 5804, HCHB  
Washington, DC 20230

Dear Mr. Garcia:

At this time the North Pacific Fisheries Management Council (NPFMC) is working to place a guideline harvest level (GHL) or cap on angler catch of halibut from charter boats in Alaska. If this GHL is adopted, reduced bag limits (anglers are currently allowed only two per day) and other restrictions could be imposed upon the recreational community beginning in the year 2001.

The proposed GHL is no more than an attempt by the commercial industry to **PRIVATIZE** a strong, abundant and public resource.

Pacific halibut stocks are abundant. Since 1977, commercial utilization of halibut has increased by 300%, while the sport angler bag limit has remained the same.

Recreational anglers must not be denied their rights to a public resource. Personally, I know of over a dozen Virginia recreational fishermen who spend several thousand dollars each to fish in Alaska for halibut each year, as do thousands of other Americans. This economic windfall for Alaska would end with this GHL cap. I respectfully urge you to intervene on behalf of recreational anglers and the Alaska charter boat associations and protest the proposed GHL.

Sincerely,



Richard Welton  
Executive Director, CCA VA

Cc: Senator Charles Robb  
Senator John Warner  
Clarence G. Pautzke, Executive Director, NPFMC  
James Donofrio

Wayne Westover  
Box 1023  
Sitka, Alaska 99835  
April 7, 1999

RECEIVED

4-7-99

APR - 7 1999

N.P.F.M.C

Dear Chairman Lauber:

I am writing in reference to the Halibut Charter GHIL item that is on the April agenda. The charter quota must be set as a percentage of the total quota. That share should be based on the GHIL approved by the council last year.

I came to Alaska in 1934 when I was six years old. My family moved to Port Alexander at that time and then to Sitka in 1938. I have resided here ever since. I became involved in the halibut and salmon fisheries at the age of ten, fishing with my family. I have worked these fisheries up to the present time. My halibut quota is in Southeast.

I remember well the miles of herring flipping. With bigger and better boats, no regulations and no regard for the resource, the herring were basically wiped out. We now have a fishery that is a fraction of what it was in the 40's and 50's. Proper conservation would have allowed that fishery to continue.

When Alaska became a state, we voted out the fish traps and started limiting boats, setting seasons and making sure there were enough spawners to keep the fishery healthy. As a result of these methods, we have a very well managed salmon fishery and healthy stocks.

With the beginning of limited entry for salmon, I thought we would have a stable salmon troll fishery. As more and more charter boats got into the fishery and more of the king salmon quota was allocated to this new commercial fleet, my income from the salmon fishery became less and less. My permit value dropped from forty to fifteen thousand dollars.

Now the charter fleet is after a larger and larger slice of the halibut resource. The IFQ system was developed to provide stability to this fishery. Allocating a set amount to the charter fleet at the peak of the biomass would be a formula of disaster for the commercial fleet, their families, the processors and the communities that are dependent on this resource. The commercial fisherman has been involved in both the conservation and the management of the halibut fishery since the advent of The International Pacific Halibut Commission. We have done a good job. No one denies the true sportsmen a share of the resource, but do disagree with a reallocation of the resource we have guarded so well to another commercial group that has no history in the fishery.

Sincerely,

  
Wayne Westover

Chairman Richard Lauber  
NPFMC  
605 West 4th Ave, ste. 306  
Anchorage, Alaska

March 30, 1999

Dear M r. Lauber,

My name is David Harris and I am a commercial halibut fisherman. I have been in the industry for 13 seasons, first as a deckhand and now as a hired skipper, and those I fish with have as much or more experience than I. It has come to my attention that the Council is in the process of reevaluation the allocation of the Guideline Harvest Level between the primary user groups, namely sport and commercial fishermen.

As a commercial fisherman whose livelihood is dependent on catching our share of the GHL each season I am deeply concerned about ADF&G Sportfish Division's request to adjust the charter fleets allocation to 125% of 1998's charter fleet halibut catch. I understand that last year the council approved a GHL for the charter fleet at 125% of the 1995 catch. I urge you to preserve this level of allocation between sport and commercial users, as a continual readjustment of the GHL in the favor of the sport fishing charter fleet will begin to severely impact my industry. The most disturbing aspect of this request is that the allocation be in fixed pounds rather than a percentage of the GHL. It is common knowledge that the halibut biomass is at an historic high in the North Pacific at this time. By allocating in fixed pounds rather than a percentage you will be unfairly penalizing the commercial fishermen when the biomass cycles to lower levels and the GHL is similarly reduced. If the charter fleet has fixed pounds allocated to them rather than a percentage like everyone else, it could effectively shutdown the commercial fleet. Commercial fisherman have always supported conservation of the resource, accepting low quotas when the biomass was low to preserve the resource and our way of life. Why should the charter fleet have different rules?

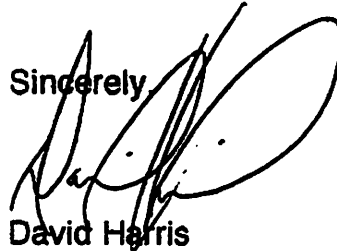
The charter fleet promised to develop and implement "slow down" measures to live within their allocation - which obviously aren't in place or effective. I urge the Council to analyze effective slow down measures such as reduced bag limits to keep the



charter fleet under their GHL.

In closing, if the Council does decide to unfairly adjust the allocation of the harvestable halibut in favor of the charter fleet that you **DO NOT DO SO IN FIXED POUNDS**. The natural way of the halibut biomass is to expand and shrink in cycles that may take decades to go full circle. The charter fleet's halibut allocation must be a percentage of the North Pacific's GHL.

Sincerely,



David Harris

FM Vis

Box 20467

Juneau, Alaska 99802

cc Governor Tony Knowles

P.S. Dear Governor Knowles,

I'd like to point out that 97% of the charter caught halibut in the 2C area (Southeast) is taken by non residents. Allocation adjustments in favor of the non residents will hurt me, other Alaskan fishermen, as well as the commercial fishing industry as a whole which, you are well aware, is a positively contributing and vibrant member of our states economy. Every gear group in every fishery accept catch reductions when conditions warrant, but this reallocation of the harvest from the commercial to the charter fleets hurts the existing and established commercial fleet and support industries to reward a much smaller ( but louder) group of relative newcomers.

Thank you,



To: Richard Lauber, Chairman NPFMC

*Robert D. Schell*  
From: Robert D. Schell, F/V Alice Faye

Subject: Halibut Charter GHIL

Date: March 31, 1999

RECEIVED  
MAR 31 1999  
N.P.F.M.C

I sold my first commercial halibut in 1967. My primary fishery was in salmon until the decline in value of all salmon forced me to look at other alternatives for income if I wanted to continue in the fish business. I have fully participated in the halibut fishery since 1980. With the beginning of the IFQ fishery, I dipped into my resources to purchase more quota. Even with these additional quota purchases, I would still be considered a small longline fisherman, having a quota of 13,000 pounds this year.

I invested in the fishery because halibut is an excellent food fish and because the market is mostly domestic. The management of halibut through IPHC has been conservative and I reasoned that any conservation on the fishing fleets part would be rewarded with a sustainable catch that would be equal to the abundance of the stocks. I DID NOT invest to see a reallocation of the resource to another commercial user group-a group with a short term perspective and no history of conservation of the resource or a financial commitment to a particular share of that resource.

My young fishing friends have been encouraged to enter the IFQ halibut fishery as a way of maintaining and extending their investment in the fisheries. There has been much optimism on their parts that finally the lawsuits are settled, the markets are firming up and the federal government is putting into place a loan program to help them obtain quota. Any move on the council's part to deviate from the status quo in the halibut management plan would be a blow to the sustainability of the fleet and to these young people's hopes.

All users need to play by the same rules. The GHIL approved by the council a year ago must remain with the charter allocation being set on a percentage basis of the total quota. We all need to be rewarded or not by the status of the stocks. The commercial fleet cannot afford to have another fishery taken away or reduced by unfair allocations. The entire commercial halibut fleet would appreciate a universal playing field for all users.

# NATIONAL MARINE TRADES COUNCIL

c/o Marine Trades Association of New Jersey

1999 Rt. 88E, Brick, NJ 08724

(732) 206-1400/Fax (732-206-1413)

March 23, 1999

Terry Garcia, Assistant Secretary  
U. S. Department of Commerce  
National Oceanic & Atmospheric Administration  
14th & Constitution Avenue NW  
RM 5804, HCHB  
Washington, D.C. 20230

RECEIVED  
APR - 1 1999  
N.P.F.M.C

Dear Mr. Garcia:

As you are aware, the North Pacific Fisheries Management Council (NPFMC) is working, at present, to place a Guideline Harvest Level (GHL) or cap on angler catch of halibut from Charter Boats in Alaska. If this GHL is successfully adopted, the restrictions will be felt by the recreational community beginning in the year 2001.

Anglers are currently allowed only two per day; the proposed GHL would further reduce bag limits and further restrictions could be imposed upon the recreational fishermen. We believe this to be a maneuver by the Commercial industry to "privatize" a strong, abundant, public resource.

Pacific halibut stocks are plentiful. Since 1977, Commercial limits on the harvest of halibut have increased 300%, while bag limits for the sport angler have remained unchanged.

Recreational anglers must not be denied their rights to a public resource. I urge you to join our protest against the proposed GHL and intervene on behalf of the recreational anglers and the Alaska Charter Boat industry.

Sincerely,



Alan Davidson, Chairman  
Fisheries Committee

AD/emc

cc: Senator Ted Stevens  
Congressman Jim Saxton  
Congressman Don Young  
↓ Clarence G. Pautzke, Executive Director, NPFMC

RECEIVED

APR - 6 1999

Kevin R. Harris, Ph.D., M.D.  
2485 Exton Road  
Hatboro, PA 19040  
April 1, 1999

**N.P.F.M.C**

Clarence G. Pautzke, Executive Director  
North Pacific Fisheries Management Council (NPFMC)  
605 West 4<sup>th</sup> Avenue, Room 306  
Anchorage, AK 99501

Dear Director Pautzke:

I am aware that currently the NPFMC is considering a guideline harvest level (GHL) to be placed on recreational catches of halibut from charter boats in Alaska. This would be a reduction from the current bag limit from of two fish per angler each day beginning in 2001. It is my feeling that this is unnecessary and would place a needless hardship on the Alaskan communities dependant on sportfishing to support their economies.

The proposed GHL is an attempt by the commercial industry to monopolize and privatize a public resource which is currently strong and abundant.

Pacific halibut stocks are plentiful. Since 1977, commercial utilization of halibut has increased by 300 %, while the sport angler bag limit has remained the same.

As a recreational angler concerned about our nations marine resources and my rights to those resources, I protest the proposed GHL.

Even though I am not a resident of Alaska I have a personal vested interest in these regulations. Each year a group of friends and I visit the Kenai, Alaskan peninsula to fish for salmon and halibut. Even when the salmon are not biting or the river is in a "catch and release" status we can always count on the halibut for a good day's fishing and food for the larder. On the Alaska trips we happily leave behind considerable money for food, lodging, guide fees, charters, auto rentals, fishing gear, etc. Without the halibut our future trips and those of many others would probably be in jeopardy. I would hate to see the economy of the communities built around and dependant upon the recreational fishing industry and the halibut fishery suffer from this.

I respectfully urge you to intervene on behalf of recreational anglers throughout the country in opposing the GHL reducing bag limits on recreational halibut catches.

If possible I would like to hear from you as to where you stand on this important issue.

Sincerely,



Kevin R. Harris, Ph.D., M.D.

P.O. Box 99  
Sitka, Alaska 99835  
April 1, 1999

RECEIVED

APR - 6 1999

N.P.F.M.C

Chairman Richard Lauber  
NPFMC  
605 West 4th Ave., Ste. 306  
Anchorage, Ak. 99501

Dear Chairman Lauber:

I'm a 50 year lifetime resident and commercial fisherman in Alaska. I am also a halibut charter guide.

I was issued original halibut quota shares and have purchased more since. Now I understand the council is considering a new option concerning management of the halibut charter fleet.

Last year you allocated to them 125% of their 1995 catch. Now ADF&G Sport's Division wants to give them more yet, a fixed number instead of percentage of the allowable catch.

Why should one group not participate in resource conservation, especially when that group makes money off the resource without having had to buy IFQ's or have had a past history in the fishery? Presently halibut stocks are at historically high levels. When these stocks go down, as they have in the past, every participating user group should share in the conservation effort by reducing their catch.

Would it be reasonable or fair for the charters to have a fixed number to catch as everyone else gets less, giving them a higher percentage of the total take? This is especially true when they are "the new kids on the block", having just recently begun exploiting the resource.

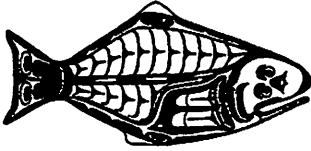
Thank you for taking the time to consider my opinions on this matter.

Sincerely,

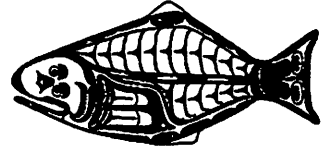


Alan T. Andersen  
F/V Sea Haven  
(907) 747-8747

cc: Governor Tony Knowles



F/V Pacific Dawn and F/V Nancy K  
James E. Phillips and Patricia A. Phillips  
USS 3371 Lot 1 / P.O. Box 33  
Pelican, AK 99832  
(907) 735-2240



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APR - 6 1999

N.P.F.M.C

North Pacific Fisheries Management Council  
605 West 4<sup>th</sup> Avenue, Ste. 306  
Anchorage, Alaska 99501

Attention: Chairman Rick Lauber and Council Members:

We are a multigenerational - family owned commercial fishing business. Our operation is dependent upon the survival of an adequate halibut resource. The financial statements submitted for financing a vessel with RSW and seaworthy capabilities was based on projections of quota and fish prices. The quota shares we hold are Area 2C and 3A. Without the stability of poundage available for us to harvest, our business would experience financial difficulties. Our vessel has diversified into other fisheries because of economics. Without that other income our operation would not break even.

The Council understand the complexities of the halibut fishery. A steady and consistent supply of quality fish on the market is a goal that has been reached eight months of the year. The consumer demands are increasing because of the quality product that has been delivered to markets. What will happen to the hard established markets, if the TAC for halibut is reallocated to the sport fishermen.

We urge the Council to use the GHL approved a year ago and to base the halibut charter allocation on a percentage of the total quota so every user groups quota goes down when the halibut biomass declines. The halibut stocks are healthy because of restrictions commercial halibut fishermen have endured to maintain healthy populations.

The Council's strength lies in the ability to request program changes and improvements. Please analyze effective slow down measures, such as reduced bag limits, hook and release, and size limits. All measures necessary to keep the charter boat fleet under the Guideline Harvest Level.

The growth of the sport charter fleet is displacing the traditional users of the halibut resource. Residents of coastal Alaskan communities need economic opportunities but not at the expense of an established fleet. The charter boat industry halibut harvest goes to 97% nonresident sport catch and 3% resident sport catch. The traditional commercial harvesters and local residents should have a priority to harvest the resource. The sport charters should not have a special interest set of criteria and rules. The halibut resource is healthy because of the diligence of the IPHC and NPFMC; decisions have been made because of good research, information and allocating staff to options that need study. Thank you for your time a commitment.

Sincerely,

James E. Phillips and Patricia Phillips

*James E. Phillips*      *Patricia Phillips*

CC: Governor Tony Knowles



## Lone Fisherman, Inc.

John C. Phillips, Pres.  
Maura J. Phillips, Sec. Tres.  
General Delivery  
Petersburg, Ak. 99833  
PH: 907-772-2554  
FAX: 907-772-2553  
EMAIL: lfincjmp@alaska.net

RECEIVED  
APR - 7 1999  
N.P.F.M.C

April 6, 1999

North Pacific Fisheries Management Council  
605 West 4th Avenue, Ste. 306  
Anchorage, AK 99501

Attention: Chairman Rick Lauber and Council Members

Dear Chairman Lauber:

I am writing you as a member of a **lifelong and future** fishing family. We are extremely concerned about the Guideline Harvest Level for the charter fleet. We, as fisherman, living in and near the small coastal communities of Alaska, see first hand the use and abuse of the charter fisherman and the impact that they have on the local commercial and subsistence fisherman. We are originally from Pelican where impact can be seen readily. With the local plant being shutdown (due to Kake Tribal's lawsuits) the locals are trying to find other ways to survive. We choose to move, leaving behind a home. Locals feel like chartering is the answer to their problems in Pelican. There were two licensing classes offered there this past fall. Aside from all of the local interest, in trying to survive and remain residents in rural Alaska, we have the expanded charter operations that currently exist in and around Elfin Cove. We have watched chicken after chicken being brought up the docks of Elfin Cove. Many of the **sport caught fish are butchered and frozen before anyone even sees them.** The commercial fisherman are targeted and fined, unable to cut up a fish without first getting it weighed and processed thru the unloading process under NMFS watchful eyes. All of this is very frustrating to us as commercial fisherman. We have worked relentlessly over the past years with the International Halibut Commission to preserve stocks for our future and the futures of our children. It seems very unfair that the sports fisherman are looking at a quota that will never change. Whereas, the commercial fisherman could have severely reduced quotas or no quota at all. Have the fisherman worked so hard within the system to watch it all be allocated to the sports fisherman? The halibut stocks are so healthy now because we, as fisherman, have supported conservation, accepting quota reductions when the council deemed so.



## Lone Fisherman, Inc.

**John C. Phillips, Pres.**  
**Maura J. Phillips, Sec. Tres.**  
**General Delivery**  
**Petersburg, Ak. 99833**  
PH: 907-772-2554  
FAX: 907-772-2553  
EMAIL: Ifincjmp@alaska.net

With the sport industry growing at such outrageous rates, it seems only fair that they are required the same rules and regulations as others harvesting the resource. Commercial fisherman are held within extremely imposing rules and regulations which grow like tumors every year. Every time a commercial fisherman unloads his catch, he is closely monitored by the NMFS. Every fish is accounted for, holds are inspected, massive amounts of paperwork are generated, and people bearing arms are boarding our vessels. The sport fisherman have grown from .86 million pounds in 1997 to 1.78 million pounds in 1998. What will the figures, ( keeping in mind, that the figures are **not** logged and accounted for by organizations like IPHC and NMFS) look like in 1999?

I realize that fisheries management is a political and extremely complex job. We, as commercial fisherman, have just recently been allowed to supply the market with fresh fish over a period of 8 months a year. The consumer demands are increasing, as we see from the removal and low invoice of product held in the freezers prior to the season, 1999. What is the future of our long, enduring struggle to shape these markets if the resource is allocated to the sport fisherman? How can the commercial fisherman survive both the impact of the sport fisherman and the influx of farmed halibut to their established markets? When the commercial fisherman is pushed out of business, who will finance the state, banks, and processing plants when boats are repossessed? **Commercial fishing is the number one industry in Alaska.** The spiral effects of the loss of commercial fishing would be devastating to our states economy.

I strongly urge you to use the GHL approved a year ago and to base the halibut charter allocation on a percentage of the total quota so that every user group fluctuates with the fluctuating biomass. It is important to remember that the halibut stocks are strong now because of the commercial fisherman's conservation and restrictions. Additionally, we must remember that the resource is at a **peak presently** and it will have downward fluctuations. Commercial fisherman have had to and still live with these fluctuations. So should every other user group.

Significantly, 97% of the charter boat halibut harvest goes to nonresident catch. Only 3% is resident sport catch. What are the implications of this to Alaska's economy? I say, extremely far reaching. The traditional commercial harvesters and local residents should have priority in harvesting the resource. However, any group harvesting the resource should have to live by the same rules and regulations, be it Individual Sport Quota's, NMFS regulations, or changes in the harvest levels.





## **Lone Fisherman, Inc.**

**John C. Phillips, Pres.**

**Maura J. Phillips, Sec. Tres.**

**General Delivery**

**Petersburg, Ak. 99833**

**PH: 907-772-2554**

**FAX: 907-772-2553**

**EMAIL: Ifincjmp@alaska.net**

I commend you for all of the work you have done in the past to work with and for the commercial fisherman to establish guidelines to manage the fisheries so there is a healthy resource. I appreciate your commitment. **I simply cannot see you making a mistake now and allocating anything different than last years GHIL to the charter industry.**

Thank-you.

Sincerely,

cc: Governor Knowles  
Linda Behnken, ALFA

To: Chairman Richard Lauber  
North Pacific Fisheries Management Council  
605 West 4th Ave.  
Ste. 306 Anchorage Ak. 99501

From: Tony Guggenbickler  
Box 393  
Wrangell, Ak 99929

RECEIVED  
APR - 7 1999  
N.P.F.M.C

Dear Chairman Lauber and members of the Council:

I'm mad, mad as hell! I have just learned of the request to the council by the ADF&G sport fish division. The request to raise the Guideline Harvest Level for the charter fleet to reflect the increased numbers that the charter fleet caught in 1998 and to allocate this poundage in fixed pounds!

I have served on the local ADF&G advisory committee for about 35 years and have been active in salmon trolling politics. During this time I have seen the sport fish division steadily develop into a tool for the paid sport fish fleet. These charter operators are not stupid. They have infiltrated the sport fish division at the highest levels and many in the division intend to become charter operators when they retire. Its high time that these people are exposed for what they are doing. They care not at all for the damage they do to the established fishery as long as it serves there own selfish means. Further, a lot of these charter operators live in the lower 48. I think it would be a horrible injustice to take this poundage away from the endemic peoples and the sons and daughters of the pioneers of this state and give it to this bunch of carpetbaggers.

Our Family has been in the fishing business since 1945! We are here for the long haul. When IFQs became a reality we invested in our future by buying halibut shares to add to what we already had. We rely on this poundage to feed our families. Three families rely on the poundage we have that we fish together from my boat. Oh yes, we are Alaskans. We live here, we have our home here and we moor our boat here.

I say this. IF THESE PEOPLE WANT MORE FISH, LET THEM BUY THEM JUST LIKE WE DID! NOT CATCH THEM FOR FREE AND TAKE THEM OUT OF OUR POCKETS AT A COUNCIL MEETING.

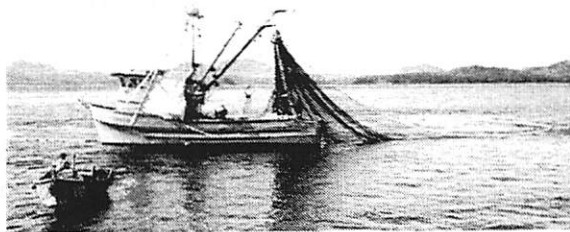
Thank you for your consideration,

  
Tony Guggenbickler  
F/V Toni Marie

# F/V ARCHANGEL

PHIL and THERESA WYMAN

907-747-5568



P.O. BOX 2507

SITKA, ALASKA 99835

April 7, 1999

NPFMC  
Richard Lauber, Chairman  
605 W. 4<sup>th</sup> Ave., Ste. 306  
Anchorage, AK 99501

RECEIVED

APR - 8 1999

N.P.F.M.C

Dear Mr. Chairman,

I am a life long resident of Sitka, Alaska and a commercial fisherman for the past 25 years. I've seen many changes over these last 25 years and if there's one thing certain about the fishing industry it is the uncertainty.

Over the last 5 years, I've been trying to take some of the uncertainty out of my fishing business, for my family, my crew of 3 and myself by buying through borrowing large amounts of money for 2C Halibut IFQ's. It is very discouraging to see my Halibut IFQ poundage being decreased by the increased take brought on by the Charter Industry whose customers are 97% nonresident. These newest numbers showing the charter catch in 2C has doubled in one year is not only troubling, it is catastrophic for my fishing business if the escalation is allowed to continue.

Let me inform you that in this coastal community of Sitka, we've ran out of options besides IFQ's to provide for year round stability.

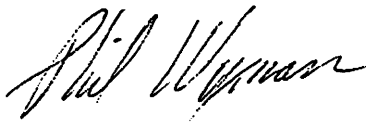
I was in Elfin Cove last year in early May trying to get out to 3A to make a Halibut trip when I had a chance to observe the Charter Industry there getting ready for their season. It was really pretty impressive new buildings going up, new charter boats showing up, most of the little community seemed to be thriving versus the last time I visited when it was mainly dependent on commercial fishing. This last fall the other side of the charter industry came to light; I heard on Raven Radio that the school in elfin Cove had closed. Its enrollment had dropped from 22 in the early 90's to 4 and 3 of those 4 were leaving shortly. Pretty impressive industry.

The last thing I want to comment on is the influence of ADF&G Sport Fish Division in this allocation struggle. Back in the 1980's when commercial Salmon fishermen found

themselves in allocation battles between gear groups, the ADF&G stayed on the sidelines and remained neutral. I totally detest what is going on now with the Sport Fish Division of the ADF&G being active lobbyists for the Charter Industry in this Halibut allocation battle. It is time the State of Alaska review and changes the way sport fish license fees go directly into the sport fish budget instead of the general fund and to use those monies to lobby against Alaska citizens right to make a living through commercial fishing.

I find raising the sport allocation up to roughly 2 million in 2C totally unacceptable. Just because they've stalled this issue for 2 years, shouldn't allow them to have a whole new set of enhanced numbers. I believe 125% of 1995 sport harvest numbers is more than acceptable.

Thank you,

A handwritten signature in cursive script, appearing to read "Phillip Wyman".

Phillip Wyman

CC:

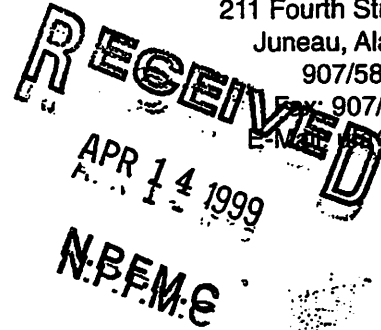
Tony Knowles, Governor  
Representative Ben Grussendorf  
Senator Robin Taylor



# UNITED FISHERMEN OF ALASKA

211 Fourth Street, Suite 112  
Juneau, Alaska 99801  
907/586-2820  
Fax: 907/463-2545  
E-Mail: [info@alaska.net](mailto:info@alaska.net)

April 9, 1999



Mr. Rick Lauber  
Chairman  
North Pacific Fishery Management Council  
605 West 4th Avenue, Ste 306  
Anchorage, AK 99501-2252

Dear Chairman Lauber,

This letter addresses concerns we have with the Halibut Charter Guideline Harvest Level (GHL) discussion paper that will be reviewed by the Council at its April 1999 meeting.

First, any allocation to the halibut charter group, should be a percentage allocation and not a fixed poundage allocation. The biological reality is that the halibut total allowable catch (TAC) will fluctuate over time. Those who engage in commercial halibut fishing or guided sport fishing must consider this one of the risks of doing business. Those who participate must also share fairly in the "costs" of resource conservation. Granting the halibut charter group a fixed poundage allocation would give them an unfair advantage in doing business and reduce their incentive to foster resource conservation.

The conversion of the GHL to an allocation should be based on the 1995 GHL. This allocation was made after several years of discussion and provided a generous harvest opportunity for the halibut charter industry to learn to live within its means. The Council did a prudent thing in 1995 and should not be pressured into increasing the allocation because a group did not heed clear warnings that it should find ways to control its harvest. The tourism industry needs to use restraint in raising visitor expectations. Creating unrealistic expectations and then having someone else pay the bill to meet these expectations is not fair.

The Council needs to press forward with measures to keep the guided harvest under the GHL. Conservation of the resource must come first and uncontrolled fishing must not be allowed to jeopardize the resource on either a local or regional level. The 1998 charter logbook data, which shows a significant harvest increase from 1995 to 1998, provides a clear indication that this fishery must be brought under control soon.

The Council's discussion paper details the economic concerns of the charter fleet. The paper needs to also analyze the impacts of reducing the commercial catch of IFQ shareholders and the ripple effect this will have on the economies of fishing communities, particularly those in rural Alaska. The discussion needs to recognize the significant capital investments made by IFQ shareholders based on a federal policy that was developed after years of analysis.

We oppose ADFG Sport Fish Division's proposal to set the allocation in pounds with a harvest range floor. Again this delinks the charter fleet from conservation and does not recognize fluctuations in the TAC. Commercial fishing businesses deal with a fixed percentage allocation

#### MEMBER ORGANIZATIONS

Alaska Crab Coalition • Alaska Longline Fishermen's Association • Alaska Trollers Association • Bristol Bay Driftnetters Association • Concerned Area "M" Fishermen  
Cook Inlet Aquaculture Association • Cordova District Fishermen United • Kenai Peninsula Fishermen's Association • Kodiak Regional Aquaculture Association • Kodiak Seiners Association  
North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association • Northwest Setnetters Association • Peninsula Marketing Association  
Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel Owners Association • Seafood Producers Cooperative  
Southeast Alaska Seiners Association • Southern Southeast Regional Aquaculture Association • United Cook Inlet Drift Association • United Southeast Alaska Gillnetters

and annual poundage changes; fishermen have learned to live with a percentage allocation and adjust their fishing effort and other business activities accordingly.


Additionally, we recommend that changing the definition of "possession" be added to the management measures that will be studied. We propose a possession regulation which would close the loophole in the regulations of the IPHC and the State of Alaska. Currently, the IPHC sport fishing regulations state that "In all waters off Alaska, ... the daily bag limit is two halibut of any size per day per person... and the possession limit for halibut in the waters off the coast of Alaska is two daily bag limits." A "daily bag limit" is defined as the "maximum number of halibut that they may take in any calendar day from Convention waters", but there is no definition of "possession". The State of Alaska defines possession to mean the "maximum number of unpreserved fish a person may have in possession", and further defines "preserved fish" to mean "a fish prepared in such a manner, and in an existing state of preservation, as to be fit for human consumption after a 15-day period...". In the absence of an IPHC or NPFMC definition for possession, sport fishermen are using the state's definition. Once an individual "preserves" the fish, it is no longer considered to be in possession. This definition allows individuals to harvest more than allowed under IPHC regulations. We suggest the Council approve a definition of possession which closes this loophole by adding "...until reaching their place of residence" to the State of Alaska's definition. "Place of residence" could be defined as the state where an individual legally resides.

The discussion paper should make note of the ramifications of National Park Service actions to phase commercial fishing out of Glacier Bay Proper beginning this year and their implied intent to eliminate charter fishing from the bay at some future date. This action will displace 188,000 to 328,000 pounds (1991-1995 NPS data) of halibut harvest in area 2C; most likely this harvest will be displaced into the Icy Strait and increase the risk of local stock depletion. Crowding on the grounds by both commercial and charter vessels will also increase safety risks for both groups.

We look forward to reviewing the next step in the allocation process.

The United Fishermen of Alaska (UFA) is a statewide organization composed of nineteen commercial fishing organizations, 400 individual members, and 30 businesses.

Sincerely,



Thomas M. Gemmell  
Administrator

cc: Alaska Longline Fishermen's Association  
Fishing Vessel Owners Association  
Alaska Trollers Association  
Commissioner Frank Rue, ADFG  
Governor Tony Knowles, State of Alaska

**SITKA CHARTER BOAT OPERATORS ASSOCIATION****PO Box 2422 Sitka Alaska 99835****Phone & Fax 907-747-3736****April 10, 1999****RECEIVED****APR 12 1999****N.P.F.M.C**

Chairman Richard Lauber  
North Pacific Fisheries Management Council  
605 West 4th Ave., Ste 306  
Anchorage, Alaska 99501

Dear Chairman Lauber and other NPFMC members:

This letter is in regards to the Charterboat Halibut Guideline Harvest Level (GHL) issue you will be considering at your April 21 meeting. Please consider the following points in your decisions.

- 1) An alternative proposed by the Alaska Department of Fish and Game (ADF&G) was changed significantly by the Advisory Panel (AP) at the February meeting. We would like the original ADF&G proposal included as one of the alternatives released for analysis.
- 2) Any GHL should be based on the International Pacific Halibut Commission's (IPHC) Constant Exploitable Yield (CEY) rather than the Total Allowable Catch (TAC). As we understand the process, the CEY takes into account all removals, and is set by the IPHC. The TAC is recommended by the IPHC, but is subject to deliberations, and set by the Conference Board relative to market conditions of commercially caught fish, which has nothing to do with the marketing of halibut charters.
- 3) Please keep in mind, charterboat operations are NOT commercial fishing. Reference the definitions in the Magnuson-Stevens Fishery Conservation and Management Act. Also, the United States Coast Guard and the Internal Revenue Service do NOT consider charterboat fishing as commercial fishing. Recreational anglers on charterboats use a single, hand held rod with a single hook (as defined by ADF&G Sport Fish regulations).
- 4) Halibut are a public resource. That is, they belong to an American in Florida, as much as to you. The current GHL alternatives (1995 or 1998 levels) being proposed would severely restrict public access, especially for nonresidents of Alaska. Should the fish be taken to the people (commercial fishing) or the people taken to the fish (charter fishing)? Most people who sport fish for halibut, fish for food. The only practical means of access most owners of the resource have, is through a charter boat. In a democratic society, where the resources belong to the public (i.e. common property), the public deserves the choice of catching their own fish or buying their fish from the supermarket.
- 5) If the NPFMC can sanction some 13-16 million pounds of halibut to be tossed overboard as bycatch, surely the Council can grant public access to at least this much. Afterall, it is their fish.

Page 2

6) Since the implementation of the halibut longline IFQ program, longliners have left from three to eight percent of their quota unharvested. Is there really an urgency to control the charter fleet for the benefit of IFQ fishers, when they choose not to harvest an amount nearly equal to that harvested by recreational anglers on charter boats?

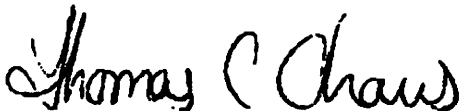
7) The recreational daily bag limit was reduced from three halibut to two halibut sometime around 1973, "for conservation reasons". The total allowable catch (TAC) in 1973, was 23 million pounds. The TAC has more than tripled in some years since then, yet the bag limit for recreational angler has never been increased. Commercial interests have, in fact, taken all the gain.

8) IFQ longliners now have eight months to fish, and have little incentive to travel any farther than they have to. Areas adjacent to population centers, (e.g. Homer, Kodiak, Seward, Sitka), where significant amounts of halibut are landed commercially, are receiving more and more pressure. This issue has not been addressed. Recreational anglers do not have the boats, time, nor equipment to travel long distances in the open ocean or fish in deep waters.

Finally, we would like to inform you a little about our industry. The public, who gains access to the resource on charterboats, makes plans well in advance. They make lodging reservations, likely pay nonrefundable deposits, and most buy advance nonrefundable airline tickets. The likelihood of an inseason reduced bag limit, or a closed season, would discourage our clients and severely impact our business. Unlike longliners, who now have an eight month fishing season, we have three to four months and are limited by weather, distance and time. It is difficult to impossible, to replace cancelled charters in the middle of our season, and we cannot make up for bad weather days.

We believe the sport charter fishery should be nurtured as a valuable contributor to state and local economies. Thank you for your consideration.

Sincerely,



Tom Ohaus  
President

cc: Senator Ted Stevens  
Senator Frank Murkowski  
Representative Don Young  
Governor Tony Knowles  
Dan Coffey, Alaska Board of Fisheries  
Kevin Delaney, ADF&G Sport Fish Division



4/12/99

RECEIVED

APR 12 1999

Rick Lauber  
NPFMC  
605 West 4<sup>th</sup> Ave  
Suite 306  
Anchorage AK, 99501

N.P.F.M.C

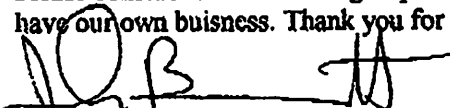
I appreciate this opportunity to bring my concerns to the council and my representatives in Washington, regarding pending actions from the NPMFC.

About 4 years ago my wife and I started dreaming about the possibility of starting a lodge in a remote part of Kodiak Island. The dream started taking shape. We sold our home and purchased a 31 ft. boat (\$27,000.00). We have 5 acres of remote land (\$30,000.00) and will begin construction of our permanent home and guest cabin in Port Bailey this summer (\$50,000.00). It takes a great deal of time and effort to get a small fishing lodge started; business and marketing plans, acquiring a six pack license and building the lodge and living facilities. We feel our dream is about to come full circle.

You can't imagine how we felt when a friend told us you were considering a proposal to prohibit new lodge and charter businesses from starting, due to a conflict between charter sport fishing and longliners.

I have been sport fishing in the area for a few years. Halibut and salmon are abundant. I rarely see other boats, sport or commercial in the areas we fish. I don't understand how my small lodge could negatively impact the halibut stocks in and around Port Bailey.

Please consider the devastating impact your decisions might have on my family and our desire to have our own business. Thank you for your time and consideration of my concerns.

  
John Burnett  
PO Box 8535  
Kodiak, AK, 99615

CC: Gov. Tony Knowles  
Ted Stevens  
Frank Murkowski  
Don Young

RECEIVED

APR 12 1999

N.P.F.M.C.

Richard Lawber,  
N. P. F. M. C.  
605 west 4<sup>th</sup> Ave. ste. 306  
Anchorage, Ak. 99501

I am a skiff fisherman with halibut quota in area 2C. Commercial fishing has been a significant part of my income for over fifteen years.

I have concerns with the growing effort of guided sport harvest levels in our area. It is important to me to have a future in the fishery, but if the sport allocation continues to climb without controls it threatens the stability of our commercial fleet.

Please keep the halibut charter quotas based on a percentage of the G.H.L. Reduce bag limits for non-residents, and work with locals to reduce the growth-rate of guided halibut sport catch.

Sincerely

Terry Perensovich

Terry Perensovich

PORT ALEXANDER FISH AND GAME ADVISORY COMMITTEE  
P.O. BOX 8125  
PORT ALEXANDER, ALASKA 99836

APRIL 10, 1999

CHAIRMAN RICHARD LAUBER  
NPFMC  
605 WEST 4TH AVE. STE. 306  
ANCHORAGE, ALASKA 99811

RECEIVED

APR 12 1999

N.P.F.M.C

WE ARE WRITING TO URGE THE NPFMC TO USE THE GHL APPROVED A YEAR AGO FOR THE HALIBUT CHARTER OPERATORS AND TO BASE THE HALIBUT CHARTER ALLOCATION ON A PERCENTAGE OF THE TOTAL QUOTA.

PORT ALEXANDER IS A SMALL COMMUNITY WHOSE ORIGIN CAME FROM COMMERCIAL FISHING AND TODAY IT REMAINS THE MAINSTAY OF OUR ECONOMY. WE TAKE PRIDE IN BEING INDEPENDENT PRODUCERS THAT LEAD PRODUCTIVE BUT REMOTE LIFESTYLES.

OPPORTUNITY WILL ALWAYS BE EXPLOITED. IN A MANAGED RESOURCE, AS WE HAVE WITH HALIBUT, WHY HOLD ALL SECTORS IN CHECK BUT ONE? IF THE HALIBUT CHARTER OPERATORS ARE AWARDED A FIXED POUND QUOTA IT WILL MAKE A MOCKERY OF WHATEVER PROGRESS AND SACRIFICES HAVE BEEN MADE THUS FAR TOWARD CONSERVATION. THE GHL ALREADY APPROVED BY NPFMC FOR THE HALIBUT CHARTER OPERATORS SEEMS OVERLY GENEROUS GIVEN THE HALIBUT CHARTER OPERATORS HISTORY OF EFFORT. HOWEVER, IT IS BETTER THAN THE SPECTOR OF THIS FISHERY HAVING A FIXED POUND QUOTA.

IT IS TIME FOR THE HALIBUT CHARTER FISHERY TO BE ACCOUNTABLE RESOURCE USERS. SHARE THE PAIN, SHARE THE GAIN.

HALIBUT STOCKS ARE HEALTHY BECAUSE COMMERCIAL FISHERMAN HAVE ALWAYS SUPPORTED CONSERVATION, ACCEPTING LOW QUOTAS WHEN THE BIOMASS WAS LOW....WHY SHOULD THE CHARTER FLEET HAVE DIFFERENT RULES? WE URGE THE COUNCIL TO ANALYZE EFFECTIVE SLOW DOWN MEASURES, SUCH AS REDUCED BAG LIMITS, TO KEEP THE CHARTER FLEET UNDER THE GHL ALREADY APPROVED BY THE COUNCIL. WE DO NOT SUPPORT AN INCREASE IN THE GHL.

WE FEEL THE HALIBUT CHARTER OPERATORS NEED TO ADJUST THEIR ACTIVITIES TO LIVE WITHIN THE GHL, ALREADY ESTABLISHED, FOR A SUSTAINABLE LIVELIHOOD.

PAGE TWO - PORT ALEXANDER FISH AND GAME ADVISORY COMMITTEE

WE SUPPORT EQUITABLE ACCESS TO THE FISHERIES AND RESPONSIBLE  
USE OF OUR MARINE RESOURCES.

THANK YOU FOR YOUR TIME AND CONSIDERATION.

SINCERELY,

PORT ALEXANDER FISH AND GAME ADVISORY COMMITTEE AND  
CONCERNED COMMUNITY MEMBERS

RECEIVED

APR 12 1999

N.P.F.M.C.

STANLEY N. JONES, MD  
P. O. BOX 1249  
HAINES, ALASKA 99827  
11 April 1999

Mr Richard Lauber, Chairman NPFMC,  
605 West Fourth Ave., Suite 306  
Anchorage, AK 99811

Dear Mr. Lauber:

Our family has been involved in the 2C halibut fishery since 1978 and the 3A halibut fishery since 1995. We have seen marked fluctuations in the biomass and TAC of halibut over the years. We saw the tremendous increase in participation in the commercial fishery to the point of limiting the fishery to derby style fishing. Now the fishery is threatened by a new type of commercial operation with the theoretical ability to harvest the entire TAC. In 2C it already has increased to 1.78 million pounds, over 14% of the TAC for 1998. At the present time the business seems to be at a high level and great discretion should be exercised in any allocation of the halibut resource that would severely restrict or eliminate the historical commercial harvest. I think the allocation should be based upon per cent, rather than fixed poundage. At the time we were granted or bought our QS we thought we had earned or invested in a certain percentage of the harvestable biomass over a long period of time. Now we realize that per cent may have been a very theoretical maybe! At best we know it is going to be a lower per cent because of the sport charter operations.

Yes, there are possible solutions. Those preferring a sport charter operation could buy existing Quota Shares from the historical commercial quota share base. This would have little impact upon the present management of the species and would not change TAC. It would however, be important to be judicious in the granting of charter fishing quota at this time (based upon historical sport charter catches) to a conservative per cent of the TAC. If the charter operator bought existing QS and failed to attract enough clients to harvest the owned QS, he/she could then harvest it as a regular commercial harvest.

We enjoy sport fishing and have friends who are charter operators and appreciate their need for clients to make their businesses successful. We want to be able to sport fish and see our friends sport charter businesses succeed. Please do what is good for the halibut and equally good and fair to the historical commercial fisherperson and the sport charter operator.

Sincerely,

*Stanley N. Jones*

F/V "Katie-J"  
C/O SPC  
507 Katlian St.  
Sitka, AK 99836  
4-7-99

RECEIVED

APR 12 1999

N.P.F.M.C

Chairman Richard Lauber  
NPFMC  
605 West 4<sup>th</sup> Ave.  
Suite 306  
Anchorage, AK 99501

Dear Sirs:

This letter is in response to the proposal from the charter industry that they be allocated a fixed share of the Halibut fishing quota. I belong to the commercial fleet, which the quota was originally set for. I feel that the quota cap hurt our viable industry but saved the fishing stocks. That the charter industry be allocated a fixed share not affected by the variations in the stocks would be wrong. To also, not have them buy or own shares as we do would be detrimental to the intent of the IFQ quota system. After all they are a commercial industry also. Please realize that commercial fishing is more than a sport and is a viable industry that helps Alaskans throughout the entire state economy. Making any kind of a rash decision that could hurt the traditional commercial fishing industry at this time could be detrimental to a large, if not vocal, work force. Be careful.

Sincerely,

  
Gregory D. Smith

Cc Governor Tony Knowles  
PO Box 110001  
Juneau, AK 99811

*F/V Swan*  
**Gary & Martha Egerton**  
P. O. Box 3094  
Sitka, AK. 99835  
PH: 907-747-8049 ~ FAX: 907-747-8571

April 08, 1999

**Chairman Richard Layber**  
NPFMC, 605 West 4th. Ave. Ste. 306  
Anchorage AK. 99501

**RECEIVED**  
APR 12 1999  
N.P.F.M.C

To: North Pacific Management Council,

I am from Sitka and have fished commercially for 26 years. I fish 12 months out of the year trying to earn what I used to make in 4 months. I have been told you receive many times more mail from charter fisherman than you do from commercial fisherman. This is not because we don't care. It is because most of us are too busy trying to survive. These are hard times for the small time fisherman, low salmon, and halibut prices, low black cod quotas and high expenses. The US economy has inflated 10 times in the past 30 years. The price of salmon was the same last summer as it was back 30 years ago. The price of halibut dropped below what it was 20 years ago.

For me to read that ADF&G sport fish division is requesting the council to adjust the GHIL for the halibut charter fleet to 1998 numbers is not happy news. And for them to ask for fixed pounds rather than a percentage is an insult. This could possibly put all of us who fish 2-C out of business.

I urge you to use the GHIL approved last year, and to base the halibut charter fleet allocation on a percentage instead of fixed pounds.

Sincerely,  
Gary & Martha Egerton

*Gary Egerton*  
*Martha Egerton*

**Rodney McVicker**

507 Katlain Dr.  
Sitka Ak 99835  
Country

April 05, 1999

RECEIVED  
APR 12 1999

N.P.F.M.C

To: Chairman Richard Lauber  
North Pacific Fisheries Management Council  
605 West 4th Ave.  
Ste. 306 Anchorage Ak. 99501

From: Rodney McVicker  
507 Katlain Dr.  
Sitka Ak. 99835

Dear Chairman Lauber and members of the Council:

I have just learned of the request of the council by the ADF&G sport fish division to raise the Guideline Harvest Level of Halibut for the charter boat fleet to fixed pounds, which leaves me very upset.

Fisheries resource belongs to the people of the United States, or the consumer. We the commercial fishing industry's job is to provide the public access to seafood. We do that by catching, processing and shipping fish to the local supermarkets where people can buy fish and enjoy it. Commercial fishermen are not a user group. The consumer is.

To reallocate fish from the established commercial fleet to the sport fleet is the same as taking the resource away from the public at large and giving it to the few elite rich people to play with, which is terribly wrong! The charter boat fleet may say that they contribute more dollars to the economy, which proves my point. It costs more to harvest fish this way, which takes it away from the majority of the people. Do they expect an 80 year old lady living in Detroit to fly up to say Sitka, jump on a boat and bounce around on the ocean to have a fish dinner? Of course not.

My family has been on the commercial fishing business for over 70 years, we have invested time, money and years of experience to upgrade our boat and learn better ways of providing as good as seafood to the public as possible, that's our job. The industry has spent years and millions of fishing and public (taxpayer) dollars through expensive management, buying IFQ's to even being displaced, to provide the public better Halibut.

To think some arrogant rich charter fishermen could get this resource to play with is unconscionable, to those that consume fish And to those of us that have invested generations of know-how and making a living working on the ocean for the consumer.

**SAY NO TO REALICATING HALIBUT TO THE CHARTERBOAT FLEET!!!!**

Thank you for your consideration

Rodney McVicker  
F/V Sundancer



April 7, 1999

RECEIVED  
APR 12 1999  
N.P.F.M.C

Chairman Richard Lauber  
NPFMC  
605 West 4<sup>th</sup> Ave. Ste 306  
Anchorage, AK 99501

I am a commercial fisherman. I fish for halibut, sablefish and salmon. I am very concerned about the Guideline Harvest Level for the charter fleet. I would very much prefer to see an allocation in place that is based on a percentage of the quota, not a fixed poundage. Over a year ago the Council adopted the GHL. Seeing as it is set at 125% of the charter fleets biggest reported catch it should give them plenty of room to grow. I strongly feel that the GHL should not be adjusted upwards to reflect the new harvest level that was shown with the 1998 logbook program. The charter fleet and ADFG Sport Fish Division have staunchly maintained for years that their accounting system was more than adequate. If a mandatory logbook program that has been in place for one year shows different numbers, higher numbers, than it must be that the charter fleet is growing. I do not think the commercial longline fleet should be made to give up fish for this other growing commercial fleet! I strongly feel that the Charter industry should be regulated with an allocation based on a percentage so that their quota goes up and down as the biomass goes up and down, just like the longline fleets. We all know that fish boimasses do not stay up at highs forever and that the halibut quotas will not stay at the present level forever, so why would the charter industry be special and get their quota in pounds rather than percentages? The longline fleet has always supported conservation of stocks. IF the halibut biomass was to fall to the levels of the 1970's, and IF the charter industry was to receive a quota in pounds than the charter industry would have the whole quota ! Where would this leave the longline fleet? You implement the IFQ program, fishermen take loans to buy quota, and than you allocate the fish away to another, just as commercial, user group? ( The charter fishing fleet is , as we all know , just as commercial as the longline fleet. It is my understanding that 97% of the halibut caught from charter boats is taken by non residents. The non guided, non charter fleet I have no problem with whatsoever.) Is the Council going to get a loan repayment program in place to make the fishermen's loan payments on quota shares the government issued as a saleable item and then took away and gave the same resource to another group? Is the demise of the IFQ program what the Council has in mind?

Please use the GHL approved a year ago. Please base it on a percentage of the total quota. Please get effective slow down measures in place to regulate the charter industries catch into place. Ways of slowing down the charter catch that I am familiar with are reduced bag limits, reduced possession limits, size restrictions such as the 32 inch limit that the longline fleet works under , and area closures. I realize the charter operators will scream that they already have bookings etc., but is that any different then longline fishermen and deckhands that are depending on the season to make their living too? Please do not spend so many years developing this program and implementing it that it is of no use.

Thank You,

Carolyn Nichols  
305 Islander Drive  
Sitka, AK 99835

Carolyn R Nichols

**F/V Cherry**  
Todd & Tami Bayne  
P.O. Box 3036  
Sitka, AK 99835  
907 747-3907

April 7, 1999

NPFMC  
Richard Lauber, Chairman  
605 W. 4<sup>th</sup> Ave., Ste. 306  
Anchorage, AK 99501

**RECEIVED**

APR 12 1999

**N.P.F.M.C**

Dear Mr. Chairman,

We are sixteen year residence of Sitka, Alaska and have commercial fished for fourteen of those years. We have fished the derby style halibut openings and have fished the halibut IFQ system.

We were both deck hands and therefore were not allotted original IFQ shares. Subsequently we purchased into a program that would allow us to continue our lifestyle as commercial fishers, this meant taking out very large loans to achieve this goal. This also meant taking a very large risk with our finances and our future.

And now, just when it seems we should actually be seeing a return on our investment, the Charter Boat industries increase on the amount of halibut they take will decrease the amount we can take. A growth rate of .86 million pounds one year to nearly double that the next year at 1.78 million pounds, seems a little excessive.

As I watch my original investment dwindle, so that the charter boat industries **97% non-resident** customers can have more I get a sick feeling in my stomach. When is the management of this fishery going to become fair to everyone?

First of all, why is it that the Charter Boat fleet is not subject to the same rules as the commercial fisherman? Yes, I know because technically they don't classify themselves as a form of commercial fishing. So should we sit back and allow them to deplete our valuable resource all for the sake of a client who really didn't come here for the meat of the fish, they came for the sport of it.

Second, if we allow the Charter Fleet to get their halibut allocation based on fixed pounds rather than as a percentage, what does that do to the commercial industry in later years when the resource has just about been depleted. It means a lot of economic hardships on a community like Sitka that has relied on commercial fishing for a lot

longer than any of these overnight Charter Boat operations.

I urge you to take a good look at the numbers you are considering allocating to the Charter Boat fleet and just be fair for the good of the whole industry. And if it seems like the commercial fisherman does not care about this issue, this is a wrong assumption. Keep in mind the commercial halibut fisherman fishes for 8 months, while the Charter Boat operator fishes for 4 months. So obviously, we are a lot busier for a good part of our year.

And when you see more Charter Boat operators present at your April 18<sup>th</sup> meeting to plead for their cause, we the commercial fisherman, are out working hard for our living as our season is already underway. Whereas most Charter Boat operators season doesn't start till May 15<sup>th</sup>. So it's not that we don't care!!!!

Please remember the economic hardship that has already been placed on halibut fisherman, and the hardships that will continue if the allocation to the Charter industry is allowed to escalate at such an alarming rate.

Thank you for your consideration to our concerns,

*Todd L. Bayne*

*Tami L. Bayne*

Todd L. Bayne  
Tami L. Bayne

**RECEIVED**

APR 12 1999

N.P.F.M.C

April 8, 1999

NPFMC  
Richard Lauber, Chairman  
605 W. 4<sup>th</sup> Ave., Ste. 306  
Anchorage, AK 99501

Dear Mr. Chairman,

My name is Todd Nevers and I have lived in Sitka, Alaska my whole life. I have fished as a deck hand for at least 15 years. I, like most deck hands were not allocated any original IFQ's. Like so many of my other co-workers I purchased 2C halibut pounds to help insure my current lifestyle would still exist.

Now it seems as though the Charter Boat operators will be given a very large portion of the quota in this area. Although, unlike me, they will not have to purchase these pounds, or for the newer fleet members, not even have to work that hard for them.

I feel the 125% of 1995 sport harvest numbers is more than adequate. I don't see raising the sport allocation to nearly 2 million pounds in 2C is acceptable at all.

Let's not forget commercial fisherman have always stood for conserving our natural resources, unlike the 97% non-resident Charter customer who will just move on to the next coastal community once our resource is gone.

Thank you,

  
Todd M. Nevers

(No return address included or on envelope)

P.O. Box 1767  
Sitka, Alaska 99835  
April 7, 1999

RECEIVED  
APR 12 1999

N.P.F.M.C

Chairman Richard Lauber  
NPFMC  
605 West 4<sup>th</sup> Avenue, Ste. 306  
Anchorage, Alaska 99501

Dear Mr. Lauber and Council Members:


I am a commercial fisherman out of Sitka and have been for 15 years. Originally a deckhand on a boat that participated in the halibut and blackcod fisheries back in the derby days, I graduated to a hired skipper position. As a hired skipper I fished halibut in both 2C and 3A. Eventually able to buy my own boat, I now have money invested into the halibut fishery. Upon purchasing the boat I had enough quota to make my boat payment and continue investing into the fisheries. Any cut to the commercial fishing quotas jeopardizes my chances at a continued future in the fishing industry. We are a family of three supported fully by the commercial fishing.

I am writing you to urge you to use the Guideline Harvest Level approved a year ago, and to base the halibut charter allocation on a percentage of the total quota so everyones quota goes down when the halibut biomass declines.

Due to conservation by the commercial fisherman the halibut stocks are healthy and thriving. The charter fisherman should understand this and agree fully with your decision. After all their future depends on future stock also. Or is there an unwritten rule that says the charter fleet has different rules? Halibut charter fishing is a commercial industry and should use effective slow down measures and reduced bag limits to help conserve our resources.

In Southeast we have lost our logging industry. We cannot afford to loose the commercial fisherman. Commercial fisherman provide as much to their community as the charter fisherman do. The exception being, for Sitka anyway, more commercial money stays local and employs local. We all deserve an equal and fair living from our resources. The Guideline Harvest Level approved a year ago is a workable plan for all involved. Please use it.

Sincerely,

  
Brent Young  
F/V CAPE Enchantment

**RECEIVED**

APR 12 1999

N.P.F.M.C

April 12, 1999

Dear Council Members,

I am a 17 year commercial halibut fisherman and a lifelong fisherman. I've invested heavily in the IFQ program (purchasing over 95% of my quota), and am concerned about the management plan you will soon be considering for halibut charter boats.

Last year you adopted a Guideline Harvest Level for the charter fleet at 125% of their 1995 harvest level. But apparently the ADF&G is wanting that year changed to 1998 and fixed pounds allocated instead of a percentage. I would like to urge you to stick by your original plan.

Because of the commercial halibut fleets conservative use of the resource, the halibut biomass is at an all time high, rewarding all sectors of the industry. Yet when that biomass declines, as I believe it eventually will, a fixed poundage for the sport sector would penalize the commercial fleet, who would be the only ones to suffer a reduced take, while at the same time rewarding the sport fishermen, who presently have no investment in this IFQ fishery. The only fair way to allocate is by percentage, and this would also ensure all sectors have the same interest in the health of the fish stocks.

As far as which year to use I would like to remind you that when the Council implemented the original IFQ system the qualifying years at that time were also about 5 years prior to the start date of the IFQ system and this was done in order to award the quota shares to those who had a history of halibut fishing and had not only recently entered it in the interest of speculation. It makes sense to abide by similar rules. Isn't there a moratorium on halibut charter boats that could be used as a guide?

The decision you will be making regarding this matter could severely adversely affect many invested commercial fishermen and I hope you consider these points carefully.

Sincerely,

George Kirk  
P.O. Box 2796  
Kodiak, Ak. 99615

907)486-5433

## JUNEAU CHARTERBOAT OPERATORS ASSOCIATION

PO Box 34522  
 Juneau, Alaska 99803  
 Telephone: (907) 789-0088  
 FAX: (907) 789-2992

RECEIVED

APR 12 1999

N.P.F.M.C

April 11, 1999

Chairman Richard Lauber  
 North Pacific Fisheries Management Council  
 605 West 4<sup>th</sup> Avenue, Suite 306  
 Anchorage, Alaska 99501

Dear Chairman Lauber and NPFMC members:

I am writing in regards to the April 21<sup>st</sup> meeting where you will be considering alternatives for analysis GHI. for guided sport anglers. Juneau Charterboat Operators Association represents over 50 operators in the Juneau area.

Much emotional misinformation has be presented about guided halibut sportfishing, especially that which occurs in Southeast Alaska. In all of area 2C we sportfisherman are limited to only six lines As you already know, our limit is established by ADF&G regulations at two fish per day. We, the operators of the boat, do not catch these fish, our clients catch them. If these clients went out on their own and caught two fish, there would be nothing said ... it is only because our clients are fishing from a "charter" vessel that a big deal is being made by the longliners. The Magnuson-Stevens Fisheries Conservation and Management Act insures that the public has access to the resource. Please carefully review your options and consider which ones restrict public access to this resource.

Several years ago the sport caught limit of halibut was reduced from three fish per day to two fish per day per person. That has not changed in over 25 years. What is being suggested is that you further limit some sportfishermen by virtue of them fishing with a charter vessel without any regard to those undocumented fish caught by non-guided anglers. This, plain and simple, makes no sense at all.

ADF&G have proposed significant alternatives to those being proposed by the commercial longliners. Please consider them. Halibut charters are not based on the market value of the fish, they are based on when a person can take time off from their job and journey to the fishing grounds. It will severely impact the charter industry to place them in the same category as those who sell their fish by the pound. We sell the opportunity to sport catch the fish -- nothing more. We do not sell fish.

In 1998 we, for the first time, kept a log of our guided sport caught fish. We now have exactly one year of data. What makes sense is to go another year or two or three to see what the trend, if any, is. It does not make sense to build restrictions based on a single year of data.

On the question of IFQ's, the commercial longliners were able to document their time from the late 1980's to be included in their IFQ allocation. We in the charter industry were documented with licenses, but were not offered an IFQ. Now some are suggesting that we should have to purchase an IFQ -- even though we weren't offered one in the first place, and even though we cannot sell our fish... in fact we do not even have fish, our clients have them. Once again, this makes no sense at all.

Thank you for your consideration.

  
 Jim Preston  
 President

CC: Senator Ted Stevens  
 Senator Frank Murkowski  
 Representative Don Young  
 Governor Tony Knowles  
 Dan Coffey, Alaska Board of Fisheries  
 Devin Delaney, Director, ADF&G Sport Fish Division

April 9, 1999

RECEIVED

APR 12 1999

N.P.F.M.C

North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Ste. 306  
Anchorage, AK 99501

Attention: Chairman Richard Lauber and Council Members  
re: Halibut GHL Charter Boats

Dear Mr. Lauber,

My name is Jack "Jake" Phillips, I reside and fish out of both Pelican and Sitka. I am a life long resident of Alaska (born in Juneau) and have fished commercially since I was a high school student here in Sitka. 1946 was my apprenticeship year in the halibut fishery. In 1950 I owned my first boat and became a captain in the halibut fishery moving onto blackcod in the 60's. To the best of my memory I have at least fifty seasons of halibut under my belt, some seasons as long as 100 days fishing, some seasons as short as 2 days. In this period of time we went through a lot of changes in the halibut fishery. Some were mandatory by the IPHC or other governing groups such as NPFMC. Other changes were brought about by the voluntary efforts of the conscientious commercial fleet, most of the changes addressed the health of the resource, with several benefits to consumers. All of the changes were brought about by mutual effort of all involved in management, harvesting and processing of the halibut. We have a healthy resource in most areas now and are expecting future years to be the same, give and take a little.

In my estimation the Charter Boat Industry is the wild card. Fishing effort and unregulated harvest by the Charter Boat Industry can and will break this cycle we have had the last 10 years. However, I believe the Charter Boat Industry deserves some fish out of the stocks that I worked so hard to preserve. But the Charter Boat operators need to follow the same rules as we, the commercial fisherman. In order to protect our fishing resource you need to adjust the GHL to follow the ups and downs of stock the same as the commercial quota. Implementing rules on sublegal fish and waste on board Charter Boats may also prove to be beneficial. State and federal fisheries enforcers should spend more time policing these charter boats for breaking laws, especially licensing and over amount of fish being shipped through airports. Above all, make the charter boat industry pay for this policing on themselves by a tax.

Another thing I am strongly in favor of is making Charter Boat operators become commercial users instead of so called "sport fishermen". Using this identity to hide under the guise of sport, home use or subsistence when in fact they are as much of a commercial user of halibut as I am. Here in Sitka several local users of halibut (real sport fisherman) believe the Charter Boats have decimated local stocks, particularly around Vitskari Rocks and St. Lazaria Island. The reason for this is these areas are a known "chicken" ground except for the local people handlining. There was always a larger fish to be found in the area to satisfy their needs but not anymore according to some locals. Some people blame the commercial fishermen but I don't agree with that, there are much better areas for us to fish.

**This is a very important issue that will not go away if the council and the state does not get serious about regulations for the Charter Boat Industry and treat the rest of the users fairly.** Currently there is a local Sitka advisory panel and a group of others who have set up a plan for managing halibut in Sitka Sound. Because I fish my halibut elsewhere I am not familiar with the plan or successes, if any, at this time. But I applaud those that are involved! We probably need more of this strategy in other populated areas to protect the home users of halibut.



I am going to mention one more thing that needs addressed. As an IFQ holder of halibut shares I have to be extremely careful how I go about bringing halibut home or to give away because of regulations that if broken could result in disastrous consequences. On the other hand, I see a tremendous indifference to the halibut resource by some Charter Boat operators. I have heard people bragging about paying for their trip to Alaska with the halibut they shipped to the South 48 states through local airports as freight. I have personally watched people in baggage check-in several wetlocks per person. I am sure the legal weight would be questionable and/or numbers whichever the case may be. I have never seen a state officer, ADF&G, Coast Guard or a NMFS enforcement agent checking any of this. During IFQ fishing operations commercial fishermen are boarded at sea, monitored by helicopter and completely searched after landing at a processing plant to discharge our catch. Even the bycatch is checked! If we have a shark bit fish, we can't sell it or throw it back, that fish can't be cut or filleted onboard, it has to be weighed, logged and then taken home to cut up. It is only fair that other commercial uses of halibut, such as Charter Boat operations, abide by the same rules.

**Please implement the GHL as adopted in 1998 and base the halibut charter allocation on a percentage of the total quota. And implement "slow down" measures on catch rates in the charter fleet.**

Sincerely,

Jack D. Phillips (aka Jake)  
Lifetime Commercial Fisherman

Cc: Governor Knowles  
Linda Behnken, ALFA

# Alaska Sportfish Council

Post Office Box 32323 • Juneau, Alaska 99803 • (907) 789-7234 • Fax (907) 789-7235

April 11, 1999

Chairman Richard Lauber  
North Pacific Fisheries Management Council  
605 West 4th Ave., Ste 306  
Anchorage, Alaska 99501

Dear Chairman Lauber and other NPFMC members:

The attached letters by Linda Behnken and Mike May pertain to the halibut charter GHL issue. We have the following concerns relative to these letters.

- 1) Ms. Behnken's reference to the ADF&G logbook should be closely scrutinized. She infers that 1998 log book data is the final word, however the Department has repeatedly stated that at least three years of log book data need to be collected in order for the data to be ground truthed and at that point it might be comparable to existing data programs. Furthermore, there is incentive for anyone picking up logbooks, to fill in and return false data, in speculation of being included in a future license limitation program. One can only speculate why only 1200 logbooks were turned into ADF&G, after some 2600 boats were registered with CFEC in 1998. Implementing a license limitation program will likely result in a significant rise in the percentage of active logbooks turned in.
- 2) It is very obvious that members of the Alaska Longline Fishermen's Association will be the direct beneficiaries of a GHL, especially at a restrictive level. The more public resource that ALFA can privatize, the better off they will be. Longliners have been making a living off this public resource and its time for them to realize that the public also has a constitutional right to catch a halibut for himself, especially at the current levels of abundance.
- 3) The handwritten alternative offering IFQs for sale to charter operators is audacious. After longliners have been GIVEN millions of dollars worth of IFQs, without any consideration for recreational anglers. ALFA wants to sell the public's fish back to the public by having charter operators purchase IFQs, and the charter operator

doesn't even catch the fish.

The GHL proposal is being driven through the council process by longline representatives, for their own benefit. The GHL proposal is based solely on allocation and not one of the "action" alternatives being considered provides adequate or fair allocation for guided sport anglers.

Sincerely,



Mike Bethers  
Alaska Sportfish Council

cc:

Senator Ted Stevens  
Senator Frank Murkowski  
Representative Don Young  
Governor Tony Knowles  
Dan Coffey, Board of Fisheries  
Kevin Delaney, ADFG Sportfish  
Terry Garcia, Assistant Secretary of Commerce.



P.4  
ALFA # 2

fishermen. Do any of you care about this issue??? If so, here's what you need to do in the next two weeks:

1. Write a letter to the Council stating your history in the halibut fishery. Urge the Council to use the GHL approved a year ago, and to base the halibut charter allocation on a percentage of the total quota so everyone's quota goes down when the biomass declines. Point out that halibut stocks are healthy because commercial fishermen have always supported conservation, accepting low quotas when the biomass was low—why should the charter fleet have different rules? Also, urge the Council to analyze affecting slow down measures, such as reduced bag limits, to keep the charter fleet under the GHL. Address your letter to Chairman Richard Lauber, NPFMC, 605 West 4th Avenue, Ste. 306 Anchorage AK 99501. Send a copy to Governor Knowles PO Box 110001 Juneau, AK 99811 (add a note to the Governor pointing out that 97% of the 2C halibut caught from charter boats is taken by non-residents).

2. Make some phone calls! Council members are under the impression that commercial fishermen do not care much about this issue, because they only hear from charter operators. Call them and let them know what this decision could mean to you. Below are the names and numbers of Council members.

- Dennis Austin (Washington Dept. of Fisheries) 360-902-2182
- David Benton (Alaska Dept. of Fish and Game) 907-465-4100  
(ask for Earl Krygier if David is not available)
- David Fuharty (University of Washington) 206-685-2518
- Joe Kyle (Alaska Member) 907-586-1001
- Richard Lauber (Alaska Member) 907-483-3660
- Robert Mace (Oregon Fish and Wildlife) 541-884-4724
- Kevin O'Leary (Alaska Member) 907-488-3781
- Steve Pennoyer (NOAA Fisheries) 907-588-7221
- Wally Pereyra (Washington Member) 206-632-6761
- Robin Samuelson (Alaska Member) 907-842-3309
- LINDA BEHNKEN 907-747-3400

P42-2315 FAX

Remember, the Council will be hearing from lots of charter operators—your letters and phone calls are crucial. And don't wait. Letters must be received by April 12th to be distributed to all Council members; phone calls can be made anytime before April 18th when most Council members leave for Anchorage. Of course, if any of you can come to Anchorage to testify, the rest of the industry will be forever grateful. The trip could be one of the best investments you ever make in your future.

I will be looking for your letters!

Sincerely,  
*Linda*  
Linda Behnken

April 8, 1999

Mike Mayo  
2800 Sawmill Creek Road  
Sitka, Alaska 99835  
907-747-3413 voice and fax  
email mamayo@ptalaska.net

Dear Halibut IFQ Quota Holder

You may not be aware that your investment in the Halibut IFQ system could be hurt by actions of the North Pacific Fishery's Management Council at their April 21st, 1999 meeting in Anchorage. If you do not know the issue, hopefully I can explain it to you and you will act, that is, write letters and make some phone calls. The issue is whether the charter boats that fish for Halibut should have an allocation or if they should continue to be completely unrestricted. If unrestricted any increase in their harvest will come off your Quota. Our commercial catch is the last thing that makes up the total allowable Halibut harvest. There is a commercial catch also without any limits. This is what we need to change. If the charter Halibut catch goes up by a million pounds in area 2C you would lose 10 percent of your investment. If you have a thousand pounds you lose a thousand dollars value of IFQ's. Plus a hundred and fifty dollars to two hundred and fifty dollars in lost sales each year. It's time to write a letter and make some phone calls.

You will make a difference.

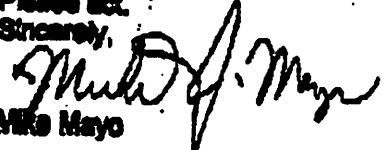
I know, I would rather go fishing, watch a ballgame, see a movie, walk in the woods, anything but write or call some of these people. But it is a slow death watching the charter fleet expand at our expense. I like you have bought Halibut IFQ's.

I have enclosed an ALFA newsletter, which includes addresses and phone numbers.

Some pages from the North Pacific Fishery Management Council's meeting in February. This has alternatives to the charter boat issue with my alternative thrown in.

And some facts from the 1999 IFQ report to the fleet.

Your future is <sup>AT STAKE</sup> ~~at stake~~.  
Please act.

Sincerely,  
  
Mike Mayo

NORTH PACIFIC FISHERY MANAGEMENT COUNCIL MEETING  
15 APRIL 21, 1999

THE COUNCIL  
FISHING (CHARTERING) THOSE POUNDS.  
CONTINUE FISHING BY BUYING IF Q HALIBUT AND  
FISHERY IS SHUT DOWN THEY COULD INDIVIDUALLY  
FLEET AT WHAT THEY CAUGHT LAST YEAR. IF THEIR  
ANOTHER ALTERNATIVE WOULD BE TO CAP THE CATCH

Option 1: 5 years (5 years, with option to renew for 2 years)  
Option 2: 3 years  
Option 3: 10 years (at the discretion of the CMC)

Yearly upgrade  
Option 1: license designated limited to 6-pick, 8-catch, and reported vessel owner (based on current licensed certificates (held at 8 of pick, 10 vessel size)  
Option 2: allow upgrade to 6-pick, 8-catch, and reported vessel owner (based on current licensed certificates (held at 8 of pick, 10 vessel size)  
Option 3: allow upgrade to 6-pick, 8-catch, and reported vessel owner (based on current licensed certificates (held at 8 of pick, 10 vessel size)

ADRAE guide registration  
compliance in drug testing program (CPR 40)

ATTACHMENT 2

# Petersburg Vessel Owners Association

P.O. Box 232  
Petersburg, Alaska 99833  
Phone (907) 772-9323 Fax (907) 772-4495

April 11, 1999

Mr. Rick Lauber, Chairman  
NPFMC  
605 West 4th Avenue, Suite 306  
Anchorage, AK 99501-2252

RECEIVED  
APR 14 1999

N.P.F.M.C

Re: Agenda Item C-1: Halibut Charter GHL

Dear Chairman Lauber,

The NPFMC will be taking up the Halibut Charter GHL issue at the April 1999 meeting. Council has been taking up this issue since 1993 and in the meantime the charter halibut catch has almost doubled to 5.2 million pounds. This amount continues to be reallocated right out of the commercial quota. (See attached chronology in Appendix 1: "A Brief History of the NPFMC and the Halibut Charter GHL").

The Council needs to move forward with measures to keep the charter harvest under the GHL. The Council has made slow but steady progress over the years while making sure the public and the charter industry had ample opportunity and consideration for input. This opportunity has consisted of two charter industry committees, scheduling of the agenda item for Anchorage meetings only, time-specific testimony, and postponement as needed for the charter industry. The Council has bent over backwards to accommodate the needs of the charter industry.

During this time, the Council has adopted a Problem Statement in which it references the "open-ended reallocation from the commercial fishery to the charter industry". Previous analysis stated, "The alternative to cap the guided charter fleet at some percentage of the overall quota would appear to be the most and direct and effective alternative to address the



**problem.”** With that, the Council has passed a GHL based on 125% of the 1995 catch.

The next step is to develop management measures to stay under the GHL. While any proposal may have some portion of merit, we urge the Council to focus on management measures that address the problem statement and the intent of the Council to keep the guided sport catch under the established GHLs as cited in the March, 1998 Federal Register notice.

In that regard, we refer you to Appendix 2, which includes management measures adopted by the Board of Fisheries when faced with a similar sport/commercial allocation issue. The objective of the plan in the appendix was **“to allow uninterrupted sport fishing while not exceeding the ceiling.”**

In the SE Alaska King Salmon Management Plan, you will find different management measures utilized when the sport component is projected to go over or under its allocation. The preeminent management tool is bag limits. The Council should add bag limits to management measures under consideration. The charter industry’s expressed desire is to have a continuous season and a two fish bag limit. In years of low abundance, this may not be possible. Interestingly enough in 2-C in 1998, a year of record abundance, the average charter client caught only one halibut.

The Discussion Paper states, **“While the Council has previously stated it will not adjust the recreational bag limit or season length of the charter fishery, which appear to be among the few measures that would be effective at reducing guided sport halibut removals, it may reconsider this.”**

Other tools in the BOF plan included non-retention by charter operators and crew members. The BOF plan also has an underage and overage carry-over policy of 7.5%, i.e. a limit on “banking”. The Discussion Paper states, **“this banking...appears to conflict with the Council’s intent to cap the fishery under the GHL”** and **“may have negative biological impacts...during years of lower halibut quotas.”**

The Council will hear considerable testimony as to LAMPs and moratoriums. The alternatives presented by the charter industry rely heavily on these two

items while at the same time being short on effective management measures such as bag limits. The Discussion Paper states, **“This preliminary examination of the problem statement for this fishery and the Council’s proposed management measures initially suggests that many of the proposed measures will NOT keep the charter fleet under the GHL.”** While LAMPs and moratorium may be long term solutions and should be examined, they are not the answer in themselves. The Discussion Paper states, **“LAMPs will not, on their own, satisfy the third listed goal in the problem statement, such that LAMPs will not prevent the open-ended reallocation of halibut quota from the commercial to the guided sport sector.”**

Similarly in regards to moratoriums, the Discussion Paper states, **“ It is unlikely that a moratorium will slow the harvest rate of the guided sport fishermen once the GHL is reached.”**

The Council will also see a proposal from ADF&G Sportfish Division which contains a “floor” that basically does not address the problem statement in regards to reallocation. In declining years of abundance (as we are faced with according to the IPHC), the charter allocation percentage will continually increase at the expense of the commercial fleet. The “floor” concept means that the charter industry will not be sharing of the burden of conservation while increasing its allocation.

ADF&G also proposes using 1998 logbook estimates for catch as opposed to the GHL based on the 1995 numbers previously adopted by the Council. We refer you to Appendix 3 which contains a series of graphs derived from the logbook data. There exists to be quite an anomaly in 2-C in 1998 in all regards. This is evident in the graph depicting charter harvest in 2-C (p.2), charter harvest as % of sport harvest in 2-C (p.6), and in the average weight of a charter caught halibut in 2-C (p. 8). ADF&G has stated that the 1998 logbook data will not be verified for three more years. The 1998 data seems suspect at this point in time and should not form the basis of a proposal.

We ask the Council to move forward in a reasonable and responsible manner.  
Respectfully yours,



Gerry Merrigan, Director

# APPENDIX 1

## Petersburg Vessel Owners Association

P.O. Box 232  
Petersburg, Alaska 99833  
Phone (907) 772-9323 Fax (907) 772-4495

April 11, 1999

### A Brief History of the NPFMC and the Halibut Charter GHL

#### 1993

- Charter halibut harvest for 2-C/3-A estimated at approx. 3.05 M pounds.
- May: ALFA proposes cap on the guided sport halibut fishery due to unconstrained reallocation in a fully utilized resource from one commercial gear group (longliners) to an other commercial gear group (charter). Cap to be based on charter fishery's largest catch ever - 1992. Moratorium suggested by NPFA.
- September: Council considers initial analysis. NPFMC is responsible for explicit domestic allocation of halibut. ADF&G Sportfish Division states "...the sport fishery will not continue to grow at the rate it has over the past decade..." since "Room for expansion is limited in many Alaskan ports" and "...some charter fleets are showing signs of overcapitalization."
- September: A date of September 23, 1993 is adopted. HCWG (Halibut Charter Work Group) is formed.
- HCWG meets in November and December.

- December: ALFA proposes additional management strategies to be considered in the analysis including: annual limits, export limits, boat caps and moratorium.

## 1994

- January: Council considering initiating analysis. HCWG reports to the NPFMC. Sport/charter members do not want to be split and do not see the need for a cap. Charter industry does not see a projected growth in the industry, citing a decrease in sport landings in 1992. Consensus is for a charter logbook. Charter associations make a de minimus argument for status quo, maintaining that their catch (their numbers) is only 2.19 M pounds in all of Alaska. Charter associations request a moratorium but state "Other management tools need to be looked at first...". Council action is to request HCWG to provide additional detail at April 95 meeting.
- February & March: HCWG meets to discuss moratorium and alternatives.
- April: Council to receive next report from HCWG and to consider next steps. Report states that **"Charter and sportfish representatives believe that a moratorium was not a reasonable solution to the problem as identified by ALFA. In fact, they do not feel that a problem even exists."** ADF&G Sportfish Division presented data that sport landings have declined from 6.0 M pounds to less than 5.6 M pounds in 1993. Approximately 50% of the sport catch is charter, i.e. 2.8 M pounds. Only Sitka and Kodiak supported a moratorium. Council action was to have the official report of the HCWG to be made at the January 1995 NPFMC meeting.

## 1995

- Sport charter harvest in 2-C/3-A hits 3.8 M pounds or 11.5% of the combined commercial quota and charter catch.
- January: Council receives report from HCWG. Council adopts Draft Problem Statement and **"...initiated analysis of alternatives to control the amount of halibut taken by the charter industry."** Analysis of

proposed alternatives is expected to be completed by December '95 or January '96. Alternatives included establishing an explicit allocation between guided sport/commercial or a moratorium in the guided sport industry. Both alternatives capped the charter harvest at 105% to 140% of the 1994 charter catch.

## 1996

- Sport charter harvest for 2-C/3-A is 3.8 M pounds or 11.6% of the combined commercial quota and charter catch.
- June: Council refines alternatives by deleting unguided sport from consideration, deleting the absolute poundage caps on the charter fleet while retaining caps as a percentage of the overall quota, and deleting consideration of IFQ's for the charter fleet.

## 1997

- Sport charter harvest in 2-C/3-A hits 4.35 M pounds or 11% of the combined commercial quota and charter catch.
- February: Council to review analyses and release document for public review with final action in April. Juneau Charter Boat Association letter from Mike Bethers supports status quo and states that there is no problem with the current (1996) charter harvest level. JCBA also stated that it does not support logbooks, an allocation or a moratorium. Additional elements and analyses are recommended by AP.
- April: Council reviews revised analyses of alternatives and releases modified document for public review with final action to be in September. Council adopts a second control date of April 17, 1997.
- September: Council considers final action. Analysis states that status quo **“will result in a de facto reallocation from the commercial setline quotas.”** Alaska Sportfish Council (ASC) letter from Mike Bethers supports status quo as they do not see a problem. Analysis states **“The alternative to cap the guided charter fleet at some percentage of the overall quota would appear to be the most direct and effective**

**alternative to address the problem.”** The problem is #3 in the draft problem statement. ASC supports logbooks and a moratorium where needed but does not support an allocation.

- September: Council adopts GHIL for charter in 2-C and 3-A with an allocation of **12.76%** of the combined commercial and guided sport halibut TAC in 2-C and **15.61%** of the 3-A TAC (125% of the 1995 catch). Council also requires mandatory logbooks. **“The halibut charterboat industry will be managed to maintain a stable charter season of historic length, using statewide and zone specific measures.”** Measures to be implemented when end-of-season catch data indicates that the GHIL may reach or exceed the GHIL in the following season.
- December: NMFS informs Council that GHIL will not be published as a regulation pending specific management measures. GHIL will be published in the Federal Register to show **“Council’s intent to establish measures to maintain the guided sport fleet at or below the GHIL.”** Council forms halibut charterboat committee to establish management measures consistent with this intent.

## 1998

- January: Letter from Senator Frank Murkowski to UFA states, **“...if the guideline harvest level (GHL) is exceeded, sport fishing will not immediately be stopped. At worst, it may result in a reduction of individual bag limits or fishing time.”**
- February: Halibut GHIL Committee meets with no commercial representation. Committee opposes the GHIL but supports LAMPs instead. If a GHIL is adopted, it should be converted to an allocation. Concept of “banking” uncaught charter allocation is discussed. Management measures discussed are line limits, boat limits, annual limits, trip limits, LAMPs, super-exclusive registration in a LAMP, and a designated sport only area. Committee does not include bag limits or limiting retention by mates and skippers. Much of the report does not address the charge of the committee.

- March: GHL notice is published in the Federal Register. The Halibut Charterboat Committee **“is tasked to keep guided sport catch under the established GHLs...”**.
- April: Council receives report from GHL committee. Council hears testimony on “Yurtle the Turtle” from the charter industry. Council approves measures for analysis with further additions. Council sets a third control date of April 27, 1998. Final action is slated for April, 1999 and then later delayed until October 1999.
- November: BOF Committee takes up Cook Inlet moratorium under a LAMP. **“One public panel member repeatedly stated that he and others had initiated this process 5 to 6 years ago, and expressed his frustration with the lack and length of the process.”** Committee’s opinion is that the moratorium does not meet LAMP protocol requirements. BOF wants to delay and ask the NPFMC to take no action relative to the GHL until the BOF can convene a Task Force in October 1999.

## 1999

- January: Halibut GHL Committee meets. Receives preliminary logbook data from 1998. In the first year of logbooks, preliminary sport charter harvest hits **5.16 M** pounds in 2-C/3-A or **12.6%** of the combined TAC. Specifically, **1.78 M** pounds are caught in 2-C or **14.5%** of the combined TAC. In 3-A. **3.38 M** pounds are caught or **11.5%** of the combined TAC.
- Logbook data has charter taking **95%** of the sport harvest in 2-C and **63%** of the sport harvest in 3-A. **97%** of the charter clients are non-residents in 2-C and **67%** are non-residents in 3-A. Average fish size caught by sport charter decreased in 3-A (consistent with IPHC) but mysteriously increased **37%** in 2-C. **Average client catches one halibut in 2-C. Average client catches 1.66 halibut in 3-A.**
- ADF&G Sportfish estimates it will be 6-8 months to compare mail-out survey to logbook and **three years** to verify the accuracy. ADF&G then proposes a concept that utilizes the 1998 logbook data. The concept has a

fixed floor for the charter fleet that is not a per cent allocation. As abundance drops (as predicted by the IPHC) from the record highs, this would mean an ever increasing allocation to the charter fleet. This does not address #3 in the problem statement as to reallocation. Concept relies on LAMPs as a management measure. ADF&G Sportfish also opposes a statewide or area moratorium.

- GHL Committee does not want a GHL. Recommends re-visiting the problem statement.
- February: Council does not take up agenda item for Discussion Paper on GHL Management Measures but instead sets a "time certain" date for the April meeting. Initial review is now tentatively scheduled for October and final action in December.
- Conclusion of Discussion Paper states, **"This preliminary examination of the problem statement for this fishery and the Council's proposed management measures initially suggests that many of the proposed measures will NOT keep the charter boat fleet under the GHL ."**
- Conclusion of Discussion Paper states, **"While the Council has previously stated it will not adjust the recreational bag limit or season length of the charter fishery, which appear to be among the few measures that would be effective at reducing guided sport halibut removals, it may reconsider this."**
- Discussion Paper states, **" LAMPs will not, on their own, satisfy the third listed goal in the problem statement, such that LAMPs will not prevent the open-ended reallocation of halibut quota from the commercial to the guided sport sector."** and **"...as a general concept, the LAMP may do nothing to restrict landings per se."** and **"LAMPs would act as a complementary action, but not a necessary one."**
- Discussion paper states, **"...this banking redefined as a sportfish reserve, appears to conflict with the Council's intent to cap the fishery under the GHL."** and **"The reserve moots the GHL, in that the minimum amount of halibut guaranteed to the charter fleet under a reserve may exceed the cap in a given year."** and **"The**



**sportfish reserve...may have negative biological impacts...during years of lower halibut quotas.” and “IPHC staff strongly recommends against harvest in addition to the quota.”**

- Discussion paper states, **“It is unlikely that a moratorium will slow the harvest rate of the guided sport fishermen once the GHL is reached.”**
- Letter from Alaska Sportfish Council to the NPFMC states **“There appears to be tendency in some areas for anglers to release large females and retain smaller sized halibut.”** Logbooks indicate a **37%** increase in average size retained halibut by charter fleet in 2-C in 1998 from previous year’s average.
- Alaska Sportfish Council states, **“ The entire Alaska sport catch is said to be biologically insignificantly (sic) by the IPHC.”** Bruce Leaman of the IPHC (pers. comm.) does not consider **8.5 M** pounds of harvest **“insignificant”**.
- Alaska Sportfish Council states, **“...a sport fishing boat has absolutely no harvest capability.”** Yet, somehow these same vessels caught **8.5 M** pounds.
- Alaska Sportfish Council states that an active charter operator needs to carry at least **300** clients a season. From the logbook data, the average charter operator carried less than 100 clients in 1998 in 2-C and **188** clients in 1998 in 3-A. At \$150.00 per client as ASC indicates this is a gross stock of \$15,000 in 2-C and \$28,000 in 3-A. With 50% operating expenses as indicated by ASC, this is a net of \$7,500 per operator in 2-C and \$14,000 in 3-A as long as there are no big breakdowns.
- Letter from Seward/Valdez Charterboat Association to the NPFMC supports a moratorium of some type. However, this letter erroneously asserts that the ADF&G proposal resolves the open ended reallocation issue (#3 of the Problem Statement) which it does not. In years of declining and low abundance, this means an increasing allocation percentage for the charter fleet. Letter from the Valdez Fish and Game Advisory Committee indicates that **85%** of respondents agree with the problem statement of the NPFMC.

# APPENDIX 2

Appendix A: Sport and commercial fisheries regulations passed by the Board of Fisheries in March 1992 which concern management of the sport fishery.

## Sport Fisheries Regulations:

### 5 AAC 46.055. SOUTHEAST ALASKA/YAKUTAT CHINOOK SALMON FISHERIES MANAGEMENT PLAN.

(a) The department shall manage the Southeast Alaska Area and Yakutat Area chinook salmon sport fisheries in marine waters so that these fisheries together harvest not more than 17 percent of the annual harvest ceiling, specified by the Pacific Salmon Commission, after the commercial net harvest specified in 5 AAC 33.365(b)(10) is subtracted from the total ceiling. The management plan in this section provides the department with guidelines for preseason and in-season adjustment of sport fishery harvest levels in order to not exceed the 17 percent ceiling.

(b) The objectives of the management plan in this section are to allow uninterrupted sport fishing in marine waters for chinook salmon, while not exceeding the 17 percent ceiling established in (a) of this section, and to minimize regulatory restrictions on anglers not fishing from a charter vessel, who harvest chinook salmon at a lower catch-per-unit of effort than do anglers fishing from a charter vessel.

(c) The department shall monitor the Southeast Alaska Area and Yakutat Area sport fisheries to obtain in-season estimates of the chinook salmon harvest.

(d) If the total seasonal sport fishery harvest of chinook salmon in the Southeast Alaska and Yakutat Areas together is projected to be within plus or minus 7.5 percent of the 17 percent sport fishery ceiling, no regulatory changes to the sport fisheries will occur.

(e) If the total seasonal sport fishery harvest of chinook salmon in the Southeast Alaska and Yakutat Areas together is projected to exceed the 17 percent sport fishery ceiling by more than 7.5 percent, the department shall close the chinook salmon fishing season in those areas and may re-open the season in areas by emergency order during which any of the following restrictions, selected at the department's discretion, are in effect.

(1) operators and crew members working on a charter vessel may not retain chinook salmon while clients are on board the vessel.

(2) the daily bag and possession limit for chinook salmon taken by anglers fishing from a charter vessel is one fish.

(3) chinook salmon less than 30 inches in length may not be possessed or retained; all chinook salmon less than 30 inches must be released immediately;

(4) the use of down riggers on charter vessels is prohibited;

Appendix A: (continued):

- (5) the use of down riggers is prohibited;
  - (6) areas containing high numbers of wild chinook salmon and enhanced chinook salmon not produced in Alaska hatcheries are closed to chinook salmon fishing.
  - (7) the daily bag and possession limit for chinook salmon is one fish;
  - (8) the daily bag and possession limit for chinook salmon during times and in areas where a fishing derby is occurring is one fish.
  - (9) chinook salmon less than 40 inches in length may not be possessed or retained; all chinook salmon less than 40 inches must be released immediately; the daily bag and possession limit for chinook salmon 40 inches or more in length is one fish.
- (f) If the total seasonal sport fishery harvest of chinook salmon in the Southeast Alaska and Yakutat Areas together is projected to be less than the 17 percent sport fishery ceiling by 7.5 percent or more, the department shall close the chinook salmon fishing season in those areas and may re-open the season in areas by emergency order during which any of the following provisions, selected at the department's discretion, are in effect:
- (1) the daily bag and possession limit for chinook salmon taken by anglers not fishing from a charter vessel is three fish;
  - (2) for anglers not fishing from a charter vessel, fishing for chinook salmon is permitted with the use of two lines per angler;
  - (3) chinook salmon less than 26 inches in length may not be possessed or retained; all chinook salmon less than 26 inches must be released immediately;
  - (4) the daily bag and possession limit for chinook salmon is three fish;
  - (5) fishing for chinook salmon is permitted with the use of two lines per angler.
- (g) The commissioner may adopt regulations that
- (1) establish a mandatory log book program for operators of charter vessels, for outfitters, or for owners of dry skiff rentals, in order to monitor chinook salmon harvest and effort;
  - (2) require that anglers obtain and complete an annual, nontransferable harvest record; a harvest record must be in the possession of each person fishing for chinook salmon in marine waters;

limit based on the preseason king salmon abundance index determined by the Chinook Technical Committee of the Pacific Salmon Commission as described in "Pacific Salmon Commission Joint Chinook Technical Committee 1992 Annual Report," dated November 19, 1993, hereby adopted by reference. When the preseason king salmon abundance index becomes available, the commissioner shall establish, by emergency order, the king salmon sport fish daily bag limit at either one, two, or three fish, whichever is projected to result in the projected sport harvest that comes closest to 20 percent of the annual harvest ceiling specified by the Pacific Salmon Commission, after the commercial net harvest specified in 5 AAC 33.365(b)(10) is subtracted from the total harvest ceiling. The preseason projected harvest at this daily bag limit becomes the harvest ceiling for the king salmon sport fishery for the remainder of the calendar year. The daily bag limit set by the commissioner will remain in effect until December 31, unless changed by emergency order issued under (e) or (f) of this section.

(b) The objectives of the management plan in this section are to allow uninterrupted sport fishing in marine waters for king salmon, while not exceeding the sport fishery harvest ceilings established in (a) of this section, and to minimize regulatory restrictions on anglers not fishing from a charter vessel, who harvest king salmon at a lower catch-per-unit of effort than do anglers fishing from a charter vessel.

(c) The department shall monitor the Southeast Alaska Area sport fisheries to obtain in-season estimates of the king salmon harvest.

(d) If the total seasonal sport fishery harvest of king salmon in the Southeast Alaska Area is projected to be within plus or minus 7.5 percent of the sport fishery harvest ceiling, no regulatory changes to the sport fisheries will occur.

(e) If the total seasonal sport fishery harvest of king salmon in the Southeast Alaska Area is projected to exceed the sport fishery harvest ceiling by more than 7.5 percent, the department shall close the king salmon sport fishing season in the Southeast Alaska Area and may re-open the season in areas by emergency order during which any of the following restrictions, selected at the department's discretion, are in effect:

- (1) repealed 5/2/97;
- (2) the daily bag and possession limit for king salmon taken by anglers fishing from a charter vessel is one fish;
- (3) king salmon less than 30 inches in length may not be possessed or retained; all king salmon less than 30 inches must be released immediately;
- (4) the use of downriggers on charter vessels is prohibited;
- (5) the use of downriggers is prohibited;
- (6) areas containing high numbers of wild king salmon and enhanced king salmon not produced in Alaska hatcheries are closed to king salmon fishing;

(7) the daily bag and possession limit for king salmon is one fish;

(8) the daily bag and possession limit for king salmon during times and in areas where a fishing derby is occurring is one fish;

(9) king salmon less than 40 inches in length may not be possessed or retained; all king salmon less than 40 inches in length must be released immediately; the daily bag and possession limit for king salmon 40 inches or more in length is one fish.

(f) If the total seasonal sport fishery harvest of king salmon in the Southeast Alaska Area is projected to be less than the sport fishery harvest ceiling by 7.5 percent or more, the department shall close the king salmon fishing season in the Southeast Alaska Area and may re-open the season in areas by emergency order during which any of the following provisions, selected at the department's discretion, are in effect:

(1) the daily bag and possession limit for king salmon taken by anglers not fishing from a charter vessel is three fish;

(2) for anglers not fishing from a charter vessel, fishing for king salmon is permitted with the use of two lines per angler;

(3) king salmon less than 26 inches in length may not be possessed or retained; all king salmon less than 26 inches must be released immediately;

(4) the daily bag and possession limit for king salmon is three fish;

(5) fishing for king salmon is permitted with the use of two lines per angler.

(g) The commissioner may adopt regulations that

(1) establish a mandatory log book program for operators of charter vessels, for outfitters, or for owners of dry skiff rentals, in order to monitor the king salmon harvest and effort;

(2) require that anglers obtain and complete an annual, nontransferable harvest record; a harvest record must be in the possession of each person fishing for king salmon in marine waters;

(3) require that anglers turn in the head of all adipose fin-clipped king salmon, along with the date and location of the catch, to a representative of the department or to a peace officer of the state;

(4) establish other reporting requirements necessary to obtain information required to implement the management plan in this section.

(h) If the king salmon sport fishery exceeds or falls short of the harvest ceiling established under (a) of this section, the current year's commercial troll fishery harvest quota will be adjusted up or down to harvest the remainder of the annual harvest ceiling specified by the Pacific Salmon Commission.

(i) If the total annual sport harvest of king salmon exceeds the sport fishery harvest ceiling by more than 7.5 percent, the number of king salmon harvested above that level will be subtracted from the 20 percent sport fishery allocation for the following year.

+ OVERALL

(j) If the salmon is... and does not... ceiling, the... essary to b... of the harv... sport fish...  
(k) If th... is 1.5 or a... emergency... harvest li... in length... Register 1...

Authority:  
  
Editor's... Chinook Tech... reference in 5... Commission, c... phone: (604) 6... inspection at... at the Depart... 802 3rd Street

5 AAC... TIONS.  
The reg... adjoining... (Eff. 7/25/93)

Authority:  
  
AREA

Section  
01. (Repealed)  
06. (Repealed)  
10. (Repealed)  
20. (Repealed)  
25. (Repealed)  
30. (Repealed)  
35. (Repealed)  
40. (Repealed)  
50. (Repealed)  
55. (Repealed)  
61.

5 AAC... CHAPTER... Repealed... Register 13.

5 AAC... YAKUTAT... Repealed... Register 13.

+ undomce

(j) If the total annual sport harvest of king salmon is less than the sport fishery harvest ceiling and does not come within 7.5 percent of the harvest ceiling, the number of additional king salmon necessary to bring the sport harvest within 7.5 percent of the harvest ceiling will be added to the 20 percent sport fishery allocation for the following year.

If the previous king salmon abundance index is 1.5 or above, the commissioner shall increase, by emergency order, the nonresident angler's annual harvest limit to five king salmon 28 inches or more in length. (Eff. 4/15/94, Register 130; am 5/2/97, Register 142)

Authority: AS 16.05.060 AS 16.05.270  
AS 16.05.251

Editor's note: Copies of the Pacific Salmon Commission Joint Chinook Technical Committee 1992 Annual Report adopted by reference in 5 AAC 47.055(a) are available from the Pacific Salmon Commission, 600-1155 Robson Street, Vancouver, BC, V6E 1B5, phone: (604) 684-8081; the 1992 Annual Report is also available for inspection at the Lieutenant Governor's Office in Juneau, Alaska or at the Department of Fish and Game's Southeast Regional Office, 802 3rd Street, Douglas, Alaska 99824.

5 AAC 47.095. APPLICATION OF REGULATIONS.

The regulations in this chapter also apply in the adjoining waters of the exclusive economic zone. (Eff. 7/25/95, Register 135; am 4/23/98, Register 146)

Authority: AS 16.05.251 AS 16.10.190

CHAPTER 48

AREA 1 — SOUTHEAST ALASKA.

Repealed 5/6/81

CHAPTER 49

YAKUTAT AREA.

- Section
- 01. (Repealed)
- 05. (Repealed)
- 10. (Repealed)
- 20. (Repealed)
- 25. (Repealed)
- 30. (Repealed)
- 35. (Repealed)
- 40. (Repealed)
- 50. (Repealed)
- 60. (Repealed)
- 70. (Repealed)
- 80. (Repealed)
- 90. (Repealed)

5 AAC 49.001. APPLICATION OF THIS CHAPTER.

Repealed. (In effect before 1988; repealed 4/15/94, Register 130)

5 AAC 49.005. DESCRIPTION OF THE YAKUTAT AREA.

Repealed. (In effect before 1988; repealed 4/15/94, Register 130)

5 AAC 49.010. FISHING SEASONS.

Repealed. (In effect before 1984; am 5/31/85, Register 94; am 4/30/91, Register 118, am 5/15/92, Register 122; am 4/1/94, Register 129; repealed 4/15/94, Register 130)

5 AAC 49.020. BAG LIMITS, POSSESSION LIMITS, AND SIZE LIMITS.

Repealed. (In effect before 1983; am 4/3/83, Register 85; am 5/31/85, Register 94; am 5/22/88, Register 106; em am 7/8/88 — 11/4/88, Register 107; am 6/7/89, Register 110; am 5/15/92, Register 122; am 4/1/94, Register 129; repealed 4/15/94, Register 130)

5 AAC 49.025. SITUK RIVER KING SALMON SPORT FISHING MANAGEMENT PLAN.

Repealed 4/30/91.

5 AAC 49.030. SALT WATER BAG LIMITS, POSSESSION LIMITS AND SIZE LIMITS.

Repealed 4/3/83.

5 AAC 49.035. METHODS AND MEANS.

Repealed. (In effect before 1985; am 5/31/85, Register 94; em am 7/8/88 — 11/4/88, Register 107; am 6/7/89, Register 110; am 4/1/94, Register 129; repealed 4/15/94, Register 130)

5 AAC 49.050. WATERS CLOSED TO SPORT FISHING.

Repealed. (In effect before 1985; am 5/31/85, Register 94; am 4/18/86, Register 98; am 6/7/89, Register 110; repealed 4/15/94, Register 130)

5 AAC 49.060. SPORT FISHING FROM COMMERCIALY LICENSED VESSELS; CHARTER VESSEL REGISTRATION.

Repealed. (In effect before 1984; am 4/28/84, Register 90; am 5/31/85, Register 94; am 4/18/86, Register 98; am 6/7/89, Register 110; am 4/30/91, Register 118; repealed 4/15/94, Register 130)

5 AAC 49.065. FRESHWATER GUIDING REQUIREMENTS.

Repealed. (Eff. 4/30/91, Register 118; repealed 4/15/94, Register 130)

CHAPTER 51

AREA 2 — UPPER COPPER — SUSITNA RIVERS.

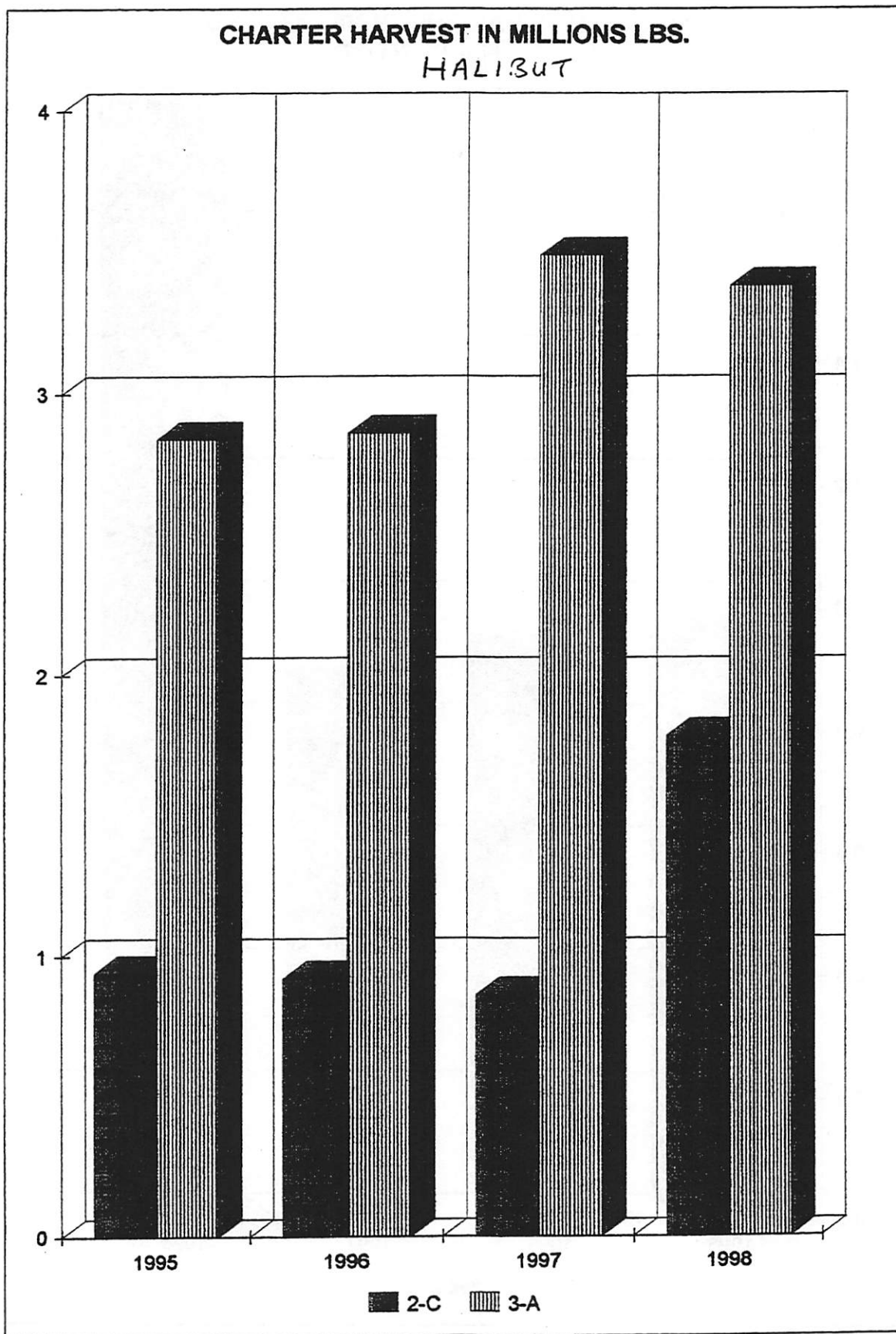
Repealed 5/6/81

CHAPTER 52

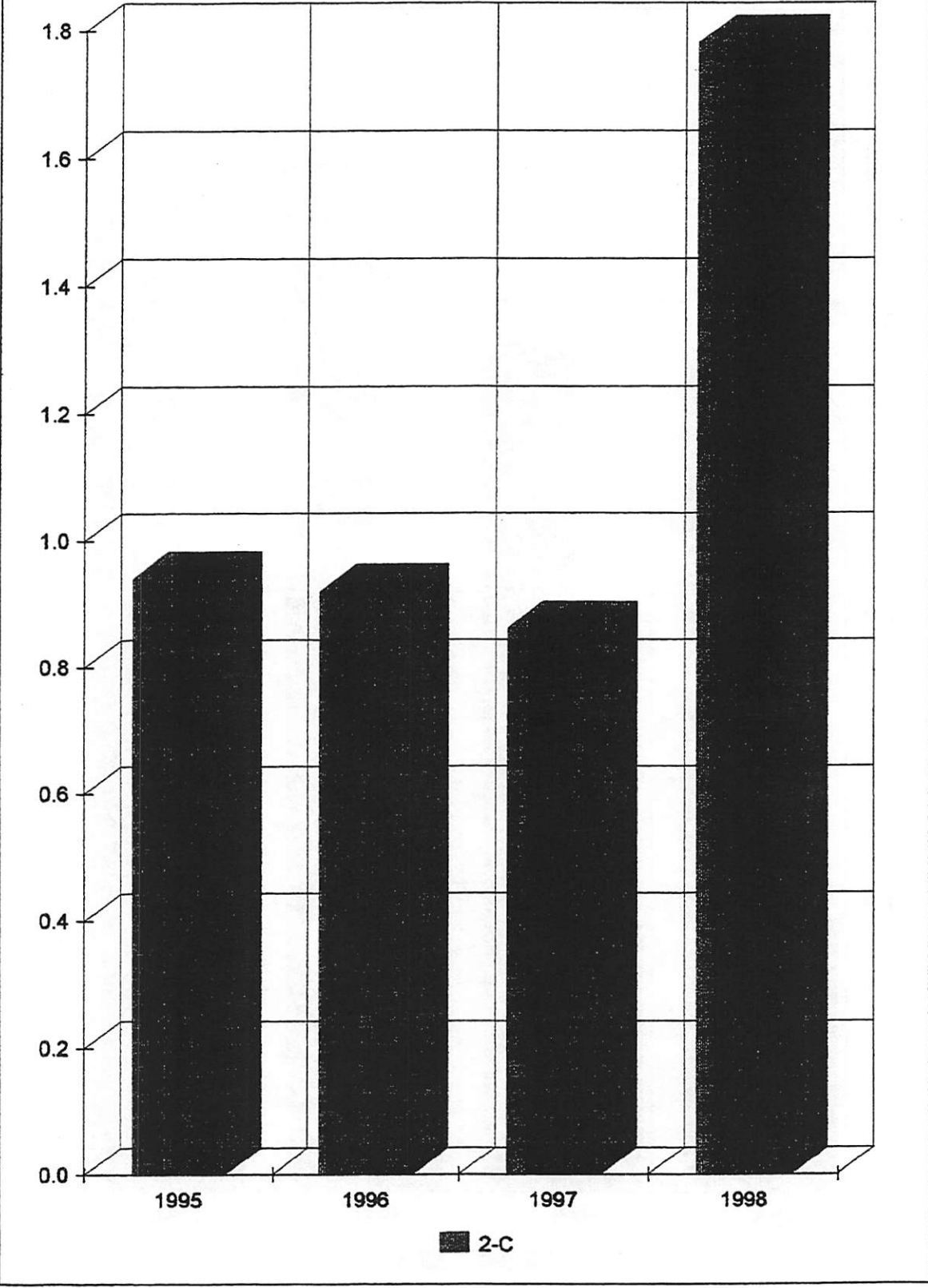
UPPER COPPER RIVER AND UPPER SUSITNA RIVER AREA.

- Section
- 01. Application of this chapter
- 05. Description of the Upper Copper River and Upper Susitna River Area

# APPENDIX 3

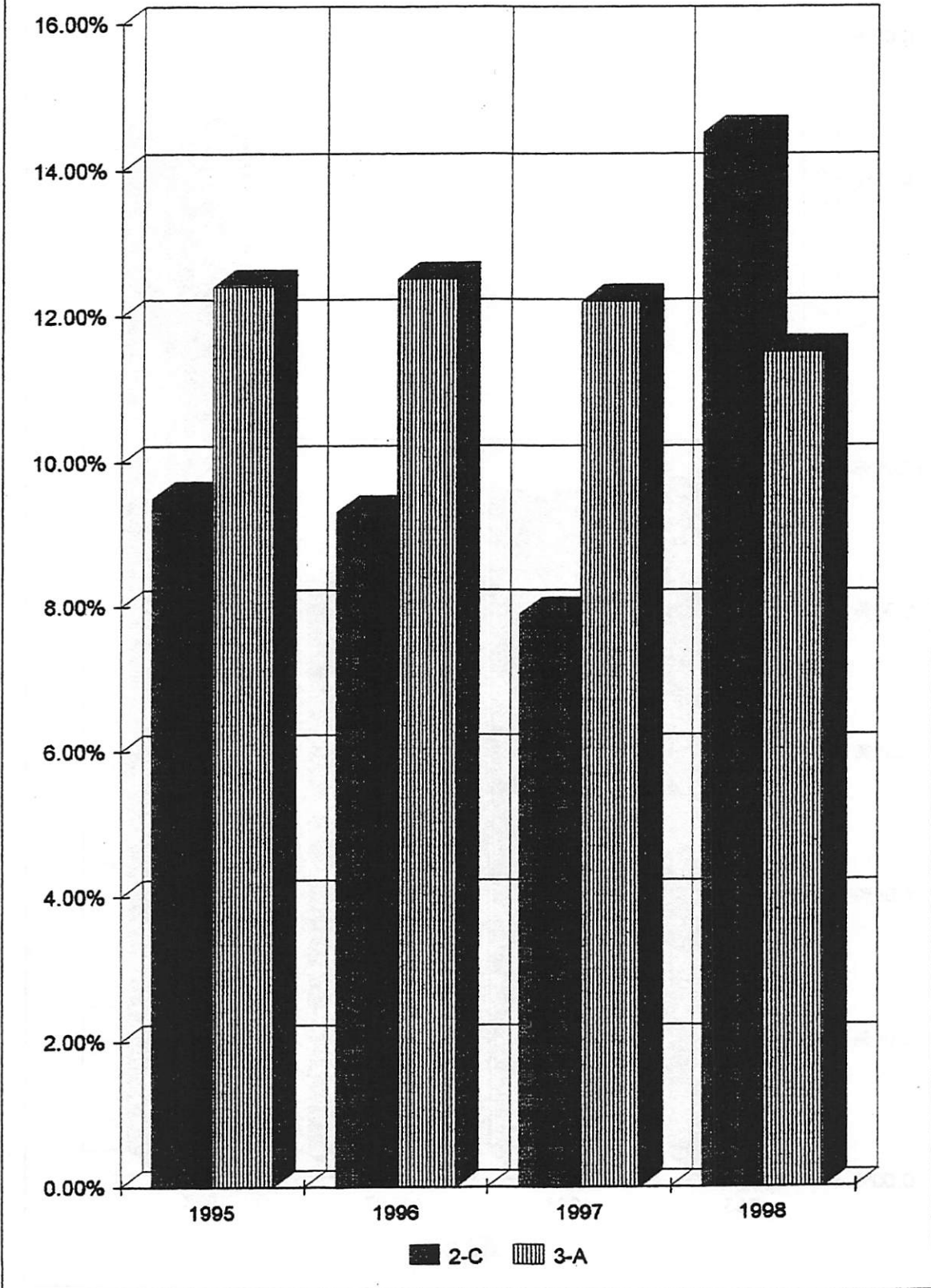


**2-C CHARTER HARVEST IN MILLION LBS.**  
HALIBUT



# CHARTER % OF COMBINED QUOTA

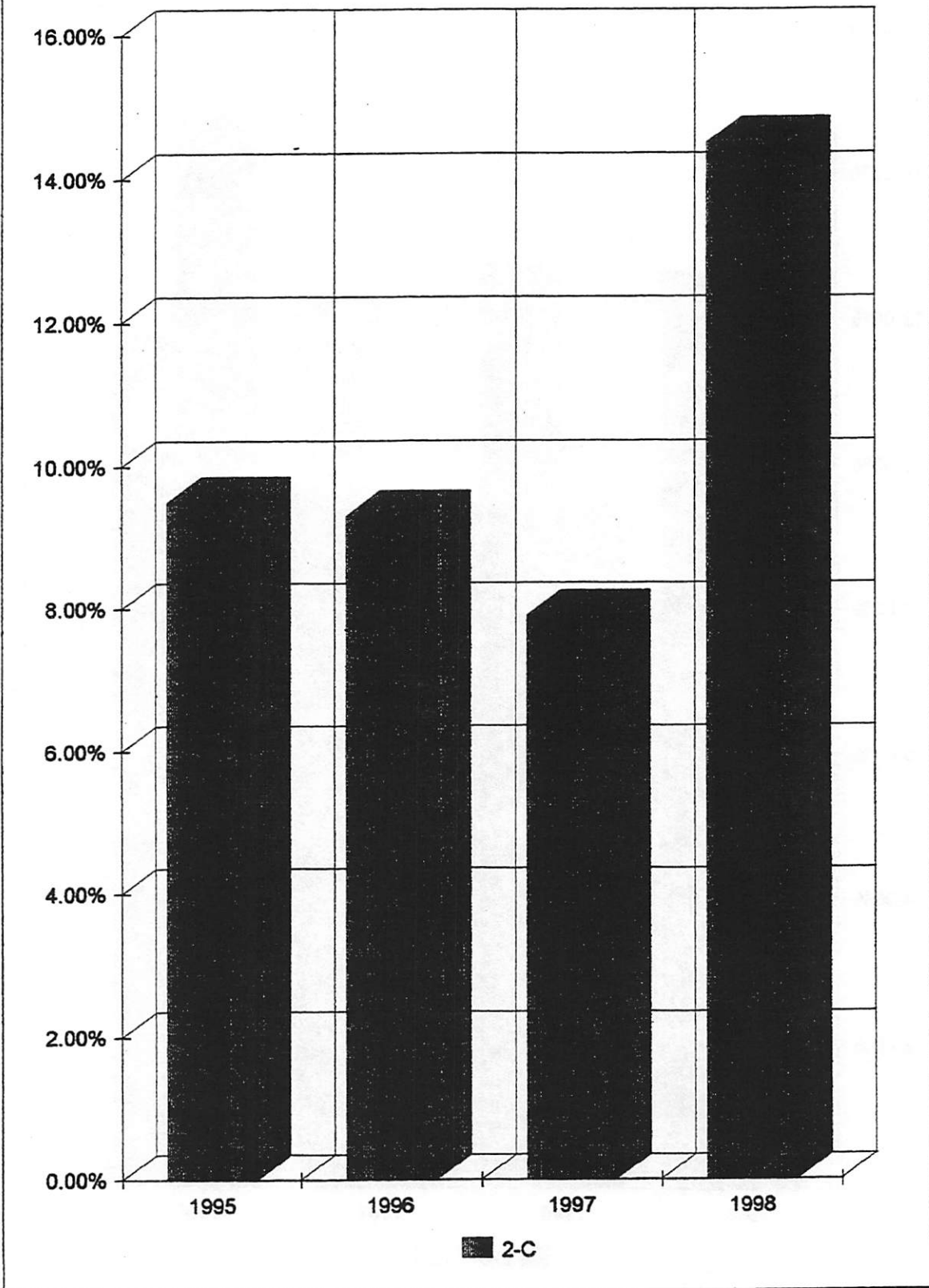
HALIBUT





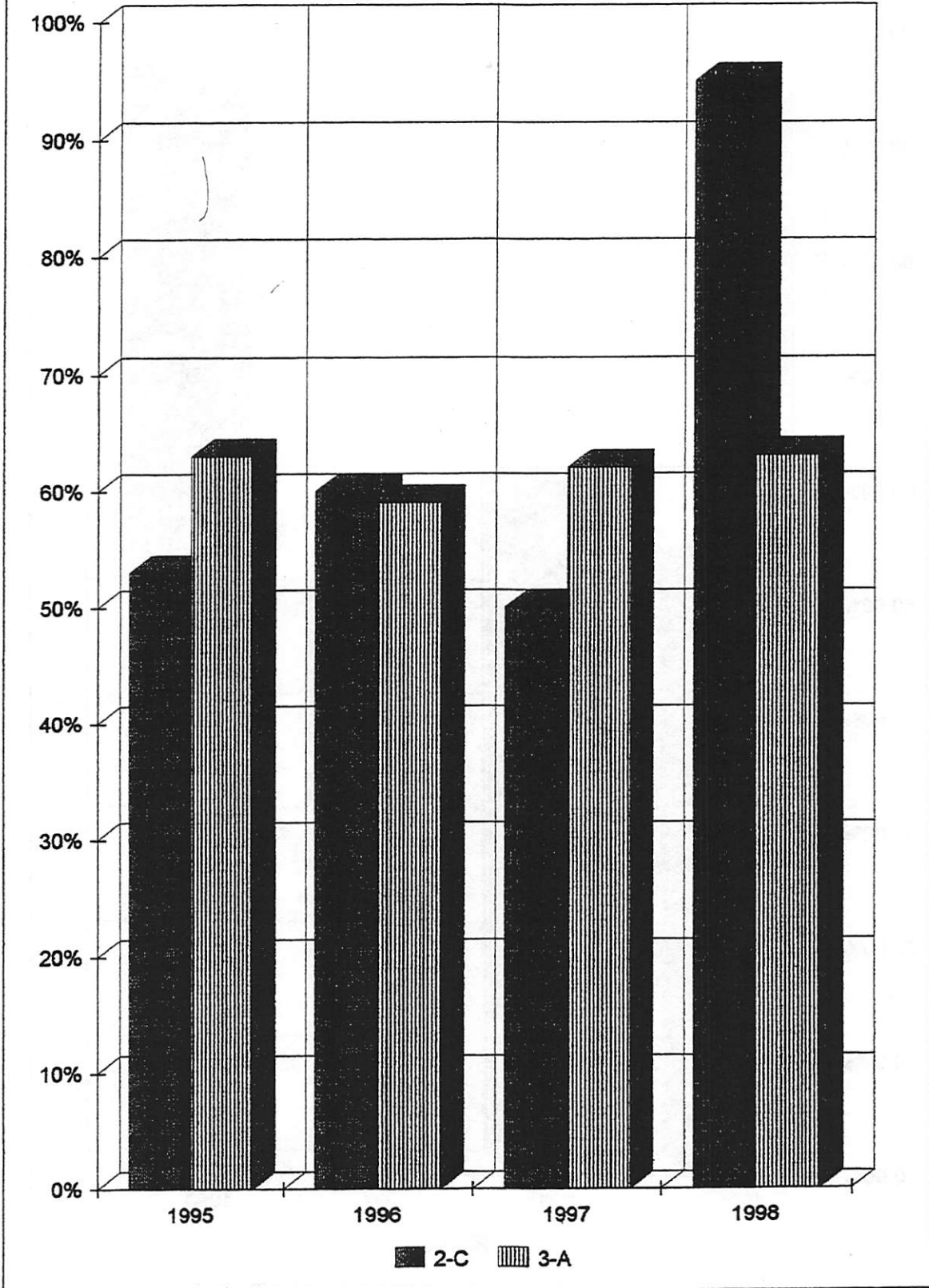
CHARTER % OF COMBINED QUOTA IN 2-C

HALIBUT



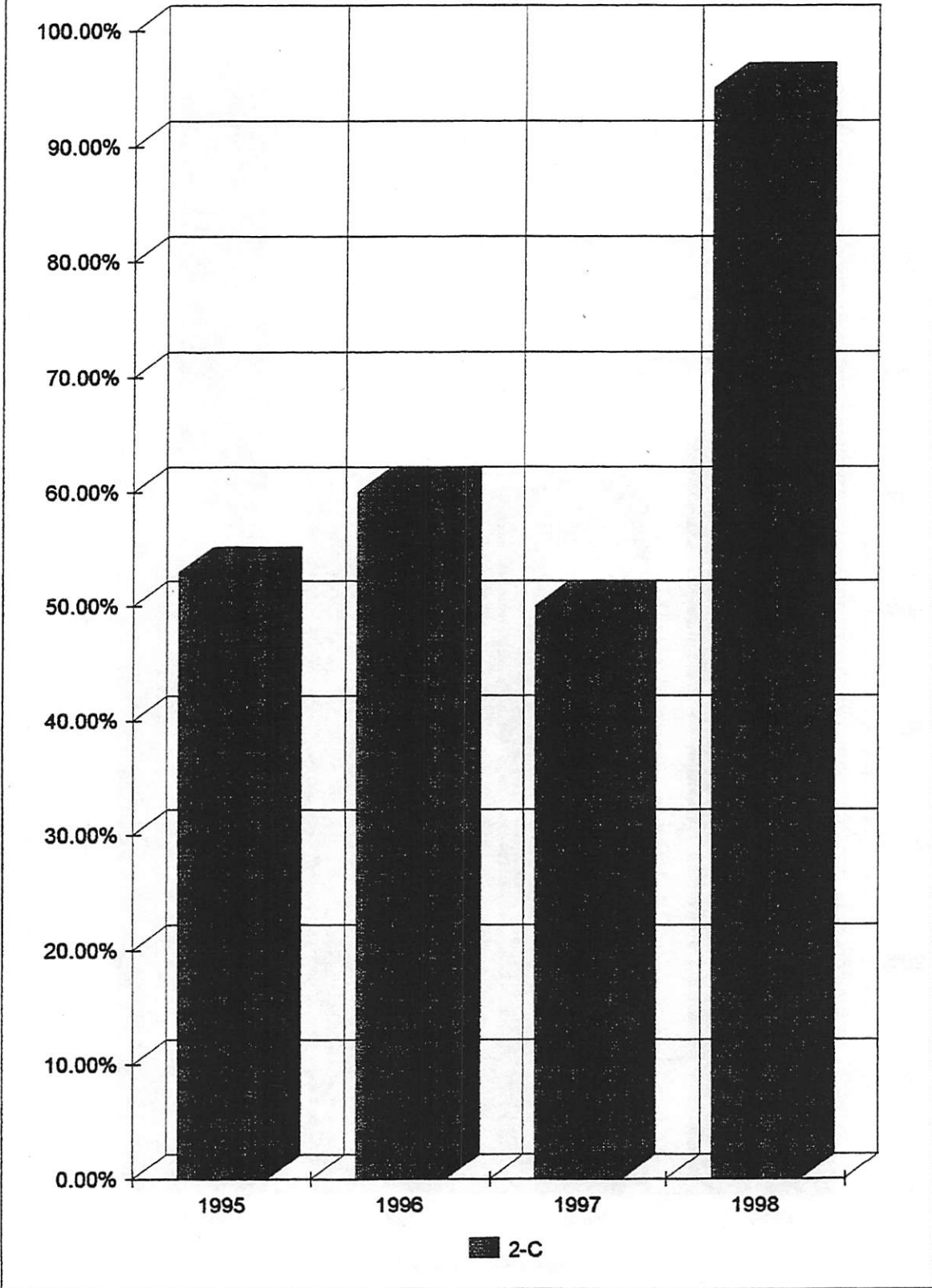
# CHARTER HARVEST AS % OF SPORT HARVEST

HALIBUT

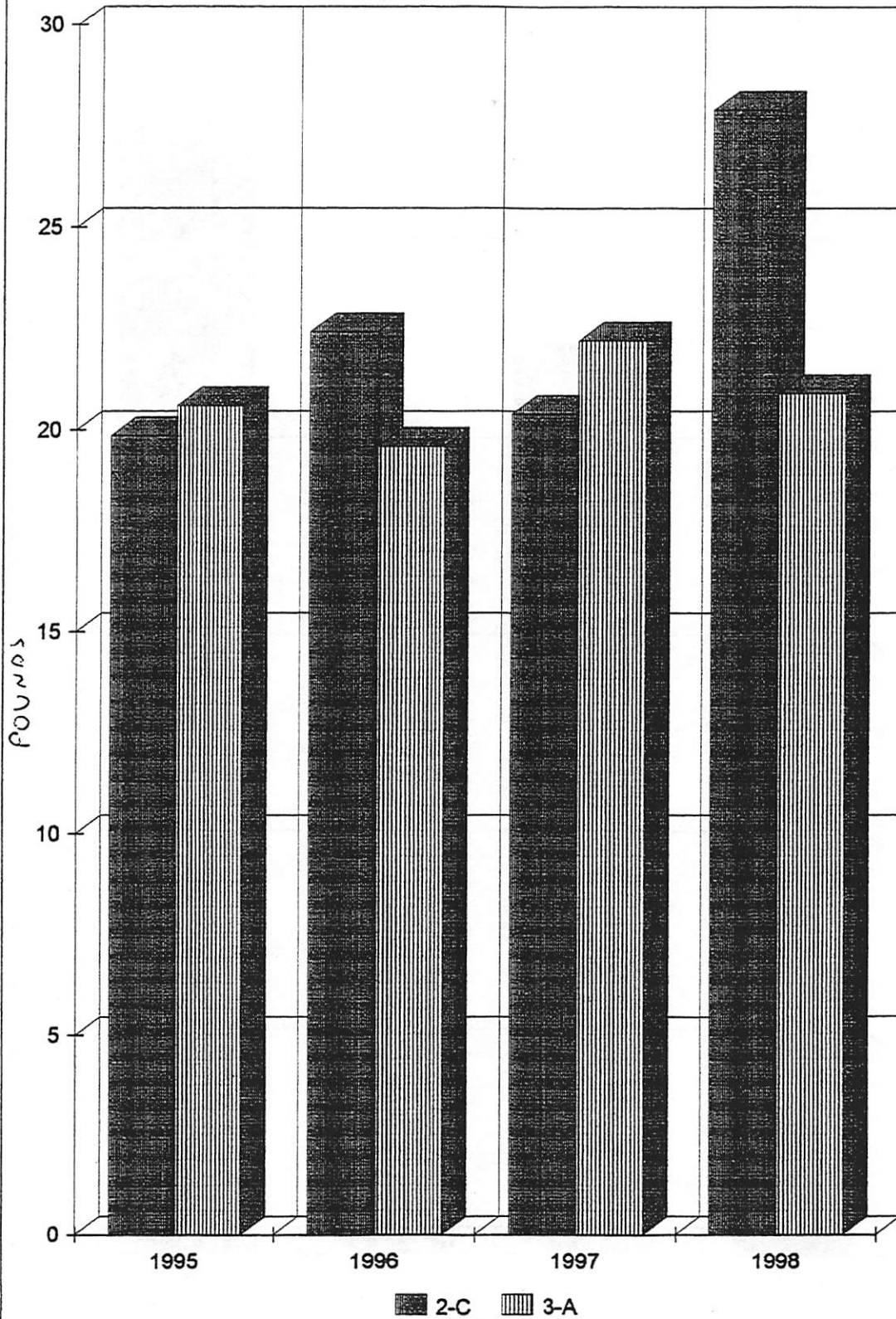


CHARTER HARVEST AS % OF SPORT HARVEST

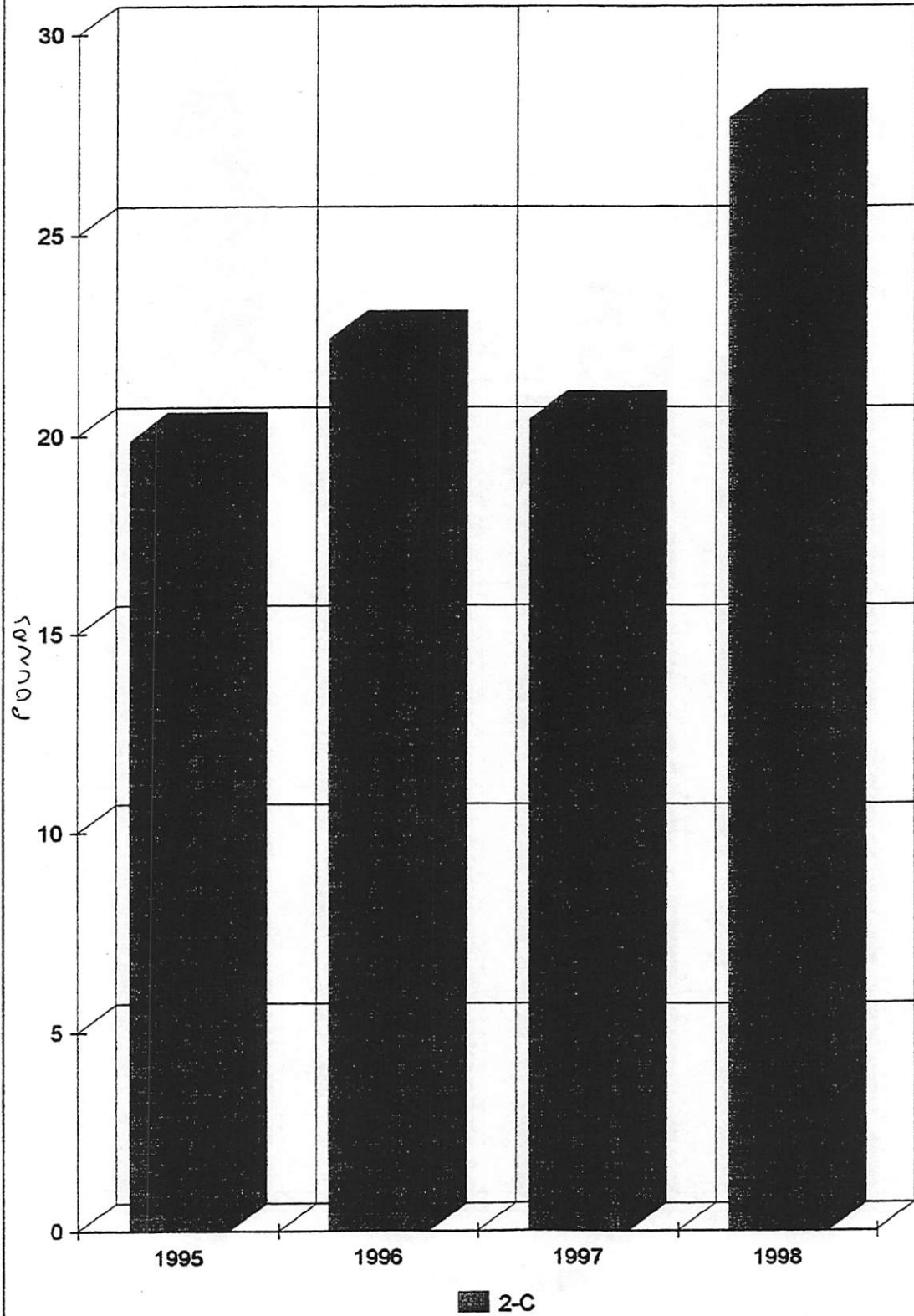
HALIBUT



# AVERAGE SIZE HALIBUT IN CHARTER HARVEST



### AVG. WEIGHT CHARTER HALIBUT (LBS.)



**RECEIVED**  
APR 12 1999  
N.P.F.M.C

**Gale K. Vick**

dba GKV & Sons and GKV & Associates  
P.O. Box 220221, Anchorage, Alaska 99522  
PH: 907-248-4264 FAX: 907-248-4303  
e-mail: gkvsons@alaska.net

**UNDER CONTRACT TO THE AFOGNAK NATIVE CORPORATION**

**NORTH PACIFIC FISHERY MANAGEMENT COUNCIL**

**Regarding**

**HALIBUT CHARTERBOAT MANAGEMENT  
and LOCAL AREA MANAGEMENT PLANS**

**APRIL 1999**

Dear Chairman Lauber, and members of the North Pacific Fishery Management Council:

My name is Gale K. Vick. I am testifying on behalf of the Afognak Native Corporation, and the Kodiak Native Tourism Association (KNTA.) This testimony is specific to the Halibut Charterboat Management Guideline Harvest Limit (GHL) alternatives, currently before Council and to the development of Local Area Management Plans (LAMPs) within the outlying villages of Kodiak Island - Port Lions, Ouzinkie, Old Harbor, Larsen Bay, Karluk and Akhiok.

There are two issues which affect not only the communities of Kodiak Island but also small communities all over the Gulf of Alaska who are developing tourism opportunities, utilizing halibut charterboats as a important component and who are not in situations of either being over-harvested or in direct competition with commercial interests.

The first issue is the elimination of the discussion of moratorium except within LAMP management. We recognize that there are some areas, specifically in the north Gulf, that may want to apply license limitation of some kind to protect near-shore depletion. We also recognize that communities need the time to examine, within their LAMPs, what their resource competition may be like now and what limitations, if any, may need to be applied in the future. To apply a moratorium now to areas that have no immediate resource competition would be an injustice and an unfair economic burden. The assumed application of GHLs would require LAMPs to examine this issue anyway. We therefore respectfully request that the moratorium issue be eliminated from IPHC area-wide discussion and be limited only to LAMPs.

The second issue is alignment of geography. The problems we are having - and almost every one else is having -with the application of the current alternatives is that we can not decide on alternatives for GHL or LAMP management measures until the geography of the statistical reporting areas is lined up. Because the very concept of LAMPs means "local area", not

IPHC area-wide, commercial reporting should be aligned with sportsfish reporting along ADF&G statistical areas. This would give us the appropriate information on where commercial harvest might be in near-shore specific competition with sports fish and to what level that competition might be occurring. This would subdivide alternatives based on the alignment of geography. Without this alignment, we cannot approach alternatives which are reasonably applicable to local area situations.

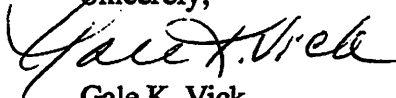
We therefore urge the Council to adopt the following measures before considering GHL alternatives:

- (1) Eliminate an IPHC area-wide alternative for moratorium, keeping the alternative for moratorium strictly within local area management plans
- (2) Adopt measures which would facilitate the alignment of commercial and sportsfish harvest reporting for halibut along ADF&G sportsfish statistical areas.
- (3) Consider GHL alternatives ONLY within the alignment of statistical reporting.

These alternatives will provide a more acceptable framework for both the existing commercial and sportsfish users, as well as the developing charter operators, to come to agreement on management measures. It will eliminate the confusion of trying to fit a square peg into a round hole and will give all of us a much better picture of what is really happening in localized areas. It will encourage an atmosphere of greater cooperation and eventually should accomplish most of our combined concerns. Further, it will allow the Alaska Board of Fish to govern local area management plans with a much greater degree of efficiency and confidence.

Thank you for your consideration.

Sincerely,



Gale K. Vick

Contractor to Afognak Native Corporation

cc: A.A. "Ole" Olsen, President, Afognak Native Corporation, Kodiak  
Dennis Metrokan, President, Koniag, Inc.  
Emil Christiansen, President, Old Harbor Native Corporation  
Tom Abel, Chair, Gulf of Alaska Coastal Communities Coalition, Hoonah  
Senator Ted Stevens, U.S. Senate, Washington, DC  
Senator Frank Murkowski, U.S. Senate, Washington, DC  
Representative Don Young, U.S. House of Representatives, Washington, DC  
Governor Tony Knowles, State of Alaska, Juneau  
Dr. John White, Chair, Alaska Board of Fish  
Steven Pennoyer, Chair, IPHC

04-13-99

To: Chairman Richard Hauber  
North Pacific Fisheries Management Council

From: Len Leach  
Box 6017  
Ketchikan, Alaska 99901

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APR 13 1999

N.P.F.M.C.

Dear Chairman Hauber and Council Members,

I am a resident of Alaska and a 2C area halibut fisherman. I was originally issued 14,000 + pounds of halibut. I have bought an additional 28,000 pounds of 2C quota, in good faith. I felt the IFQ system, created by you, was the way of the future and I invested accordingly. Now, I see it possibly being given away.

I am very opposed to ADF+G's sport fish division's request to raise the guideline harvest level for the charter fleet. I am also against their allocation being in fixed pounds.

*Len Leach*

cc. Governor Knowles



Steve Fish  
P.O. Box 6448 Sitka, Alaska 99835

April 13 1999

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APR 13 1999  
N.P.F.M.C.

Chairman Richard Lauber  
NPFMC 605 West 4th Avenue, Suite 306 Anchorage, Alaska 99811

Re: Halibut Charter GHL (C-1)

Dear Chairman Lauber and Council Members,

I have lived in Southeast Alaska since 1974 and have made my living from fishing halibut since 1975. When I first started fishing halibut the fleet was asked to lay up for 8 days in between each trip as a conservation measure, and the smaller boats were asked to lay up 1/2 day for each day fished. These were voluntary measures and from my perspective at the time in Petersburg, were observed by most if not all the boats there, and the necessity and benefits of compliance seemed to be well known by those I was around.

Within a few years, of course, we went from a 5 month open season to a season of one or two days. Yes we grumbled and it hurt a lot of people. The mayhem of the "derby" years is well documented. Then we went through all the political and social upheaval of trying to bring order to the fishery and IFQ's is what we end up with, allocating fixed percentages of the quota to each participant. Deckhands and vessel owners alike have risked everything they have to invest, faithful of good management, in quota shares.

The halibut resource is as healthy as it is because commercial fishermen, as the dominant users and beneficiaries, have supported the IPHC in its research and management objectives for over 70 years.

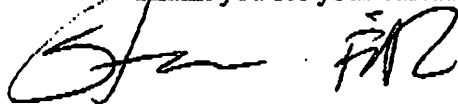
Now in recent years the unregulated sport catch of halibut has grown at an alarming rate due not to the efforts of the local sport and subsistence fishermen, (who had harvested their own small yet flexible share of the resource in happy coexistence with their commercial counterparts) but to a relative newcomer, the halibut charter industry. This industry has been allowed to grow, now at the expense of local users as well as the commercial fleet, under the protection of their "sport" designation. The halibut resource has been fully utilized, the harvest "spoken for" for alot longer than I have been around. The growth of this relatively new industry is displacing traditional users because they have been protected by their confusion with the sport fishery.

Obviously the charter industry operates by different rules than either the local sport and subsistence boats or the commercial fleet. As recognized by the council in September 1997, the halibut charter industry needs its own allocation and they need to be involved in developing the regulations to keep within their allocation. More important, the charter industry needs to be recognized as that: an industry, a commercial enterprise.

I agree that the public should have guided access to fish halibut. The public also needs to be assured that it will find halibut on the grocery shelves as their hunger for it grows.

I urge the council to institute the GHL for the halibut charter industry approved in Sept. 1997, and to create a separate commercial designation for the user group of this new allocation.

Thank you for your careful consideration of this important issue.



c.c. Governor Tony Knowles

**F/V Katie J.**

331 Craig Rd.  
Address Line 2  
Sequim, WA 98382  
usa

Phone 360-808-3100  
Fax 360-681-7819  
Home Phone 360-681-7148  
Email nun@olympus.net

**RECEIVED**

April 13, 1999

APR 13 1999

**N.P.F.M.C**

Chairman Richard Lauber  
C/O North Pacific Fisheries Management Council  
605 West 4th Avenue . Ste.306  
Anchorage . AK 99501

Council Members.,

I would like to express my concern over the the proposal by the Alaska Dept. of Fish & Game Sport Division, to set the current charter fleet GILL to a fixed poundage amount based on the 1998 Quota. I feel that this would be an extremely allocative decision that could benefit only the sport/charter industry with no concern for the history and livelihoods of the commercial fleet. As a commercial halibut fisherman since 1975 I have seen the halibut Quota fluctuate every season , directly affecting the amount of mine , and every other halibut fishermans catch in a given year Everything that I have read or heard from the IPHC leads me to believe that while the stocks are in good shape right now, the overall biomass is in a decline which will have to mean a decreasing quota at some point. To fix the charter fleet catch at any percentage of the the highest Halibut Quota on record would be, in my opinion, asinine.

In closing ,I would like to address the possible concerns of some of the council members , that due to lack of presence at meetings , We commercial fisherman don't have much of an opinion on this matter. I personally feel very strongly on this issue. However,unlike the charter industry,our season doesn't end in two or three months,tie up the boat and go home. Commercial fishing is hard on boats , equipment and crew. There is always something to maintain or repair in this business, but I'll try to stay in touch more between trips and oil changes.

Sincerely,  
Norman L. Pillen

Your name goes here

**F/V MARVEL**  
**MIKE J. DALY**

P.O. BOX 8042  
FORT ALEXANDER, AK 99838  
PH. (907) 568-2242

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APR 14 1999

**N.P.F.M.C**

April 13, 1999

Chairman Richard Lauber  
C/O North Pacific Fisheries Management Council  
605 West 4<sup>th</sup> Avenue, Ste. 306  
Anchorage, AK 99501

Dear Council Members:

I would like to express my concern over the proposal by the Alaska Dept. of Fish & Game Sport Division, to set the current charter fleet GHL to a fixed poundage amount based on the 1998 Quota. I feel this proposal is unjust to the commercial halibut fleet. I have been a commercial fisherman since 1987. During which time I was not one of the fortunate ones to be allocated Halibut IFQ's because I am deckhand. I have been fortunate enough to be eligible to purchase IFQ's because of my participation in the Halibut fishery for 12 years. Just this past winter I purchased over \$80,000. Worth of Halibut IFQ's, just to sustain my position in the fishery.

I hope you understand by allocating sports fisherman a fixed quota at any percentage of the highest Halibut quota on record would be, in my opinion, unfair, ridiculous, and asinine. I like so many other commercial fishermen have paid a high price just for the right to catch Halibut, where the sport fishermen have not had to pay a price of any kind. Please take into consideration those of us like myself who have risked everything to own Halibut quota compared to those who have risked nothing.

Sincerely,

Mike J. Daly  
Commercial Fisherman

Dear NPFM Council Members.

I should like to take this opportunity to address the council regarding management of the charter fleet halibut harvest. First however, let me give you some background info. My 1st ever commercial fishing experience was for halibut during a 48 hr opening. We fished out of Sitka on a small troller/longliner (wooden), the K/V Sea Boy. It was hard work & I was terribly seasick, yet I was fascinated by it all and began to consider commercial fishing as a career. That was in the mid-1980s. I crewed regularly during halibut openings afterwards, always on small boats (36' or less) often 10-15 miles out in the Gulf of Alaska. Though incompetent on that first trip, I learned the trade & not long after had regular work crewing. When the ITQ system was enacted, I got nothing. A standard crew share would have been fair, but even half that would have

been something — an economical Toehold as it were. As it was there was a need for Community Development & so as CDQs were awarded, crewmen who had worked long and hard during the fast paced Derby Days ~~fell~~ fell between the cracks. I can accept that sometimes life just isn't fair. I have scrimped & saved, borrowed from the bank etc & purchased my ITQs the hard way. There was no big lump dropped into my lap. Not even a little one. I now fish salmon (gillnet), shrimp (pot) & halibut (longline) from a 36 ft boat the K/V Proud Mary. I believe that this diversification is essential if one is to survive in the fishing business. You know ~~what~~ what salmon prices are like right now. Without halibut, I and many like me would have a hard time making it. We can not afford to have our hard earned IT whittled away by charter operators, man;

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APR 13 1995

N.P.F.M.C

Who never even had a license five years ago. Don't get me wrong, I'm not against sport fishermen or even charters. We're all trying to make a living off Halibut. Charter fishing may not be commercial fishing per se but neither is it "Joe six-pack" jigging out of a dingy. A sportsman has no guarantee of a fish it's been said. Let me say that an IFQ holder has no guarantee either. If you miss 'em you keep fishing at your expense until you get them. The charter sportsmen can do likewise. He can even change charters. The charter operators are in it to make money and they make money by getting fish to the sportsmen. All I'm asking is for some fairness in this system. My suggestion is that we have a Charter Boat Quota determined by looking at the average annual catch of the fleet during the same years that the IFQ qualification occurred. Numbers could be reasonably estimated from ADF&G Creel Census Data.

This CBQ would be a percentage of the total allowable catch just as current CBQs & IFQs. Charter operators would be awarded Individual Charter Boat Quota based on the last five years catch. Operators should have to show tax records showing that they earned income chartering not just held a license. Creel surveys & logs could be used to determine these ICBQs. Like IFQs they could be sold to other charter operators or possibly even commercial fishermen. Also if charter boat operators need more quota for an expanding business they could buy IFQs from fishermen and fish them. Having fished as a crewman for over ten years & receiving no Quota, I would be quite a high-in-the-face to have the Quota I have purchased siphoned off by a charter fleet that is virtually unregulated in this matter. One other issue I should like to bring up is the 32" limit, If this limit is biologically valid for the

commercial fleet then it should be as well for the sportsman. It comes down to about 8 lbs of fillets anyway. I have seen a few unscrupulous charter boat operators (minority I hope) who return with clients having caught 12"-14" fish from a "rearing" hole. This is unfair to the resource and a rip-off to the client. Please consider this.

Sincerely,

Michael J. Van Note

Box 26

Heinec, AL

99827

K10 Proud Mary

907-312-1824

P.S. Please enter this as Testimony  
at the upcoming meeting,

April 13, 1999

Chairman Richard Lauber  
NPFMC  
605 West 4th Ave. Ste. 306  
Anchorage, AK 99501

Dear Chairman Lauber,

Subject: Halibut charter boat mgmt. plan

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APR 13 1999  
N.P.F.M.C

Let me introduce myself. I am a lifelong Alaskan and have been a commercial halibut fisherman for thirty-four years. I grew up fishing on my father's boat and purchased it from him in 1977. I have longlined for halibut every year since. The halibut fishery has always been a significant portion of my income. Halibut fishing put me through college, allowed me to raise my family in security and I aim for the same for my children. My two sons, wife and daughter complete the crew on our present boat the Tammy Lin.

I was pleased when the IFQ management plan was brought into existence. This plan provided for a stable fishery and made it easier to plan our future. Until now. So, what's the problem? Unhealthy stocks? No, the halibut stocks are healthy because commercial fishermen have always supported conservation, accepting low quota's as the stocks declined. Too short a season? No complaints there either. We recognize the problem being the unrestricted charter fleet eating away at our quota shares.

Chairman Lauber, I urge you and other council members to apply the GHL that was approved a year ago for the charter fleet. The GHL (allocation) that was set at 125% of the charter fleets harvest in 1995 gave the charter fleet a chance to grow. This figure must remain a percentage of the overall quota so when the biomass declines, everyone's quota goes down. Consider this. If the halibut biomass drops back to what it was in the 70's (I remember this all too well) the commercial fishermen in 2C would be sitting on the beach while the unrestricted charter fleet is out harvesting the entire quota! Madness! The commercial fishermen and the charter fleet should be under the same rules. **When the quota drops, both entities should have their share dropped proportionally.**

This is not what we envisioned when we purchased quota shares. I say we because my two sons, age 18 and 15 have purchased small blocks of their own. Our family is dependent on a stable halibut fishery. Fluctuations in price and quota are acceptable; losing quota to an unrestricted commercial group is not.

I would also urge the council to analyze effective slow down measures such as reduced bag limits to keep the charter fleet under the GHL.

Respectfully,

George Eliason

cc: Governor Tony Knowles  
PO Box 110001  
Juneau, AK 99811

RECEIVED  
APR 13 1999  
N.P.F.M.C

Otto Florschutz  
P.O. Bx. 547  
Wrangell AK, 99929  
907-874-2522

Chairman Rich Lauber  
NPFMC  
605 west 4<sup>th</sup> avenue, ste. 306  
Anchorage, AK, 99501

Chairman Rick Lauber:

I have commercially fished halibut for 20 years, the last 16 years with my own boat. I have a small amount of Halibut IFQ. As a dependent on this fishery with a family of 5 others to support I am extremely concerned about this resource and its allocation.

I am also a Glacier Bay crab fisherman and I have seen that fishery closed by visitor interest groups and I have lost that income. As a troller I have seen the charter boat- visitor interest receive portions of our king and coho salmon allocations and have lost that income. Now a well-organized attempt is occurring to reallocate the halibut portion of my livelihood away from me as well. This attempt is partly being led by our own Dept. of F&G which has many high-level retired workers operating charter boats.



many more ready to retire and hang up their shingles. I believe they are looking out for their own interests.

In 1997 you awarded the charter boat fleet 125% of their highest catch level (in a year of record high halibut production) with the understanding that they would slow down their growth. Their response was a 50% growth in one year. This cannot go on. They also want to be allocated on a fixed poundage regardless of biomass levels. This type of demand shows me exactly what kinds of stewards of the resource they really are. No matter how many halibut are out there they want their number, or they might lose some visitor dollars. What an argument!

Since the charter boat catch levels were established in a year of extremely high abundance, we can expect, through natural cycles, the number of halibut to decrease in the future. When this occurs, if charter boats are on a fixed poundage, they will catch an increasing share of the fish, hurting other users of the resource who will have to reduce their catch for the health of the resource. This is completely unfair! All users should receive allocations by the same method, by percentage.

As a resident of Southeast Alaska I know lots of charter operators. Some of these operators take out people on a daily or twice daily trip. Others

have lodges where their clients fish and catch their limits every day and even yes twice a day (it's denied but S.E. is a small place and most of us have either seen it or been told about it by someone blowing their horn). Others take out groups for overnight or even weeklong trips, fishing, beachcombing, birdwatching and just enjoying themselves. My point is that not every visitor needs to catch more pounds of fish than they could possibly eat.

In a recent conversation with a charter captain I was told how he had taken out a group who then bragged that the year before they had paid for their trip by selling 400lbs of fillets to his brother's restaurant. You have to believe that this goes on.

It is apparent that this industry will not slow down on its own and that you must implement measures to do so. Bag limits must be reduced, trip limits must be implemented to see that each fisherman doesn't leave the state with an unrealistic amount of fish. Line limits and annual bag limits must also be introduced.

I support managing the charter boat industry within the level already allocated to them by a fixed percentage, not a fixed number or quota. Any increases outside of their allocation should be done with personally owned IFQs. This is an idea that some within the charter industry already support. I

believe that fishing within the present IFQ system is the best management plan for this industry. While presenting some problems, I believe it solves most, while addressing the blatant commercial intent of this industry.

I thank you for your time you devote to this council and the time and thought you have put into this issue. Please make a decision that will insure our halibut future, we have already had enough of our livelihoods taken away by out of state and visitor interests.

Sincerely Otto Florschutz.



# SEAFOOD PRODUCERS COOPERATIVE

PRODUCERS, PROCESSORS & MARKETERS OF PREMIUM QUALITY SEAFOODS

April 10, 1999

Richard Lauber, Chairman  
North Pacific Fisheries Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501

RECEIVED  
APR 13 1999  
N.P.F.M.C

Subject: Halibut Charter GLC

Dear Chairman Lauber:

The 495 member fishermen of Seafood Producers Cooperative strongly oppose any reallocation of the Alaska halibut resource to the charter halibut fleet.

The GHL approved by the council over a year ago was fair and was based on a percentage of the total quota. There is no logical reason that all users of the resource should not have to play by the same rules. When quotas are decreased they should be decreased for everyone, not just the commercial fleet.

The halibut resource in Alaska is healthy because the commercial fishermen have always supported conservative management of the fishery. When the biomass has decreased in the past they accepted reduced quotas to assure the future viability of the fishery.

The commercial fleet cannot afford to have another fishery taken away through unfair allocations. We urge you not to support this attempt by the charter fleet to obtain an unfair advantage over other users of this valuable resource.

Sincerely,

  
Barry S. Lester  
President/CEO

pc: Governor Knowles

April 9, 1999  
F/V Casino  
607 Etolin  
Sitka, AK., 99835

**RECEIVED**

APR 13 1999

N.P.F.M.C

North Pacific Management Council  
605 West 4th Av., Ste. 306  
Anchorage, Ak., 99501

Dear Chairman Lauber,

Since 1980 I have been fishing halibut in area 2C. I was awarded share of IFQ's based on my participation in the fishery. Since then I have purchased more halibut IFQ's. I have an extremely strong interest in maintaining my ability to earn a living from halibut fishing.

I am very concerned with the charter fleet and their use of the halibut stocks. I believe they should be considered a commercial fishing fleet and their ability to catch halibut regulated by the same standards as the longline fleet. Therefore, I urge the council to use the Guideline Harvest Level approved a year ago, and to base the halibut charter allocation on a percentage of the total quota. Halibut stocks are healthy now due to the commercial fleets acceptance of low quotas when the biomass was low. The charter fleet should have the same rules to preserve a healthy halibut stock. To achieve this I suggest the council look at effective slow down measures, such as reduced bag limits to keep the charter fleet under the GHL.

The charter fleet should be allowed a percentage of the total quota, but only a percentage.

Sincerely,

Forrest Dodson

**F/V KINGDOM**

P.O. Box 1175  
Craig Alaska 99921  
USA

Phone 907-826-3597  
Fax 907-826-3597

RECEIVED  
APR 14 1999  
N.P.F.M.C

April 12, 1999

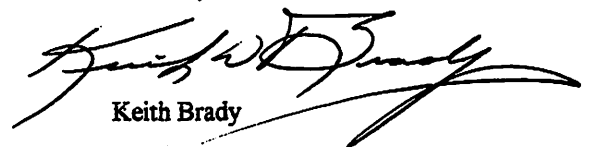
Chairman Richard Lauber  
North Pacific Fisheries Management Council  
605 West 4th Ave.  
Ste. 306  
Anchorage, AK. 99501

Dear Chairman Lauber and members of the council:

I'm writing to express my concerns over giving a set amount of halibut lbs. to the charter sport fleet.

I am an independent commercial fisherman of 20 years. I have seen many changes from when I first started halibut fishing. Back then we had three 14 day openings. I watched many new boats come into the fishery. Consequently, I watched my catch rate go down. I then moved to the outside waters, where, during the last few years before IFQ's were implemented I was catching approximately 30,000 lbs. Unfortunately for me, these were not the years chosen to determine my IFQ allocation. Instead I was allocated 10,000 lbs. I still supported the IFQ program because I realized the system needed change, and felt this was a fair method of regulation. I then had to purchase IFQ shares to bring me back up to what my business needed to support my family. Based on the way commercial fishing was handled ( and we all know charter fishing is a form of commercial fishing) the only fair answer to this current proposal is for charter captains to be issued IFQ shares based on their proven past commercial participation, the same as all the other fishermen. If they felt that they didn't receive enough they could always purchase more, also, like we have. This number would fluctuate with the biomass, not be locked into a set number, which would take from our poundage should the biomass go down. The charter fishing industry has known for many years that we were heading to IFQ's. They could have acted as any other fisherman. I don't understand how you could even consider this unfair and unjust proposal by ADF&G! I feel certain that you and the council will do the right thing when this comes up at the meetings, and not succumb to the relentless pressure of the charter fleet.

Sincerely,

  
Keith Brady

**F/V Sarah E**

P.O. Box 1175  
Craig Alaska 99921  
USA

Phone 907-826-3597  
Fax 907-826-3597

**RECEIVED**

April 12, 1999

APR 14 1999

N.P.F.M.C

Chairman Richard Lauber  
North Pacific Fisheries Management Council  
605 West 4th Ave.  
Ste. 306  
Anchorage, AK 99501

Dear Chairman Lauber and members of the council:

I can't believe it! I have just learned of the request to the council by ADF & G sport division. That request being to raise the Guideline Harvest Level for the charter fleet to reflect the increased numbers that the charter fleet caught in 1998, AND, to allocate this poundage in fixed pounds!

I am 46 years old and have been in the commercial fishing industry all my life, as were my parents. My son, (now the 3rd. generation) has purchased halibut IFQ's. During this time I have seen the sport fish division steadily develop into a tool for the paid sport fleet. These charter operators, in general, are shrewd and greedy. They have infiltrated the sport fish division at the highest levels and many in the division intend to become charter operators themselves when they retire. It is time these people are exposed and their real motives brought to light! They are not interested in the damage they cause the existing fishery. Compared to the existing commercial fleet with a vested interest in the fishery, they are "fly by nighters!" Where is the fairness in this proposal to GIVE this poundage to the charter fleet, when we have had to work for, and/or buy our IFQ shares? My 3 generation ALASKAN family has invested in, and makes our living solely in the commercial fishing industry. It the charter fisherman wants IFQ poundage he should purchase them as we have. It is the only right, and fair way.

Sincerely,

*Carla Smith*

Carla Smith

Chairman Richard Lauber  
NPFMC, 605 West 47th Ave  
Suite 306  
Anchorage AK 99811

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APR 14 1999

N.P.F.M.C

I Philip Wiley Live and Fish out of Sitka Alaska. I started Commercial Fishing or Longlining in Alaska in 1980 For Halibut and Every year since.

I was Born and Raised in Southern California. I recently contacted some of my friends that belong to Sport Fishing Clubs in Calif. They feel that Sportfishermen from out of State would be just as happy with one Halibut and a catch and release system with Barbless Hooks. They also pointed out the fact that other States have a catch and release law for out of State Sportfishermen, and part of Mexico have the same laws.

I understand 97 Percent of the Charter Boat Fishermen are from out of State.

These friends told of one person they know who brings home 300 Pounds of Halibut Fillets a year from Alaska plus Salmon.

I think the reason the Council doesn't here from very many Commercial Fishermen is because of low fish prices, high financial dep. low profit and government keeps taking more or wanting more so most feel helpless.



I Feel Most People of The United States  
DON'T care about Sport Fishing in Alaska. But Like  
Eating Fresh Halibut and Salmon From Alaska and have  
a Right To Buy this Food from Their Local Market without  
Coming To Alaska. Thousands of Restaurants Depend on  
it Too.

I Think the Council Should Stay with their  
Adopted Guidelines For Charter Boats. I Feel its much  
Too Generous. Their Quota must Be on a Percentage.

I Think The Council Needs To Consider the  
Fact that The Rest of the U.S. is over Populated  
and Growing. Take a Hard Line Now and The Future  
Will Stay Bright.

Sincerely

Philip R. Wiley

P.O. Box 115

Sitka, AK 99835

CC Governor Knewles

Ben Mitchell  
103 Davin  
Sitka, AK 99835

RECEIVED  
APR 14 1999  
APR 10, 1999

Chairman Richard Lauber  
NPFMC  
605 West 4<sup>th</sup> Ave. Ste 306  
Anchorage, AK 99501

N.P.F.M.C

Re: Charter Boats that fish for Halibut presently unrestricted  
Dear Chairman Lauber,

The guided sport charter fishing industry must have an allocation of halibut. It is imperative that regulations be developed this year to implement a halibut Guideline Harvest level. There must be a local moratorium (Sitka) <sup>Area 2C</sup> prohibiting new charter licenses and additional fishing capacity of existing operators in the Sitka area and Area wide preferably.

A good alternative would be to cap the charter fleet at what they caught in 1995 or 1996. Also eliminate the over capitalization of this fishery like the "qualifying years" in the commercial halibut IFQ process. A lot of recent entries into the halibut fishery were flushed out and put on the beach by the IFQ process. This was good and should be done for the Charter boat industry, now!! this year!! at the upcoming meeting. With a cap in charter halibut being attained they could individually continue, by buying IFQ halibut and chartering those pounds.

Impose a minimum size limit of 32 inches and bag limit of one fish per day or 3 fish maximum per person to ship out of state. The Status Quo will not be acceptable any longer!!

cc Knowles

I remain,

Ben Mitchell *B.M.*

North Pacific Fishery's Management Council  
 Richard Lauber, Chairman  
 605 West 4th Ave., Suite 306  
 Anchorage, AK 99811

RECEIVED

APR 14 1999

N.P.F.M.C

4-12-99

RE: GHIL for Charter Boat Fleet

Dear Mr. Lauber and NPFMC Council Members:

In order to establish guidelines and equitable treatment of individuals participating in commercial enterprises related to Alaska fisheries, we strongly recommend that the Council give priority at your April 1999 meeting to the development of regulations that will result in a *halibut management plan for the charter boat fishery*.

**The core content of the halibut management regulations for the charter boat fishery should include the utilization of the GHIL approved a year ago and to base future halibut charter allocations on a percentage of the total quota.**

While discussing the halibut management issue with current IFQ permit holders, who had previously participated in the Alaska charter industry, they indicated that much of the sales promotion for that industry has been the opportunity for clients to realize high fish (pound) yields. It is time to modify the mode of exploiting a resource in a high growth tourism industry in order to promote the sale of an Alaskan fishing adventure at the expense of individuals who have invested financial resources in an IFQ.

The NPFMC can take the initiative in developing a plan that would establish a reasonable allocation of catch for the charter industry, and regulations for enforcement of limits. One example of limit enforcement and an alternative to individual client reporting would be the use of pound-catch coupons (provided on an annual basis to charter operators who have met participation requirements) that must accompany a client's product in order to be legally transported. Each eligible charter operator would receive their share of the charter industry's quota at the outset of each season and could use these coupons until their share was depleted. If a growth option for the charter industry appears appropriate we would suggest that the Management Council add a proviso that charter professionals who meet a prescribed participation level in that industry could purchase IFQ shares that could then become dedicated for use in the charter industry for as long as needed.

If you have any questions pertaining to the above please feel free to contact Leonard Leach at Box 6017, Ketchikan, AK 99901 (Tel. 907-225-5894).

Sincerely,

Leonard Leach, IFQ Fisherman

Richard Stillman, IFQ Fisherman

Charles Piercy, IFQ Fisherman

Nevin May, IFQ Fisherman

Mike Mayo  
2800 Sawmill Creek Road  
Sitka, Alaska 99835  
907 -- 747 -- 3413 voice and fax  
email msmayo@ptialaska.net

Chairman Richard Lauber  
North Pacific Fishery Management Council  
Anchorage Alaska

Dear chairman Lauber,

I would like to comment on a guideline harvest level for Halibut charter fishermen -- C-1 in the upcoming Council meeting. The Council implemented the IFQ system because of safety, environmental well-being, reduction in over capitalization, elimination of waste of resource, and a concern for stabilization in the Halibut industry.

Because of the Council's decision, many people have invested in the Halibut industry. I am one of the many. After all, if you are not wasteful you should reap the benefits a somewhat stable biomass. The councils clear economic decision has become translucent by it's inaction in setting a guideline harvest level for Halibut charter boat fishermen.

Just like us they are an economic enterprise, however, they have an unfair advantage.

They are allowed unbridled expansion at the expense of other Halibut fishermen.

Many crewmembers who were not original recipients of pounds in the IFQ Fishery have chosen to invest in the Halibut industry. See attachment. In its 1999 report to the fleet by RAM it shows IFQ crewmembers purchased millions of pounds of Halibut worth tens of millions of dollars. This is not counting the millions of dollars invested by those who had received original Quota. Alaskan crewmembers bought into the Fishery at a rate of two and a half times the rest of United States combined.

Some are boat owners, some are not. Some are wives, some are children, some are family, some are even original applicants but they're all investing because they saw their future Fishing Halibut in Alaska under the IFQ system. Their future is cloudy because of the councils inaction in the charter boat Halibut Fishery.

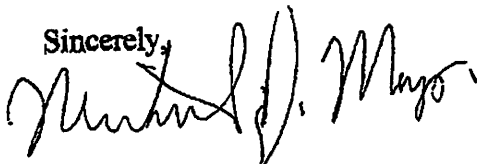
Many Alaskans have banked on the Halibut fishery. Many banks have invested in Alaskans because of the councils decision. There's no doubt in my mind that the charter boat industry is an economic enterprise. Many charter companies have multiple boats.

They should be bound economically the same way we are, by a fixed percentage of the Halibut harvest. With unlimited expansion they have nothing to lose. Already losses have happened in communities that depend on Halibut for subsistence. There is

localized depletion from Sitka to Dutch Harbor, mostly because of the charter boat fleet. I have a slight alternative for a guideline harvest level for the Halibut charter boat fishermen. I would cap them at a fixed percentage of the overall Halibut Quota. If their

Quota was caught I would allow them to charter and they could do either of two things. One, they could catch and release. Two, they could buy into the IFQ system and use these pounds to charter with. This would be fair to all those who have invested financially in buying IFQ's.

RECEIVED  
APR 14 1999  
N.P.F.M.C

Sincerely,  
  
Michael J. Mayo

**SUMMARY OF TRANSFER ELIGIBILITY CERTIFICATE  
("IFQ CREWMEMBER") ISSUANCE ('94 - '98)  
AND "CREWMEMBERS" HOLDING QS AS OF YEAR-END 1998**

Claimed Residency	"Crewmember" TECs Issued ('94 - '98)	"Crewmembers" Holding QS/IFQ at year-end 1998
Alaskan	1,272 (72.0%)	599 (76.3%)
Non-Alaskan	497 (28.0%)	186 (23.7%)
<b>Total</b>	<b>1,769</b>	<b>785</b>

**Note to Table:**

- The designation of "Alaskan" versus "non-Alaskan" is premised upon the most recent address provided by the applicants. RAM makes no attempt to determine, or to verify, a person's state of legal residence.

**QUOTA ACQUIRED BY "IFQ CREWMEMBERS" BY SPECIES, AREA, AND RESIDENCE CATEGORY**

The following table displays "Alaskan" and "Non-Alaskan" IFQ Crewmembers holdings of QS as of the end of 1998 (as expressed in 1998 IFQ pound equivalents and as a percentage of the 1998 TAC).

**QUOTA HELD BY "IFQ CREWMEMBERS"  
BY SPECIES, AREA, AND RESIDENCE CATEGORY  
AT YEAR-END 1998, EXPRESSED IN 1998 IFQ POUNDS**

Species Area	"Alaskan" IFQ Pounds	"Non-Alaskan" IFQ Pounds	Total 1998 IFQ Pounds	Percent of TAC
Halibut 2C	1,169,717	349,544	1,519,261	14.5%
3A	2,178,704	831,380	3,010,084	11.6%
3B	981,601	450,934	1,432,535	13.1%
4A	418,488	163,689	582,177	16.6%
4B	90,194	174,251	264,445	9.4%
4C	99,289	18,411	117,700	14.8%
4D	40,480	70,212	110,692	9.9%
<b>Halibut Total</b>	<b>4,978,473</b>	<b>2,058,421</b>	<b>7,036,894</b>	<b>12.6%</b>
Sablefish SE	302,209	377,854	680,063	8.8%
WY	78,720	160,845	239,565	5.0%
CG	162,726	359,382	522,108	4.7%
WG	44,568	46,215	90,783	2.8%
AI	12,520	59,842	72,362	4.0%
BS	0	37,531	37,531	3.3%
<b>Sablefish Total</b>	<b>600,743</b>	<b>1,041,669</b>	<b>1,642,412</b>	<b>4.7%</b>

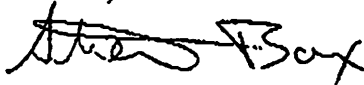
**RECEIVED**

APR 14 1999

Chairman Richard Lauber  
North Pacific Fishery Management Council,**N.P.F.M.C**

I have been an Alaskan resident for 31 years. I have participated in the commercial fishing industry for the past 17 years as a captain and crew member. I began Halibut fishing in the 2c and 3a districts in 1982 as a crew member aboard numerous vessels. In 1990 I purchased my own vessel and began fishing halibut on my own until the IFQ program was implemented. Still wanting to participate in the halibut fishery, I decided to invest in some 2c halibut quota since I was not issued any from the beginning. As you might not know, a 10,000lb chunk of quota is a very sizable investment. A fishery that I once made a profit from now is being used to pay off IFQ loans. I am not alone. There are many commercial fishermen doing the exact same thing in hopes that in the future this will again be a profitable fishery for those of us that have incurred debt to continue to fish. My concern is with the fast growing charter fleet. They have been taking more and more of the quota every year without any investment in the fish. They were never forced to purchase IFQ's to continue halibut fishing for a living. I urge the council to use the Guideline Harvest Level approved a year ago, and to base the halibut charter allocation on a percentage of the total quota so everyone's quota goes down when the biomass declines. Is it fair that my quota is reduced to continue a healthy fishery and the charter fleet quota is not? Over a year ago the GHL was set at 125% of the charter fleets recorded halibut harvest of 1995 for room to grow. They have definitely grown. According to the results of their first year of logbook use 1997 to 1998, area 2c has grown from 8% of the total halibut quota to 14%. ADF&G sportfish division is requesting that 125% of the 1998 charter fleets catch be allocated to the charter fleet. Not only do they want this much more they want it in fixed pounds rather than a percentage of the entire quota. Our halibut stocks are at a historic high right now, so when the entire quota needs to be reduced to conserve, the charter fleet gets to continue to fish at historic high levels. The people who pay are the people who have invested large amounts of money buying quota. This to me sounds like a very poor and unfair way to manage our resources. The charter fleet quota should go up and down with the entire quota just as the commercial fleet quota does for responsible conservation of our fishing stocks. Another concern I have is with the increasing of the GHL. There are better methods of controlling increased participation than making the GHL larger. Reduced bag limits and encouraging charter boat captains to purchase IFQ's so they can continue halibut fishing after their harvest limit has been met are a few suggestions. I am very concerned with the future of commercial halibut fishing and the investments Alaskan families have put forth.

Thanks,

Steve Box  
F/V Worthy

April 14, 1999

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APR 14 1999

N.P.F.M.C

Kari L. Johnson  
P.O. Box 6448  
Sitka, AK. 99835

Re: Halibut Charter GHL (C-1)

Dear Chairman Lauber and Council Members,

I have lived in S.E. Alaska since 1979 and have made my living in the commercial halibut fishing industry since then. We have gone through many changes in the industry since then, going from a 5 month open season fishery to a couple of days. Now we have a very closely managed IFQ system, which has its good and bad points. We have worked with the IPHC very closely and have taken cuts in our quota to insure that we have and maintain a healthy viable fishery. We care about our future and have given up a well-loved lifestyle as all these changes have taken place.

Now in recent years the unregulated sport catch has grown at an alarming rate due not to the efforts of the local sport and subsistence fisherman, (who had harvested their own small yet flexible share of the resource in happy coexistence with their commercial counterparts) but to a relative newcomer, the halibut charter industry. This industry has been allowed to grow, now at the expense of local users as well as the commercial fleet, under the protection of their "sport" designation.

Obviously the charter operates by different rules than either the local sport and subsistence boats or the commercial fleet. As recognized by the council in 1997, the halibut charter industry needs its own allocation and they need to be involved in developing the regulations to keep within their allocation. Most important of all, the charter industry needs to be recognized as that: an industry, a commercial enterprise.

I urge the council to institute the GHL for the halibut charter industry approved in September 1997, and to create a separate commercial designation for the user group of this new allocation.

Thank you for your careful consideration of this important issue.

Sincerely,

*Kari L. Johnson*

c.c. Governor Tony Knowles



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APR 14 1999

April 14, 1999

N.P.F.M.C.  
North Pacific Management Council

We, the undersigned, commercial halibut fishermen ask the N.P.M.C. to consider allocating the Sports/Charter catch to a percentage basis, rather than a fixed pound formula as recommended by A.D.F. & Game Sport Fish Division. We believe the G.H.L. adopted a year ago is more equitable.

It doesn't take a rocket scientist mentality to figure out that if the halibut biomass drops back to the historic lows of the 1970's, that the charter fleet could virtually harvest all of the 2C halibut, leaving nothing for the commercial fleet.

We are a Haines-based group of commercial fishermen who also happen to gill-net (commercially) and know something about conservation measures. We have lost area, management personnel, and watched certain salmon stocks decline drastically to name a few of the caveats.

We would like to think that halibut stocks are healthy because, as commercial fishermen, we support tough conservation methods. Most of us concentrate our halibut efforts in the Icy Strait, Glacier Bay, Cross Sound, and Lynn Canal area. Thanks to Senator Frank Murkowski's efforts we may continue this effort.

In closing, accepting low quotas when the biomass is low makes sense. Why should the charter fleet live under a different set of rules?

<u>Name</u>	<u>Vessel Name</u>	<u>Address</u>	<u>Approx. Years Halibut Experience</u>
Ronald K. Sparks	MEMORIAS	Box 93 Haines, AK	20
NORMAN HUGHES	CHILKAT	PO BOX 1136 HAINES, AK	17
RICHARD BOYCE	ELEANOR S	BA 84 HAINES	20+
Mike Van Nite	HUPROUD MARY	Box 26 Haines, AK	14+
Dean R. Dwyer	F/V ROGUE	Box 1012, HAINES, AK	12
Brad Badger	F/V OSPREY	Box 684, HAINES AK	11
Wally Saunders	F/V SHOTGUN	Box 1112 Haines	15
Will (Bill) Thomas	RAVEN'S WALK	Box 942 Haines	29
Theodore L. LYNCH	F/V DARLIN MURPHY	Box 1125 Haines	15
Stanley E. Wood	WOOD STOCK	Box 348 HNS	33
GREGG BIGSBY	RUSTLER	Box 157 HAINES	20



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APR 14 1999

N.P.F.M.C

**Subject: Halibut charter allocation**

**Date: Tue, 13 Apr 1999 23:30:04 -0800**

**From: "veneroso" <veneroso@ptialaska.net>**

**To: "Linda Behnkin" <alfafish@ptialaska.net>**

Mr. Richard Lauber and members of the council,

I write you all in regards to the halibut IFQ fishery once again facing possible loss of poundage to the ever growing and very aggressive charter fleet.

I have been fishing halibut as a crewman since 1983 and more recently as skipper of my own boat since buying quota share the first year it became available. After all the controversy and debate and research and then the final decision to implement the IFQ system I found the risk of buying in was worth it. I have had the good fortune of buying into the western areas that have had substantial increases over the last few years. With those increases have also come the large drop in price and a questionable future in the market because of the high harvest levels and the growth of the farmed halibut production that is bound to play in the future of the market place.

When I was trying to decide whether to take the risk and the financial plunge into the fishery, one of the things that was a concern was how the charter fleet was going to be delt with. This business has been growing steadily at an alarming rate and the local impact on the resource is starting to show. I am not going to be so bold as to think that one business has the right to completely shut down the other, but it seems to me that the longline harvest of halibut is an established user group that has history of observing the lower quotas when the biomass was low and trying to work to keep healthy stocks. The commercial fleet knows that conservation is our future.

From what I can tell the charter fleet is not in the same conservative mind set. They have had no accurate accounting for their catch level for years and never wanted one. I would hope that they should have to follow the same set of rules. I have watched quite a few of these boats come into the harbor with ping pong paddle size halibut by the box load and then turn around and go to the same local, convenient fishing spots twice a day, day after day in the until those spots have been all but wiped out. They observe no size limit and regardless of limits of fish they're supposed to have, for the most part it goes unchecked. I have a friend who runs a charter boat here in Sitka and I hear directly from him how his clients are here for fun ,yes, but they almost all want to go home with boxes full of meat. Meat hunters he calls them. And as much as he doesn't like it he does it because that's where he makes his money, you have to please the customer.

I understand there is a recommendation to make the charter fleet GH1 at a fixed poundage rate instead of a percentage so if the quota level drops the charter fleet doesn't have to slow down at all. Where is the fairness in this or the conservation that would be needed in such a situation ? I find it hard to believe this is really a possibility and I would urge all council members to reconsider this matter before it becomes a reality.

Thank you for your time and your efforts in trying, once again, to deal with the IFQ fisheries. It seems to be always on the menu at your meetings. I hope one day we will all be content with the program and just go fishing without all the in fighting.

sincerely, George R. Veneroso

Fairweather Fisheries, Inc.  
2225 NW Oceanview Drive  
Newport, OR 97365

April 11 1999

Richard B. Lauber, Chairman  
North Pacific Fisheries Management Council  
605 W. 4<sup>th</sup> Ave. Suite 306  
Anchorage, AK 99501

RECEIVED  
APR 14 1999  
N.P.F.M.C

Dear Mr. Lauber:


I am an owner/operator of the "Pacific Venture". The "Pacific Venture" is a pot boat that fishes cod and crab in the Bering Sea. With the likelihood of the council initiating some kind of action in the re-allocation of fixed gear cod in the BSAI, I would like to express some concerns.

If the council is to address the re-allocation issue, it is imperative to address Limited License Program at the same time. Both the re-allocation and LLP should be inseparable thus benefiting all gear types. Any action separating or initiating re-allocation without LLP would unduly reward one gear type at the expense of the other.

A LLP based on a historic catch or participation would benefit participants who were responsible for the production numbers used in any re-allocation.

In closing I urge you to consider these issues together.

Respectfully,

  
Jerry Bonggen

Corrected Copy

## THE BOAT COMPANY

1730 M Street, NW, Suite 404

Washington, DC 20036

Tel (202) 338-8055

Fax (202) 234-0745

April 14, 1999

Jane DiCosimo, Fishery Biologist  
and Planning Coordinator  
North Pacific Fishery  
Management Council  
605 West Fourth Avenue  
#306  
Anchorage, Alaska 99501-2252

RECEIVED

APR 14 1999

N.P.F.M.C.

Dear Ms. DiCosimo:

A further thought to mine of April 8<sup>th</sup>.


In much of the area we operate in, lodges who have their own guides probably have as significant an impact on the Halibut fishery as do the small charter boat operators who take out one to four people for the day.

For instance one lodge, in their sales material, reports having caught approximately 1,400 Halibut within the past three years.

Since there are many lodges, it is not unreasonable to project some rather large numbers for the lodge industry.

All to say, every effort should be made to include them. Not doing so could provide misleading results.

Sincerely,



Michael A. McIntosh

P.S.: Under separate cover, I will be sending you material on our operation.

MAM:osk

Attachment(s)

19623 Viking Avenue NW, Poulsbo, Washington 98371 Tel (360) 697-5454 Fax (360) 697-4213

*"Nowhere else on earth is there such an abundance and magnificence of mountains, fjord, and glacier scenery...the Alaska coast is to become the showplace of the earth, and pilgrims, not only from the United States, but from far beyond the seas, will throng in endless procession to see it. Its grandeur is more valuable than the gold or the fish or the timber, for it will never be exhausted."*

*Henry Gannett, chief geographer, Alaska Harriman Expedition, 1899*

# THE BOAT COMPANY

1730 M Street, NW, Suite 404

Washington, DC 20036

Tel (202) 338-8055

Fax (202) 234-0745

RECEIVED  
APR 14 1999  
N.P.F.M.C

April 8, 1999

Jane DiCosimo, Fishery Biologist  
and Planning Coordinator  
North Pacific Fishery  
Management Council  
605 West Fourth Avenue  
#306  
Anchorage, Alaska 99501-2252

Dear Ms. DiCosimo:

Thanks for the time on the phone.

We have been running tours in Southeast Alaska since 1980.

We operate two converted U.S. Navy minesweepers from mid-May to mid-September. The smaller of our two vessels (100 ft.) carries 12 passengers, the larger (142 ft.) carries 20.

Our cruises last six to nine days and run between Juneau, Sitka and Ketchikan.

Our normal operating procedure is to run four to six hours per day (usually in the morning) before dropping anchor in some bay or cove for off-boat activities, i.e., hikes, walks (flora, fauna, birding, etc.) canoeing/kayaking, fishing, etc. The foregoing schedule gets interrupted when whales, orcas, sea lions, et. al., are about.

Last summer (1998) we carried about 400 passengers at an average of 7 1/2 days each. We caught/kept 4 Kings, 338 Silvers, 83 Pinks, 4 Chum, 2 Sockeye and 114 Halibut (we have the capacity to freeze, vacuum pack and box our fish on-board).

As you can see from the foregoing, unlike many other types of operations which have sports fishing as one of their functions, we are not a heavy user of the Halibut resource. Nor are we ever likely to be. But that is not to say that the ability to offer Halibut fishing to our customers is not important, because it is.

We are adding another vessel to our "fleet" in the summer of 2000 (156 ft. - 24 passengers) which will increase our capacity by 75%. I would expect our per capita fishing rate would remain the same, i.e., a customer base of 700 might be expected to catch 200 Halibut. But even if we caught twice as much (400 fish) we would still be a small per capita consumer.

19623 Viking Avenue NW, Poulsbo, Washington 98370 Tel (360) 697-5454 Fax (360) 697-4213

*"Nowhere else on earth is there such an abundance and magnificence of mountains, fjord, and glacier scenery...the Alaska coast is to become the showplace of the earth, and pilgrims, not only from the United States, but from far beyond the seas, will throng in endless procession to see it. Its grandeur is more valuable than the gold or the fish or the timber, for it will never be exhausted."*

*Henry Gannett, chief geographer, Alaska Harriman Expedition, 1899*


Jane DiCosimo  
April 12, 1999  
Page 2

We hope, in your deliberations, you make allowances for operations such as ours. For instance, an allocation system might be set up that provided X% for those operators who catch an average of one Halibut or less per customer, Y% for those whose use is more than one but less than two, etc., etc.

If one of the intents in allocating the resource is to benefit the overall economy of the area you are regulating (in our case 2C) then such a plan would make sense.

Finally, we would like to put in a plug for closing the "processing" loophole. It prohibits a "level playing field" for those of us who would prefer to play by the spirit/intent of the regulations. Set realistic limits and take away the ability to cheat.

Sincerely,



Michael A. McIntosh

MAM:osk

P.S.: We would like to be placed on the Council's mailing list (proposed regulations, requests for comments, hearing dates, etc).

## F/V HANSA

4/12/99

ATT: NORTH PACIFIC MANAGEMENT COUNCIL

MY NAME IS ELISABETH BABICH.

I HOLD 9000 LBS OF IFQ'S FOR HALIBUT IN 2 C.

MY HUSBAND, OUR SON AND I HAVE BEEN FISHING FOR MANY YEARS, I HAVE BEEN IN THE HALIBUT FISHERY SINCE 1976. THOSE YEARS WERE HARD YEARS, WITH FEW HALIBUT TO GO AROUND.

SINCE THEN THE STOCKS HAVE IMPROVED GREATLY AND ARE NOW AT AN ALL TIME HIGH.

BUT THIS DOES NOT MEAN IT WILL STAY THIS WAY.

AS WE ALL KNOW, THINGS CAN CHANGE QUICKLY IN OUR FISHERIES.

WITH A DECLINE IN STOCKS, OUR ALLOCATED POUNDAGE WOULD BE ALSO DECLINE.

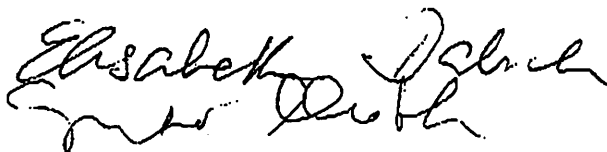
MY QUESTION IS: WHY NOT TREAT THE CHARTER HARVESTERS THE SAME WAY????

THEY DO THE SAME THING, THEY CATCH HALIBUT.

THEIR ALLOCATION SHOULD BE BASED ON A PERCENTAGE OF THE OVERALL QUOTA. JUST LIKE OURS.

REDUCING THE BAG LIMIT WOULD BE THE EASIEST MEASURE. THESE FISH ARE MOSTLY CAUGHT BY NONRESIDENTS .....

THANK YOU  
ELISABETH BABICH  
GUENTER MATH



**2601 CHANNEL DRIVE, JUNEAU, ALASKA 99801**

cc. Rick Lauer  
Tony Knowles



RECEIVED

APR 14 1999

N.P.F.M.C

April 12, 1999

Marion Bifoss  
P.O. Box 7144  
Ketchikan, AK 99901  
907 225-0848

Rory Bifoss  
P.O. Box 7144  
Ketchikan, AK 99901  
907 225-0848

To the North Pacific Management Council;

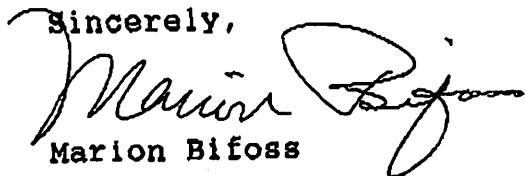
I am a concerned commercial halibut fisherman writing to inform you of my position on the halibut charter boat management plan. I started halibut fishing with my father in 1972, and have since married and continue to fish with my husband and two children. I recently purchased my own halibut shares and am now concerned that decisions that are being made regarding the halibut charter fleet could negatively affect my financial and lifestyle investment.

I urge the commission to use the Guideline Harvest Level that was adopted over a year ago in which the allocation was set at 125% of the 1995 season. It is unrealistic to allocate fixed pounds rather than a percentage of a quota that is based on a sustainable yield.


Another alternative would be to cap the charter fleet at what they caught last year (1998). If their fishery is shut down they could individually continue fishing by buying IFQ halibut and fishing (chartering) their pounds. I consider charter fishing a commercial fisheries anyway.

Thank you for giving me the opportunity to voice my opinion.

Sincerely,

  
Marion Bifoss

Sincerely,

  
Rory Bifoss

Brent M. Western  
813 West 80th Ave.  
Anchorage, AK 99518  
907-344-2710  
e-mail: bmwfish@alaska.net

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APR 14 1999  
N.P.F.M.C

April 13, 1999

PUBLIC COMMENT FOR THE 138TH PLENARY SESSION OF THE NPFMC, APRIL 21-26, 1999 IN ANCHORAGE, ALASKA

**RE: HALIBUT CHARTER GHL, SEABIRD PROTECTION, FISHERY MONITORING PROGRAMS & GROUND FISH MANAGEMENT IRIU-- HALIBUT FMP**

My family has been fishing Alaska's waters from Prince William Sound, Cook Inlet and Kodiak since the 1960s. We are involved in the halibut, herring, and salmon fisheries. I follow closely all information related to our industry by actively subscribing to journals, periodicals, listserves, and attending forums. I have a Bachelor of Science in Planning and Resource Management, along with a business management degree.

**C-1 HALIBUT CHARTER GHL:**

Any limited resource can not have or sustain an unlimited and uncontrolled number of users or extractors. The basis for limited entry, individual or vessel fishing quotas and other restrictive resource management tools is to manage the resource more efficiently, thus creating viable and continual economic bases and healthy, renewable resources.

The unbridled halibut charter fishery is growing exponentially, and shows signs of localized depletion of the resource. I used to fish in Cook Inlet for halibut, but the past ten years of rapid charter growth has greatly effected the quantity of halibut available. If left unregulated, the charter industry will effect the health of the resource and the economic bases of coastal communities.

The majority of consumers are not fishermen. These consumers rely on commercial fisherman to provide seafood for their consumption--not by use of a charter. We need to protect the consumer's right to quality seafood and sustain the economic diversity of Alaska's communities by regulating the charter fishery and protecting the resource.

**C-6 SEABIRD PROTECTION:**

Although I applaud the effort and use bird avoidance measures in my fishing activity, my family has not once over 30 plus years of fishing ever caught a seabird while longlining on our vessels of less than 50 feet. It seems to me that this is a larger boat issue and is geographically concentrated to those areas southwest of Kodiak and westward along the Aleutians.

**C-7 FISHERY MONITORING PROGRAMS:**

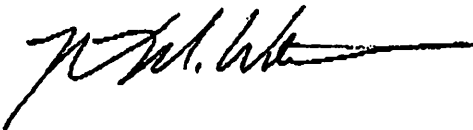
An excellent monitoring tool that is being used by the Canadian longline fleet for halibut is the practice of hailing out and reporting the anticipated poundage to be caught. Having the fleet report in and give expected catch and landing time before leaving for fishing will allow management, enforcement, and the industry to monitor and conduct the fishery in a more efficient and practical manner.

**D-1 GROUND FISH MANAGEMENT:**

To have IRIU of our groundfish resources we need to move forward by creating a year-long fishery for halibut and sablefish. Biologists I have talked with at IPHC, and my own belief as well, suggest that there is probably no biological reason not to have a year-long fishery. Such a fishery would increase IRIU by enabling fishermen who longline p-cod in the winter Federal fishery to catch and keep halibut. Currently, a fisherman must immediately release halibut--a poor use/management of the resource. A year-long fishery would spread out the fishery effort and benefit the resource (all species), the industry and the consumer.

Thank you for the opportunity to address you with my concerns for the above referenced items.

Respectfully submitted,



Brent M. Western

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4/12/99

APR 14 1999

Chairman Lauber,

I am a Commercial <sup>N.P.F.M.C</sup> halibut long line fisherman. I have been for 20 years.

I do not support the ADF&G sport fish division proposal to allocate 125% of the 1998 halibut charter fleets halibut harvest to the charter fleet. I definitely do not support any allocation in fixed pounds rather than a percentage of the quota. The commercial halibut charter fleet should accept its share of responsibility for the health of the resource as the longline fleet has done for the past 100 years, (remember, halibut numbers are at record highs.)

As a I. F. Q. fisherman who has spent \$600,000 buying into a management plan supported by both state and federal government I cannot support the increase in halibut resource allocation to a new commercial user group. (The commercial halibut charter fleet.)

I believe the commercial charter fleet should be considered separately from local sport and subsistence users. I believe the GH should remain at 125% of the 1995 halibut charter fleet harvest as was previously adopted by the N. P. F. M. C.

I also believe the commercial charter fleet should pursue limited entry. The halibut resource was fully utilized by historical user groups (longline, local sport and subsistence) long before the arrival of the charter fleet.

Most halibut charter boats fish in waters close to coastal communities. This has made it difficult for local subsistence fishermen

to fill their freezers for winter. We CAN help protect local subsistence users by working toward limited entry for the halibut charter fleet and adopting the GHL of 125% of the 1995 halibut charter fleet harvest as recommended by the N.P.F.M.C.  
Thanks for your good work and time.

DICK CURRAN  
Box 1336  
SITKA, ALASKA  
99835

907 747 6094

April 14, 1999

Noah Mayo  
1709 #13 H.P.R.  
Sitka, Ak. 99835  
907 966 2237

RECEIVED  
APR 14 1999  
N.P.F.M.C

Dear council members,

Hello my name is Noah Mayo. I am 20 and I have bought into the commercial Halibut fishery. That is I now own I.F.Q.s through purchase.

I am writing to express my opinion about the Halibut charter fleet. Or more specifically about the GHL (Guideline Harvest Level). Having bought into the Halibut fishery I don't think it's fair that the charter boats who catch the same product (Halibut). Should have different rules governing them. And because the GHL is a fixed number and they get there quota first they are getting the lions share. Also taking into consideration of the fact that sense the GHL is a fixed number and the Halibut biomass isn't if the Halibut took a nose dive the charter fishermen would go in first take there quota which, if the stock of Halibut dropped low enough, could be the whole total allowable Halibut harvest. Or at least a lot larger chunk then is fair. It just seems to me that sense charter fishermen our making money off of the same product the commercial fishermen our, Halibut. They should both follow the same rules regarding that product.

I am in favor of giving the charter fishermen a percentage of the stock. Much like we commercial fishermen get a percentage of the stock. That way the charter fishermen can fish as they like without affecting the commercial stock because it will be the same stock. And if some charter fishermen fell slighted because they didn't get enough pounds to make a living off of they can just buy more stock just like the commercial fishermen. The fact is it will still be to there advantage because a charter fisherman does not need near as many pounds as a commercial fisherman to make his livelihood.

To sum up it just seems unfair that the charter fishermen our taking my livelihood. I lived my whole live on a boat. Did odd fishing related jobs for as long as I can remember. Started actual crewing on vessels when I was twelfth yet when I.F.Q.s came around I had to buy them just like every one else who did

not own meet the qualifications. And it make me sick to see people making there living the same way I do but at my expense. Don't be fooled they our making money off of Halibut just like us and so should be subjected to the same or similar rules and guidelines.

Sincerely,



Noah Mayo

APR 14, 1999

To: North Pacific Fisheries Management Council  
Chairman Richard Lauber

RECEIVED  
APR 14 1999  
N.P.F.M.C.

We've been commercial longlining for halibut since 1975 in area 2-C. We supported the implementation of the IFQ program wholeheartedly even though we weren't allocated very many pounds at the inception of the program.

Since then my wife and I have made our largest investment ever purchasing more halibut IFQs to support our family. As you can well see we are very concerned about the uncontrolled growth in the charter industry.

We urge the council to implement the GHL approved over a year ago. We urge you to base the halibut charter allocation on a percentage of the total quota. This way everyone's quota goes down when the biomass declines. We should all share the pain and share the gain as the halibut quotas go down or up.

Most commercial fishermen have supported conservation, accepting low quotas when the biomass was low. The charter fleet needs to abide by the same rules.

We urge the council to implement effective slow down measures, like reducing bag limits, and/or moratorium, limited entry, etc....

We feel that ADF&G should only be assisting the council in gathering charter fleet data, but in no way should they be in the position to request the council to raise the guideline harvest level for the charter fleet, and allocate it in fixed pounds rather than a percentage. This seems very politically incorrect and discriminating against the longline fleet.

Sincerely,

Marty & Jean Remund, P.O. Box 8147, Port Alexander, Alaska 99836

cc: Governor Tony Knowles



As of the copying deadline of 5:00 p.m. on April 14, the Council office received 2,701 signed postcards as shown below. The majority of the addresses were from: Connecticut, Delaware, Massachusetts, Maine, Florida, Maryland, New Hampshire, New Jersey and Pennsylvania, although there were a few from the western states of Arizona and California. These postcards are available for review at the Council office: 605 W. 4th Ave, #306, Anchorage, Alaska.

Recreational Fishing Alliance (RFA)  
PO Box 98263  
Washington, DC 20090  
toll-free 1-888-SAVE-FISH



Clarence G. Pautzke, Executive Director  
North Pacific Fisheries Management Council  
605 West 4<sup>th</sup> Avenue, Room 306  
Anchorage, AK 99501



Dear Director Pautzke:

At this time the North Pacific Fisheries Management Council (NPFMC) is working to place a guideline harvest level (GHL) or cap on angler catch of halibut from charter boats in Alaska. If this GHL is adopted, reduced bag limits (anglers currently allowed only two per day) and other restrictions could be imposed upon the recreational community beginning in the year 2001.

The proposed GHL is no more than an attempt by the commercial industry to PRIVATIZE a strong, abundant, and public resource.

Pacific halibut stocks are abundant. Since 1977, Commercial utilization of halibut has increased by 300%, while the sport angler bag limit has remained the same.

**AS A RECREATIONAL ANGLER CONCERNED ABOUT OUR NATION'S MARINE RESOURCES AND MY RIGHTS TO THOSE RESOURCES, I PROTEST THE PROPOSED (GHL). I respectfully urge you to intervene on behalf of recreational anglers throughout the country.**

Sincerely,

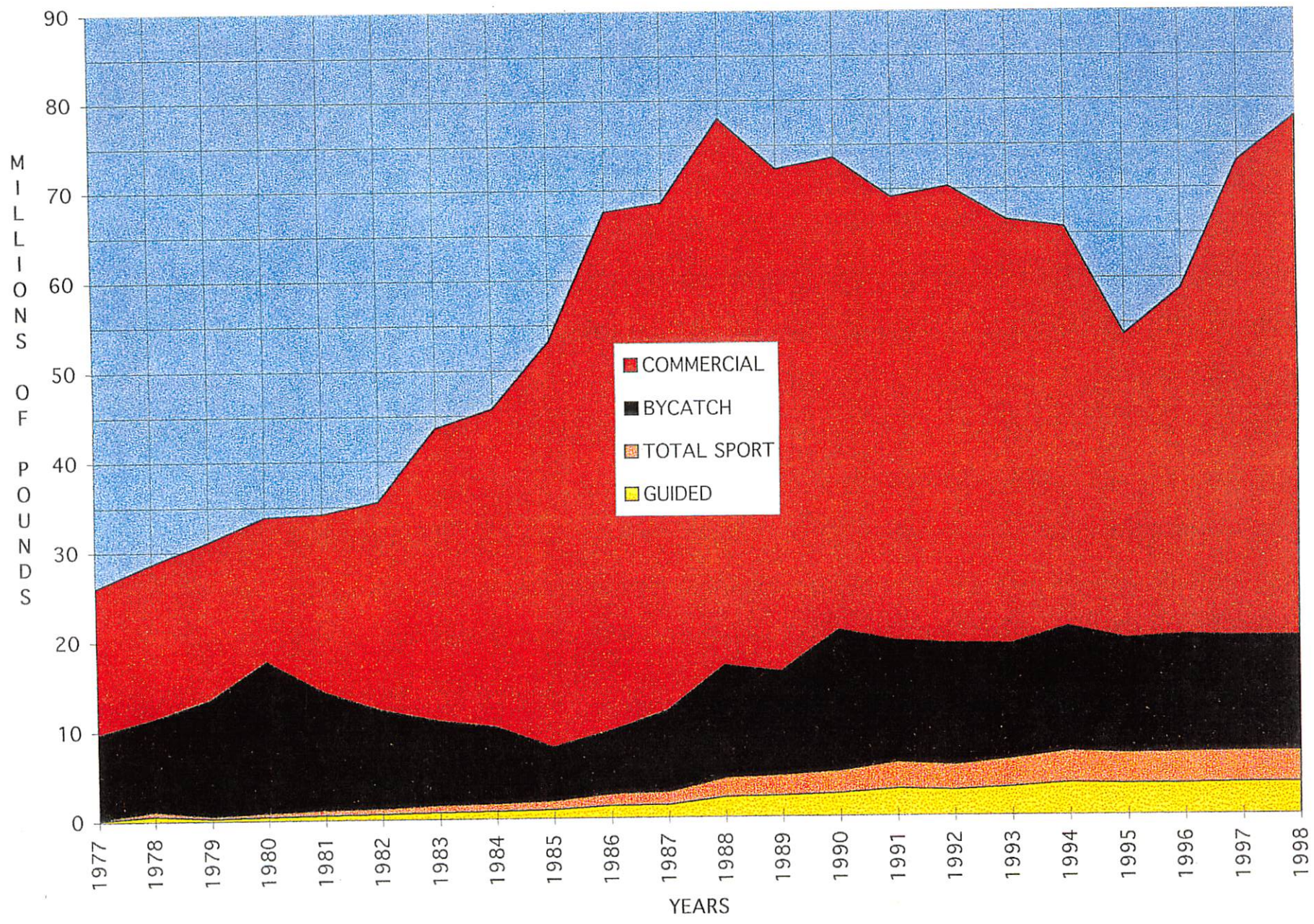
Name Bruce C. Tazelaar  
Address 765 Prospect Hill Rd  
City Windsor State CT Zip 06095

Signature

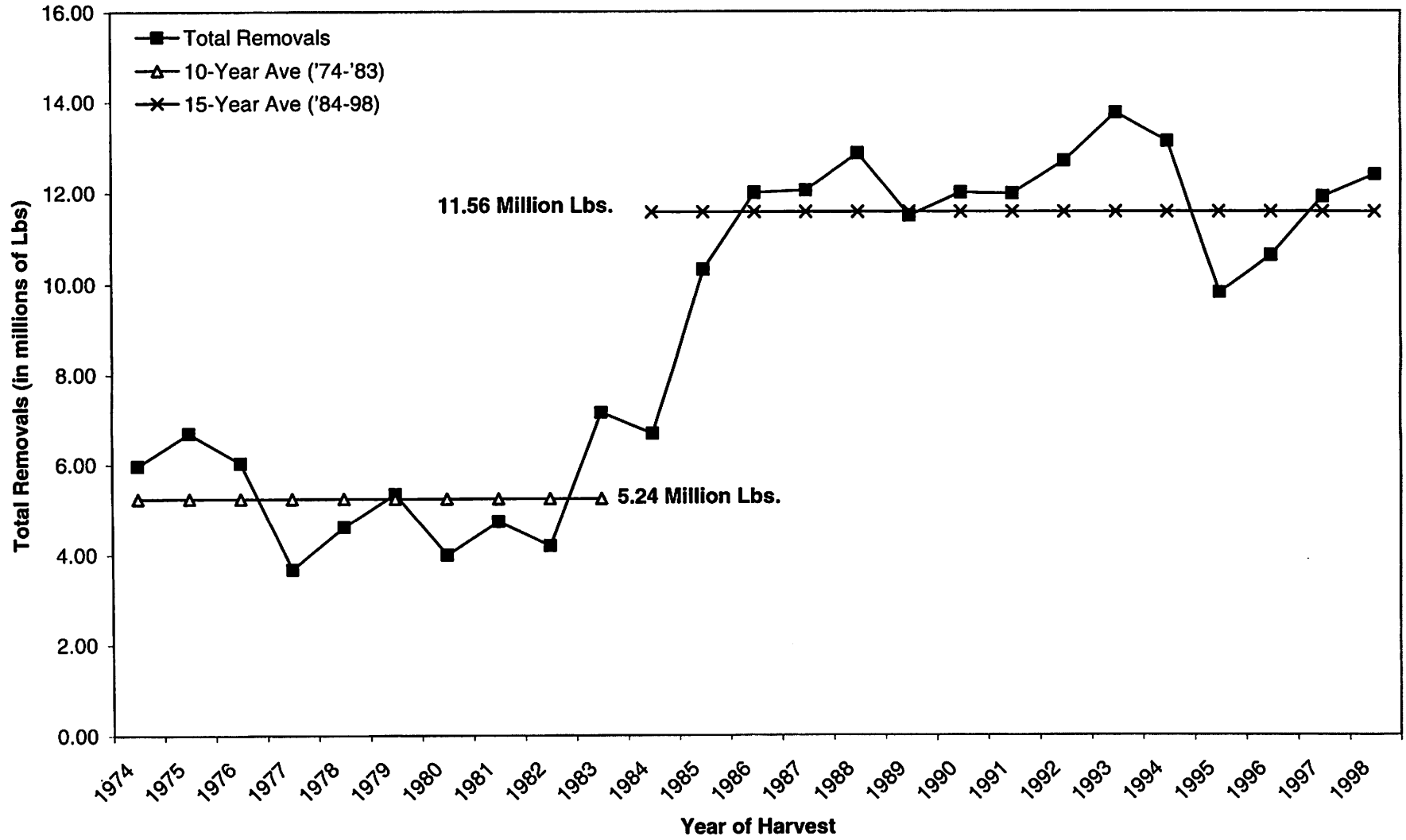
Bruce C. Tazelaar

|| I FISH I VOTE ||

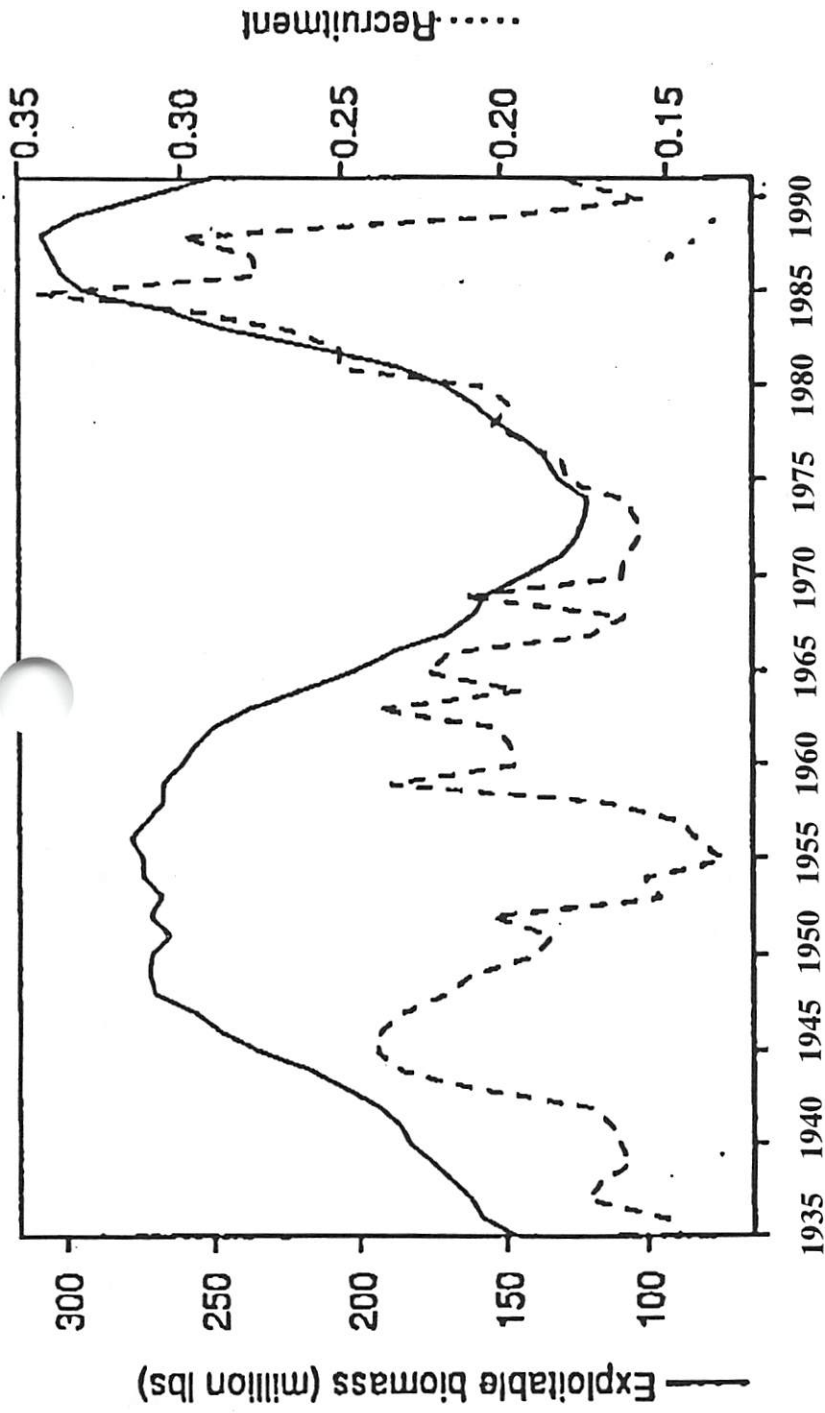
# HALIBUT USE OFF ALASKA SHORES COMMERCIAL - BYCATCH - SPORT - CHARTER



Total Removals Area 2C (w/ 10-yr & 15-yr Averages)



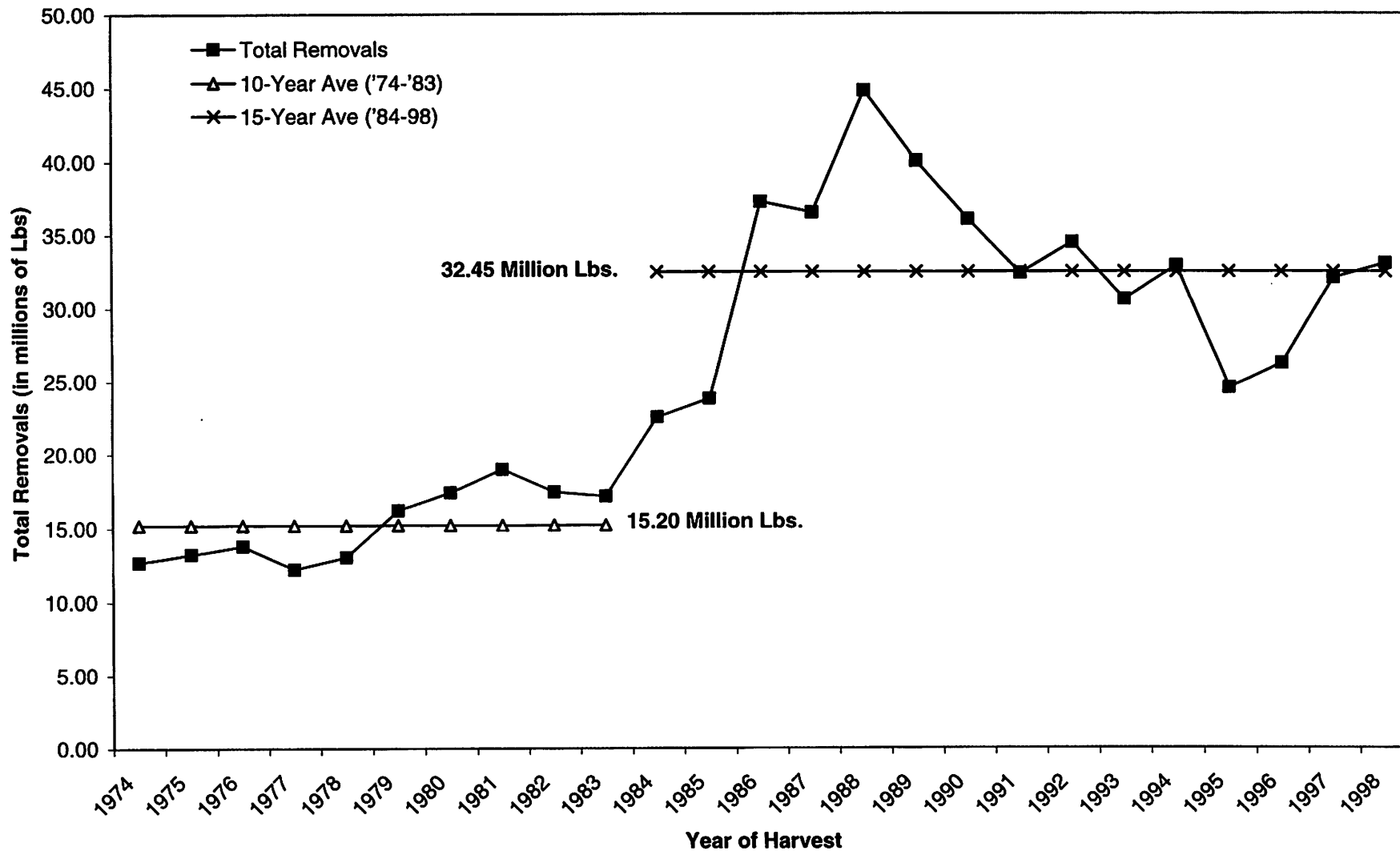
ADFG  
BENZ



Historical trends of exploitable biomass of halibut in the NE Pacific.

IPCH RARA, 1992

**Total Removals Area 3A (w/ 10yr & 15 yr Average)**



TOTAL REMOVALS 2C: COMMERCIAL + LEGAL-SIZED BYCATCH + SPORT + WASTAGE + PERSONAL USE (IN MILLION LBS. NET WT.).

<u>YEAR</u>	<u>Total Removals</u>	
1974	5.97	
1975	6.69	
1976	6.03	
1977	3.67	
1978	4.61	
1979	5.34	
1980	3.99	
1981	4.73	
1982	4.19	<u>10 YEAR AVERAGE</u>
1983	7.15	<u>5.24</u>
<hr/>		
1984	6.68	
1985	10.31	
1986	11.98	
1987	12.03	
1988	12.85	
1989	11.48	
1990	11.98	
1991	11.96	
1992	12.68	
1993	13.74	
1994	13.11	
1995	9.79	
1996	10.61	
1997	11.89	<u>15 YEAR AVERAGE</u>
1998	12.37	<u>11.56</u>

TOTAL REMOVALS 3A: COMMERCIAL + LEGAL-SIZED BYCATCH + SPORT + WASTAGE + PERSONAL USE (IN MILLIONS LBS. NET WT.).

<u>YEAR</u>	<u>Total Removals</u>	
1974	12.67	
1975	13.21	
1976	13.78	
1977	12.20	
1978	13.02	
1979	16.19	
1980	17.38	
1981	18.96	
1982	17.44	<u>10 YEAR AVERAGE</u>
1983	17.14	15.20
1984	22.50	
1985	23.78	
1986	37.23	
1987	36.48	
1988	44.76	
1989	40.00	
1990	36.02	
1991	32.35	
1992	34.46	
1993	30.59	
1994	32.86	
1995	24.52	
1996	26.19	
1997	32.03	<u>15 YEAR AVERAGE</u>
1998	33.02	32.45

**Duncan Fields'**  
**NPFMC Testimony**  
**Halibut Charter GHL**  
**April 22, 1999**

Mr Chairman, members of the council, my name is Duncan Fields and I'm here today representing Old Harbor and the rural communities on Kodiak Island.

My concerns regarding limitations on the guided sport halibut fishery remain the impacts on individuals and communities in rural Alaska where there is little or no halibut charter activity. Several of the restrictions currently being considered for review may precluded these folks from entering tourism related businesses because of restricted access to halibut. It is anticipated that few if any of the rural residents that would enter the halibut charter fishery would focus exclusively on halibut. Rather, halibut fishing would be a one of several fishing and recreational activities offered to clients. These folks are no so much concerned with a specific GHL number — but with continued access to the halibut charter fishery.

Now, as to the specific issues before the council for consideration and the alternatives you send out for review I have one primary suggestion and I want to comment on the recommendations of staff and the AP. First, the analysis prepared by staff should include a discussion of appropriate geographical subareas within the larger IPHC management areas of 3A and 2C. Perhaps the ADF&G management areas should be considered or some other measurement unit. However, without some discussion about, and analysis on the basis of sub areas, the general information regarding GHL and/or moratorium can be too gross to be significant or generally misleading. For example, alternative 2 indicates a fixed GHL allocation to the charter fleet within area 3A of 15.61% based on historical catch rates. However, if you look at the catch rates within



area 3A you will find that 94.6% of the halibut charter quota is caught outside the Kodiak area— which accounts for more than ½ of the halibut biomass in 3A — and only 8 tenths of one percent of the halibut available to commercial and recreational fishermen are captured by halibut charter operators in the Kodiak area. That's how little impact charter operators are currently having around Kodiak ---- 8 tenths of one percent. This kind of information, based on geographically distinct sub-areas needs to be available to the council. Perhaps this could be listed as alternative 6, review of the data and discussion of the issue on a sub-area basis.

My second comment reiterates a theme developed by staff in the State report and the action memo. They have suggested that the moratorium issues be considered apart from the GHL and perhaps should be left to local area management plans. Thus, alternatives 1 through 4 should go forward without area-wide or local moratoriums as an option and the moratorium would be considered as the 5<sup>th</sup> alternative for consideration. I've always felt that the two issues together confuse analysis on either one individually and I support this approach. I believe, as a matter of public policy, that moratoriums should be developed as part of the local area halibut management plans, perhaps through a process that parallels what the CFEC does when it considers limiting entrants in a fishery

Please take notice of the AP recommendations on the last page of your action memo regarding inclusion of "communities developing tourism related charter industry businesses, communities with LAMP's in process and the impacts of the 5 (and I'm advocating 6) alternatives on those communities." The AP had a lengthy discussion regarding inequities for rural communities and thought the Council should have this type of information available. Of course, this AP recommendation is strongly supported by

Duncan Fields' Halibut Charter Testimony

April 22, 1999

Page 3

the rural residents I represent. In addition we also support the acceleration of the LAMP process as suggested by the AP and the inclusion of recommendations by the SSC committee.

One final thought, should the analysis consider appropriate time frames for review — such as sunset clauses or trigger mechanisms? For example, if the council were to choose alternative 1, the status quo, you might want to indicate a trigger mechanism after three years of log book data is evaluated and a percentage threshold trend increase established. I realize that review mechanisms are distasteful in that they remind us that an issues isn't put to rest. However, a discussion up front in the analysis of such issues as sunset clauses or triggers may focus public debate and could enable council to consider alternatives that would otherwise be unacceptable.

Thank you for your consideration of my thoughts on this difficult and complex issue.

**Draft Special Publication**

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**Alaska Department of Fish and Game Sportfishing  
Guide and Business Registration and Saltwater  
Sportfishing Charter Vessel Logbook Program, 1998**

by

**Michael R. Dean**

and

**Allen L. Howe**

April 1999

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Alaska Department of Fish and Game

Division of Sport Fish



## Symbols and Abbreviations

The following symbols and abbreviations, and others approved for the Système International d'Unités (SI), are used in Division of Sport Fish Fishery Manuscripts, Fishery Data Series Reports, Fishery Management Reports, and Special Publications without definition. All others must be defined in the text at first mention, as well as in the titles or footnotes of tables and in figures or figure captions.

<b>Weights and measures (metric)</b>		<b>General</b>		<b>Mathematics, statistics, fisheries</b>	
centimeter	cm	All commonly accepted abbreviations.	e.g., Mr., Mrs., a.m., p.m., etc.	alternate hypothesis	$H_A$
deciliter	dL	All commonly accepted professional titles.	e.g., Dr., Ph.D., R.N., etc.	base of natural logarithm	e
gram	g	and	&	catch per unit effort	CPUE
hectare	ha	at	@	coefficient of variation	CV
kilogram	kg	Compass directions:		common test statistics	F, t, $\chi^2$ , etc.
kilometer	km	east	E	confidence interval	C.I.
liter	L	north	N	correlation coefficient	R (multiple)
meter	m	south	S	correlation coefficient	r (simple)
metric ton	mt	west	W	covariance	cov
milliliter	ml	Copyright	©	degree (angular or temperature)	°
millimeter	mm	Corporate suffixes:		degrees of freedom	df
<b>Weights and measures (English)</b>		Company	Co.	divided by	$\div$ or / (in equations)
cubic feet per second	ft <sup>3</sup> /s	Corporation	Corp.	equals	=
foot	ft	Incorporated	Inc.	expected value	E
gallon	gal	Limited	Ltd.	fork length	FL
inch	in	et alii (and other people)	et al.	greater than	>
mile	mi	et cetera (and so forth)	etc.	greater than or equal to	$\geq$
ounce	oz	exempli gratia (for example)	e.g.,	harvest per unit effort	HPUE
pound	lb	id est (that is)	i.e.,	less than	<
quart	qt	latitude or longitude	lat. or long.	less than or equal to	$\leq$
yard	yd	monetary symbols (U.S.)	\$, ¢	logarithm (natural)	ln
Spell out acre and ton.		months (tables and figures): first three letters	Jan., ..., Dec	logarithm (base 10)	log
<b>Time and temperature</b>		number (before a number)	# (e.g., #10)	logarithm (specify base)	log <sub>2</sub> etc.
day	d	pounds (after a number)	# (e.g., 10#)	mideye-to-fork	MEF
degrees Celsius	°C	registered trademark	®	minute (angular)	'
degrees Fahrenheit	°F	trademark	™	multiplied by	x
hour (spell out for 24-hour clock)	h	United States (adjective)	U.S.	not significant	NS
minute	min	United States of America (noun)	USA	null hypothesis	$H_0$
second	s	U.S. state and District of Columbia abbreviations	use two-letter abbreviations (e.g., AK, DC)	percent	%
Spell out year, month, and week.				probability	P
<b>Physics and chemistry</b>				probability of a type I error (rejection of the null hypothesis when true)	$\alpha$
all atomic symbols				probability of a type II error (acceptance of the null hypothesis when false)	$\beta$
alternating current	AC			second (angular)	"
ampere	A			standard deviation	SD
calorie	cal			standard error	SE
direct current	DC			standard length	SL
hertz	Hz			total length	TL
horsepower	hp			variance	Var
hydrogen ion activity	pH				
parts per million	ppm				
parts per thousand	ppt, ‰				
volts	V				
watts	W				

***DRAFT SPECIAL PUBLICATION***

**ALASKA DEPARTMENT OF FISH AND GAME SPORTFISHING GUIDE  
AND BUSINESS REGISTRATION AND SALTWATER SPORTFISHING  
CHARTER VESSEL LOGBOOK PROGRAM, 1998**

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## Table of Contents

	Page
<b>ABSTRACT .....</b>	<b>1</b>
<b>INTRODUCTION .....</b>	<b>1</b>
SPORTFISHING GUIDE AND SPORTFISHING BUSINESS REGISTRATION .....	1
SALTWATER SPORTFISHING CHARTER VESSEL LOGBOOKS .....	2
<b>METHODS.....</b>	<b>5</b>
DATA COLLECTION.....	5
DATA REDUCTION .....	6
<b>RESULTS.....</b>	<b>7</b>
SPORTFISHING GUIDE AND BUSINESS REGISTRATION.....	7
SALTWATER SPORTFISHING CHARTER VESSEL LOGBOOKS .....	8
<i>Summary by Sport Fish Division Regions.....</i>	<i>8</i>
<i>Summary by International Halibut Commission (IPHC) Regulatory Areas .....</i>	<i>13</i>
<b>DISCUSSION.....</b>	<b>19</b>
SPORTFISHING GUIDE AND BUSINESS REGISTRATION.....	19
CFEC VESSEL REGISTRATION.....	19
SALTWATER SPORTFISHING CHARTER VESSEL LOGBOOKS .....	20
<i>1998 Saltwater sportfishing charter vessel logbooks.....</i>	<i>20</i>
<i>1999 Saltwater sportfishing charter vessel logbooks.....</i>	<i>20</i>
<b>ACKNOWLEDGEMENTS .....</b>	<b>22</b>
<b>APPENDIX A ADMINISTRATIVE CODE RELATED TO GUIDE REGISTRATION AND REPORTING .....</b>	<b>23</b>
<b>APPENDIX B SPORTFISHING GUIDE AND BUSINESS REGISTRATION FORMS, 1998 AND 1999 .....</b>	<b>31</b>
<b>APPENDIX C SALTWATER SPORT FISHING CHARTER VESSEL LOGBOOK FORMS .....</b>	<b>35</b>
<b>APPENDIX D SALTWATER SPORTFISHING CHARTER VESSEL LOGBOOK PORTS OF LANING FOR IPHC REGULATORY AREAS, 1998.....</b>	<b>39</b>
<b>APPENDIX E SALTWATER SPORTFISHING CHARTER VESSEL LOGBOOK PROBLEMS, 1998.....</b>	<b>43</b>

## List of Tables

<b>Table</b>	<b>Page</b>
Table 1.- List of Alaska sportfishing regions and areas. ....	4
Table 2.-Saltwater charter vessel salmon participation and harvest, statewide and by region, 1998..	9
Table 3.- Saltwater charter vessel bottomfish participation and harvest, statewide and by region, 1998. ....	10
Table 4.-Southeast saltwater charter vessel salmon participation and harvest by area, 1998.....	11
Table 5.-Southeast saltwater charter vessel bottomfish participation and harvest by area, 1998.....	12
Table 6.-Southcentral saltwater charter vessel salmon participation and harvest by area, 1998.....	14
Table 7.-Southcentral saltwater charter vessel bottomfish participation and harvest by area, 1998. ....	15
Table 8.-Active halibut charter vessels and guide businesses by IPHC Area and Sport Fish Division management region, 1998.....	16
Table 9.- Active halibut charter vessels and guide businesses by Sport Fish Division management areas and regions, 1998.....	17
Table 10.-Charter boat bottomfish participation and harvest by IPHC area, 1998.....	18

## List of Figures

<b>Figure</b>	<b>Page</b>
Figure 1.-International Pacific Halibut Commission (IPHC) regulatory areas. ....	3
Figure 2.-Map of Alaska and Sport Fish Division regions and areas.....	3

## List of Appendices

<b>Appendix</b>	<b>Page</b>
Appendix A1.-Registration requirements for fishing guide services and sportfishing guides, sport fishing regulations 5 AAC 75.075. ....	24
Appendix A2.-Southeast Alaska king salmon management plan. ....	26
Appendix A3.-Reporting requirements for sportfishing guides, sport fishing regulations 5 AAC 75.076. ....	29
Appendix B1.-Sportfishing guide and business registration form, 1998.....	32
Appendix B2.-Sportfishing guide and business registration form, 1999.....	33
Appendix C1.-Sample 1998 saltwater sport fishing charter vessel logbook form.....	36
Appendix C2.-Sample 1999 saltwater sport fishing charter vessel logbook form.....	37
Appendix D1.-Ports of landing for IPHC regulatory areas from logbook data, 1998. ....	40
Appendix E1.-Program start-up problems.....	44
Appendix E2.-The count of daily trip reports for which problems noted during data capture could not be resolved. There were approximately 50,000 active logbook trip reports during 1998. Some daily trip reports could have more than one of the problems listed below. ....	45
Appendix E3.-Count and percent of total daily trip reports for which client/harvest problems noted during data capture could not be resolved. There were approximately 50,000 active logbook trip reports during 1998a. ....	46



## ABSTRACT

In 1998 3,823 sportfishing guides and 2,075 sportfishing guide businesses registered with the Alaska Department of Fish and Game to provide sportfishing guide services in Alaska. Of the registered businesses, about 67% indicated the intent to provide saltwater guiding services. The division issued 910 saltwater sportfishing charter vessel logbooks to vessels homeported in Southeast Alaska and 655 vessels homeported in Southcentral Alaska. Logbook records showed 1,135 unique vessels (55% Southeast) and 845 unique businesses (50% Southeast) provided saltwater sportfishing charter services. Logbooks records reported a statewide chinook salmon *Oncorhynchus tshawytscha* harvest of 41,145 with 85% taken in Southeast. Total Pacific halibut *Hippoglossus stenolepis* harvest of 225,071 was split 30% Southeast and 70% Southcentral. Of the anglers who used saltwater sportfishing charter vessels, 78% of bottomfish and 89% of the salmon clients were nonresidents.

## INTRODUCTION

The Alaska Department of Fish and Game, Division of Sport Fish, presently operates a program to register both sportfishing guides and sportfishing guide businesses and to collect information on sportfishing participation and harvest by saltwater charter vessel clients. The following briefly summarizes the history of this program and presents the approach and an overview of the results for the 1998 season.

### SPORTFISHING GUIDE AND SPORTFISHING BUSINESS REGISTRATION

Beginning in May 1995 and in 1996, the owner(s) of a businesses that engaged in guiding anglers anywhere in Alaska was required to register annually with the Alaska Department of Fish and Game (ADF&G). Additionally, any employee acting as a sportfishing guide for a business was required to register before conducting guiding activities. In 1997 sportfishing guides were required to register and provide information about the employing business. If a guide changed employers during the 1997 season, they were to update their registration information with ADF&G.

The Alaska Board of Fisheries (BOF) adopted statewide sportfishing guide registration regulations and definitions during their February 1998 Statewide Finfish meeting in Girdwood, Alaska. The regulation and definition are found in 5 AAC 75.075: *Fishing Services and Sportfishing guides; Registration Requirements; Regulations of Activities* (Appendix A1). It should be stressed that this is a registration process, not a licensing process. No fees are required and businesses and guides are presently free to provide services in any area of the state, assuming other regulatory requirements are met.

In 1998 ADF&G registered both sportfishing businesses and sportfishing guides. Neither the businesses or guides were required to submit updated information in-season. This approach to registration was used again in 1999 with minor changes to the forms. Copies of the 1998 and 1999 registration forms are included as Appendix B1 and B2, respectively. In 1999 an attempt will be made to link registered businesses and guides between 1998 and 1999 to provide better information concerning trends in this component of the sport fishing industry. To facilitate this linkage, 1998 registered businesses and guides were mailed a 1999 registration form pre-season. The form contained a unique identification number to facilitate tracking businesses and guides between years.

## **SALTWATER SPORTFISHING CHARTER VESSEL LOGBOOKS**

The BOF met during March 1992 in Juneau, Alaska, to address the Southeast region chinook salmon allocation. The Alaska Trollers Association initiated the process with an emergency petition to the BOF. The current language of the Southeast chinook salmon management plan is referenced in Alaska Administration Code under 5 AAC 47.055 (Appendix A2).

The BOF did not adopt a regulation requiring saltwater sportfishing charter vessel logbooks specifically for Southeast chinook salmon. However, ADF&G was instructed at the February 1997 BOF finfish meeting in Ketchikan that the Department had the authority to implement such a program under the current Southeast Alaska chinook salmon management plan. The BOF did adopt a statewide regulation for logbooks along with additional sport fish guiding regulations and definitions during their February 1998 statewide finfish meeting in Girdwood, Alaska (Appendix A3).

The original regulation pertaining to logbook reporting under 5 AAC 75.076 was valid only for 1998. ADF&G has requested through the Department of Law two regulation changes pertinent to logbooks. The requested effective date for the 1999 logbook regulations will be by May 15, 1999. The two changes are: (1) to adopt a regulation 5 AAC 75.076(a) so the logbook reporting program will be required for the 1999 season and (2) to adopt 5 AAC 76.076(a), which would repeal the section of the regulation that requires that the U.S. Coast Guard number of the skippers operating the charter vessel be included.

The North Pacific Fisheries Management Council (NPFMC) has also been concerned with the recent expansion of the halibut charter industry and concerns of localized depletion of the halibut resources as well as the reallocation from the Individual Fishing Quota (IFQ) longline fishery since 1993. The NPFMC endorsed a two-prong approach to resolve the perceived impacts of increased guided charter halibut fishing. The first was establishment of guideline harvest limits (GHL) for IPHC Area 2C and 3A (Figure 1) halibut charter fisheries and the second was a process to establish local area management plans for coastal communities.

Due to the above information needs for chinook salmon and halibut, ADF&G implemented a saltwater sportfishing charter vessel logbook program in 1998 for Southeast Alaska - Region I and Southcentral Alaska - Region II (Figure 2, Table 1). The amount of saltwater charter vessel fishing in other areas of the state was known to be minor.

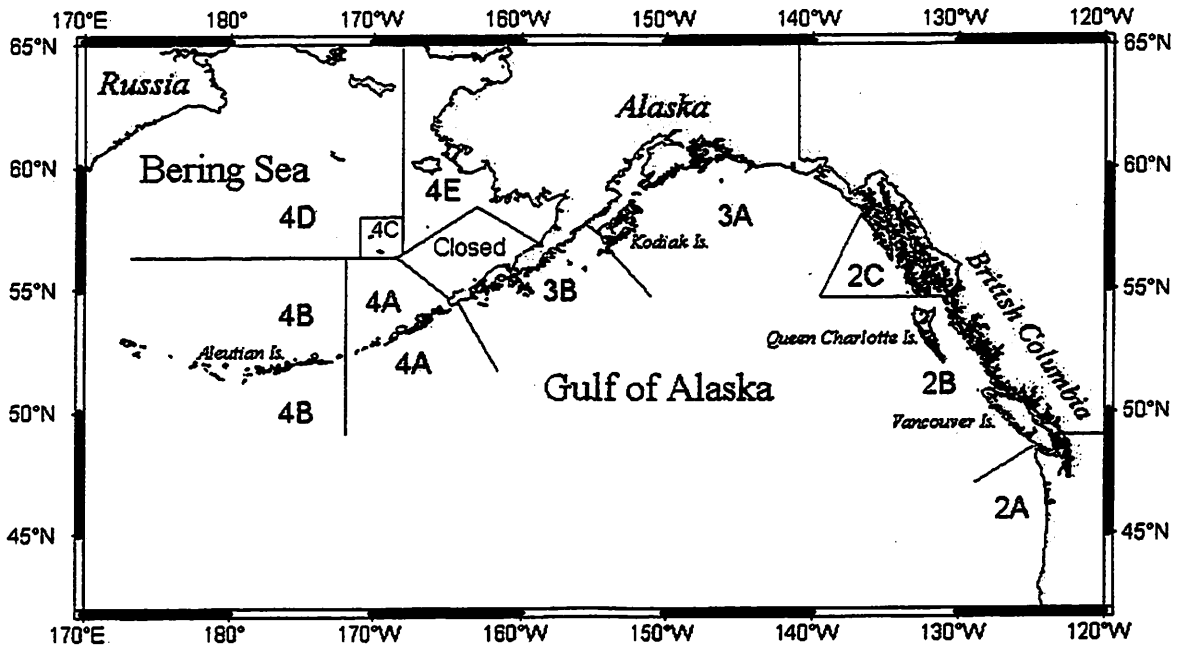


Figure 1.-International Pacific Halibut Commission (IPHC) regulatory areas.

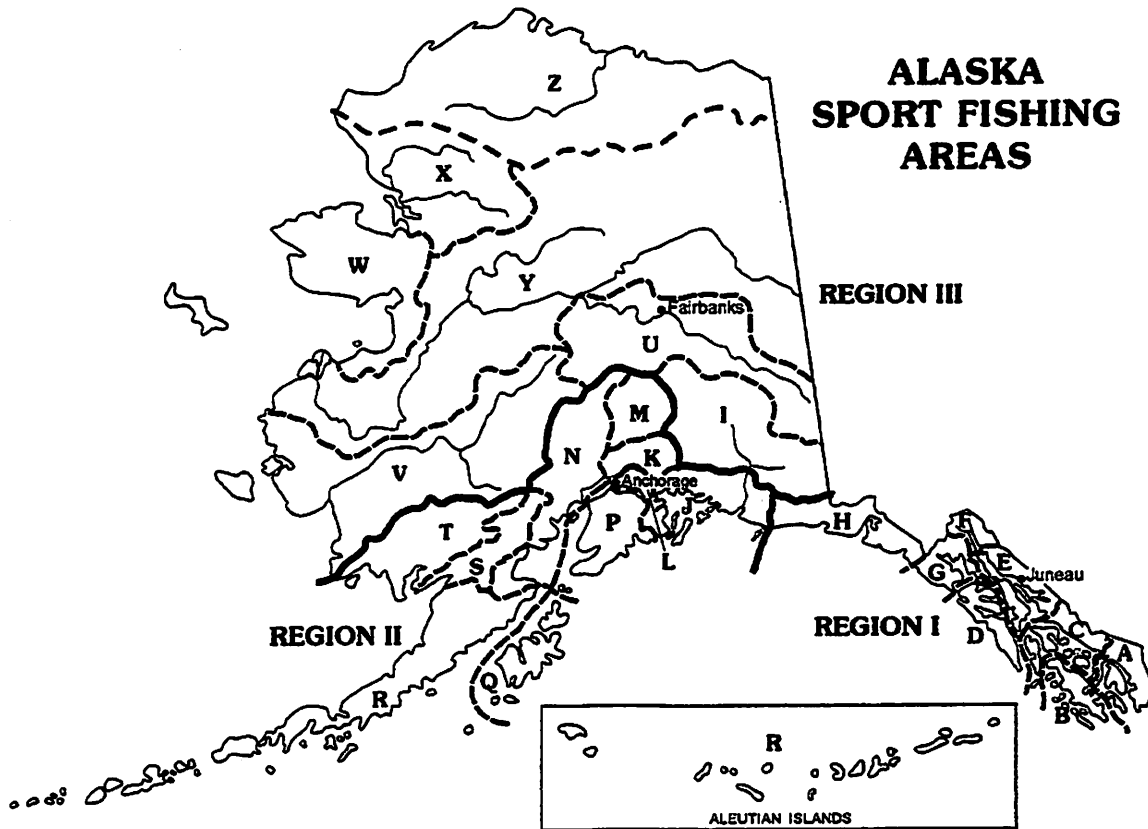


Figure 2.-Map of Alaska and Sport Fish Division regions and areas.

**Table 1.- List of Alaska sportfishing regions and areas.**

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**Regions**

- I Southeast Alaska
- II Southcentral Alaska
- III Arctic-Yukon-Kuskokwim

**Areas**

**Southeast Alaska**

- A Ketchikan
- B Prince of Wales Island
- C Kake, Petersburg, Wrangell, Stikine
- D Sitka
- E Juneau
- F Haines-Skagway
- G Glacier Bay
- H Yakutat

**Southcentral Alaska**

- J Prince William Sound
- K Knik Arm Drainage
- L Anchorage
- M East Susitna River Drainage
- N West Cook Inlet-West Susitna River Drainages
- P Kenai Peninsula
- Q Kodiak
- R Naknek River Drainage-Alaska Peninsula
- S Kvichak River Drainage
- T Nushagak

**Arctic-Yukon-Kuskokwim**

- I Glennallen
  - U Tanana River Drainage
  - V Kuskokwim River Drainage
  - W Seward Peninsula-Norton Sound
  - X Northwest Alaska
  - Y Yukon River Drainage
  - Z North Slope Brooks Range
-

## METHODS

### DATA COLLECTION

A single logbook form was used statewide in 1998, although maps were issued specific to the areas of intended operation. Sample logbook sheets for 1998 and 1999 are included in Appendix C1 and C2, respectively.

Approximately, 3,000 logbooks were printed in Anchorage for the 1998 season. Fifteen hundred logbooks were shipped to the Southeast region ADF&G office for redistribution to Southeast area offices. The logbooks for the Southcentral region were delivered to ADF&G area offices in Anchorage, Homer, Soldotna, the Kenai River Center in Soldotna, Fairbanks, Glennallen, Delta, and Cordova, and were also delivered to Fish Wildlife Protection Offices and staff in Valdez and Seward. ADF&G area staff then issued the logbooks to representatives or owners of sport fishing businesses that intended to provide saltwater sportfishing charter vessel services. Most logbooks were issued over the counter at the area offices along with mail back labels, maps and a list of frequently asked questions that related to the logbook program. Logbooks were also mailed to remote locations upon request.

The 1998 logbooks consisted of 22 weekly data sheets, five supplemental data sheets, and three crew harvests forms. Each weekly data sheet consisted of two parts: the first part of the form was a white copy upon which the original data was written and the second part of the form was a non carbon copy that stayed in the logbook itself. The original or white part of the data recording sheet was designed on the back as a tri-fold mail back form for which the department provided mail labels with each logbook depending where the charter business was doing business<sup>1</sup>. These completed original or white data sheets were to be postmarked or mailed back to ADF&G no later than the return date printed on the sheet.

The completed logbook sheets could also be dropped off at the local area ADF&G offices, put in drop off boxes located around certain harbors, or given to creel technicians that were working on the docks

Statistical reporting maps were provided to each sportfishing charter business that was issued a logbook. The area maps issued depended upon where the business intended to conduct fishing and sometimes required two or three maps. The Southeast region used one statistical map to record salmon and bottomfish data in their areas. Kodiak used two sets of maps reporting logbook information with one map for salmon and another map for bottomfish. Other Southcentral areas used the commercial bottomfish statistical maps for data reporting of both salmon and bottomfish. Each map was rather large and had to be folded three or four times to fit in the logbook itself. Logbooks were themselves large, being approximately 14.5" x 8.5".

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<sup>1</sup> Southcentral logbooks contained return labels to RTS. Southeast logbooks contained returned labels to Ketchikan or Douglas ADF&G offices so staff could extract chinook salmon information in-season. Southeast ADF&G staff forwarded completed logbook forms to RTS after review of the chinook salmon data.

## **DATA REDUCTION**

As logbook pages were received in RTS they were stored in banker-boxes (approximately 1,000 forms to a box). Administrative Clerks would enter forms out of the box and use post-it notes to mark their progress through the box on a daily basis. Each day's work was usually sorted and stored by CFEC number. To find an original form, one needed to know who entered the page, what day it was entered, and the CFEC number.

RTS Administrative Clerks attempted to edit ports and stat areas to allowable values (e.g., change a named fishing area to the corresponding stat area number). Occasionally, they would adjust the rods/clients from total to resident and nonresident values if it was "obvious". For instance, if there were 2 resident clients and 3 nonresident clients and 5 rods for bottomfish and 5 rods for salmon, an Administrative Clerks may have split the rods to match the client breakdowns. Administrative Clerks also attempted to correct the CFEC and vessel name at the entry point.

Data entry was done using an Internet based format. The entry and editing screens were hosted on an internal web server and the work done using either Netscape or MS Internet Explorer web browsers.

During entry, the Administrative Clerks would note the following problems using codes in a "comments" entry field<sup>2</sup>:

- A1= Area fished left blank
- A2= Primary area fished listed as bottomfish (primary salmon not identified), rods/catch listed as salmon
- A3= Primary area fished listed as salmon (primary bottomfish area not identified), rods/catch listed as bottomfish
- A4= Multiple areas fished (primary not identified)
- A5= Area fished not a viable number
- B1= Boat hours fishing left blank
- C1= Number of clients not filled in
- C2= Clients not broken down by resident/nonresident
- E1= Rods fished not identified
- E2= Rods fished not broken down by resident/nonresident
- H1= Harvest KEPT not broken down by resident/nonresident
- H2= Harvest released not broken down by resident/nonresident
- L1= No USCG number
- P1= No Port or site of landing identified
- R1= No resident clients identified, but resident poles
- R2= No nonresident clients identified, but nonresident poles
- R3= Resident clients, but harvest listed under nonresident
- R4= Nonresident clients, but harvest listed under resident
- R5= No resident clients, but harvest listed
- R6= No nonresident clients, but harvest listed
- S1= No skipper initials

Also noted in the database were the "inactive" and "no report" days on each form received.

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<sup>2</sup> Note: Appendix E2 and E3 contain a summary of problems that could not be resolved.

The forms were recorded in a database that represents the raw data. Each record was edited programmatically and copied to a second database. The edits applied to each record were to examine the comment codes above and reformat the data to reflect the codes. In cases where information was an aggregate of resident and nonresident numbers, the sums were placed in an "unknown" category present in the "cleaned" database. "Null" values replaced "zeros" in cases where information could not be recorded (such as resident clients when an aggregate number was recorded). Total fields were also created to quickly get total harvest, client and effort information for the entire boat.

The data were also checked but not edited for the allowable boat harvest for a given area. A table was created for each SWHS area and the maximum bag limits for each species from the harvest regulations.

Other programs that checked the data were to identify potential problems in the recorded data. The checks were performed on a vessel-by-vessel basis. Duplicate entries for a vessel, date and trip of day were identified and verified as were missing dates from a log-page-week. Further checks on ports and fishing areas were examined at this point. The number of apparent missing pages based on the first and last forms of season for a vessel, and for those pre-printed pages between April 27, 1998 (page 1) and September 27, 1998 (page 22) were noted. Also, several vessels not reporting their CFEC numbers correctly were fixed. The typical problem was the wrong CFEC number or the wrong vessel name. In some cases, what appeared as two separate vessels (by CFEC number) in the database were combined into one single vessel with the correct CFEC number.

The data were summarized into Excel pivot tables and distributed for staff review. Through several iterations, some errors were located in the logbook data and fixed (a few stat-areas for vessels and the "USBH" = "Valdez Small Boat Harbor" were most of the adjustments). A few more vessels were found to have two CFEC #'s across all their log pages and these were fixed. Data for several military vessels were removed, because they were not truly commercial sportfishing charter vessels (i.e., no fee for service).

## **RESULTS**

### **SPORTFISHING GUIDE AND BUSINESS REGISTRATION**

In 1998 ADF&G registered 3,823 sportfishing guides and 2,075 sportfishing guide businesses. Sportfishing guides were not required to identify locations where they would provide services, because a guide could not provide guiding services unless he were also a sportfishing guide business or worked for a business. Thus information on expected general types and locations of services was provided via the business registration.

Of the 2,075 registered businesses, 712 indicated they would provide guide services in saltwater only; 638 in freshwater only; 685 in both saltwater and freshwater; and 40 did not respond to this question. Additionally in 1998, businesses were asked to indicate in which region (Southeast, Southcentral, or both) they intended to operate in saltwater and with how many vessels. Of the 2,075 registered businesses 66% provided a regional breakdown of where they would provide services: 589 in Southeast, 697 in Southcentral, and 92 in both Southeast and Southcentral. These businesses stated an intent to operate 662 vessels in Southeast and 596 vessels in Southcentral.

## **SALTWATER SPORTFISHING CHARTER VESSEL LOGBOOKS**

The Division of Sport Fish initiated a statewide saltwater sportfishing charter vessel logbook program in 1998. Over 100,000 daily records were received from businesses that operated charter vessel during the 1998 fishing season. About eight months of Administrative Clerk time was required to complete data capture for the logbook information.

The division intends to complete three years of comparisons between logbook data and independent estimates provided by the division's creel surveys and statewide harvest survey (SWHS)<sup>3</sup> project before reaching any conclusion about the accuracy of logbook reports. The first step in this process of validation of participation and harvest values will not be completed until fall 1999 when the estimates from the SWHS project will be completed. Until the division has completed three years of comparisons, information from the logbooks should be used with some caution.

### **Summary by Sport Fish Division Regions**

Statewide charter vessel operators guided 125,041 salmon clients and 162,188 bottomfish clients; some anglers fished both species. The majority of salmon clients (89%) and bottomfish clients (78%) statewide were nonresidents. Statewide charter vessel clients harvested 41,145 chinook salmon, 152,544 coho salmon, and 56,601 pink salmon, 225,071 halibut, 26,980 pelagic rockfish, 20,141 other rockfish, and 14,737 lingcod (Table 2, Table 3).

### **Southeast Alaska - Region I**

Approximately 1,250 vessels were licensed in 1998 with the Commercial Fisheries Entry Commission (CFEC) as sportfishing charter vessels intending to operate in Southeast Alaska. ADF&G staff issued about 910 logbooks to fishing businesses with vessels homeported in the Southeast Alaska area. Of the logbooks issued for these vessels about 290 were in the Southern Southeast area (Ketchikan and Prince of Wales Island), 80 to Petersburg/Wrangell, 205 to Sitka, 300 to Northern Southeast (Juneau, Gustavus, Elfin Cove, Angoon, Hoonah) and about 20 each to both Yakutat and Haines/Skagway.

Southeast charter vessel operators guided 90,241 salmon clients and 65,390 bottomfish clients or 72% and 40% of statewide clients, respectively. Southeast charter vessel harvest of chinook salmon represented 85% of the statewide total; coho salmon harvest was 72% of the statewide total (Table 2, Table 3). Additional breakdown of Southeast sport charter for salmon and bottomfish by sport fish harvest areas are provided in Table 4 and Table 5.

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<sup>3</sup> The SWHS project is based on an end-of-season mail survey to obtain information on sport fishing participation, catch, and harvest.



**Table 2.-Saltwater charter vessel salmon participation and harvest, statewide and by region, 1998.**

Region		Number of Clients	Number of Rods	Chinook Salmon Kept	Chinook Salmon Released (28" or larger)	Chinook Salmon Released (smaller than 28")	Coho Salmon Kept	Sockeye Salmon Kept	Pink Salmon Kept	Chum Salmon Kept
Southcentral	Resident	9,572	7,709	1,470	88	101	12,438	336	706	183
	Nonresident	24,189	20,567	4,420	304	264	28,565	920	3,692	206
	Total	34,319	29,350	6,045	397	379	42,266	1,350	4,552	396
Southeast	Resident	2,809	2,534	1,352	204	566	1,723	45	801	240
	Nonresident	86,407	80,008	33,205	6,184	14,512	106,681	993	50,809	9,388
	Total	90,241	83,465	34,989	6,452	15,226	109,872	1,045	51,982	9,749
Unknown	Resident	80	67	36	8	-	42	-	1	8
	Nonresident	397	297	74	10	26	339	-	58	15
	Total	481	376	111	18	26	406	5	67	25
Statewide	Resident	12,461	10,310	2,858	300	667	14,203	381	1,508	431
	Nonresident	110,993	100,872	37,699	6,498	14,802	135,585	1,913	54,559	9,609
	Total	125,041	113,191	41,145	6,867	15,631	152,544	2,400	56,601	10,170

**Table 3.- Saltwater charter vessel bottomfish participation and harvest, statewide and by region, 1998.**

Region		Number of Clients	Number of Rods	Halibut Kept	Halibut Released	Pelagic Rockfish Kept	Other Rockfish Kept	All Rockfish Released	Lingcod Kept
Southcentral	Resident	31,167	28,794	48,331	45,590	5,476	2,349	2,677	1,097
	Nonresident	63,439	57,688	101,293	94,122	7,143	3,266	5,575	1,240
	Total	96,158	89,090	156,516	146,805	14,082	5,899	8,761	2,437
Southeast	Resident	2,062	1,725	2,131	1,207	423	462	1,239	364
	Nonresident	62,416	53,646	64,649	29,802	12,058	13,526	26,137	11,586
	Total	65,390	56,197	68,004	31,750	12,715	14,188	28,125	12,242
Unknown	Resident	72	49	81	85	11	17	70	10
	Nonresident	568	280	444	270	163	31	228	39
	Total	640	333	551	364	183	54	298	58
Statewide	Resident	33,301	30,568	50,543	46,882	5,910	2,828	3,986	1,471
	Nonresident	126,423	111,614	166,386	124,194	19,364	16,823	31,940	12,865
	Total	162,188	145,620	225,071	178,919	26,980	20,141	37,184	14,737

Table 4.-Southeast saltwater charter vessel salmon participation and harvest by area, 1998.

Area		Number of Clients	Number of Rods	Chinook Salmon Kept	Chinook	Chinook	Coho Salmon Kept	Sockeye Salmon Kept	Pink Salmon Kept	Chum Salmon Kept
					Released (28" or larger)	Salmon Released (smaller than 28")				
Ketchikan	Resident	523	475	42	1	210	430	-	438	160
	Nonresident	19,493	18,681	1,078	135	5,369	16,546	212	27,392	6,721
	Total	20,234	19,305	1,144	144	5,612	17,012	213	27,988	6,979
Prince of Wales Island	Resident	480	448	387	21	31	485	21	65	19
	Nonresident	17,412	16,933	10,447	747	642	32,797	150	10,105	722
	Total	18,041	17,502	10,895	772	678	33,370	171	10,200	742
Kake, Petersburg, Wrangell, Stikine	Resident	171	167	81	5	14	25	-	27	19
	Nonresident	3,016	2,741	932	192	563	2,625	35	1,951	119
	Total	3,214	2,929	1,024	198	608	2,651	35	1,978	138
Sitka	Resident	772	666	636	146	79	449	17	77	23
	Nonresident	29,138	25,816	17,144	4,683	1,964	42,710	537	5,805	1,249
	Total	30,376	26,945	18,072	4,869	2,063	44,239	557	5,986	1,285
Juneau	Resident	647	584	114	14	171	234	6	177	18
	Nonresident	11,057	10,266	1,926	192	4,080	7,199	52	5,107	468
	Total	11,774	10,938	2,060	215	4,293	7,567	58	5,348	494
Haines-Skagway	Resident	52	49	35	10	39	2	-	1	-
	Nonresident	2,980	2,752	1,014	150	1,641	11	-	15	2
	Total	3,034	2,803	1,050	160	1,680	13	-	16	2
Glacier Bay	Resident	123	118	54	7	21	43	1	13	1
	Nonresident	1,808	1,537	450	66	194	1,287	6	370	81
	Total	1,998	1,705	525	75	231	1,390	10	397	83
Yakutat	Resident	41	27	3	-	1	55	-	3	-
	Nonresident	1,503	1,282	214	19	59	3,506	1	64	26
	Total	1,570	1,338	219	19	61	3,630	1	69	26

**Table 5.-Southeast saltwater charter vessel bottomfish participation and harvest by area, 1998.**

SWHS Area		Number of Clients	Number of Rods	Halibut Kept	Halibut Released	Pelagic Rockfish Kept	Other Rockfish Kept	All Rockfish Released	Lingcod Kept
Ketchikan	Resident	258	230	219	87	43	24	24	9
	Nonresident	5,239	4,312	4,191	1,167	578	773	1,356	188
	Total	5,536	4,562	4,438	1,274	621	808	1,409	213
Prince of Wales	Resident	441	361	673	219	97	104	519	150
	Nonresident	17,430	15,308	21,315	4,386	3,222	3,772	7,568	5,071
	Total	18,031	15,774	22,130	4,637	3,330	3,911	8,195	5,258
Kake, Petersburg, Wrangell, Stikine	Resident	208	202	245	101	75	52	148	46
	Nonresident	4,638	4,449	4,990	2,737	503	1,007	1,460	209
	Total	4,905	4,700	5,302	2,878	590	1,059	1,629	257
Sitka	Resident	605	465	513	455	122	92	400	88
	Nonresident	24,924	20,442	23,717	14,580	5,834	6,275	14,113	4,896
	Total	25,993	21,328	24,864	15,368	6,113	6,498	15,083	5,132
Juneau	Resident	247	204	159	106	67	78	97	1
	Nonresident	4,923	4,419	4,620	2,341	1,185	1,085	743	55
	Total	5,226	4,692	4,888	2,514	1,301	1,180	846	56
Haines-Skagway	Resident	20	22	8	-	-	-	-	-
	Nonresident	311	313	85	67	1	2	21	-
	Total	331	339	93	67	1	2	21	-
Glacier Bay	Resident	111	91	92	80	-	1	4	5
	Nonresident	2,213	1,915	2,248	2,259	61	123	377	76
	Total	2,411	2,100	2,483	2,472	64	125	395	133
Yakutat	Resident	172	150	222	159	19	111	47	65
	Nonresident	2,738	2,488	3,483	2,265	674	489	499	1,091
	Total	2,957	2,702	3,806	2,540	695	605	547	1,193

## **Southcentral Alaska - Region II**

Approximately 1,320 vessels were licensed in 1998 with the Commercial Fisheries Entry Commission (CFEC) as sportfishing charter vessels intending to operate in Southcentral Alaska. ADF&G staff issued about 655 logbooks to fishing businesses with vessels homeported in the Southcentral Alaska area. Of the logbooks issued for these vessels about 460 were issued to vessels from Cook Inlet, 120 to Prince William Sound, and the remaining 85 to the Kodiak/Alaska Peninsula area.

Southcentral charter vessel operators guided 34,319 salmon clients and 96,158 bottomfish clients or 27% and 59% of statewide clients, respectively. Southcentral charter vessel harvest of chinook salmon represented 15% of the statewide total; coho salmon harvest was 28% of the statewide total; and halibut harvest was 70% of the statewide total (Table 2, Table 3). Additional breakdown of Southcentral sport charter for salmon and bottomfish by sport fish harvest areas are provided in Table 6 and Table 7.

### **Summary by International Halibut Commission (IPHC) Regulatory Areas**

The IPHC was established in 1923 by a convention between Canada and the United States for the preservation of the halibut *Hippoglossus stenolepis* fishery of the North Pacific Ocean and the Bering Sea. IPHC scientific staff collect and analyze statistical and biological data needed to manage the halibut fishery. While the North Pacific Fishery Management Council makes allocative and limited entry decisions for halibut, the IPHC is responsible for conservation of halibut. The following summaries are included to make information collected by the division's logbook program more useful to the IPHC. Appendix D1 includes a list of ports of landings for IPHC regulatory areas based on data from the 1998 logbook program.

IPHC Area 2C corresponds approximately to the Southeast (Region I) Sport Fish Division Management Region (Figure 2), but does not include the Yakutat Area (H). If ADF&G received at least one weekly logbook form that contained information from at least one charter vessel trip that fished either exclusively for bottomfish or fished part of their trip for bottomfish the charter vessel turning in the form was considered an "active" charter vessel. Table 8 summarizes the number of halibut vessels and associated businesses by IPHC Area and divisional management areas.

In IPHC Area 2C 607 active vessels conducted 28,246 charter fishing trips where clients fished either exclusively for bottomfish or fished part of their trip for bottomfish (Table 8) The number of clients on these charter vessel trips was 62,433; an average of 2.2 clients per trip. Only three percent of the clients were residents of Alaska. The clients on these charter vessel trips harvested 64,198 halibut and caught and released an additional 29,210 halibut (Table 10).

Table 9 demonstrates that some businesses and vessels in each region provide sport halibut charter services in multiple divisional management areas. In Southeast there were 624 unique vessels and 422 unique businesses, yet the sum of vessels across divisional management areas is 743 and the sum of businesses across management areas in 530.

**Table 6.-Southcentral saltwater charter vessel salmon participation and harvest by area, 1998.**

Area		Number of Clients	Number of Rods	Chinook Salmon Kept	Chinook	Chinook	Coho Salmon Kept	Sockeye Salmon Kept	Pink Salmon Kept	Chum Salmon Kept
					Released (28" or larger)	Salmon Released (smaller than 28")				
Prince William Sound	Resident	1,507	1,138	38	4	19	3,788	122	277	53
	Nonresident	2,483	1,978	71	4	42	5,502	540	1,330	27
	Total	4,007	3,304	109	8	61	9,627	731	1,615	81
Kenai Peninsula, West of Gore Point	Resident	3,911	3,498	1,068	70	23	321	32	145	21
	Nonresident	11,714	10,625	3,359	214	96	1,906	126	1,339	69
	Total	15,908	14,489	4,525	287	125	2,254	174	1,502	90
Kenai Peninsula, East of Gore Point	Resident	3,099	2,219	59	3	49	6,912	105	212	86
	Nonresident	5,638	4,393	72	5	74	13,593	85	532	62
	Total	8,933	6,880	140	9	129	20,953	190	854	148
Kodiak	Resident	1,037	834	298	11	10	1,412	71	72	23
	Nonresident	4,222	3,476	901	47	52	7,442	165	435	32
	Total	5,314	4,555	1,247	59	64	9,305	245	525	61
Naknek River Drainage-Alaska Peninsula	Resident	18	20	7	-	-	5	6	-	-
	Nonresident	99	62	7	-	-	122	4	56	16
	Total	124	89	14	-	-	127	10	56	16
Nushagak	Resident	-	-	-	-	-	-	-	-	-
	Nonresident	33	33	10	34	-	-	-	-	-
	Total	33	33	10	34	-	-	-	-	-
Unknown	Resident	80	67	36	8	-	42	-	1	8
	Nonresident	397	297	74	10	26	339	-	58	15
	Total	481	376	111	18	26	406	5	67	25
Statewide	Resident	12,461	10,310	2,858	300	667	14,203	381	1,508	431
	Nonresident	110,993	100,872	37,699	6,498	14,802	135,585	1,913	54,559	9,609
	Total	125,041	113,191	41,145	6,867	15,631	152,544	2,400	56,601	10,170

**Table 7.-Southcentral saltwater charter vessel bottomfish participation and harvest by area, 1998.**

SWHS Area		Number of Clients	Number of Rods	Halibut Kept	Halibut Released	Pelagic Rockfish Kept	Other Rockfish Kept	All Rockfish Released	Lingcod Kept
Prince William Sound	Resident	6,260	6,067	8,027	5,073	1,259	1,385	470	704
	Nonresident	5,401	5,098	6,502	4,100	1,021	1,096	587	506
	Total	11,736	11,456	14,740	10,035	2,434	2,621	1,074	1,249
West Cook Inlet-West Susitna River Drainages	Resident	1	-	1	-	-	-	-	-
	Nonresident	4	-	8	5	-	-	-	-
	Total	5	-	9	5	-	-	-	-
Kenai Peninsula, West of Gore Point	Resident	16,779	15,580	30,561	35,280	312	161	166	40
	Nonresident	43,670	40,214	78,253	79,762	752	294	487	94
	Total	61,494	57,411	114,025	120,308	1,101	491	683	141
Kenai Peninsula, East of Gore Point	Resident	6,252	5,511	7,426	2,819	3,492	621	1,502	296
	Nonresident	8,209	7,050	8,889	3,094	4,225	1,233	2,063	330
	Total	14,808	13,052	17,379	6,327	8,913	1,935	3,763	677
Kodiak	Resident	1,525	1,326	1,782	1,464	388	165	487	57
	Nonresident	5,454	4,696	6,594	5,506	1,076	556	2,336	308
	Total	7,047	6,213	8,751	7,491	1,540	725	3,074	368
Naknek River Drainage-Alaska Peninsula	Resident	350	310	534	954	25	17	52	-
	Nonresident	680	607	1,025	1,648	69	87	102	2
	Total	1,047	935	1,590	2,632	94	127	167	2
Nushagak	Resident	-	-	-	-	-	-	-	-
	Nonresident	21	23	22	7	-	-	-	-
	Total	21	23	22	7	-	-	-	-
Unknown	Resident	72	49	81	85	11	17	70	10
	Nonresident	568	280	444	270	163	31	228	39
	Total	640	333	551	364	183	54	298	58
Statewide	Resident	33,301	30,568	50,543	46,882	5,910	2,828	3,986	1,471
	Nonresident	126,423	111,614	166,386	124,194	19,364	16,823	31,940	12,865
	Total	162,188	145,620	225,071	178,919	26,980	20,141	37,184	14,737

IPHC Area 3A corresponds closely to the Southcentral (Region II) Sport Fish Division Management Region for the Cook Inlet (P,N, M), Prince William Sound (J), and Kodiak (Q) management areas, plus the Yakutat Area (H) (Figure 2, Table 1). If ADF&G received at least one weekly logbook form that contained information from at least one charter vessel trip that fished either exclusively for bottomfish or fished part of their trip for bottomfish the charter vessel turning in the form was considered an "active" charter vessel. Table 8 summarizes the number of halibut vessels and associated businesses by IPHC Area and divisional management areas.

In IPHC Area 3A 515 active vessels conducted 21,143 charter fishing trips where clients fished either exclusively for bottomfish or fished part of their trip for bottomfish (Table 8). The number of clients on these charter vessel trips was 98,180; an average of 4.6 clients per trip. Thirty-two percent of the clients were residents of Alaska. The clients on these charter vessel trips harvested 158,842 halibut and caught and released an additional 146,764 halibut (Table 10).

Table 9 demonstrates that some businesses and vessels in each region provide sport halibut charter services in multiple divisional management areas. In Southcentral there were 508 unique vessels and 426 unique businesses, yet the sum of vessels across divisional management areas is 546 and the sum of businesses across management areas in 462.

**Table 8.-Active halibut charter vessels and guide businesses by IPHC Area and Sport Fish Division management region, 1998.**

Location	Number of Different Active Vessels <sup>a</sup>	Number of Different Vessels w/ Halibut <sup>a</sup>	Number of Logbook Trips	Number of Logbook Trips w/ Halibut	Number of Businesses <sup>a</sup>
<b>IPHC Area</b>					
2C	607	565	28,246	14,952	410
3A	515	496	21,143	16,639	429
3B	2	2	6	5	2
4A	6	5	192	173	6
4E	5	5	80	46	5
Unknown	6	1	275	53	6
Statewide	1,135	1,070	49,942	31,868	845
<b>Management Region</b>					
Southeast	624	580	29,010	15,593	422
Southcentral	508	491	20,664	16,226	426
Unknown	6	1	268	49	6
	1,135	1,070	49,942	31,868	845

<sup>a</sup>Statewide totals are not the sum of IPHC Area or Management Regions due to some vessels providing services in both Southeast and Southcentral.



**Table 9.- Active halibut charter vessels and guide businesses by Sport Fish Division management areas and regions, 1998.**

Sport Fish Division Management Area <sup>a</sup>	Number of Different Active Vessels	Number of Different Vessels with Halibut	Number of Logbook Trips	Number of Logbook Trips w/ Halibut	Number of Businesses
Ketchikan (A)	102	88	6,171	1,702	74
Prince of Wales (B)	126	120	5,762	4,220	57
Take, Petersburg, Wrangell, Stikine (C)	63	57	1,213	949	51
Sitka (D)	246	230	8,869	5,517	182
Juneau (E)	128	113	4,410	1,915	100
Haines-Skagway (F)	15	12	936	104	11
Glacier Bay (G)	46	41	885	545	42
Yakutat (H)	17	15	764	641	13
Sum of Areas <sup>b</sup>	743	676	29,010	15,593	530
Southeast Region	624	580	29,010	15,593	422
Prince William Sound (J)	85	80	2,906	2,032	74
West Cook Inlet-West Susitna River Drainages (N)	1	1	12	9	1
Kenai Peninsula, West of Gore Point (P, in part)	280	273	12,253	10,485	230
Kenai Peninsula, East of Gore Point (P, in part)	97	79	3,068	1,877	86
Kodiak (Q)	72	72	2,146	1,599	60
Naknek River Drainage-Alaska Peninsula (R)	10	10	262	217	10
Nushagak (T)	1	1	17	7	1
Sum of Areas <sup>b</sup>	546	516	20,664	16,226	462
Southcentral Region	508	491	20,664	16,226	426
Unknown	6	1	268	49	6
Statewide	1135	1070	49,942	31,868	845

<sup>a</sup> Refer to Figure 2 for a map of the management areas.

<sup>b</sup> The Sum of Areas values for vessels and businesses may not equal the regional totals because some vessels and businesses provided services in multiple areas within a region.

Table 10.-Charter boat bottomfish participation and harvest by IPHC area, 1998.

IPHC Area		Number of Clients	Number of Rods	Halibut Kept	Halibut Released	Pelagic		All Rockfish Released	Lingcod Kept
						Rockfish Kept	Other Rockfish Kept		
2C	Resident	1,890	1,575	1,909	1,048	404	351	1,192	299
	Nonresident	59,678	51,158	61,166	27,537	11,384	13,037	25,638	10,495
	Total	62,433	53,495	64,198	29,210	12,020	13,583	27,578	11,049
3A	Resident	30,997	28,642	48,027	44,797	5,470	2,442	2,672	1,162
	Nonresident	65,598	59,629	103,858	94,790	7,740	3,666	5,987	2,330
	Total	98,180	90,928	158,842	146,764	14,665	6,374	9,156	3,629
3B	Resident	11	8	11	-	-	1	-	-
	Nonresident	18	18	18	3	10	3	-	-
	Total	29	26	39	6	20	4	-	-
4A	Resident	5	5	10	2	-	-	-	-
	Nonresident	-	-	-	-	-	-	-	-
	Total	5	5	10	2	-	-	-	-
4E	Resident	3	2	1	-	-	-	-	-
	Nonresident	33	28	32	19	3	-	3	-
	Total	36	30	33	19	3	-	3	-
Unknown	Resident	395	336	585	1,035	36	34	122	10
	Nonresident	1,096	781	1,312	1,845	227	117	312	40
	Total	1,505	1,136	1,949	2,918	272	180	447	59
Statewide	Resident	33,331	30,594	50,574	46,901	5,913	2,828	3,989	1,471
	Nonresident	126,426	111,616	166,387	124,194	19,364	16,823	31,940	12,865
	Total	162,547	145,926	225,623	179,935	27,013	20,175	37,303	14,747

## DISCUSSION

### SPORTFISHING GUIDE AND BUSINESS REGISTRATION

The 1998 and current (1999) ADF&G guide and business registration process differs from earlier registration efforts in terms of the approach used and the information collected on registration forms. They do, however, bear one similarity to the department's previous registration efforts in that they solicit information on intent to provide services. Thus the 1998 and 1999 registration processes are similar and, if continued in the present format would provide a basis for establishing a long-term database of registered businesses and guides. However, information summaries on the type (saltwater vs freshwater) and location (regions/subareas) of services provided are still based statements of intent.

The following brief summary of previous ADF&G guide and business registration programs highlight the differences and difficulties involved in attempts to compare information from the present 1998-1999 registration approach with that derived by processes used in earlier years.

In 1997, guides were required to register first on the registration forms and business information was filled out secondarily. There were two databases used in 1997 to compile information on the guide registration program. The first database (sportfishing guide/business) contained basic registration information supplied from sportfishing guides and about the businesses they owned or of the business that was going to employ them. The second database-contained information derived from the "1997 Saltwater Vessel Registration" forms. Maps used in 1997 had numeric listings (Areas 1-33) of geographical registration areas so guides and vessel owners could register their areas of intended operations. In 1997 these map areas were further delineated so the Southcentral region had two different area designations for saltwater (Areas 9-14) and freshwater areas (Areas 15-22), but in 1996 both the salt and freshwaters were combined in the same Southcentral region areas.

Previously, in May 1995 and in 1996, the owner(s) of a businesses that engaged in sport fishing guiding anywhere in Alaska were required to register annually with the department. Additionally, any employees acting as sportfishing guides for that business were required to register before conducting guiding activities. In 1996 the sport fishing businesses were listed first on the forms followed by a section for sportfishing guides. Check boxes were used to indicate what type of environment or waters (salt, fresh, or both) these guiding activities were planned to occur. Maps used in 1996 had letter designations (Areas A-Z) for geographical areas so businesses could reference register areas of intended operations.

### CFEC VESSEL REGISTRATION

In 1997, ADF&G in conjunction with the Commercial Fishing Entry Commission (CFEC) created a new licensing category for sport charter vessels called the "*Sport Vessel License*". The 1998 CFEC database for Sport Vessel Licenses indicated there was 3,665 sportfishing charter vessels. Approximately 2,541 of these vessels had indicated intent to operate charters in saltwater.

The IPHC did not issue IPHC sport charter vessel licenses for Alaska or British Columbia in 1998 as they had done for previous years. The IPHC chose to use data from the 1998 logbook program instead. A similar approach for the 1999 season will be followed by the IPHC, although on the CFEC sportfishing vessel license application it states in error that halibut sportfishing charter vessels must be registered with the IPHC.

## **SALTWATER SPORTFISHING CHARTER VESSEL LOGBOOKS**

### **1998 Saltwater sportfishing charter vessel logbooks**

The 1998 logbook requirement should have been widely known. BOF meetings and actions are typically followed closely by the fishing industry and internal communication within the charter fleet should have spread the word widely. The 1998 guide and business registration forms and sport fishing regulation summaries included statements about logbook requirements, the division's Internet site explained the registration and logbook requirements, and staff also communicated directly with local charter associations. In addition ADF&G issued news releases in Southeast and Southcentral and sent letters explaining the logbook requirement to businesses registered to provide saltwater services in Southeast. Letters were mailed to Southeast businesses only because of specific needs for Southeast data and the outlook that the first year was somewhat of a "test" phase elsewhere in the state.

One might examine the CFEC registration information, the ADF&G sportfishing guide business registration, and the ADF&G logbook information and speculate that a number of business and vessel owners intent to provide sportfishing charter services in saltwater were unrealized. The CFEC sport vessel registration information indicated 2,541 vessels that indicated an intent to charter in saltwater. The ADF&G guide business registration process returned 1,397 businesses intending to provide services in saltwater. ADF&G issued 1,575 logbooks, yet received activity reports from only 1,135 unique vessels statewide. This information could be interpreted to mean vessel owners had hoped to use a simple registration process as evidence of participation as a saltwater charter business when they in fact were not active. As vessel owners and businesses realize that they must document provision of saltwater sportfishing charter services via the ADF&G logbooks more vessels will probably report at least some activity during the season to meet minimum qualifications as an "active" sport charter vessel.

The 1998 saltwater sportfishing charter vessel logbook program appears successful with limitations, although we won't have an independent comparison with estimates of effort and harvest from the division's SWHS project until fall 1999. Until comparison can be made between logbook summaries and estimates from the division's SWHS project, no final assessment should be made related to the accuracy of the logbook information. The division will continue the saltwater logbook program in 1999 with some modification described below. Until three years of comparisons can be made between logbook data and estimates of participation and harvest from the division's SWHS project and creel survey projects, the division will make no definitive conclusions about the accuracy of logbook reports.

The 1998 logbook program experienced some start-up problems associated with form design, form distribution, and staffing requirements to complete programming and data capture. Problems experienced in 1998 have been addressed for 1999 and the operation should run smoother from the division's perspective. While there is some anecdotal and other evidence that some charter operators did not complete logbooks or that specific daily records differ between on-site creel surveys and logbook entries, we can't empirically assess the magnitude of such problems. In addition crew harvest reporting seemed smaller than staff expected in some locations. Some specific start-up problems are included in Appendix E1.

### **1999 Saltwater sportfishing charter vessel logbooks**

A single statewide form will be used again for 1999. The basic information collected by the 1999 logbooks will be the same as that collected in 1998. Some changes were made to better

track logbooks as they are issued, to improve ease of use of the forms, to improve capture crew harvest information, and to improve tracking and handling of forms during data capture.

Changes to the 1999 logbook include:

1. Unique logbook numbers have been put on the cover and each page of the logbook and sequential page numbers have been added to track logbook page returns. This will help with CFEC license and vessel identification.
2. The basic data collection page was redesigned to improve reporting.
3. A new and more complete "checkout" sheet was added to the logbook to track distribution by each area office. Information recorded on the "checkout" sheet can be entered into a database via the divisional Intranet by area staff or sent to Research and Technical Services for data capture. The 1999 "check-out" sheet has fields for the following information:
  - Date Issued
  - Business name
  - Business Owner/Agent name
  - ADF&G BUSINESS registration number
  - Mailing address
  - Phone Number
  - Vessel name and ADF&G CFEC number
  - Home Port
  - Signature of ADF&G representative, Area Office
  - A comments area.
4. The salmon information columns are grouped together on the form, bottomfish information grouped together also. This should help get more complete/consistent salmon-trip information and/or bottomfish-trip data.
5. A "crew" line has been added with "resident" and "nonresidents." This would enhance distinctions for crew/client residency breakdown, but could cause some reporting problems for vessels that regularly take 2 trips per day. The second trip in a day would be recorded on a Supplemental logbook sheet in 1999.
6. We are looking at options to provide feedback to businesses regarding incomplete or missing logbook pages and/or data. This feedback could use a form letter or we could setup our telephony equipment to place the calls.
7. Options to scan all logbook pages to make digital copies available are being investigated. This will allow for quick checks from the original logbook page and for distributed access to the images through the divisional Intranet.
8. In-season entry of logbook data forms is possible from area offices throughout the state using the divisional Intranet. It is expected that Kodiak staff may enter logbook records for their area.

For the 1999 logbooks data processing staff will be watching closely for the following types of problems:

- Businesses with multiple vessels and logbooks mixing which logbook is used for which vessel from week to week.
- Incomplete logbook pages, missing logbook pages (even inactive pages), and late logbook pages.
- Logbooks issued without collecting the checkout page information.
- Logbooks being issued to sportfishing guides instead of the sport fishing business.

## **ACKNOWLEDGEMENTS**

Southeast and Southcentral regional and area staff, especially numerous front counter personnel, were critical to the implementation of the 1998 ADF&G sportfishing guide and business registration and saltwater sportfishing charter vessel logbook program. Southeast region staff that oversaw the technical and inseason aspects of the logbook program in their areas were Paul Suchanek, Brian Frenette, and Dennis Hubartt. The above staff along with Rob Bentz from Southeast and Scott Meyer and Len Schwarz from Southcentral also provided valuable comments during the process of registration and logbook form design.

Bob Walker and Jeff Sabrowski of the division's Research and Technical Services section deserve considerable credit for designing and implementing efficient information management systems for data capture, cleaning, storage, and reporting. These systems, accessible via the division's Intranet, allowed area staff statewide to query the most up-to-date registration and logbook databases via their Internet browser. Kathy Kush, Joanne MacClellan, Donna Buchholz, Beverly Greenstein, and several seasonal technicians deserve credit for receiving, entering, and filing the registration and logbooks forms. With their perseverance, we met reporting deadlines that seemed nearly impossible with available staffing and workloads.

Of course, we must certainly acknowledge the cooperation of the thousands of sportfishing guides and sportfishing businesses that registered and completed the saltwater sportfishing charter vessel logbooks.

**APPENDIX A  
ADMINISTRATIVE CODE RELATED TO GUIDE  
REGISTRATION AND REPORTING**

**Appendix A1.-Registration requirements for fishing guide services and sportfishing guides, sport fishing regulations 5 AAC 75.075.**

**5 AAC 75.075: FISHING SERVICES AND SPORTFISHING GUIDES; REGISTRATION REQUIREMENTS; REGULATION OF ACTIVITIES.**

(a) An owner of a business intending to conduct fishing services shall register annually with the department before the business conducts fishing services. To meet the registration requirement of this subsection, the owner shall complete a fishing services registration form provided by the department. The following information must be provided on the fishing services registration form at the time of registration:

(1) the name, permanent address, local address, mailing address, and phone number of the business conducting the fishing service;

(2) the name, permanent residence address, local residence address, mailing address, and phone number of each owner of the business conducting the fishing service;

(3) the areas in which the fishing service intends to operate; and

(4) other information required by the department on the registration form.

(b) The owner of a business that conducts fishing services

(1) may not directly provide fishing guide services to anglers unless the owner is also registered as a fishing guide under (c) of this section;

(2) may employ or contract with a person who is a fishing guide registered under (c) of this section to provide fishing guide services.

(c) A person who intends to provide fishing guide services shall register annually with the department before the person provides fishing guide services. To meet the registration requirement of this subsection, the person intending to provide fishing guide services shall complete a fishing guide services registration form provided by the department. The following information must be provided on the fishing guide service registration form at the time of registration:

(1) the name, permanent residence address, mailing address, and phone number of the person who will provide fishing guide services;

(2) the areas in which the fishing guide will operate; and

(3) other information required by the department on the registration form.



**Appendix A1.-Page 2 of 2.**

(d) A person who provides fishing guide services may only provide fishing guide services

(1) as an employee of or as a contractor under an agreement with a business that conducts fishing services that has registered under (a) of this section; or

(2) as the owner of a business that conducts fishing services that has registered under (a) of this section.

(e) While engaged in providing fishing guide services, a person who provides fishing guide services shall have in possession:

(1) a copy of the person's completed fishing guide registration form; and

(2) a copy of the completed registration form of the business conducting the fishing services by which the person providing the fishing guide services is employed or with which the person is affiliated.

(f) A person who provides fishing guide services or a business that conducts fishing services may not aid in the commission of a violation of AS 16.05 - AS 16.40 or a regulation adopted under AS 16.05 - AS 16.40 by an angler who is a client of the person or of the business.

(g) Repealed 5/19/98.

History - Eff. 4/18/86, Register 98; am 5/13/95, Register 134; am 4/23/98, Register 146; am 5/19/98, Register 146

Authority -

AS 16.05.251

**Appendix A2.-Southeast Alaska king salmon management plan.**

**5 AAC 47.055:**

**SOUTHEAST ALASKA KING SALMON MANAGEMENT PLAN.**

(a) The commissioner shall establish, by emergency order, the king salmon sport fish daily bag limit based on the preseason king salmon abundance index determined by the Chinook Technical Committee of the Pacific Salmon Commission as described in "Pacific Salmon Commission Joint Chinook Technical Committee 1992 Annual Report," dated November 19, 1993, hereby adopted by reference. When the preseason king salmon abundance index becomes available, the commissioner shall establish, by emergency order, the king salmon sport fish daily bag limit at either one, two, or three fish, whichever is projected to result in the projected sport harvest that comes closest to 20 percent of the annual harvest ceiling specified by the Pacific Salmon Commission, after the commercial net harvest specified in 5 AAC 33.365 (b)(10) is subtracted from the total harvest ceiling. The preseason-projected harvest at this daily bag limit becomes the harvest ceiling for the king salmon sport fishery for the remainder of the calendar year. The daily bag limit set by the commissioner will remain in effect until December 31, unless changed by emergency order issued under (e) or (f) of this section.

(b) The objectives of the management plan in this section are to allow uninterrupted sport fishing in marine waters for king salmon, while not exceeding the sport fishery harvest ceilings established in (a) of this section, and to minimize regulatory restrictions on anglers not fishing from a charter vessel, who harvest king salmon at a lower catch-per-unit of effort than do anglers fishing from a charter vessel.

(c) The department shall monitor the Southeast Alaska Area sport fisheries to obtain in-season estimates of the king salmon harvest.

(d) If the total seasonal sport fishery harvest of king salmon in the Southeast Alaska Area is projected to be within plus or minus 7.5 percent of the sport fishery harvest ceiling, no regulatory changes to the sport fisheries will occur.

(e) If the total seasonal sport fishery harvest of king salmon in the Southeast Alaska Area is projected to exceed the sport fishery harvest ceiling by more than 7.5 percent, the department shall close the king salmon sport fishing season in the Southeast Alaska Area and may re-open the season in areas by emergency order during which any of the following restrictions, selected at the department's discretion, are in effect:

(1) repealed 5/2/97;

(2) the daily bag and possession limit for king salmon taken by anglers fishing from a charter vessel is one fish;

**Appendix A2.-Page 2 of 3.**

(3) king salmon less than 30 inches in length may not be possessed or retained; all king salmon less than 30 inches must be released immediately;

(4) the use of downriggers on charter vessels is prohibited;

(5) the use of downriggers is prohibited;

(6) areas containing high numbers of wild king salmon and enhanced king salmon not produced in Alaska hatcheries are closed to king salmon fishing;

(7) the daily bag and possession limit for king salmon is one fish;

(8) the daily bag and possession limit for king salmon during times and in areas where a fishing derby is occurring is one fish;

(9) king salmon less than 40 inches in length may not be possessed or retained; all king salmon less than 40 inches in length must be released immediately; the daily bag and possession limit for king salmon 40 inches or more in length is one fish.

(f) If the total seasonal sport fishery harvest of king salmon in the Southeast Alaska Area is projected to be less than the sport fishery harvest ceiling by 7.5 percent or more, the department shall close the king salmon fishing season in the Southeast Alaska Area and may re-open the season in areas by emergency order during which any of the following provisions, selected at the department's discretion, are in effect:

(1) the daily bag and possession limit for king salmon taken by anglers not fishing from a charter vessel is three fish;

(2) for anglers not fishing from a charter vessel, fishing for king salmon is permitted with the use of two lines per angler;

(3) king salmon less than 26 inches in length may not be possessed or retained; all king salmon less than 26 inches must be released immediately;

(4) the daily bag and possession limit for king salmon is three fish;

(5) fishing for king salmon is permitted with the use of two lines per angler.

(g) The commissioner may adopt regulations that

(1) establish a mandatory log book program for operators of charter vessels, for outfitters, or for owners of dry skiff rentals, in order to monitor the king salmon harvest and effort;

(2) require that anglers obtain and complete an annual, nontransferable harvest record; a harvest record must be in the possession of each person fishing for king salmon in marine waters;

**Appendix A2.-Page 3 of 3.**

(3) require that anglers turn in the head of all adipose fin-clipped king salmon, along with the date and location of the catch, to a representative of the department or to a peace officer of the state;

(4) establish other reporting requirements necessary to obtain information required to implement the management plan in this section.

(h) If the king salmon sport fishery exceeds or falls short of the harvest ceiling established under (a) of this section, the current year's commercial troll fishery harvest quota will be adjusted up or down to harvest the remainder of the annual harvest ceiling specified by the Pacific Salmon Commission.

(i) If the total annual sport harvest of king salmon exceeds the sport fishery harvest ceiling by more than 7.5 percent, the number of king salmon harvested above that level will be subtracted from the 20 percent sport fishery allocation for the following year.

(j) If the total annual sport harvest of king salmon is less than the sport fishery harvest ceiling and does not come within 7.5 percent of the harvest ceiling, the number of additional king salmon necessary to bring the sport harvest within 7.5 percent of the harvest ceiling will be added to the 20 percent sport fishery allocation for the following year.

(k) If the preseason king salmon abundance index is 1.5 or above, the commissioner shall increase, by emergency order, the nonresident angler's annual harvest limit to five king salmon 28 inches or more in length.

History - Eff. 4/15/94, Register 130; am 5/2/97, Register 142

Authority -

AS 16.05.060

AS 16.05.251

AS 16.05.270

Editor's Notes -

Copies of the Pacific Salmon Commission Joint Chinook Technical Committee 1992 Annual Report adopted by reference in 5 AAC 47.055 (a) are available from the Pacific Salmon Commission, 600-1155 Robson Street, Vancouver, BC, VGE 1B5, phone: (604) 684-8081; the 1992 Annual Report is also available for inspection at the Lieutenant Governor's Office in Juneau, Alaska or at the Department of Fish and Game's Southeast Regional Office, 802 3rd Street, Douglas, Alaska 99824.

**Appendix A3.-Reporting requirements for sportfishing guides, sport fishing regulations  
5 AAC 75.076.**

**5 AAC 75.076: FISHING SERVICES AND SPORTFISHING GUIDES REPORTING  
REQUIREMENTS.**

(a) In conjunction with the activities regulated under 5 AAC 75.075 (a) - (f), each fishing guide, and the owner or agent of each fishing service, that operates a charter vessel used to provide fishing guide services in salt waters shall complete a State of Alaska, Department of Fish and Game, 1998 Saltwater Sport Fishing Charter Vessel Logbook, herein adopted by reference. The logbook requires information necessary for the management and conservation of fishery resources or the regulation of the guided sport fishing industry, including:

(1) the license numbers and names of the vessels licensed under AS 16.05.490 that are used during the provision of fishing guide services in marine waters;

(2) the U.S. Coast Guard license number of the skippers operating the charter vessel;

(3) the locations of fishing; and

(4) the effort, catch, and harvest of fish by persons who are clients of a business that conducts fishing services or of a person who provides fishing guide services.

(b) A person required to complete a logbook under (a) of this section shall do so and return it to the department, in the manner specified in the logbook.

(c) A person may not make a false entry in the logbook required in (a) of this section.

History - Eff. 5/19/98, Register 146; am 9/23/98, Register 147

Authority -

AS 16.05.251

Editor's Notes -

The logbook adopted by reference in 5 AAC 75.076 (a) is available from Department of Fish and Game offices in Anchorage, Soldotna, Palmer, Ketchikan, Sitka, Douglas, or by writing to the Alaska Department of Fish and Game, Division of Sport Fish, P.O. Box 25526, Juneau, Alaska 99802-5526. In addition, the logbook is available for inspection at the Lieutenant Governor's Office, Juneau, Alaska.



**APPENDIX B**  
**SPORTFISHING GUIDE AND BUSINESS REGISTRATION**  
**FORMS, 1998 AND 1999**

Appendix B1-Sportfishing guide and business registration form, 1998.

Alaska Department of Fish and Game  
No. \_\_\_\_\_ (Year)

**Sport Fishing Services Business & Fishing Guide Registration Form**

This is a two part form. Any business that provides sport fishing services is required to complete Part A of this form to register with the Department of Fish and Game. Part B of the form must be completed by any person conducting fish guiding services. The owner(s) of Sport Fishing Services Businesses who also personally guide clients must complete BOTH sections of the form. The form must be completed and signed by an authorized representative of the Department of Fish and Game prior to conducting fishing or guiding services. Each Sport Fishing Services Business and each fishing guide must register annually with the Department. Please refer to the back of this page for detailed instructions.

**Part A: Fishing Services Business Registration** - A copy of the completed Sport Fishing Services Business Registration form must be in the possession of each sport fishing guide in your employment while providing guiding services within the State of Alaska.

BUSINESS NAME \_\_\_\_\_ Business License Number \_\_\_\_\_

Business Owners or Permanent Contact Name (Last, First, MI) \_\_\_\_\_ Fishing Season Contact Person \_\_\_\_\_

Permanent Mailing Address - Street or P.O. Box \_\_\_\_\_ Fishing Season Contact Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_ Phone \_\_\_\_\_ Fax \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_ Phone \_\_\_\_\_ Fax \_\_\_\_\_

Indicate below if your business provides guide services in saltwater and/or freshwater. If saltwater is designated, please indicate if operations occur in Southeast Alaska and indicate the number of vessel(s) operating in each area. If freshwater is designated, list the specific areas in which guide services are provided as explained on the back of this form.

Does business provide SALTWATER guide services? YES NO (circle one)

If yes, check the area(s) of operation and number of vessels operating in each area: Southeast  No. of Vessels: \_\_\_\_\_

Southcentral  No. of Vessels: \_\_\_\_\_

Does business provide FRESHWATER guide services? YES NO (circle one)  
If yes, list specific areas of operation as explained on back of form.

**AREAS OF FRESHWATER OPERATION**

AS A SPORT FISHING SERVICES BUSINESS OWNER YOU ARE RESPONSIBLE FOR LICENSING VESSELS USED IN SALTWATER OR FRESHWATER GUIDED FISHING OPERATIONS AS REQUIRED BY THE COMMERCIAL FISHERIES ENTRY COMMISSION. Contact CFEC at (907) 789-6150 for information about vessel licenses. You are also responsible for ensuring operations are conducted in compliance with applicable ADF&G regulatory requirements (for example, maintenance of logbooks by saltwater charter operators).

Signature of Business Owner/Agent \_\_\_\_\_ Date \_\_\_\_\_  
Department Representative \_\_\_\_\_ Date \_\_\_\_\_

**Part B: Fishing Guide Registration** - A copy of your Fishing Guide Registration form and a copy of your employer's Sport Fishing Services Business Registration form must be in your possession while you are providing guiding services within the State of Alaska.

Last Name \_\_\_\_\_ First Name \_\_\_\_\_ MI \_\_\_\_\_ Drivers License Number/State \_\_\_\_\_

Permanent Mailing Address & Contact Phone: \_\_\_\_\_ Fishing Season Contact Person \_\_\_\_\_

Street or P.O. Box \_\_\_\_\_ Fishing Season Contact Address (Street or P.O. Box) \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Phone \_\_\_\_\_ Fax \_\_\_\_\_ Phone \_\_\_\_\_ Fax \_\_\_\_\_

Signature of Fishing Guide/Agent \_\_\_\_\_ Date \_\_\_\_\_  
Department Representative \_\_\_\_\_ Date \_\_\_\_\_



Appendix B2.-Sportfishing guide and business registration form, 1999.



State of Alaska  
Department of Fish and Game  
Division of Sport Fish  
333 Raspberry Road  
Anchorage, Alaska 99518-1599

**1999 Fishing Guide  
and Business  
Registration Renewal**

No. 1999-

For more information, contact:  
Research & Technical Services  
(907) 267-2369 - Fax (907) 267-2422

**IMPORTANT: YOU MUST RETURN THIS FORM TO BE REGISTERED.**  
This registration requires that all business owners/individuals providing sport fishing guide services in Alaska register annually with the Department of Fish and Game. Some portions of this registration form must be completed in order to be eligible for a sport fishing license. Registered guides must also have a valid permit to guide issued by the Department of Fish and Game. A sport fishing license is required for all sport fishing activities. Registered guides must also have a valid permit to guide issued by the Department of Fish and Game. A sport fishing license is required for all sport fishing activities.  
**PLEASE PRINT** - Incomplete or illegible registration forms will delay your registration.

**To register a BUSINESS:** This form has no cost. An agent or authorized person of the business owner should fill out this section. A business should be registered only ONCE in 1999.

Name of Business (if incorrect, please correct):	
Permanent Mailing Address:	Inseason Mailing Address: <input type="checkbox"/> SEND THE WALLET-SIZED CARD TO THIS ADDRESS
Street or P.O. Box	Street or P.O. Box
City State Zip Country	City State Zip Country
Telephone Number:	Inseason Telephone Number:
Name of Business Owner or Permanent Contact Person:	Inseason Contact Person:
Last Name/Surname First Name MI	Last Name/Surname First Name MI
Alaska Business License Number	SIGNATURE OF OWNER/AGENT X Date:
<p><b>IF SALTWATER, where?</b> <input type="checkbox"/> Southcentral - Kodiak to Cape Suckling Number of vessels _____</p> <p><input type="checkbox"/> Southeast - Cape Suckling to Dixon Entrance Number of vessels _____</p> <p><input type="checkbox"/> Other _____ Number of vessels _____</p> <p><b>IF FRESHWATER, where?</b> <input type="checkbox"/> Arctic/Yukon/Upper Kuskokwim <input type="checkbox"/> Bristol Bay/Lower Kuskokwim <input type="checkbox"/> Cook Inlet/Kenai/Mat-Su</p> <p><input type="checkbox"/> Kodiak/Alaska Peninsula/Aleutians <input type="checkbox"/> Prince William Sound/Upper Copper-Upper Susitna <input type="checkbox"/> Southeast Area</p>	

Saltwater Charter Vessel Logbooks are required

**To register yourself as a GUIDE:**

Name of Guide:	Guide's Driver's License Number and State:
Last Name/Surname First Name MI	
Permanent Mailing Address:	Inseason Mailing Address: <input type="checkbox"/> SEND THE WALLET-SIZED CARD TO THIS ADDRESS
Street or P.O. Box	Street or P.O. Box
City State Zip Country	City State Zip Country
Telephone Number:	Inseason Telephone Number:
	SIGNATURE OF GUIDE/AGENT X Date:

**YOUR GUIDE ADDRESS SHOWS ON THE OUTSIDE. SEAL, ADD POSTAGE, AND MAIL. UNPAID/UNREGISTERED GUIDES MUST BE IN YOUR POSSESSION BEFORE GUIDING ACTIVITY CAN BEGIN.**



**APPENDIX C**  
**SALTWATER SPORT FISHING CHARTER VESSEL LOGBOOK**  
**FORMS**



Appendix C2.-Sample 1999 saltwater sport fishing charter vessel logbook form.

WEEK OF April 26-May 2, 1999. This sheet must be postmarked by May 9, 1999. No. 1280

State of Idaho - Department of Fish & Game - Division of Sport Fish - Saltwater Sport Fishing Charter Vessel Logbook  
 INSTRUCTIONS: Mark each inactive date. Mail while copy to ADF&G; keep pink copy for your records. Return signed sheets for ALL days, active and inactive, between your first and last 1999 charter trips.



This form has my FIRST charter of the season.  This form has my LAST charter of the season.

DATE	Day No. of Multi-Day Trip	PORT OR SITE OF OFF-LOADING	NUMBER OF CLIENTS AND CREW	SALMON FISHING		RING SALMON		OTHER SALMON		BOTTOMFISH FISHING		HULLBUT		PELAGIC FISH		OTHER FISH		LANGUARD							
				Primary Area Fished (Write 1 Salmon Code no. per Day)	No. Loads Fished for Salmon	Boat Hours Fished	28" and Larger	"Shaker" Less Than 28"	Coho	Sockeye	Pink	Chum	Primary Area Fished (Write 1 Bottomfish Code no. per Day)	No. Loads Fished for Bottomfish	No. of Hauls	Kept	Released	Kept	Released	Kept	Released	Kept	Released		
MON APR 26																									
TUE APR 27																									
WED APR 28																									
THURS APR 29																									
FRI APR 30																									
SAT APR 1																									
SUN APR 2																									

BUSINESS OWNER OR AGENT SIGNATURE

DATE

Page 1

FD-11-540 (02-99)



**APPENDIX D**  
**SALTWATER SPORTFISHING CHARTER VESSEL LOGBOOK**  
**PORTS OF LANING FOR IPHC REGULATORY AREAS, 1998**

**Appendix D1.-Ports of landing for IPHC  
regulatory areas from logbook data, 1998.**

2C	2C	2C
ANGOON	HAWK INLET	PYBUS POINT
AUKE BAY	HOLLIS	REFUGE COVE
BAR HARBOR	HOOD BAY	ROCKY PASS RESORT
BARANOF	HOONAH	ROCKY POINT
BARTLETT COVE	HYDABURG	ROWAN BAY
BAY OF PILLARS	HYDER	S DALL ISLAND
BOARDWALK	IDAHO INLET	S KAIGANI BAY
BREADLINE	JUNEAU	S LONG ISLAND
BWL	KAKE	SAGINAW BAY
CAMP ISLAND	KALININ BAY	SALISBURY SOUND
CANNERY COVE	KC	SALMON FALLS
CAPE CHACON	KELP BAY	SALTERY BAY
CAPE MUZON	KETCHIKAN	SOOK BAY
CATCHAKING	KHAZ BAY	SARKAR COVE
CEDARS LODGE	KILLISNOO	SEAL BAY [SE]
CHOLMONDELEY SOUND	KLAWOCK	SEALING COVE
CLOVER BAY	KNUDSON COVE	SHELIKOF BAY
CLOVER PASS	KUTU ISLAND	SHELTER ISLAND
COFFMAN COVE	KUPREANOF ISLAND	SILVER KING LODGE
COSMOS COVE	LETNIKOF COVE	SITKA
CRAIG	LITUYA BAY	SITKOH BAY
CRESCENT HARBOR	LODGE	SKAGWAY
DALY FLOAT	METLAKATLA	SPORTSMAN COVE
DEEP BAY	MEYER'S CHUCK	SURESTRIKE
DOUGLAS	MOIRA SOUND	SWANSON HARBOR
EL CAPITAN	MORNE ISLAND	TEE HARBOR
ELFIN COVE	NARROWS INN	TENAKEE
EXCURSION INLET	NAUKATI	THOMAS BASIN
FICK COVE	NICHOLS BAY	THORNE BAY
FIREWEED LODGE	OGDEN PASSAGE	VITSKARI ISLAND
FRESHWATER BAY	ORR ISLAND	VDEN INLET
FUNTER BAY	OUTER POINT	WARM SPRINGS BAY
GEORGE INLET	PELICAN	WATERFALL
GLACIER BAY	PETERSBURG	WHALE BAY
GOLD COAST LODGE	POINT BAKER	WHALE PASS
GULL COVE	PORT ALEXANDER	WHALERS COVE
GUSTAVUS	PORT ALTHROP	WHALES RESORT
HAINES	PORT PROTECTION	WHITSTONE HARBOR
HANSEN FLOAT	PORT REEL MARINA	WRANGELL
HANUS BAY	PORT ST NICHOLAS	YES BAY
HARRIS HARBOR	PORTLOCK [SE]	

-continued-



Appendix D1.-Page 2 of 2.

3A	3A	3B	4A	4B	4E
AFOGNAK	PORT LIONS	CHIGNIK	AKUTAN	ADAK	ALINCHAK BAY
AKHIOK	PORT VITA	COLD BAY	DUTCH HARBOR	ATKA	DILLINGHAM
AMOOK ISLAND	PORT WAKEFIELD	FALSE PASS	NIKOLSKI		EGEGIK
ANCHOR POINT	PORTLOCK [SC]	KING COVE	UNALASKA		GEOGRAPHIC HARBOR
ANCHOR RIVER	RASPBERRY ISLAND	PERRYVILLE			KUKAK BAY
CAINES HEAD	ROBBINS CAMP	SAND POINT			NAKNEK
CAPE NINILCHIK	SEAL BAY [SC]				PILOT POINT
CEDAR BAY	SELDOVIA				PORT HEIDEN
CHENEGA	SELIEF BAY				SOUTH NAKNEK
CHINA POOT	SEWARD				
CORDOVA	SHUYAK ISLAND				
DEEP CREEK	SILVER SALMON				
DUTTON	SNUG COVE				
ELLAMAR	ST PAUL				
HALIBUT COVE	TATTILEK				
HAPPY VALLEY	TONKI BAY				
HIDDEN BASIN	TUTKA BAY				
HINCHENBROOK	TYONEK				
HOMER	UGAK BAY				
IRON CREEK	USBH				
JAKALOF BAY	VALDEZ				
KARLUK	WHISKEY GULCH				
KASITSNA BAY	WHITTIER				
KENAI	WILLIAMSPORT				
KODIAK	WOMENS BAY				
KUSTATAN	YAKUTAT				
LARSEN BAY	ZACHAR BAY				
LEONARDS LANDING					
LOWELL POINT					
MARSHA BAY					
MUSKOMEET BAY					
NANWALEK					
NINILCHIK					
OLD HARBOR					
OUZINKIE					
PARKS CANNERY					
PASAGSHAK BAY					
POOHS LANDING					
PORT CHATHAM					
PORT ETCHES					
PORT GRAHAM					

**APPENDIX E**  
**SALTWATER SPORTFISHING CHARTER VESSEL LOGBOOK**  
**PROBLEMS, 1998**

**Appendix E1.-Program start-up problems.**

- There were no logbook numbers printed on the logbook pages being returned to ADF&G. We had to rely on the CFEC/vessel name to identify the boat, and later the business.
- There were inconsistencies in tracking of logbooks that were issued to businesses between area offices, making it more difficult to determine which business was operating a vessel.
- The CFEC number and vessel name were sometimes left blank.
- The reported CFEC vessel number was the wrong number (usually due to transposing 1 or more digits)
- Misidentification of fish species could be a problem. Staff have observed charter vessel operators misidentifying both salmon species as well as pelagic vs. other rockfish.
- There was missing information typically on port/site of landing, primary areas fished, hours fishing, number of clients or rods fished.
- The name of the primary area fished was listed instead of using statistical area numbers, which slowed down entry while these were resolved.
- Occasionally we found a fishing area for the port/site of landing.
- We found many cases where the harvest was over the legal limit. This was likely due to including crew harvest in client harvest. This is suspected as to have happened on a large scale due to the small number of crew harvest data sheets received.
- Clients/rods/harvest were not broken down by residency and even when broken down it may not be accurate. Staff discussions with charter vessel operators indicate that operators have no way to track fish harvest by angler residency and thus provide their best guess.
- Salmon and bottomfish information would sometimes be mixed for a trip (salmon areas fished but bottomfish hrs, rods and harvest reported).
- Some data editing occurred prior to data entry. While not a problem, it would have been more efficient to deal with cleaning programmatically once the data were captured.

**Appendix E2.-The count of daily trip reports for which problems noted during data capture could not be resolved. There were approximately 50,000 active logbook trip reports during 1998. Some daily trip reports could have more than one of the problems listed below.**

Code	Comment	Count
A1	Area fished left blank	1,290
A2	Primary area fished listed as bottomfish (primary salmon not identified), rods/catch listed as salmon	222
A3	Primary area fished listed as salmon (primary bottomfish area not identified), rods/catch listed as bottomfish	410
A4	Multiple areas fished (primary not identified)	214
A5	Area fished not a viable number	115
B1	Boat hours fishing left blank	2,862
C1	Number of clients not filled in	758
C2	Clients not broken down by resident/nonresident	582
E1	Rods fished not identified	2,308
E2	Rods fished not broken down by resident/nonresident	769
H1	Harvest KEPT not broken down by resident/nonresident	974
H2	Harvest released not broken down by resident/nonresident	1,392
L1	No USCG number	1,078
P1	No Port or site of landing identified	1,128
R1	No resident clients identified, but resident poles	16
R2	No nonresident clients identified, but nonresident poles	6
R3	Resident clients, but harvest listed under nonresident	20
R4	Nonresident clients, but harvest listed under resident	82
R5	No resident clients, but harvest listed	40
R6	No nonresident clients, but harvest listed	8
S1	No skipper initials	924

**Appendix E3.-Count and percent of total daily trip reports for which client/harvest problems noted during data capture could not be resolved. There were approximately 50,000 active logbook trip reports during 1998<sup>a</sup>.**

	Count	%
Should be INACTIVE/NOREPORT?	1,207	2.40%
No N clients for N harvest	434	0.90%
No R clients for R harvest	163	0.30%
No R&N clients for N&R harvest	60	0.10%
N clients w/ R harvest	-	0.00%
N clients w/ R&N harvest	1	0.00%
R clients w/ N harvest	-	0.00%
R clients w/ R&N harvest	15	0.00%
R&N clients w/ N harvest	506	1.00%
R&N clients w/ R harvest	301	0.60%

<sup>a</sup> N=nonresident, R=resident